

Rep ID: 1	
Consultee code: Parish/Town Council	Consultee Organisation (if applicable): Laverstock and Ford Parish Council
Is this response on behalf of someone else/another organisation? No	
Organisation being represented (if applicable):	
Does this representation refer to attachment(s): N	If this representation refers to attachment(s), these are listed below:
Please provide your comments here	
<p>Atkins' assessment of the impact of the proposed Local Plan housing growth for Salisbury is that traffic volumes would increase on all key local roads, with the greatest increases on Ford Road and Church Road. The proposed mitigation measures will have only a marginal effect on vehicle traffic. As a result, even with the proposed measure, traffic volumes in the morning peak period (8-9 am) would be:</p> <ul style="list-style-type: none"> • at 100% of capacity on Ford Road and Castle Road • at 85-100% of capacity on the "rat run" between the A36 and Milford Mill Bridge <p>The Site Allocation document for Salisbury shows Site 1 (SHELAA S80) at Old Sarum as the preferred green field housing expansion site. The supporting evidence suggests that there would be secondary school capacity at Sarum Academy, but the reality is that students from this site would probably displace out of area students in the Laverstock schools or go to the city's grammar schools. Some of the former would undoubtedly be taken by car along Ford Road and perhaps some of the latter along Castle Road, although public transport is available in this case. There does not appear to be any proposed mitigation other than the proposed cycle ways shown in Fig. 3.3.</p>	

The cycle way proposals are welcome but, although costings are included, no detailed descriptions are given, so comment is difficult. Regarding the easterly cycle way shown on the map we would offer the following suggestions:

- If it is to be well used it will require tarmac surfacing of Green Lane from the Portway to Pearce Way in those parts where it is currently missing and routine shrub and bramble cutting where this restricts the path width.
- The crossing of the Portway from the end of Green Lane onto the country park paths is dangerous and requires some form of traffic control
- The crossing of Ford Road at the intersection with Green Lane is dangerous, partly because of restricted views from Green Lane and partly because of weight of traffic at peak times. Some form of traffic control is needed.
- The current cycle way across the front of the BP garage on the A30 London Road is unsatisfactory, as is the short, shared pathway between the garage and the entrance to the path connecting to Jewell Close/Seth Ward Drive, which is shared with the Park and Ride return bus stop.
- If there is to be significantly increased cycle traffic to the Laverstock schools from this route the traffic light crossing of the A30 at the Barrington Road junction will probably need revision due to the limited capacity central reservation.

Rep ID: 2	
Consultee code: Parish/Town Council	Consultee Organisation (if applicable): Laverstock and Ford Parish Council
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Organisation being represented (if applicable):	
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<p>These comments relate to Salisbury and the potential impact of retail changes on our parish which adjoins the city. The study makes reference to the impact of the covid-19 epidemic but, due to timing is unable to draw any conclusions: "In light of these events, and whilst there is hope that the health of high streets will make a speedy recovery after the events in the first part of 2020, there is a need to rebalance the suite of land uses in town centres in order to ensure that a wider range of opportunities exist to visit, work and live in town centres."</p> <p>It now seems to be widely acknowledged that the epidemic will have brought forward by several years the changes which were trending pre-pandemic and that city centre usage has probably fundamentally changed. It seems necessary to revisit this study, as it relates to Salisbury, alongside a review of the Salisbury Central Area Framework, as soon as some degree of "new normality" has returned. There seems to be a strong possibility for Salisbury city centre to become a more residential community, supporting its hospitality sector, with a more focussed/specialised retail offering (the likes of BHS and Debenhams seem to be gone forever). Any brownfield development in the city will have a double benefit, helping revitalise the city's hospitality sector and reducing green field development pressure on surrounding areas.</p>	

Rep ID: 3	
Consultee code: Other Advisory Body	Consultee Organisation (if applicable): Sport England
Is this response on behalf of someone else/another organisation? No	
Organisation being represented (if applicable):	
Does this representation refer to attachment(s): N	If this representation refers to attachment(s), these are listed below:
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The Wiltshire Playing Pitch Strategy is a key document which under pins the Local Plan. Whilst it is coming to the end of its life, it has been updated regularly since its adoption and is due to be completely refreshed in 2022.	

Rep ID: 5	
Consultee code: General Public	Consultee Organisation (if applicable):
Is this response on behalf of someone else/another organisation? No	
Organisation being represented (if applicable):	
Does this representation refer to attachment(s): N	If this representation refers to attachment(s), these are listed below:
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<p>I consider it to be a glaring omission that the Interim SA does not even mention emissions reductions in its recommendations and mitigation measures sections. If either the net zero target by 2030, or the 6th Carbon Budget targets are to be met, radical emissions reduction needs to be the central plank of the Local Plan. There is no evidence here to support the assertion that carbon reduction is an integral theme of the Local Plan.</p> <p>If the Council is to have any prospect of achieving the GHG emissions reductions that are now required by law, my view is that this Local Plan requires a radical rethink to align it with the markedly changed priorities that are now extant in relation to the urgent need to address the climate and ecological emergency.</p> <p>The Interim SA references a July 2020 Scoping Report, which doesn't appear to be available to people wishing to respond to this consultation. Particularly because it would be useful to see how the climate emergency acknowledgement and net zero commitment have been incorporated into the sustainability issues and problems that the SA seeks to identify. Furthermore it would be helpful to see any baseline data around carbon emissions in the county, that may be set out in the updated Scoping Report (although it may be that there is no baseline data there, in which case this is an omission that should be rectified).</p>	

In the light of the net zero target, GHG emissions should be highlighted as a key sustainability issue and priority for assessment within the SA. The carbon emissions impacts of the proposed new developments set out in the Local Plan should feature as a clearly identifiable factor in terms of the consideration of whether or not the development can be categorised as sustainable. It is noted that Wiltshire Council produced an updated draft Scoping Report for consultation in order to take account of the Climate Emergency acknowledged by WC in Feb 2019 and the commitment to seek to make the county carbon neutral by 2030. The Interim SA references a July 2020 Scoping Report and a final September 2020 version of the Scoping Report, however neither of these appear to be in the supporting documents available through the consultation section of the website, and the old Feb 2019 Scoping Report is still the one linked to. This is unfortunate, because it would be useful to be able to scrutinise the methodology used to see whether it does in fact incorporate the implications of the commitment to achieve carbon neutrality by 2030.

Whatever the methodology, it is not apparent that climate change impacts have featured to any meaningful degree in the Interim SA.

Furthermore, I am unable to understand how the higher level of housing need can be assessed as not having impacts significantly more adverse than the lower level, when the SA acknowledges the potential for all the options for development as increasing both embodied and operational carbon.

The Interim SA appendices set out the detailed assessment of impacts of the various development options. SA Objective 5 - 'Minimise impacts on climate change (mitigation) and reduce vulnerability to future climate change effects (adaptation)' relates specifically to the focus of this response to the consultation. I do not believe that SA Objective 5 sufficiently accounts for the urgency with which GHG emissions must be reduced in order for the county to achieve net zero by 2030, or even achieve the 68% reduction in GHG emissions by 2030 required by the 6th Carbon Budget. In that context, the SA is right to note that the developments have the potential to produce significant amounts of GHGs through the construction and occupation of the developments. Although it alludes to the opportunities to lower this impact through building energy efficient homes, generating on site renewable energy and delivering sustainable transport, it fails to set out what mitigation measures would be necessary to neutralise the emissions completely and contribute to the radical reduction in emissions necessary to achieve the net zero targets. I therefore do not believe that the assessment outcomes stated in the SA under this objective are at all realistic. In reality, all the proposed options, without the concurrent implementation of significant emissions reduction measures, should be assessed as 'major adverse effect'.

It is also noted that even in the assessment as it stands, there is an acknowledgement that developers would need to implement a positive strategy for renewable energy generation and the construction of energy efficient housing. Their track record in this regard does not offer much hope that this will be a priority for them.

Carbon reduction targets and monitoring of progress towards them, do not feature in the SA.

Rep ID: 7	
Consultee code: Statutory Body	Consultee Organisation (if applicable): Highways England
Is this response on behalf of someone else/another organisation? No	
Organisation being represented (if applicable):	
Does this representation refer to attachment(s): N	If this representation refers to attachment(s), these are listed below:
Please provide your comments here	
<p>Highways England welcomes the opportunity to comment on the Wiltshire Local Plan and Gypsies and Travellers Plan. As you will be aware we are responsible for operating, maintaining and improving the Strategic Road Network (SRN), which in the Plan area comprises parts of the M4, A303, A36 and A419. It is on the basis of these responsibilities that the comments that follow in this letter have been made.</p> <p>Highways England is keen to ensure that transport and land use planning policy is closely integrated and that the network is able to deliver sustainable economic growth. In this respect, Highways England draws your attention to “The Strategic Road Network - Planning For The Future - A Guide To Working With Highways England On Planning Matters”, Highways England’s Licence issued by DfT and DfT Circular 02/2013, which sets out how we will engage with the planning system to deliver sustainable development.</p> <p>We are interested in the potential traffic impacts of any development site proposals and/or policies coming forward through the Local Plan process and need to ensure that these are fully assessed during the plan-making stage. It is imperative to identify any improvements needed to deliver aspirations at this early stage, as set out in Government policy.</p>	

Paragraph 12 of Circular 02/2013 states that 'The preparation and delivery of Local Plans provides an opportunity to identify and support a pattern of development that minimises trip generation at source and encourages the use of sustainable modes of transport, minimises journey lengths for employment, shopping, leisure, education and other activities, and promotes accessibility for all. This can contribute to environmental objectives and also reduce the cost to the economy arising from the environmental, business and social impacts associated with traffic generation and congestion.'

Paragraph 15 states that 'In order to develop a robust transport evidence base [for local plans], the Agency (now Highways England) will work with the local authority to understand the transport implications of development options. This will include assessing the cumulative and individual impacts of the Local Plan proposals upon the ability of the road links and junctions affected to accommodate the forecast traffic flows in terms of capacity and safety.'

Paragraph 18 states that 'Capacity enhancements and infrastructure required to deliver strategic growth should be identified at the Local Plan stage, which provides the best opportunity to consider development aspirations alongside the associated strategic infrastructure needs. Enhancements should not normally be considered as fresh proposals at the planning application stage. The Highways Agency (now Highways England) will work with strategic delivery bodies to identify infrastructure and access needs at the earliest possible opportunity in order to assess suitability, viability and deliverability of such proposals, including the identification of potential funding arrangements.'

Responses to Local Plan consultations are also guided by other pertinent policy and guidance, namely the MHCLG National Planning Policy Framework (NPPF), DfT Circular 02/2013 The Strategic Road Network and the Delivery of Sustainable Development, and in our guide The Strategic Road Network – Planning for the Future.

The NPPF sets out that plans should be shaped by early, proportionate and effective engagement between plan-makers and communities, local organisations, businesses, infrastructure providers and statutory consultees. (para 16).

Transport issues should be considered from the earliest stages of plan-making and development proposals so that the potential impact of development on transport networks can be addressed. (para 102).

The planning system should actively manage patterns of growth such that significant development is focused on locations which are or can be made sustainable, through limiting the need to travel and offering a genuine choice of transport modes. (para 103).

Planning policies should be prepared with the active involvement of highways authorities and other transport infrastructure providers so that strategies and investments for supporting sustainable transport and development patterns are aligned. (para 104).

Planning policies and decisions should support development that makes efficient use of land, taking into account the availability and capacity of infrastructure and services – both existing and proposed – as well as their potential for further improvement and the scope to promote sustainable travel modes that limit future car use. (para 122).

In terms of identifying the necessity of transport infrastructure, NPPF confirms that development should only be prevented or refused on highways grounds if there would be an unacceptable impact on highway safety, or the residual cumulative impacts on the road network would be severe. (para 109).

Plans should set out the contributions expected from development. This should include setting out the levels and types of affordable housing provision required, along with other infrastructure (including transport). Such policies should not undermine the deliverability of the plan. (para 34).

In summary; as a minimum, in order for the transport evidence base to satisfy the requirements of NPPF and Circular 02/2013, it is necessary to establish:

- The transport impacts of the development allocations.
- The improvements necessary to ensure that the impacts are not severe.
- Any land required for the delivery of the necessary improvements
- The cost of the necessary improvements.
- Any other deliverability constraints.

Paragraphs 9 and 10 set out the approach that Highways England takes in relation to development proposals as follows:

“9. Development proposals are likely to be acceptable if they can be accommodated within the existing capacity of a section (link or junction) of the strategic road network, or they do not increase demand for use of a section that is already operating at over-capacity levels, taking account of any travel plan, traffic management and/or capacity enhancement measures that may be agreed. However, development should only be prevented or refused on transport grounds where the residual cumulative impacts of development are severe.

10. However, even where proposals would not result in capacity issues, the Highways England’s prime consideration will be the continued safe operation of its network”.

Applying the principals of paragraph 9 of Circular 02/2013, development proposals are likely to be unacceptable, by virtue of a severe impact, if they increase demand for use of a section that is already operating at over-capacity levels, or cannot be safely accommodated, i.e. a development which adds traffic to a junction which already experiences road safety issues; would increase the frequency of occurrence of road safety issues; or would in itself cause those road safety issues to arise, would be considered to have a severe impact. In order to establish whether a section of the SRN has a severe impact, an assessment of additional traffic on the SRN as a result of the development proposals will be necessary, and agreement should be sought on the best way to establish whether the additional traffic constitutes a severe impact. To support the assessment the Emerging Spatial Strategy, a Transport Review report has been produced by Atkins on behalf of Wiltshire Council. This report considers existing traffic conditions, sets out how future development and planned transport improvements schemes have been added to the network and sets out a high level assessment of the impact of the proposed growth and whether further mitigation is required. The focus of this report has been Chippenham and Salisbury, with limited reference to other locations for development in Wiltshire.

The report notes that the assessment has been undertaken using the Wiltshire strategic model, which has a 2018 base. Highways England has been engaged on the production of the base year for this model, which is based upon the Highways England Regional Transport Model. We accept this model as an appropriate base for the assessment of the local plan impacts. Section 2 of the report sets out the model scenarios for the assessment of the proposed growth. The principle of the scenario structure is reasonable, but we note that some of the schemes that are proposed to be included in the 2036 Do Minimum scenario are substantial schemes that are currently the subject of Government funding bids and as such are not yet guaranteed. Hence, there is a risk that if these bids are not successful, the basis of the assessment will have changed.

The forecasting of trip demand from the proposed allocations has utilised trip rates from the TRICS database. This provides a good clarity on the rates being used. It is assumed that rates contained in Table 2-2 of the report are vehicle per dwelling rates. Confirmation of this would be welcomed.

Section 2.3 lists the Do-Nothing and Do-Minimum infrastructure assumptions. These are considerable, and assuming delivery of some of the schemes carries some risk. Hence, we assume that the schemes included in the modelling assessment will also be included in the relevant development allocation policies as necessary prior to commencement of new development. If this is not the case, it would be helpful to understand what phasing would be assumed and what measures would be taken if the development were to advance ahead of the delivery of infrastructure. It is suggested within the report that the A303 Stonehenge (Amesbury to Berwick Down) improvement been assumed in the Do Nothing and/or Do Minimum scenario. Further clarification would be welcome in this regard.

Section 2 contains various plots of data from the Wiltshire SATURN model. As we are aware that in its original form the South West Regional Transport Model is a peak period model, we note that the various plots refer to AM peak period (08:00-09:00). We assume that this means that the model used for the assessment is a peak hour model, but clarification would be helpful. The distinction between peak period and peak hour is important when considering a suitable threshold to identify a severe or unacceptable impact.

Section 3 of the report considers the mitigation of the Local Plan. The hierarchy is taken from the Wiltshire Local Transport Plan, which considers walking and cycling measures first, then public transport and then highway interventions as a last step. We are content with this approach, but expect that any alterations made to the highway impact analysis using the traffic model will be clearly stated and evidence provided to substantiate any mode transfers.

It is noted in the report and its appendices that standard methodologies have been used to assess the likely modal shift from car based trips to walk/cycle and public transport. Use of standard methodologies is welcome. A summary, how the location of the non-home end of the journey is taken into consideration. For the SRN, it is longer distance bus journey and rail journeys that could offer an alternative to using the SRN, but it is only appropriate to forecast a transfer of mode when the destination location of the journey is also within reasonable distance of the public transport interchange point and the journey is not convoluted (i.e. involving many changes which in reality may not be coordinated resulting in long journey times).

Section 4 of the report provides some conclusions and a summary. In reviewing the potential impacts without mitigation. M4 Junction 17 is specifically mentioned as a pinch-point. Hence, we are particularly interested in working with Wiltshire Council going forward to better understand the assessment undertaken and to identify appropriate mitigation.

The promotion of active modes is welcome from a wider sustainability and health point of view. Unfortunately for the operation SRN, however, journeys taking place on the SRN tend not to be those that can be readily undertaken by walking and cycling. Hence, our interest in these local trips is more focussed on accepting the way in which these are identified and quantified, so that we can be comfortable that the appropriate proportion of short and longer distance trips have been calculated as arising from the proposed allocations.

We have commented on the opportunities that public transport, primarily rail, can offer as an alternative to using the SRN. We have also noted that there needs to be careful consideration of the whole journey in order to be confident that it is realistic to assume a transfer of mode could realistically take place. In section 4.2.2, the uncertainty of future public transport networks and utilisation of services following the Covid-19 pandemic is described. We acknowledge this uncertainty, and agree that further work is necessary to be confident regarding the take up and indeed availability of public transport services going forward.

The highway impacts and mitigation are summarised in section 4.2.3. As previously mentioned, the report describes a number of substantial road schemes that have been identified as necessary to accommodate the envisaged growth. These are at various stages of feasibility and design, and some are the subject of funding bids to Government. There is also a need to secure planning permission and other licenses to allow their implementation. As the combination of schemes has been shown to impact on the SRN, we are interested in understanding how the delivery of the schemes will relate to the delivery of the proposed allocations in the plan and how the delivery of the development allocations will be regulated to ensure that the necessary infrastructure is delivered alongside or in advance of the development. It is noted that the report states that a Major Road Network scheme has been developed for M4 Junction 17. We have been working with the Council on this scheme and will continue to do so to further refine the scheme through the detailed design processes.

Section 4.4 sets out some recommended next steps and locations for further investigation. We note that this specifically includes further assessment of the Market Towns, which we have noted in this letter as currently absent. We therefore look forward to building on our regular engagement with Wiltshire Council regarding the development of the transport evidence base.

Rep ID: 8	
Consultee code: General Public	Consultee Organisation (if applicable):
Is this response on behalf of someone else/another organisation? No	
Organisation being represented (if applicable):	
Does this representation refer to attachment(s): N	If this representation refers to attachment(s), these are listed below:
Please provide your comments here	
<p>I am concerned to see that the report supports bus transport in the A350 corridor instead of the Transwilt railway line. Page 53 denotes the relative travel times which are all vastly superior to bus and car travel. And rail is much more sustainable than car. The trains used provide cycle friendly accommodation and this travel combination is by far the most sustainable. The rail service is reliable and regular but not often. The Council could support the provision of a passing loop on this single line which would enable a frequency of once per hour. The Council could also support railway works at Westbury to enable efficient connections so that there could be an efficient north/south travel corridor from Swindon to Salisbury (and onward to Southampton). The Council states an aspiration on page 19 to improve access to stations as its sole way to promote rail travel. This is unsustainable and pathetic. And not even acted upon. When the Council accepted CILs from the North Chippenham and Langley Park developments (currently proceeding) it did not see fit to improve the hazardous access to the north side of Chippenham Station which is an accident waiting to happen. A vehicular access in Foundry Lane, opposite the new hotel, should be provided for the north car park and the existing access restricted to pedestrians and cycles and disabled. To me this proves that the Council works on soundbites and does nothing of relevant substance.</p>	

Rep ID: 9	
Consultee code: Other	Consultee Organisation (if applicable): Cycling Opportunities Group for Salisbury (COGS)
Is this response on behalf of someone else/another organisation? No	
Organisation being represented (if applicable):	
Does this representation refer to attachment(s): N	If this representation refers to attachment(s), these are listed below:
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<p>Wiltshire Local Plan Addressing Climate Change and Biodiversity and others (e.g. Appendix 1 for update on the Council's response to Climate Emergency) identify the major emitters of CO2 in Wiltshire, as well as the trajectory needed to reach carbon neutrality by 2030 that the council is seeking to achieve. Transport accounts for 45% of emissions and therefore the Local Plan covering the period up to 2036 needs to have a robust strategy in place to assist the whole county to progress towards this as soon as possible. Given that the Local Plan is not due to be adopted until 2023, the urgency of beginning to work towards the target becomes even more imperative. Therefore it is surprising that the Transport Review contains very little in terms of strategy or policy to support this objective.</p> <p>The "business as usual" approach to travel and transport, housing allocations and energy usage described in various documents seems unlikely to result in the desired reduction in carbon emissions. Despite some welcome leadership from the council in tackling internally generated emissions, the lack of a coherent plan that involves the general public is likely to fail to meet any target.</p>	

It is pleasing to see a hierarchy of interventions to mitigate the LP highlighted in Appendix A of the Transport Review (Table A2), however, this is not reflected in proposed schemes for Salisbury or elsewhere in the county where detailed planning is shown only for modification of major road junctions and road building schemes which themselves lack any detailed planning for assistance for cycling or walking. New cycle infrastructure is described only by some non-specific thick lines on large scale maps that are impossible to comment on, some of them duplicate existing facilities, are these to be replaced or left as they are? Many existing facilities are substandard in width and surfacing, or are shared use with pedestrians. We would expect all new facilities to be designed to LTN1/20 standard as were those shown on Brown Street and Exeter Street that are about to be removed (1st March 2021), are these to be reinstated at a later date together with the unsupported Tranche 2 scheme on Downton Road as shown in Fig.3-3?

The following comments refer to the proposed facilities shown in Fig 3-3, p18 for Salisbury

- The Sustrans NCN cycle routes which go from Wilton through Salisbury to Alderbury (NCN route 24) and the route from Salisbury Cathedral north via the Woodford Valley (NCN 45) have always been considered important links. Parts of these routes (e.g. out to Alderbury and Wilton) are still missing, why are these not prioritised and shown on Fig 3-3?
- Wilton should be joined to Salisbury/Harnham via Wilton Road/Quidhampton and Netherhampton Road
- The River Park proposals for Salisbury offer opportunities for improving sub-standard parts of NCN 45. This should be shown on Fig 3-3.
- Some of the roads where on-carriageway cycle lanes are shown do not appear to be wide enough to accommodate such lanes, particularly if they are built to LTN 1/20 standards – e.g. Wilton Road, Devizes Road, South Western Road, Milford Mill Road.
- In some cases on-carriageway cycle lanes or segregated cycle tracks are marked in Fig 3-3 when previous cycle network plans (see Salisbury and Wilton Town Cycle map on <https://www.wiltshire.gov.uk/transport-town-cycle-networks>) have shown 'quiet streets' which would not typically need such lanes (e.g. Heronswood, Old Blandford Road, Bedwin Street/Bourne Hill, Estcourt Road)
- Employment at Churchfields needs linking safely along Churchfields Road where there is a high proportion of HGV movements, and links with housing at Harnham and Netherhampton Road via Broken Bridges improved
- Major housing areas at Bemerton Heath and St Peter's Place not joined to network
- Wilton Hill and St Peter's Place not joined to Wilton or Salisbury
- No direct link to Longhedge
- Petersfinger Road route should continue to the Alderbury junction using the A36 signal-controlled crossing and Marshmead Close (supporting Sustrans NCN 24)

Other missing links

- No apparent facilities for cycling or walking shown in Figs D4 Salisbury junctions. Detailed surveys of all road users are necessary to determine the proportion of journeys and their destinations so that facilities for cycling and walking can be designed to reflect this appropriately.

- No connecting links between radial routes to join communities with employment or education

- Joining Downton to Alderbury via disused railway line (requires coordination with Hampshire and New Forest Councils).

The trackbed needs to be protected from further development.

- Improved access Fugglestone Red to Bemerton (Westwood School)

Potential links for all these places have been proposed in various documents initiated locally (Salisbury Greenspace Partnership connectivity study, emerging Local Cycle and Walking Infrastructure Plan) and in responses to planning applications, but not accepted as of importance or concern by planning officers over the last 20 years.

Table A2 notes that only Medium (public transport) and High (active travel, walking and cycling) interventions will result in lower carbon emissions, impacts on air quality and improvements in health and wellbeing.

- The Table further states (under Low Highway Schemes) that there are

“Potential increases in traffic and potential inconsistencies with policies to address Climate Emergency.

- “The aim is therefore to mitigate impacts of Local Plan development by reducing demand and encouraging mode shift, rather than using infrastructure measures to facilitate a greater number of vehicle trips.” This is not reflected in plans for road building and lack of planning for active modes throughout the county

It is also noted in several documents that a complete lack of monitoring since 2009 means that there is no baseline data on which to base the success of any interventions or inform any part of a strategy for modal shift to active travel. This should be specified in the Plan to give confidence that active travel is being promoted and analysed.

What funding source is proposed? This is described in some detail for road improvements that seem to have shovel ready schemes in place, this should be the same for cycling and walking facilities that should be in place by the time they are needed, not as an afterthought.

Please also refer to the COGS response to the Formulating Alternative Development Strategies (ADSs) Wiltshire Council Salisbury

Rep ID: 10	
Consultee code: Other	Consultee Organisation (if applicable): Cycling Opportunities Group for Salisbury (COGS)
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Does this representation refer to attachment(s):	If this representation refers to attachment(s), these are listed below:
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<p>p12, Table 6</p> <ul style="list-style-type: none"> It is a surprise to find that Salisbury and Wilton score 5 on these criteria. Salisbury may have a plan for a cycle network but it is largely aspirational, is incomplete and has not been added to since 2009, despite numerous housing developments constructed in the last 10-15 years, e.g. Hampton Park, Riverdown Park, Fugglestone Red, Wilton Hill, Longhedge. In fact in 2021 Wiltshire Council are actively removing cycling facilities that were only installed in 2020 in response to the Government's Emergency active travel fund. Wilton and Alderbury are not joined to Salisbury by a safe cycling route despite the best efforts of Sustrans and others over the last 20 years. Is the estimated funding enough to complete the existing network as well as new facilities outlined in the Transport Review? I also refer to the Central Area Framework document Constraints, p15, please see quote below (https://www.wiltshire.gov.uk/media/4948/link-1-salisbury-future/pdf/Link1_SalisburyCAF_Final.pdf?m=637435629113930000) that emphasises the lack of coordinated, waymarked and convenient facilities for pedestrians and cyclists. We would hope that 	

the Local Plan would address these deficiencies as a priority given the hierarchy of interventions outlined in the Transport Review (p36, Table A2) and the ambition to reduce carbon emissions to net zero by 2030, well within the timescale of the Plan.

“Salisbury’s urban form presents barriers to movement, many of which have been put in place as a means of avoiding damaging the city core. Both the railway and the main through road – the A36 – skirt the central area to the north. In doing so, they create a barrier between the central area and the residential communities beyond. Existing subways, footpath bridges, roundabouts and tunnels are often not attractive to people walking and cycling. Pedestrian crossing points can be rare and the cycling and walking network is poorly integrated and waymarked. To the south, the ease of movement is somewhat restricted by the natural setting of the water meadows and rivers. Bridge crossings are limited and access on foot or by bike can be indirect. These barriers impact upon public transport services. Physical and visual barriers make it seem as if distances are further than they actually are, while traffic discourages cyclists and pedestrians. Walking and cycling to and through the centre can be perceived as difficult because of the poor public realm, narrow footpaths and poor wayfinding. Existing way-finding is often cluttered amongst uncoordinated street furniture and A-boards. There is a lack of infrastructure for people to sit, dwell, meet and spend more time in the centre.”

Please also refer to our response to Wiltshire Local Plan Transport Review

Rep ID: 11	
Consultee code: General Public	Consultee Organisation (if applicable): New Forest NPA
Is this response on behalf of someone else/another organisation? No	
Organisation being represented (if applicable):	
Does this representation refer to attachment(s): N	If this representation refers to attachment(s), these are listed below:
Please provide your comments here	
<p>1. Interactive Portal Map This is a useful online resource to have available alongside the consultation documents and other information. As illustrated below, the interactive map shows the 'Wiltshire boundary' (black line) as being the wider administrative boundary of the Wiltshire unitary authority, rather than the boundary of Wiltshire Council's planning remit. We suggest it would be more accurate – and cause less potential confusion for the circa 3,000 people living in the Wiltshire parishes of the National Park – to cut the Interactive Portal Map to Wiltshire Council's Plan-area boundary to remove any ambiguity regarding the area within the National Park.</p> <p>2. HRA Scoping Report (LUC, January 2021) The HRA Scoping Report for the review of the Wiltshire Local Plan has been undertaken by Land Use Consultants (LUC), who are the same consultants who undertook the HRA work for the New Forest National Park Authority (2019) and New Forest District Council Local Plans (2020). This is helpful and should ensure appropriate consideration of the potential impacts of planned development in Wiltshire on the New Forest internationally protected sites through the Plan-making process.</p>	

The HRA Scoping Report confirms that the National Park Authority's adopted Local Plan (2019) has been factored into the factored and this is supported. Paragraphs 4.16 and 4.23 of the Scoping Report confirm that the New Forest's internationally protected habitats have been scoped in for the potential of loss of functionally linked habitat given its distance from the Wiltshire Council boundary (adjacent) and the Zone of Influence for the qualifying species (2km). This scoping conclusion is supported. Table 4.2 gives the New Forest habitats a 'zone of influence' of 20km based on Sharpe, J., Lowen, J. & Liley, D. (2008). Changing patterns of visitor numbers within the New Forest National Park, with particular reference to the New Forest SPA. Wiltshire Council are part of the project Steering Group overseeing the work on visitor patterns in the New Forest (Footprint Ecology, 2020) and so will be fully aware of the reports published in 2020 and the follow up work definition a 'zone of influence' for the New Forest SPA/SAC and Ramsar sites. We would suggest the HRA work has regard to this up-to-date research as the work on the Wiltshire Local Plan review progresses.

The overall conclusion that potential impacts of planned development in Wiltshire on the New Forest SAC, SPA and Ramsar sites should be 'scoped in' to future HRA work – as illustrated from the HRA Scoping Report extract below – is fully supported.

Rep ID: 12

Consultee code: Statutory Body

Consultee Organisation (if applicable):

Is this response on behalf of someone else/another organisation? No

Organisation being represented (if applicable):

Does this representation refer to attachment(s): N

If this representation refers to attachment(s), these are listed below:

Please provide your comments here

Please do not kill all our wildlife, destroy our County Farms, ruin our exercise area along the off road cycle path through open farmland for health and wellbeing for excessive building. I hope the answers I have given on other forms will be enough, I haven't got time to go through the other 70 documents.

Rep ID: 13	
Consultee code: General Public	Consultee Organisation (if applicable):
Is this response on behalf of someone else/another organisation? No	
Organisation being represented (if applicable):	
Does this representation refer to attachment(s): N	If this representation refers to attachment(s), these are listed below:
Please provide your comments here	
<p>The document refers to a new cycling infrastructure. There are several cycling routes which we have been waiting for for up to 10 years (see Wiltshire website pages on cycle routes, and Salisbury and Wilton cycling map produced by a partnership including Sustrans and Salisbury District Council).</p> <p>A cycling network should make it easy to get to and from settlements around Salisbury - eg. to/from Wilton, Downton, Alderbury/Whaddon. Such radial schemes are not in the review document.</p>	

Rep ID: 14	
Consultee code: Parish/Town Council	Consultee Organisation (if applicable): Tisbury and West Tisbury Neighbourhood Plan Steering Group
Is this response on behalf of someone else/another organisation? No	
Organisation being represented (if applicable):	
Does this representation refer to attachment(s): N	If this representation refers to attachment(s), these are listed below:
Please provide your comments here	
<p>Tisbury Parish Council broadly welcomes the aims and objectives of this retail review, although we note that it was carried out in 2017 and is already out of date. Since 2017, Tisbury High St has already lost some commercial space to conversion to dwellings, with very little evidence of resistance from Wiltshire Council, despite protestations from the Parish Council. Strengthened policies via the Local Plan are necessary to support the retail and commercial offer in the local High Streets.</p>	

Rep ID: 17	
Consultee code: General Public	Consultee Organisation (if applicable): Drews Pond Wood Project
Is this response on behalf of someone else/another organisation? No	
Organisation being represented (if applicable):	
Does this representation refer to attachment(s): N	If this representation refers to attachment(s), these are listed below:
Please provide your comments here	
<p>1. Produce a document to inform Local Green Space Designation</p> <p>Designating land that meets the criteria for Local Green Space designation (NPPF 100) has not been mentioned in any of the LP review documents, even though it is a process that can be done through Local Plan reviews. In tandem with deciding on which areas are to be developed, people should be made aware that they are entitled to identify areas that are special and important to protect. A draft document to explain LGS and how to go about the process should be produced and consulted on. Any guidance should be flexible to allow local communities to decide what is important to them as each settlement is unique. During the Covid 19 pandemic, the value of local green infrastructure has been highlighted. It is more important than ever to ensure that consideration is given to protecting places that people value for their special landscape, sense of place, and wildlife. The Local Plan has much emphasis on overall enhancement of Green Infrastructure. In the light of the Climate emergency, protection of biodiversity must be given more priority and it is our experience that Core policy 52 has not protected important biodiversity. Merely requiring token mitigation measures from developers is not adequate. Species requirements are often</p>	

complex and little understood. Loss cannot always be compensated for by overall enhancement. LGS will help to identify and protect land that is important for wildlife as well as people.

2. The document has not included some important factors. As the sustainability appraisal process continues to inform the next stages of Planning for Devizes we would like reassurance that consideration will be given to the following:

Objective 5: Minimise impacts on climate change (mitigation) and reduce vulnerability to future climate change effects (adaptation) Climate change will have a huge impact on biodiversity. This should be considered as part of this objective.

Protecting rare habitat and species is especially important as the impact on species already under pressure will be greater. More emphasis needs to be on protection rather than ineffectual mitigation.

Objective 6: Protect, maintain and enhance the historic environment Devizes. The Old Asylum building and associated land is important in both County and National context but has not been included. All the land associated with the former Roundway Hospital has a special character that should be identified and is worthy of protection by virtue of its connected history and sense of place.

Objective 7: Conserve and enhance the character and quality of rural and urban landscapes, maintaining and strengthening local distinctiveness and sense of place. The objective refers to protection of locally important landscapes. For Devizes this objective only mentions impact on designated landscape. The wider landscape outside of the AONB needs to be protected. The topography of Devizes means that areas of valuable landscape could be damaged outside of the AONB, if they are not acknowledged. The historic landscape setting of the town is a constraint that should be recognised.

The objectives only seem to have been considered in isolation. It cannot be guaranteed that a particular objective can be achieved by certain actions, if other objectives are given priority, that result in those actions being compromised. The ability to achieve one objective may only be possible if there is an adverse impact on other objectives unless there is greater constraint overall.

Rep ID: 18	
Consultee code: Developer/Agent	Consultee Organisation (if applicable): Pegasus Group
Is this response on behalf of someone else/another organisation? Yes	
Organisation being represented (if applicable): Robert Hitchins Ltd	
Does this representation refer to attachment(s): N	If this representation refers to attachment(s), these are listed below:
Please provide your comments here	
<p>Formulating Alternative Development Strategies for Chippenham HMA.</p> <p>In addition to the representations below, forms have also been completed in response to the consultation on the Emerging Strategy (using the Emerging Strategy consultation form) and also in response to the:</p> <ul style="list-style-type: none"> • Planning for Chippenham consultation (using the Chippenham Principal Settlement Form); • Planning for Melksham consultation (using the Melksham Market Town Form), • Planning for Devizes consultation (using the Devizes Market Town Form) and • Planning for Calne consultation (using the Calne Market Town Form). <p>The higher figure (45,630 homes) which has been used to develop alternatives is supported for reasons set out in our response to the Emerging Strategy. Overall, the evidence suggests a need to plan for 43% more homes in the Chippenham HMA over the plan period compared to 2006-2026, as shown in Table 1 of the document - Formulating Alternative Development Strategies for Chippenham HMA.</p>	

The figure for the HMA increases under this scenario from 14,295 to 20,400 dwellings for the period 2016- 2036. The settlements in Chippenham HMA are well placed to accommodate future growth.

Pegasus Group on behalf of Robert Hitchins Ltd are promoting sites to accommodate future housing needs at Calne (land north of Spitfire Road, land south of Spitfire Road), Chippenham (land north of Barrow Farm), at Devizes (Land off Coate Road Devizes) and at Melksham (land to the north east of Melksham).

It is noted that rolling forward the increase in the number of dwellings in accordance with the same distribution as the Core Strategy suggests an increase in Calne from 1,440 dwellings to 2,050 dwellings, for Chippenham an increase from 4,510 to 6,440 dwellings, for Devizes from 2,010 to 2,870 dwellings and for Melksham from 2,240 to 3,200 dwellings. This is supported.

The basis for the total amount of employment land needed over the period 2016-2036 has been established in the Swindon and Wiltshire Functional Economic Area Assessment (FEMA) 2016, (supplemented by the 2018 Wiltshire Employment Land Review (ELR)). It is noted that the employment land requirement total has been distributed according to the equivalent share of employment under the current strategy for the period 2016-36 and that this results in an 8% reduction being planned for in the next 20 years in the HMA (except Malmesbury), compared to the period 2011 – 26.

Table 3 shows the current housing commitments (dwellings built, with planning permission or allocated at April 2018). This information needs to be updated to a base date of April 2019. Particularly as stated in paragraph 18 that “The Plan’s contribution to housing supply is estimated in the commitments above from a draft stage of preparation.” The footnote reference refers to “The submitted draft Wiltshire Housing Site Allocations Plan included housing sites in the Chippenham HMA, one of which is proposed to be removed.”

The latest Housing Land Supply Statement with a base date of April 2019 was published in December 2020, but this evidence is not reflected in the consultation documents.

Table 3 illustrates that already approximately half the scale of local housing is committed. This only serves to demonstrate that with so much already committed that the long-term strategy for the area is compromised by limiting the plan period to 2036. In accordance with the NPPF strategic policies should look ahead over a minimum 15year period from adoption to anticipate and respond to long term requirements and opportunities. If according the Council’s timetable for the Local Plan, the plan is adopted in 2023, the plan period should be at least until 2038. In turn this will affect the residual housing requirement as those already in accounted for will not meet half of the requirement.

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;”

It is noted from the HLS published in December 2020, that the North and West Wiltshire HMA in the period 2006-2019 has only exceeded the annualised housing requirement in 5 years (2006/7, 2007/8, 2013/14, 2016/17 and 2018/19).

Pegasus agree that both Chippenham and Melksham are relatively less constrained environmentally compared to other settlements in the HMA and also appear the best served settlements in the HMA, indicating potential for higher growth. However, both Calne and Devizes have opportunities to accommodate housing needs which are well related to the settlements and not constrained. Calne is one of the market towns in the Chippenham HMA and is an important centre for its surrounding area. The settlement clearly has the potential to accommodate growth as there are no environmental barriers. Devizes is one of the largest market towns, located at the cross roads of the A361 and A342 and has important links to both Chippenham and Swindon and also links to the M4. The town has a varied employment base and historical has been the focus for growth for development.

It is noted that the Economic forecasts, produced by the ELR, provide a distribution of job growth that can be translated into a distribution of housing requirements within the HMA.

Para 95 of the Chippenham HMA ADS states : “At Chippenham the scenario shows quite modest growth trends behind strategy expectations. However, the Employment Land Review suggests that a main reason for this has been a lack of land available for business development (Appendix 5.1, para 4.3.1). The situation is similar to housing delivery (above). The Review indicates a strong market demand due to the proximity to M4 (Junction 17), very different to past trends, and when this is factored into forecasts, prospects exceed levels indicated by continuing the current strategy. This supports higher rates of house building.” From previous consultations there appears to be support for additional sites at Chippenham to address delays on some of the current sites and addressing underperformance, a greater of mix of sites is required in order to address delivery. A range and choice of sites is required to ensure delivery and to significantly boost housing supply.

Paragraph 69 states that rolling forward the current would require house building rates to nearly treble at Chippenham, while the rates of development at Calne and elsewhere in the HMA have not been far below what would be necessary to meet their share of forecast housing need.

It is noted that the poor housing delivery at Chippenham is explained in paragraph 71 and is due to “little land available for development” and in paragraph 75 “Land supply at Chippenham has only recently been addressed through the preparation of the Chippenham Site Allocations Plan and now more than two thirds of the land that would be needed to roll forward the current strategy has been built, has permission or is allocated in a plan.” “Unlike Chippenham, Devizes and Corsham each have less than a third of the land needed to roll forward the current strategy. Whereas the rest of the HMA has just under half.”

Table 9 needs to be updated as this shows Housing Land availability at April 2018, given that the April 2019 figures are published this should be reflected in the document. As it stands the figures are misleading as they are out of date.

Paragraph 91 refers to economic forecasts produced by the Employment Land Review – providing a distribution of job growth that can be translated into a distribution of housing requirements. Lower housing growth might constrain future economic growth and increase local affordability issues. Worsening imbalances either way implies increased levels of commuting.

It is noted that the Employment Land review scenarios support the findings of previous analysis for Melksham and the rest of the HMA and suggest an employment land provision higher than the current strategy. Paragraph 98 states that: "Chippenham would see lower employment land growth compared to rolling forward the current strategy, but higher compared to following past trends. The market-led scenario for the town broadly accords with the current strategy which dovetails with the evidence on market interest in the strategic sites by way of planning permissions."

Devizes is forecast to see higher growth compared to the rolling forward of the WCS strategy.

Paragraph 107 provides a table of "based on information collated in relation to the place based assessment" and potential scales of growth – rolling forward the current strategy, however it is not clear on what evidence the RAG assessment was based there is no cross referencing to supporting information which was used to inform the assessment. Mitigation is not considered.

An objection is made to the assessment for Calne as the Council conclude this has a lower indicator of growth (red) page 39, however it concludes that environmentally there are no fundamental barriers, "local infrastructure capacity is in a similar position" developer interest in the town continues but the report concludes that prospects for economic growth do not appear to match the scale of housing envisaged.

Robert Hitchins Ltd are promoting land at Calne for residential and employment generating uses which will help to maintain the economic base of the town and improve the self-containment of the settlement. See our response to the Planning Strategy for Calne and The Site Selection Report.

The RAG assessment for Chippenham – (green) is supported. Robert Hitchins Ltd are promoting land north of Chippenham. 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.

An objection is made to the assessment for Devizes which the Council conclude this has a lower indicator of growth (red) page 40, "The town is amongst the more environmentally constrained in the HMA and the pool of potential land opportunities appears to be relatively limited. Consultation highlighted a priority to deliver local employment. Air quality was also a concern. There was a view that larger sites might help deliver new roads to help to tackle it. There also appears to be a relatively significant need for affordable homes." Prospects for employment growth do not seem to match rolling forward the current strategy and trends seem to align with concern over local employment. Rolling forward the current strategy involves a pro-rata increase on past requirements. In this context it would be appropriate to test a strategy that included a lower rate of growth."

Devizes - is one of the largest market towns, located at the cross-roads of the A361 and A342 and has important links to both Chippenham and Swindon and also links to the M4. The town has a varied employment base and historically has been the focus for development in East Wiltshire. There are concerns that there are insufficient affordable homes available to support the local economy.

The development strategy for the previously defined Devizes Community Area supporting Devizes' role as a significant service centre providing jobs, homes and attractive retail opportunities within east Wiltshire whilst recognising existing constraints within the highway network and the town's rich built and natural environment should continue. The town should support the role of the nearby larger villages providing access to schools, doctors and small-scale convenience shopping. It is considered that there is scope for further development at Devizes in order to meet affordable housing needs and support economic growth and support its role in the settlement hierarchy.

Robert Hitchins Ltd are promoting land off Coate Road Devizes. The site provides for a flexible allocation and has the capacity to accommodate an urban extension of up to 1,150 homes together with social and community infrastructure. It can also be delivered as a smaller scale allocation. The land is in the hands of an experienced developer, no major infrastructure is required and it can be brought forward quickly to help meet Wiltshire's housing requirements on a site acknowledged by the Secretary of State as being sustainable.

The RAG assessment for Melksham (green on page 41) is supported. Melksham – is close to and has strong links to the larger settlements of Trowbridge and Chippenham as the A350 runs through the town in a north south direction and Bath is only 11 miles from the M4. In the adopted Core Strategy Melksham is identified as having an important strategic employment role. It is located on the A350 and forms part of the key A350 employment growth area. The town has a reasonably broad economic base and has historically been able to attract large employers.

The Employment Land Review (May 2018) paragraph 7.1.2 states; "In the A350 FEMA, there is a potential match of site supply and forecast demand across the plan period. In the first five years of the plan period, there is an excess of supply over demand. New allocations should be considered in Chippenham, to meet both market demand and public policy aspirations, and in Melksham, (where the highest forecast demand scenario is more than double the currently available supply), Trowbridge, and Corsham."

Robert Hitchins Ltd are promoting land between Woodrow Road and Sandridge Common Melksham as shown on Plan accompanying these representations. The land immediately adjoins the existing built-up area, is readily accessible to the town centre, can be readily serviced, can provide a link to Eastern Way from Woodrow Road and might represent the first phase of a bypass to ease traffic flows on the A350 through the centre of the town to link with the A350 at Beanacre.

Land to the south of Woodrow Road Melksham has the capacity to accommodate a substantial urban extension of around 1,100 dwellings together with social and community infrastructure, and can be brought forward without major new infrastructure, with no lag in lead times in the short-term to help meet Wiltshire's housing requirements in a highly sustainable location immediately adjoining the existing builtup area.

Alternative Development Strategies

Roll forward the Wiltshire Core Strategy Distribution of homes and jobs (CH-A)

Whilst it is acknowledged that there are issues to resolve in terms of delivery in some areas, if the current strategy were continued this would deliver of homes by a wider choice of locations within the market area. This approach would maintain the current business and market expectations of each settlement established in the Wiltshire Core Strategy. The Chippenham HMA ADS also states at paragraph 111, "Continuing the roles and relationships of settlements within the area may ensure the best use of existing infrastructure, may reduce overall demand for additional infrastructure." CH- A is supported.

Chippenham Expanded Community (CH-B)

This option is not supported as it focuses too much of the housing need upon Chippenham at the expense of the other settlements. While the ELR support additional growth at Chippenham, employment land delivery has been poor and Chippenham Site Allocations Plan permissions have only recently been granted. Given that there have already been issues with housing land supply and a failure to provide a 5 year housing land supply such a focus upon Chippenham envisaging a step change is considered unrealistic and may continue to undermine the Council's responsibility to ensure a continuity of supply of deliverable land for housing.

Chippenham C – Melksham Focus Chippenham C (CH-C) is not supported. This strategy would divert the scale of new housing away from the main settlements that are more environmentally constrained or sensitive (Calne, Corsham, Devizes and Malmesbury). The Council concludes that this alternative envisages a change that may be unrealistic to achieve and which may undermine the Council's responsibility to ensure a continuity of supply of deliverable land for housing.

The Emerging Strategy

The Alternative Development Strategies document sets out the three strategies referred to above, but it does not explain how the emerging strategy has been derived. For example in all three options above the figure for Devizes is higher than the figure included in the emerging Strategy. The figure for Chippenham is not the same as included in any of the above.

Paragraph 3.29 of the Emerging Strategy document states "The emerging strategy is not a choice of one of the alternatives tested. It assimilates the results of the sustainability appraisal."

The Emerging Strategy appears as a combination of the above, a strong emphasis on Chippenham is supported and the recognition of the potential for growth at Melksham is supported "Higher growth here has also been seen as a means to help deliver road infrastructure during discussions with the Town Council.

In this regard, the Government has announced funding support to progress an A350 Melksham bypass . A preferred scale of development is therefore the higher of the range tested at Melksham (as in CH-C)."

The document states that "A similar situation to Melksham arises at Calne, but to a much more modest degree and with less certainty. A slightly higher scale of development than that in alternative CH-B would be predicated on this increase being necessary to help provide transport solutions to alleviate issues such as traffic congestion and local air quality in the town centre."

What is not clear in any of the documentation is how the quantum of development is decided between the settlements, there is no transparent explanation of the quantum of development that is included in the Emerging Strategy table on page 14 of the

Emerging Strategy document. The Emerging Strategy document states at paragraph 3.43 that the “strategy has been informed by, and takes account of, the findings of the sustainability appraisal which recommends ways of mitigating any likely significant adverse effects and improving the benefits of the strategy overall. This strategy has itself been subject to sustainability appraisal which concludes that mitigation measures could sufficiently reduce any likely significant adverse effects of the strategy.”

Sites have been assessed to in most cases an SA level 2, but again the justification for the RAG assessment is not necessarily clear and is not supported by the evidence base.

Further submissions in respect of sites at Chippenham, Melksham, Devizes and Calne are made in response to the Planning Strategies and Site Selection for the settlements.

In summary, our main concerns are as follows:

- The plan period should be 2020-2040 to provide the strategic framework for future development in Wiltshire. This would provide an extra 4 years beyond the Council’s proposed plan period and satisfy government guidance that strategic policies should look ahead over a minimum of 15 year period from adoption.
- There is a current housing land supply shortfall which will not be addressed by a strategy that is reliant on significant infrastructure e.g. Chippenham. Planning policies should identify a sufficient supply of sites, taking into account their availability, suitability and likely economic viability, providing a range and choice of sites to significantly boost supply and delivery.
- Given the current strategy for Chippenham and the recent lack of delivery at Chippenham it is important that a range and choice of sites is included in the Local Plan Review, i.e. sites which can come forward in the short term and address the housing land supply shortfall but at the same time supporting the focus on Chippenham. Otherwise there is a risk that the strategy will be undermined by development coming forward in less sustainable locations in the HMA.
- Further development at Calne can take place to complement Chippenham and at the same time support its role as an important centre for the surrounding area. The Core Strategy recognised that Calne falls within the A350/West Wiltshire Towns Functional Economic Market and is located in its eastern part and overlaps with the Swindon/M4 Corridor Functional Economic Market Area – thus having the potential to address issues of self-containment and accommodate future housing growth.
- The sites that Pegasus are promoting on behalf of Robert Hitchins Ltd are at Chippenham, Calne, Devizes and Melksham are suitable, available, achievable and deliverable for allocation either in whole or part (and can be phased). All the sites are in sustainable locations, well related and connected to the existing urban areas/facilities and controlled by an experienced developer/promoter. These are addressed in detail in response to the Planning Strategy and Site Selection Report for each settlement.

Rep ID: 19	
Consultee code: General Public	Consultee Organisation (if applicable):
Is this response on behalf of someone else/another organisation? No	
Organisation being represented (if applicable):	
Does this representation refer to attachment(s): N	If this representation refers to attachment(s), these are listed below:
Please provide your comments here	
<p>Wiltshire Local Plan Transport Review The Transport Review highlights a fundamental flaw in Wiltshire Council’s emerging Local Plan. There is insufficient reference to the Climate Emergency, and “more explicit consideration of the carbon reduction agenda” is considered to be one the ‘next steps’ proposed in Section 4.4 of the document.</p> <p>This is no longer the approach which should be applied to planning for a ‘Net Zero’ target, where the target needs to be the basis of the planning process rather than an afterthought. Latest thinking on this topic can be found in (for example) the RTPI’s research paper ‘Net Zero Transport: The role of spatial planning and place-based solutions’ [https://www.rtpi.org.uk/netzerotransport].</p> <p>It is suggested that this report – and publications such as the 6th Carbon Budget report https://www.theccc.org.uk/publication/sixth-carbon-budget/ be used to inform the next iteration of Wiltshire’s Local Plan. According to the ‘Climate Change’ report (submitted as part of this Local Plan Review) Wiltshire transport is responsible for some</p>	

40% of all emissions, so it is absolutely fundamental to tackle this issue rather than to compound it, which seems to be the current approach.

Detailed comments:

Scope of assessment (section 1.1)

The scope should include a review of reports which have already been researched in respect of improvements which could be made to sustainable transport modes in Wiltshire. For example:

- Improving Wiltshire's Rail Offer, Cycle and Pedestrian access study [Sustrans 2013]
- Swindon and Wiltshire Rail Study, Rail Strategy Report Ref number 107523 [SWLEP 2019]
- Salisbury Transport Strategy Refresh [WC, July 2018]
- Current LTP3 strategies, including Wiltshire Countryside Access Improvement Plan (see <https://www.wiltshire.gov.uk/recreation-rights-of-way>)

The scope also needs to consider the carbon impacts of proposed transport interventions, rather than defer these to a later step (para 4.4). The NPPF, considers that the planning system should 'shape places in ways that contribute to radical reductions in greenhouse gas emissions' [NPPF para 148] – the proposed road building programme suggested in this Transport Review will not achieve this.

The relationship to the emerging Local Transport Plan (LTP4) and the Local Cycling and Walking Infrastructure Plan(LCWIP) needs to be clarified.

Forecast Scenarios (section 1.3)

As mentioned at the start, Wiltshire Council has approached this in completely the wrong manner. The presumption should be that development needs to comply with the 'net zero' target which Wiltshire has set. The type of development which will be the best fit for a 'net zero' target then needs to be defined.

Assessing the impacts of local plan growth (section 2)

This section fails to assess the impact of local plan growth because the transport impacts – responsible for at least 40% of emissions – are being ignored. Thus for Site 1 in Chippenham it is acknowledged that this would "be likely to generate one-way traffic flow that exceeds 1800 vehicles per hour" [LPR Interim Sustainability Appraisal, Annex II, p.12]. This transport impact has not then been taken into account in objective SA 5 (Minimise our impacts on climate change).

Mitigating impacts of Local Plan Growth (section 3)

There seems to be virtually no attempt to mitigate the traffic impacts which the proposed pattern of growth would impose. Building new roads is seen as the solution, and the consequences of these in terms of carbon generation are not calculated. In section 4.4 'more explicit consideration of the carbon reduction agenda' is seen as a 'next step' – this is a flawed approach. A different and more radical approach will be needed to ensure that transport emissions in Wiltshire contribute to the 'carbon neutral by 2030' target which has been adopted by the Council.

'Clean fuels' are not going to provide the full answer to meet decarbonisation targets, the consensus is that this will also require significant changes in transport habits. The Sixth Carbon Budget, produced by the Committee on Climate Change (December 2020) suggests that car mileage needs to reduce – for example their assumptions for a balanced net zero pathway by 2035 include a fall in total car miles by 9% by 2035 relative to the baseline. "This is driven by modal shift from cars to walking, cycling (including e-bikes) or public transport, an increase in average car occupancy and a reduction in travel from factors such as increased working from home." See Table A3.1.a, p49 in Surface Transport Report at <https://www.theccc.org.uk/publication/sixth-carbon-budget/>.

Similar conclusions are reached by other bodies which have studied this issues, thus the House of Commons Science and Technology Committee into "Clean Growth: Technologies for meeting the UK's emissions reduction targets" [HC 1454] (August 2019) concluded that "In the long-term, widespread personal vehicle ownership does not appear to be compatible with significant decarbonisation."

The Sixth Carbon budget reports contain information about how Local Authorities policies can contribute to achieving Net Zero. In respect of Transport this includes the following:

- Favouring development which reduces the need for people, and goods, to travel.
- Investing in walking and cycling networks, and developing Local Plans and LTPs which will deliver modal shift from cars to active and public transport
- Introducing low emissions zones, this could help with the number of AQMAs across Wiltshire
- Planning and support for EV charging networks
- Using parking powers to repurpose parking spaces for car clubs, cycle parking and EV charge points and use parking charges to discourage private car use and promote public transport.
- Introduction of a Workplace Parking Levy, as has been done by Nottingham City Council
- Working with bus operators to provide a bus rapid, reliable and affordable bus network (e.g. through a bus strategy and bus quality partnership).

Walking and cycling measures (3.2)

There is a need to improve walking and cycling links across all settlements in Wiltshire, not just the 'three principle settlements'. Links between settlements also need to be covered.

There is reference to 'eleven sections of new cycle infrastructure' which are being proposed for Salisbury. However it is not clear what schemes this covers, and the relationship to the 'new walking and cycling infrastructure' shown in Figure 3-3 is unclear.

There needs to be a breakdown of what is proposed across the principal settlements for the £31.69million total given in Table G.1.

Figures 3-1 to 3-3 show new cycle infrastructure proposed for the three principal settlements:

- Has a detailed design been done for all of these schemes?
- Is there space available to construct these schemes to LTN 1/20 standards?
- Is the cost of all the schemes proposed included in the costs given in Appendix G?

Paragraph 3.2.1 refers to 'providing safe, well-signed routes to railway stations from across the three principle settlements of Chippenham, Trowbridge and Salisbury. Will consideration also be given to other routes to serve employment sites, schools, shops, town centres and other amenities? Has account been taken of the Sustrans report of 2013 already referred to which covers routes to railway stations across Wiltshire?

Turning to the cycle network being proposed for Salisbury (Figure 3-3):

- This does not match the Pedestrian and Cycle schemes shown in Figure 4-1 of the Salisbury Transport Strategy Refresh [WC, July 2018].
- The Sustrans NCN cycle routes which go from Wilton through Salisbury to Alderbury (NCN route 24) and the route from Salisbury Cathedral north via the Woodford Valley (NCN 45) are considered important routes (the LTP3 Cycling Strategy refers to these routes and says that the Wiltshire Infrastructure Delivery Plan (2011-2026) includes "... improvements to specific cycle routes, particularly National Cycle Network routes..." [LTP3 Cycling Strategy, para 1.38]. Parts of these routes, including the links from Salisbury to Alderbury and Wilton are still missing. These should be prioritised for delivery and shown on Fig 3-3.
- Some of the roads where on-carriageway cycle lanes are shown do not appear to be wide enough for such lanes to be built to LTN 1/20 standards – e.g. Wilton Road, Devizes Road, South Western Road, Milford Mill Road.

- In some cases on-carriageway cycle lanes or segregated cycle tracks are marked in Fig 3-3 when previous cycle network plans (see Salisbury and Wilton Town Cycle map on <https://www.wiltshire.gov.uk/transport-town-cycle-networks>) have shown 'quiet streets' which would not typically need such lanes (e.g. Heronswood, Bedwin Street/Bourne Hill, Estcourt Road).
- A segregated two-way cycle track is shown on Exeter Street/New Street. Is there any intention to bring back the segregated one-way cycle track which has recently been removed from Exeter Street? Is there space to allocate a two-way cycle track on these roads?
- The River Park proposals for Salisbury offer opportunities for improving sub-standard parts of NCN 45. This should be shown on Fig 3-3.

Rail Strategy (3.3.2)

The SWLEP Rail Strategy Report's recommendations for new stations in Wiltshire included Corsham, Devizes Parkway, Porton & Wilton (the latter being subject to results of study on Porton). (see SWLEP Rail Strategy Main Report [July 2019] on <https://swlep.co.uk/about/our-strategies>).

It is surprising, considering that Wiltshire Council put its name to this report and has attended the meeting which approved it, that there is no reference to these aspirations in the Transport Review. This should be rectified.

Bus Strategy (3.3.3/3.3.4)

In respect of Salisbury, there should be a reference to Park & Ride services and how these might be able to contribute to modal shift.

The references to 'Dynamic Demand Responsive Transport' (DDRT) are welcome, and this is an option which should be explored, bearing in mind the number of households across the county – including some in the rural areas – who do not have access to a car.

Appendix C2 Parking policy recommendations

Getting an understanding of the oversupply of car parking across Wiltshire is fundamental, since it is needed in order to consider what car parking space might be usefully reallocated for other uses.

It is particularly important for Salisbury to review City Centre car parking spaces, given the implementation of Park & Ride, and the presumption in LTP1 that, on full implementation of Park & Ride, city centre spaces would be reduced from around 4,000 spaces to around 1,600 [LTP1, p. 111]. This commitment needs to be reviewed, and taken together with the recommendation from Atkins in 2018 referred to here, there needs to be a review of car parking across Wiltshire.

This step is crucial in order to confirm the approach recommended in Salisbury's Central Area Framework, to redevelop car parks at Salt Lane, Brown Street and part of Central car park. These could help to provide housing on brownfield City Centre sites, thereby reducing the need to travel and lessening the need for redevelopment of greenfield sites on the edge of the City.

Appendix D4: Salisbury Junctions

There needs to be confirmation that all junction redesigns will take account of the needs of cyclists and pedestrians. This is particularly important for the Harnham Gyrotory which presents a barrier between West and East Harnham and which needs to be made easy and safe for walkers and cyclists to negotiate to access schools, shops, hospital and other amenities. Note that Local Transport Note 1/20 indicates that "to receive Government funding for local highways investment where the main element is not cycling or walking, there will be a presumption that schemes must deliver or improve cycling infrastructure to the standards in this Local Transport Note, unless it can be shown that there is little or no need for cycling in the particular highway scheme."

Missing section: Residential car parking strategy

The 'minimum' parking standards which Wiltshire Council has agreed for residential properties (see LTP3, Parking Strategy) make it difficult to achieve modal shift. Car ownership needs to be discouraged through the design of the public realm and the way parking is allocated in new housing developments. As examples, parking for private vehicles should be further from housing than parking for shared vehicles or demand responsive public transport, and consideration should be given to charging for private parking spaces. Active and public transport need to become the most convenient and cheapest option for travel, with shared car clubs and demand responsive transport providing for journeys where active and public transport are not an option.

This will require a radical shift from Wiltshire Council's current 'minimum' parking standards. As a start, a 'zonal' approach to parking could be developed, see for example the SPD for Bournemouth & Poole (available on the web at:

<https://www.bournemouth.gov.uk/planningbuilding/PlanningPolicy/Planning-Guidance/BCP-Parking-Standards-Supplementary-Planning-Document.aspx>)

Missing section: Shared transport, or 'Mobility as a Service' (Maas).

This is a growing area of transport planning, which has become mainstream in larger cities, but has now gained a foothold in Wiltshire – for instance the Co-Cars car share club which now has a thriving branch in Salisbury <https://www.co-cars.co.uk/>.

There are opportunities to expand this across Wiltshire, and into new developments, as well as options for bike share, mobility hubs etc. All these options which should be a key component of a forward looking transport review for Wiltshire.

Rep ID: 20	
Consultee code: Statutory Body	Consultee Organisation (if applicable): South Western Railway
Is this response on behalf of someone else/another organisation? No	
Organisation being represented (if applicable):	
Does this representation refer to attachment(s): N	If this representation refers to attachment(s), these are listed below:
Please provide your comments here	
<p>The approach to the Transport Review appears to be flawed in that it has made no attempt to carry out a full multi-modal modelling exercise to properly test different infrastructure investment scenarios to mitigate transport impacts. By using a traditional highways only model (with very minimal logit modelling for walking and cycling) it automatically bakes in past travel patterns into future policy including a high dependence on single occupancy car travel. The analysis is extremely highways heavy with very little effort given to alternative modes and options. It appears to have been designed to justify investment in roads by locating development where it will generate most impact on the A350 corridor.</p> <p>The evidence for road trip modelling only focuses on the total number of vehicles on a particular stretch of road. There is no attempt to analyse origin and destination data to generate an analysis of trips that could potentially be made by rail including in combination with other modes. Table A.2.1` (P35) suggests the right priority of approach but unfortunately this doesn't seem to have been then followed through in the rest of the report. If the priorities are genuinely followed through and invested in you would expect that a high proportion of local trips from new developments are made by active modes and that medium and longer</p>	

distances ones by public transport, particularly rail. It is by no means clear where all the trips creating demand on the roads are going to and why car is the assumed mode.

It is not clear why the overall level of car trip generation is so high if there is a major focus on reducing the need to travel. Using TRICS data, really intended for individual developments and not strategic plans, is a blunt tool and makes no assessment of the length and type of trip. This approach is exacerbated by the very limited ambition to mitigate trips using other modes.

The approach to modelling alternatives to road travel is extremely basic. There is no attempt to look at how different modes can be combined together as one system e.g. through mobility hubs to provide an effective alternative to car travel. This could be a step change in the provision of alternative travel options but shared transport options barely get a mention. Limiting the potential of cyclists to 40%, even if in TAG, makes no attempt to apply alternative future scenarios.

The data used for non car modes is extremely limited and makes the automatic assumption that existing patronage levels will be roughly replicated in the future. In particular it is very disappointing that no up to date O&D data for rail travel was sourced from the rail industry – this is available within certain parameters. An assumption is made that there will be no improvement in services or facilities such as stations. This is particularly surprising given Wiltshire's own rail strategy and its active involvement in both the Western Gateway rail strategy and individual route studies (e.g. West of England CMSP) which explicitly propose investment to help mitigate the impact of new development as well as existing trips.

The way future trips for rail are calculated is also disappointing. General statements about the distance of the population of Wiltshire to rail stations is not really relevant when it would have been much better to look at distance from planned development sites to rail stations. The fact that much of the growth is planned along the A350 corridor means that there is good access to the rail network from the majority of new development. It is therefore not clear why a simple and flat 4% was used for rail trips at all the development locations rather than a town by town analysis and figure.

No attempt has been made to model what the % of trips could be if various rail enhancement projects including service improvements went ahead (e.g. TransWilts).

Overall the potential for road trips generated by new development to be replaced by rail (supported by mobility hubs / other modes) appears to have been substantially underestimated leading to a perpetuation of high levels of car use by continuing to focus the majority of investment in road improvements. There are extensive options to substantially improve rail services which have been ignored when considerable focus has been given to potential road investment options.

We would request that the Transport Review document be substantially reviewed in this light.

Rep ID: 21	
Consultee code: General Public	Consultee Organisation (if applicable):
Is this response on behalf of someone else/another organisation? No	
Organisation being represented (if applicable):	
Does this representation refer to attachment(s): N	If this representation refers to attachment(s), these are listed below:
Please provide your comments here	
<p>Many Appendices have no maps in them so I am unable to comment. Why were they held back? When will the maps be available?</p> <p>How does one get a copy of Wiltshire Council's Ground water strategy published in 2016?</p> <p>I note that understanding ground water flooding is in its infancy but the farmers around Downton can readily tell you where it occurs through their local knowledge. The major risk areas are actually to the West of the A338 on the fields bordering the Western edge of the River Valley. There's a field South of the village where a developer is exploring building houses. The field is not farmed as it is too wet – it actually has marsh reeds growing on it!</p> <p>The main issue with ground water is that planning applications only consider a specific site and typically only what happens within it whereas ground water (an underground slow moving river) has systemic impacts eg a development could effectively dam these underground flows causing problems 'upstream'</p> <p>Appendix Q is missing the major flood event for Downton in 2000 [http://www.bbc.co.uk/wiltshire/villages/downton.shtml or http://www.downtonhistorygroup.org.uk/dhg/category/floods/ and http://www.downtonhistorygroup.org.uk/dhg/wp-content/uploads/2016/02/O127-Flooding-in-Downton.pdf] that resulted in the multi million pound Environment Agency Flood Defence being installed!</p>	

Rep ID: 22	
Consultee code: Developer/Agent	Consultee Organisation (if applicable): Barwood Development Securities Ltd
Is this response on behalf of someone else/another organisation? No	
Organisation being represented (if applicable):	
Does this representation refer to attachment(s): N	If this representation refers to attachment(s), these are listed below:
Please provide your comments here	
<p>WILTSHIRE LOCAL PLAN LOOKING TO THE FUTURE CONSULTATION: REPRESENTATIONS ON BEHALF OF BARWOOD DEVELOPMENT SECURITIES LTD</p> <p>These representations are submitted on behalf of Barwood Development Securities Ltd ('Barwood Land'), which has been selected by the landowners of c. 35 acres (14 hectares) of land located to the south of Whaddon Lane and north of Devizes Road, in Hilperton, Trowbridge - Much of this land is included in the SHELAA site ref. 677a ('Land Rear of Church Street') to the east of Hilperton, Trowbridge.</p> <p>We commend the Council for continuing to progress the preparation of the emerging local plan and welcome the opportunity to comment on the emerging strategy at this early stage.</p> <p>We explain below why we believe that there are some fundamental matters which require further consideration and consultation prior to the Reg 19 stage and submission of the Local Plan. This includes in relation to the housing requirement and distribution and site-selection and Sustainability Appraisal process. It is also important that a complete and up to date evidence base is published for consultation. We look forward to having a further opportunity to comment on those matters.</p>	

We support many of the principles set out in the consultation, including the identification of Trowbridge as a Principal Settlement and its proposal to allocate a strategic level of growth to the north east of the town, which will assist in meeting the identified housing requirement whilst also deliver meaningful public benefits, including support to existing and the provision of new services and infrastructure.

However, we do not believe there is evidence to demonstrate that the level of growth directed to Trowbridge should be constrained in the manner proposed and are concerned by the absence of evidence to support the choices outlined in the consultation documents.

We strongly disagree and object to the assessment and conclusions reached currently in relation to site ref 677a ('Land at Church Street'), which fundamentally conflict with the assessment of the adjacent land at North East Trowbridge which is proposed to be allocated. We explain below why the land we are promoting is deliverable and there are no constraints which are not capable of being mitigated. Indeed, there are no constraints which cannot be satisfactorily mitigated and if allocated, it would deliver in the region of 175 new homes (of a mix of sizes and tenures), new and accessible public open space and community uses. We are also committed to meaningful engagement with the Council and other stakeholders to ensure that it is masterplanned comprehensively alongside the identified emerging allocation to deliver a scheme that is high quality design and respects its setting and delivers meaningful public benefits. We encourage the Council to reconsider its assessment and conclusions in respect of this site. There are no constraints which cannot be mitigated, including through an appropriate masterplan and design and if assessed objectively, with an appropriate evidence base, it should be scored at least as positively as the emerging allocation of NE Trowbridge.

It is also essential that the Council prepares and publishes its full evidence base which underpins the emerging Local Plan and the decisions made, taking into account the plan's economic and social effects in addition to its potential environmental impacts. We have significant concerns that the approach taken to site-selection is not sound and is not informed by an appropriate evidence-base.

We are particularly concerned that the Sustainability Appraisal (SA) which is published as part of this consultation does not meet the relevant legal requirements. SAs should be used to test the evidence underpinning the emerging Plan and to help to demonstrate how the tests of soundness have been met. However, up-to-date and robust evidence base does not appear to exist at present (or at least has not been published), including the absence of up-to-date landscape and heritage assessments, which the assessment indicates it relies upon. We also contend that an inconsistent approach has been taken when undertaking the assessment.

The SA assessment of the Land at Church Street (site ref 677a) is one such example, where the SA concludes that this site is unsuitable for landscape and heritage reasons and not only is there no landscape or heritage assessment to qualify the reasoning for this. It reaches a very different and contradictory conclusion, however, about the land which is included as a preferred allocation at North East Trowbridge (site refs 293 and 3644). This is notwithstanding the fact it is adjacent

to the Land Rear of Church Street site, is clearly more sensitive than the land at Church Street in landscape terms and is subject to the same heritage considerations (albeit we agree impacts can be mitigated). We also disagree that Site 677a has exposed views from the north and that it would be seen as a prominent urban encroachment into the countryside. This is factually incorrect - there are limited views into the site from the north and east into the site and,

importantly, it is possible to mitigate through the design and masterplanning process. Indeed, should the NE Trowbridge allocation be taken forward, this land would be enclosed by built development and would likely close off any potential views of this site.

Land at Church Street / Whaddon Lane, Hilperton

Barwood Land is working with the landowners of c. 35 acres/14 hectares of land as shown on the attached plan. Much of this land falls within SHEELA site ref 677a and is located adjacent to the preferred allocation at North East Trowbridge that has been identified in the current consultation.

The site can deliver in the region of 175 homes, together with attractive and accessible public open spaces and a network of blue/green infrastructure, with the potential to incorporate new/expanded community facilities such as allotments. We are also committed to engaging meaningfully with the Council, the local community, and other stakeholders to ensure that any development on this site is high-quality, sustainable and which would respond appropriately to its location and setting and maximise the public benefits that will be delivered.

This site could be brought forward independently of the wider strategic allocation, which would assist in avoiding further issues in housing delivery rates being slower than projected owing to the complex nature of bringing forward larger-scale sites. At the same time, we would be committed to working with the Council and other stakeholders to ensure that the development was planned and designed comprehensively as part of a masterplan for the planned growth in this area to ensure that

This site is in a sustainable location and is deliverable, noting that:

1. It is available now:

The landowners are willing to see it developed as a high-quality residential-led development housing and they are working with Barwood Land, which is an experienced and specialist residential land promoter, to assist in delivering the site as expediently as possible. There are also no legal constraints which would prevent its quick delivery, subject to the grant of planning permission.

2. It offers a suitable location for development now:

It is in a sustainable location, within a convenient walking distance of several key services and facilities, including includes being within 300m of existing bus stops, with regular services to services, facilities and employment in Trowbridge, Chippenham and Frome. In due course, there is also the opportunity for it to connect to new services and facilities that would be delivered as part of the identified NE Trowbridge preferred allocation.

There are no constraints which cannot be suitably mitigated through an appropriate masterplan and design approach, and though appropriate planning conditions and s106 obligations being secured. This includes in respect of landscape, heritage, highways and accessibility, air quality, ecology, and flood risk considerations.

As set out above, we dispute the assessment and conclusions that have been reached about this site in the current consultation and would request that this is reassessed.

3. It is a viable and achievable option, which will be delivered within 5 years subject to the grant of planning permission.

We encourage the Council to consider this site option and to assess it using a consistent approach, using a robust evidence base. It is a suitable and deliverable option that would help to meet the identified housing requirement on a site to the east of the town, which has rightly been identified and assessed as being the most suitable option for growth.

We trust these comments are helpful and we would welcome a further discussion on any of the points raised, including in relation to the land at Church Street / Whaddon Lane, Hilperton as shown on the attached plan.

Rep ID: 23	
Consultee code: General Public	Consultee Organisation (if applicable):
Is this response on behalf of someone else/another organisation? No	
Organisation being represented (if applicable):	
Does this representation refer to attachment(s): N	If this representation refers to attachment(s), these are listed below:
Please provide your comments here	
<p>This document on which the Local Plans is based is now out of date as it does not reflect the significant ongoing impacts of both the COVID-19 pandemic and Brexit on the document's planning assumptions. For example, recent data suggests a now reduced UK population, and this document's LHN does not reflect these recent significant changes.</p> <p>Section 3.32 justifies the use of 10-year migration trends based on a paper in 3.31 including " .. a shorter period is more susceptible to cyclical trends, and argument that has particular force when the five-year period in question - 2007-12- neatly brackets the deepest and longest economic downturn for more than a generation." In retrospect, this period 2007-12 is more likely to be indicative of the norm given for example a much deeper economic down tum 10 years later in 2020. The use of adjusted annual LHN figures by local authority and HMA in section 3.31 instead of using the base figures in 3.28 is therefore not justified and is incorrect.</p> <p>Section 4.1 explains reasons for an increase to the LHN for ' ... ambitious authorities who want to plan for growth.' Wiltshire Council should instead be challenging the Government on why so many additional houses are needed using the standard method and not increasing the figures that would lead to even greater areas of Wiltshire countryside being covered in new houses.</p>	

Rep ID: 24	
Consultee code: Developer/Agent	Consultee Organisation (if applicable): Carter Jonas
Is this response on behalf of someone else/another organisation? Yes	
Organisation being represented (if applicable): David Wilson Homes	
Does this representation refer to attachment(s): N	If this representation refers to attachment(s), these are listed below:
Please provide your comments here	
<p>WILTSHIRE COUNCIL LOCAL PLAN REVIEW (REGULATION 18) CONSULTATION (JANUARY-MARCH 2021) REPRESENTATIONS ON BEHALF OF DAVID WILSON HOMES</p> <p>We write on behalf of our client, David Wilson Homes (DWH), in response to the Wiltshire Local Plan Review (LPR) (Regulation 18) consultation.</p> <p>DWH has an interest in the Land East of Royal Wootton Bassett (hereafter referred to as 'the site') as shown edged red on the Location Plan at Appendix 1. The site extends to 26.7ha and forms the northern part of a larger site area which is included in the 2017 Wiltshire SHELAA and the Royal Wootton Bassett Site Selection Report (January 2021) under site reference 3357 (Land at Woodshaw). The total area of site reference 3357 as considered in the SHELAA and Site Selection report is approximately 53.2ha, of which approximately 50% is controlled by DWH.</p> <p>The site provides the opportunity for a sustainable, residential-led development immediately adjacent to the eastern edge of Royal Wootton Bassett. DWH considers that the site is suitably located to form a logical and sensible extension to the town with capacity to accommodate:</p>	

- Up to 400 new homes to meet local housing need;
- A 2FE Primary School;
- A Park and Ride facility;
- Generous public open amenity space.

The site has potential to deliver a number of social, economic and environmental benefits to Royal Wootton Bassett through the delivery of new market and affordable housing of varying types and sizes; infrastructure provision by way of a park and ride and primary school; provision of open space in accordance with planning policy requirements including outdoor recreation facilities to meet local needs and to benefit the existing and proposed local communities; and financial contributions towards other infrastructure improvements such as improved health care facilities, through Wiltshire Council's CIL and S106 mechanisms. The site's opportunities and constraints, together with the site vision, are explained in more detail under Section 1 below.

This representation refers to the following documents which form part of the Wiltshire LPR consultation: the Emerging Spatial Strategy (January 2021); Planning for Royal Wootton Bassett (January 2021); and the Royal Wootton Bassett Site Selection Report (January 2021). Comment is also made on the 'supporting documents' listed as part of the LPR, including the Interim Sustainability Appraisal Documents; the Local Housing Needs Assessment (April 2019); and the Formulating Alternative Development Strategies Documents.

The representation is structured in the following sections:

1. Land East of Royal Wootton Bassett
2. Wiltshire LPR Main Consultation Documents
3. Wiltshire LPR Supporting Documents 3. WILTSHIRE LOCAL PLAN REVIEW SUPPORTING DOCUMENTS

As part of our review of the Emerging Spatial Strategy for Wiltshire, as set out under Section 2 of this representation, we have considered and commented on the Swindon HMA: Formulating Alternative Development Strategies (ADSs) document (January 2021) and the Local Housing Needs Assessment (April 2019). We therefore do not repeat these comments in this section on the LPR supporting documents, but instead provide comment on other relevant LPR supporting documents, including the Interim Sustainability Appraisal (January 2021).

Interim Sustainability Appraisal (SA)

As set out above, DWH supports alternative development strategy SW-B for the Swindon HMA and welcomes the findings of the Interim SA, insofar as it concludes that alternative strategy SW-B scores more highly than alternative strategies i.e. strategy SW-A (rolling forward the current strategy) or strategy SW-C (focussing development in the rest of the HMA). DWH firmly agrees with this conclusion and would add that the strategy SW-B has the opportunity to score more highly against SA objectives 4, 5 and 9 than as currently assessed:

- SA Objective 4: the SA acknowledges that Royal Wootton Bassett is subject to elevating levels of nitrogen dioxide and may in future be subject to an Air Quality Management Area (AQMA) designation. As highlighted in this representation, there are

opportunities for strategic housing development on the edge of the town which could provide sustainable levels of growth in walking and cycling distance of existing employment and services, which in turn would minimise environmental impacts and further support Objective 4.

- SA Objective 5: the north, east and west of Royal Wootton Bassett is less constrained than other parts of the HMA in terms of flood risk from river and surface water flooding, and can therefore accommodate growth whilst minimising vulnerability to future climate change effects, further supporting SA Objective 5.

- SA Objective 9: Royal Wootton Bassett has more availability of potential development sites than other constrained parts of the HMA, which can provide strategic levels of housing growth and a range of different sizes and tenures of market and affordable housing to meet demand. The SA also recognises the need for infrastructure improvements in the town, with respect to health care provision and education, which would rely on large scale growth. As a less constrained part of the HMA, it is logical that growth is therefore directed to Royal Wootton Bassett to support these investments in infrastructure and as set out above, it is clear that the town has available land to accommodate development.

It is noted that only potential development sites in the Principal Settlements (Chippenham, Salisbury and Trowbridge) are assessed against the SA criteria at this stage. Given that the preferred alternative development strategy for the Swindon HMA is to direct growth to a Market Town (i.e. Royal Wootton Bassett), it seems illogical to omit the consideration of potential development sites in the Market Towns as part of the SA process and to inform the ongoing consideration of development sites to be allocated through the LPR.

Review of Land East of Royal Wootton Bassett Against SA Objectives

The Land East of Royal Wootton Bassett (the northern part of site 8/SHELAA site 3357) is within easy reach of existing services and facilities in Royal Wootton Bassett town centre and has good accessibility to the M4 and Swindon. It therefore presents the opportunity to deliver much needed new homes in a sustainable location close to existing services (contributing to SA objectives 2, 9, 10 and 11). The site also has the unique opportunity to deliver a new Park and Ride facility which could result in a much greater proportion of trips being completed by public transport before drivers would ordinarily leave Royal Wootton Bassett and reach Junction 16 of the M4. A new Park and Ride facility could significantly lower levels of congestion and accommodate manageable levels of housing growth on the edge of the settlement (contributing to SA objectives 4, 5 and 11).

The site lies outside the AONB and is not covered by any other landscape designation. The site is not within a Conservation Area and there are no Listed Buildings or other heritage assets within the site itself. The site falls entirely within Flood Zone 1. In summary, the site has no overriding constraints and its development would contribute to achieving SA Objectives 5, 7, and 8. A masterplanning exercise undertaken for the site demonstrates that approximately 400 new homes can be accommodated in addition to a 2FE Primary School and Park and Ride facility, as well as generous areas of open space incorporating playing fields, accessible open space, SUDS features and biodiversity enhancement (contributing to SA Objectives 1, 2, 8 and 10).

The site therefore performs well against the objectives of the SA and should be taken forward for further consideration and assessment to inform the LPR site allocation process.

Summary

These representations and the attached Vision Document demonstrate the potential to provide considerable community benefits in addition to the provision of new homes on land immediately East of Royal Wootton Bassett. Some of these benefits include:

- A 2FE Primary School within an area of 2.1 Ha, including playing fields;
- A community hub at the centre of the proposed development, including a green space and nonresidential uses;
- The retention of existing PRow footpaths traversing the site and including these in the proposal to offer enhanced connectivity within and beyond the site;
- The provision of new, high quality open spaces and publicly accessible areas
- The provision of a new Park & Ride facility.

In summary, the site has the potential to become a natural extension to the market town of Royal Wootton Bassett to meet established local housing needs. All technical aspects have been investigated to inform the preparation of a masterplan for the site, which is presented in the Vision Document at Appendix 2.

The proposed development also presents an opportunity for delivering contributions to increased secondary school and health care provision, which are elements of infrastructure specifically identified in the LPR evidence base as being deficient and requiring investment. As set out under Section 3 of these representations, the site scores well against the Council's SA Objectives and should therefore be progressed to the next stages of assessment for allocating sites for development within the Swindon HMA and Royal Wootton Bassett. DWH and its project team would welcome discussions with Wiltshire Council's Officers at this stage, if not before, to assist the Council with refining its site allocation options.

Rep ID: 25	
Consultee code: Developer/Agent	Consultee Organisation (if applicable): Pegasus
Is this response on behalf of someone else/another organisation? Yes	
Organisation being represented (if applicable): GLP	
Does this representation refer to attachment(s): N	If this representation refers to attachment(s), these are listed below:
Please provide your comments here	
<p>The fact that the Functional Economic Market Areas Report (2016) and Employment Land Review, dated 2018 but based on evidence from 2017 were used as the basis for developing the alternative strategies put to Cabinet in 2019 mean that the Sustainability Appraisal of the alternative development strategies and the subsequent preferred emerging strategy of the Wiltshire Local Plan Review are based on out of date evidence which does not account for recent growth in the logistics sector post 2017 or take account of market singles resulting from Covid-19 and Brexit.</p> <p>The employment data on which the spatial strategy is based is at best 4 years out of date and does not respond to current market signals evidenced in Appendices 2,3,4,10 and 11 attached to these representations.</p>	

Rep ID: 26	
Consultee code: Developer/Agent	Consultee Organisation (if applicable): Barton Willmore
Is this response on behalf of someone else/another organisation? Yes	
Organisation being represented (if applicable): Bloor Homes South West	
Does this representation refer to attachment(s): N	If this representation refers to attachment(s), these are listed below:
Please provide your comments here	
<p>Local Plan Transport Review: Appendix D.1 of the Local Plan Transport Review shows the Melksham Bypass (SOBC) as running through land to the north and west of Manor Farm (the site being promoted by Bloor Homes South West). Options are still being considered for the route's alignment with a detailed assessment of better performing options to be undertaken. The November 2020 consultation on the A350 bypass stated that a further consultation would be undertaken in mid-2021 with the adoption of the preferred route and submission of Outline Business Case anticipated in October 2021.</p> <p>We reserve the right to comment further on the precise alignment of the route as part of this separate consultation process, however, would note at this stage that it is premature for the Local Plan Transport Review to show a specific alignment, which in our view should not pass-through land to the north and west of Manor Farm which would be more appropriately developed for residential use.</p>	

Rep ID: 27	
Consultee code: Developer/Agent	Consultee Organisation (if applicable): Carter Jonas
Is this response on behalf of someone else/another organisation? Yes	
Organisation being represented (if applicable): Leda Properties Limited	
Does this representation refer to attachment(s): N	If this representation refers to attachment(s), these are listed below:
Please provide your comments here	
<p>3. WILTSHIRE LOCAL PLAN REVIEW SUPPORTING DOCUMENTS</p> <p>As part of our review of the Emerging Spatial Strategy for Wiltshire, as set out under Section 2 of this representation, we have considered and commented on the Swindon HMA: Formulating Alternative Development Strategies (ADSs) document (January 2021) and the Local Housing Needs Assessment (April 2019). We therefore do not repeat these comments in this section on the LPR supporting documents, but instead provide comment on other relevant LPR supporting documents, including the Interim Sustainability Appraisal (January 2021).</p> <p>Interim Sustainability Appraisal (SA)</p> <p>As set out above, Leda Properties supports alternative development strategy SW-B for the Swindon HMA and welcomes the findings of the Interim SA, insofar as it concludes that alternative strategy SW-B scores more highly than alternative strategies i.e. strategy SW-A (rolling forward the current strategy) or strategy SW-C (focussing development in the rest of the HMA). Leda firmly agrees with this conclusion and would add that the strategy SW-B has the opportunity to score more highly against SA objectives 4, 5 and 9 than as currently assessed:</p>	

- SA Objective 4: the SA acknowledges that Royal Wootton Bassett is subject to elevating levels of nitrogen dioxide and may in future be subject to an Air Quality Management Area (AQMA) designation. As highlighted in this representation, there are opportunities for strategic housing development on the edge of the town which could provide sustainable levels of growth in walking and cycling distance of existing employment and services, which in turn would minimise environmental impacts and further support Objective 4.
- SA Objective 5: the north, east and west of Royal Wootton Bassett is less constrained than other parts of the HMA in terms of flood risk from river and surface water flooding, and can therefore accommodate housing growth whilst minimising vulnerability to future climate change effects, further supporting SA Objective 5.
- SA Objective 9: Royal Wootton Bassett has more availability of potential development sites than other constrained parts of the HMA, which can provide strategic levels of housing growth and a range of different sizes and tenures of market and affordable housing to meet demand. The SA also recognises the need for infrastructure improvements in the town, with respect to health care provision and education, which would rely on large scale growth. As a less constrained part of the HMA, it is logical that growth is therefore directed to Royal Wootton Bassett to support these investments in infrastructure and as set out above, it is clear that the town has available land to accommodate development.

It is noted that only potential development sites in the Principal Settlements (Chippenham, Salisbury and Trowbridge) are assessed against the SA criteria at this stage. Given that the preferred alternative development strategy for the Swindon HMA is to direct growth to a Market Town (i.e. Royal Wootton Bassett), it seems illogical to omit the consideration of potential development sites in the Market Towns as part of the SA process and to inform the ongoing consideration of development sites to be allocated through the LPR.

Review of Land East of Royal Wootton Bassett Against SA Objectives

Land at Marsh Farm (forming the most part of site 1/SHELAA site 499) is within easy reach of existing services and facilities in Royal Wootton Bassett town centre and has good accessibility to the M4 and Swindon, being located on the edge of the B4042/A3102 interchange. It therefore presents the opportunity to deliver much needed new homes in a sustainable location close to existing services (contributing to SA objectives 2, 9, 10 and 11).

The site lies outside the AONB and is not covered by any other landscape designation. The site is not within a Conservation Area and there are no Listed Buildings or other heritage assets within the site itself. Whilst there is a listed building immediately to the east of the site, the enclosed masterplan demonstrates how it can be sensitively screened from the development to ensure that there is no harmful impact on its setting. Moreover, the site falls entirely within Flood Zone 1. In summary, the site has no overriding constraints and its development would contribute to achieving SA Objectives 5, 7, and 8.

A masterplanning exercise undertaken for the site demonstrates that approximately 175 new homes can be accommodated in addition to a new park as well as generous areas of open space, SUDS features and biodiversity enhancement (contributing to SA Objectives 1, 2, 8 and 10).

The site therefore performs well against the objectives of the SA and should be taken forward for further consideration and assessment to inform the LPR site allocation process.

Summary

These representations and the enclosed plans demonstrate that Land at Marsh Farm has the potential to become a natural extension to the market town of Royal Wootton Bassett to meet established local housing needs. All technical aspects have been investigated to inform the preparation of an illustrative masterplan for the site, which is enclosed at Appendix 2.

The site does not have any technical constraints and is not located within any formal designations for the most valued landscapes. The site is currently outside of, but contiguous with, the Royal Wootton Bassett settlement boundary.

The location of the site in close proximity to Royal Wootton Bassett town centre, with its existing facilities and amenities, as well as areas of employment and recreation within walking and cycling distance, presents an excellent opportunity for residential development.

The proposed development also presents an opportunity for delivering contributions to increased secondary school and health care provision, which are elements of infrastructure specifically identified in the LPR evidence base as being deficient and requiring investment.

As set out under Section 3 of these representations, the site scores well against the Council's SA Objectives and should therefore be progressed to the next stages of assessment for allocating sites for development within the Swindon HMA and Royal Wootton Bassett. Leda Properties and its project team would welcome discussions with Wiltshire Council's Officers at this stage, if not before, to assist the Council with refining its site allocation options.

We hope that this representation, together with the enclosed documents, assists with the Council's ongoing work as part of the LPR process. Should you have any queries or require any further clarification on the above matters, please do not hesitate to contact me.

Rep ID: 28	
Consultee code: Developer/Agent	Consultee Organisation (if applicable): Barton Willmore
Is this response on behalf of someone else/another organisation? Yes	
Organisation being represented (if applicable): Bloor Homes South West	
Does this representation refer to attachment(s): N	If this representation refers to attachment(s), these are listed below:
Please provide your comments here	
<p>LOCAL PLAN REVIEW CONSULTATION LAND TO THE WEST OF A365, SHURNHOLD, MELKSHAM, WILTSHIRE, SN12 8DG REPRESENTATIONS ON BEHALF OF BLOOR HOMES SOUTH WEST</p> <p>INTRODUCTION</p> <p>We write on behalf of Bloor Homes South West to provide a response in respect of the above consultation. Bloor Homes South West supports the Council in progressing with the Local Plan Review and welcomes the opportunity to provide comments at this stage. We realise that the current consultation does not relate to site-specific matters and have therefore avoided reiterating detailed site-specific merits of our client's potential land interests at land to the west of A365, Shurnhold, Melksham within this response, however we would welcome the opportunity to engage with the Council to discuss the opportunity this site provides to provide sustainable development in due course.</p> <p>Please find enclosed the following documents:</p> <ul style="list-style-type: none"> • Land to the west of A365, Shurnhold: Site Location Plan; • Response Forms in respect of: 	

- o Emerging Spatial Strategy;
- o Planning for Melksham;
- o Addressing Climate Change and Biodiversity Net Gain; and
- o Supporting Evidence.

SUPPORTING EVIDENCE

At this stage, our client's comments are limited to the Interim Sustainability Appraisal - we support the SA in recommending that there should be an increase in the growth requirement at 'the less environmentally constrained settlement of Melksham'.

CONCLUSION

We trust that the above representations will be duly considered as part of the LPR's preparation. We would welcome the opportunity to discuss our comments further with you and in particular engage with you on land east of Melksham being promoted by Bloor Homes South West. In the meantime, please let me know if you have any questions in relation to any of the above.

Rep ID: 29	
Consultee code: Developer/Agent	Consultee Organisation (if applicable): Copperfield
Is this response on behalf of someone else/another organisation? Yes	
Organisation being represented (if applicable): David Wilson Homes	
Does this representation refer to attachment(s): N	If this representation refers to attachment(s), these are listed below:
Please provide your comments here	
<p>This letter of representation is submitted on behalf of David Wilson Homes, in connection with their land interest to the north of Buckley Barracks and Dyson (at Hullavington Airfield). The site is bordered by the A429 to the east, the Great Western Mainline railway to the north, The Street (road) to the west and the Norton to A429 road to the south.</p> <p>This letter addresses the following consultation documents in turn:</p> <ul style="list-style-type: none"> • Emerging Spatial Strategy • Empowering Rural Communities • Addressing Climate Change and Biodiversity Net Gain • Interim Sustainability Appraisal <p>The overall comments made in this response, however, can be summarised as follows:</p> <ul style="list-style-type: none"> • The emerging Spatial Strategy and Interim Sustainability Appraisal needs to consider a wider range of reasonable alternatives, including the potential of a new settlement in the Chippenham HMA to support growing the towns through major urban extensions. 	

- Whilst Hullavington is referenced twice in the Interim Sustainability Appraisal (regarding the Dyson research facility), the plan does not seek to manage the impact of Buckley Barracks closing in 2029 and support a future for this greenfield/ brownfield part of the plan area.
- The Spatial Strategy document provides strategic guidance for growth in these areas, but the Empowering Rural Communities document only focuses on small scale neighborhood plan growth. As such strategic locations like Hullavington/ Stanton St Quinton/ Buckley Barracks/ Dyson and the surrounding area are left without any meaningful policy support or guidance which is needed during the plan period.
- DWH acknowledge the need to respond to climate change and for new development to deliver net-biodiversity gain in accordance with the Environment Bill. Whilst it is unlikely that new development will be able to reverse the impact of climate change singlehanded (given it is a relatively small proportion of all development in Wiltshire), it represents a change in direction. It is important therefore for the Interim Sustainability Appraisal to consider the impacts of different types and locations of major growth and their impact. At present, the benefits of development within the Chippenham HMA at Hullavington/ Stanton St Quinton/ Buckley Barracks/ Dyson has not been considered.

In conclusion, these representations on behalf of David Wilson Homes request that the emerging Wiltshire Plan and the Interim Sustainability Appraisal consider the closure Buckley Barracks in 2029 alongside the opportunity for wider growth in the Hullavington area which encompasses the existing employment facilities and the range of brownfield and greenfield land in this location. Alternatively, and at the very least, the plan should recognise the strategic importance of this area and that it is under-represented by the Empowering Rural Communities document.

David Wilson Homes would welcome an opportunity to support Wiltshire Council in their formation of a bespoke policy for the Hullavington/ Stanton St Quinton/ Buckley Barracks/ Dyson area.

Set out below is the detailed response to the Wiltshire Local Plan review which picks up on the points made in the summary above.

Interim Sustainability Appraisal

The Interim Sustainability Appraisal (SA) considers low, medium and high housing and employment need scenarios for each of the HMAs. For the Chippenham HMA (and others), a fine grain approach is taken to the main towns, but a coarse grain is taken with the rest of the HMA. This does not accurately represent some parts of the HMA such as the Hullavington/ Stanton St Quinton/ Buckley Barracks/ Dyson which is markedly different to other rural locations in that it is already a major employment destination with a small residential population. The PPG (ref ID: 11-018-20140306) makes it clear that the sustainability appraisal needs to consider and compare all reasonable alternatives as the plan evolves.

It goes on to describe that “Reasonable alternatives are the different realistic options considered by the plan-maker in developing the policies of the plan. They need to be sufficiently distinct to highlight the different sustainability implications of each so that meaningful comparisons can be made”. At present, the SA only appears to consider a strategy which adjusts growth at the

market towns according to different housing and employment growth factors. This does not appear to represent a sufficiently different spatial approach to plan-making and does not consider all reasonable alternatives and realistic options.

The SA should therefore broaden its focus beyond assessing a set of growth factors at the main towns and consider larger-scale housing and economic growth Hullavington/ Stanton St Quinton/ Buckley Barracks/ Dyson.

Conclusion David Wilson Homes welcomes the opportunity to engage with the emerging Wiltshire Local Plan and is encouraged by many of the themes it covers. However, there is an overriding concern that it does not provide enough support for growth outside the principle urban areas to sustainably re-balance particular locations.

David Wilson Homes believe that the aims and objectives of the emerging plan would be supported by further exploration of the Hullavington/ Stanton St Quinton/ Buckley Barracks/ Dyson area as a location for sustainable growth to support the range of employment opportunities that currently draw in commuters from other parts of Wiltshire.

Rep ID: 30	
Consultee code: Parish/Town Council	Consultee Organisation (if applicable): Bremhill Parish Council
Is this response on behalf of someone else/another organisation? No	
Organisation being represented (if applicable):	
Does this representation refer to attachment(s): N	If this representation refers to attachment(s), these are listed below:
Please provide your comments here	
<p>The world is facing a major crisis of Climate Change, the planet is heating up and there appears to be little willingness to stop, or even reverse this trend.</p> <p>The consequences for the continued asset stripping of the environment will be increased temperatures, rising to over 40 degrees in summer months by 2040, and increased storm damage through severe weather systems bringing intense rain and wind.</p> <p>Lord Krebs, Chair of the Adaptation sub-committee of the Climate Change Committee [1] stated:</p> <p>“the six immediate priority areas are related to the risks of flooding and coastal change, the impact of high temperatures on health and wellbeing, risks of future water shortages, impacts on the global food system, and risks arising from new and emerging pests and diseases (COVID)”</p> <p>The Scott Wilson report 2011 on the Bristol River Avon states:</p> <p>“Within the county of Wiltshire, the river is predominately underlain by the Kellaways formation and in the west Great Oolite Group. The low permeability of this area results in rapid response to rainfall.”</p>	

“Communities that have experienced flooding from this river system include Malmesbury, Chippenham, Melksham and Bradford Upon Avon.”

At Para 3.3 “The areas that are identified as being the most susceptible to ground water flooding are located close to the Upper Bristol Avon and the River Marden.” (All land to the East of Chippenham)

This is not the first-time developers and Wiltshire Council have proposed development to the East of Chippenham. In 2015 an Examination in Public was held to consider the building of 1600 homes:

On 14th September 2015 the Planning Inspector leading the EIP in his initial appraisal stated:

“The plan acknowledges the landscape impact for this area is a significant concern as is the need for considerable work to avoid the flood risks to the town and elsewhere”

The former point is recognized in the Landscape setting report (docceps06) Para 6.25.

“The open character and strong association with the rivers and floodplain are important characteristics to safeguard. The generally remote character to the north of the North Wilts River Route and the eastern end of Stanley Lane is important to conserve.”

The matter of concern here is that the plan is over-allocating in both housing and employment land requirements specifically in the area, which the evidence base suggests is environmentally sensitive and least attractive in terms of flood risk. Soundness Issues:

Mr Patrick Whitehead, the EIP’s Planning Inspector, went on to state at Paragraph 19 of his report:

“Over-allocation of both housing and employment land is driven primarily by the need to support and justify the eastern part of the ELR [2].

This appears to ignore significant and legitimate environmental, landscape and flood risk concerns which would suggest that inclusion of housing allocation to the north of the North Wilts Rivers Route and the larger of the two employment sites intended for development beyond the plan period are unsound.”

Wiltshire Council is again putting forward an over-allocation of housing in order to benefit from the £75m being offered by the Government for road infrastructure. The over-allocation this time is far greater than that proposed in 2015.

From the notes of the progress meeting following the suspension of the EIP on 18th January 2016, Mr Patrick Whitehead stated “The Flood risk report (CEPS10-EP6) on balance Area C (Land to the East of Chippenham) appears least attractive for development in the terms of flood risk, surface water management compared to others because of the degree to which flooding is an issue to tackle and the extent of flood risk land”

It was recorded that it was noted that the consequences of management measures being miscalculated or failing would be potentially far more serious than other areas, and that the links across the river could disrupt the natural flows. For these, and a number of other questions including changes in perception nationally resulting from recent flood events, it was necessary to re-visit the issue of flood risk associated with strategic Area C (Land to the East of Chippenham).

[NAME REDACTED] Senior Drainage Engineer for Wiltshire Council stated in the planning application for the Riverside Development to the East of Chippenham on 15th January 2016.

“It is clear from casual observations in the area of the Radial Gate weir and the river Avon immediately upstream of the Chippenham Town Bridge that the running tolerances in terms of “freeboard” already leave little room to manoeuvre since the purpose of the radial gate is to maintain an elevated flow level in the river. Following severe storm events, this “freeboard” almost disappears, and the radial gate has been overtopped. The amount of rainfall falling on large developments on each bank of the River Avon will influence the expected peak flows.”

As Climate Change takes hold and more severe rainfall is expected over the lifetime of this proposed development of 9,000 plus houses the flood risk to Chippenham Town and its residents will increase.

Local Plan Assessment - JBA Consulting Level 1 Flood Risk Assessment report (May 2019)

This Flood assessment for the Chippenham Site Selection process for land to the East of Chippenham is not appropriate for a level 1 assessment as the area has been subject to numerous flooding incidents, which are increasing year on year. The underlying geology is The Kellaways formation and Oxford Clay making the soil construction impermeable leading to flooding.

Further comments are:

2.3.1 Bristol Avon. The data was collected in 2011 and is out of date. It is no longer relevant today due to Climate Change. The number of homes at risk from flooding is out of date and should be significantly increased, as will the risk.

Table 2-2 How is Wiltshire Council managing the flood risk for Chippenham? Building at Rawlings Green and on Site 1, both sites upstream from the town, will bring an increased risk of flooding the town itself. The flood risk can be mitigated by building fewer houses.

2.7 Wiltshire Local Flood Risk Management Strategy. Wiltshire LFRMS is out of date and due for renewal. Will Wiltshire Council proceed to the EIP with this and with the concerns of flooding land to the East of Chippenham which were raised by the last Planning Inspector in 2016.

2.8.1 NPPF. Sequential testing must be undertaken for the planning, as this area is high risk to flooding. (See above)

2.8.2 Wiltshire Council must take into account the cumulative impact on flood risk including:

- Developing Rawlings Green
- Proposed development to the south and east of 7500 houses
- Proposed river crossings at Rawlings Green and to the south of Chippenham
- Impact of Climate Change - increase in river levels and flow of the river Avon.

It must also take into account the impact of Climate Change. Climate Change is expected to increase flood risk and lead to development to become unsustainable, opportunities should be taken to relocate developments away from downstream flood risk areas.

2.10 Surface Water Management Plan (SWMPs). Chippenham is ranked 2nd in the Wiltshire properties at risk from flooding at 1,192 properties. However, this report was published in 2011 and is now over 10 years old and out of date. It should not be used in this report. An up-to-date report is required.

2.15 Sewers for Adoption. The risk to the river Marden and river Avon of foul water escaping into the rivers cannot be overemphasized. The waters of the river Marden are pristine, and there is an abundance of fish, otters, kingfishers and other threatened species. Protection of this watercourse is imperative.

6.3.2 Surface water (pluvial) flooding. Climate change is predicted to increase rainfall intensity in the future by a range of between 20% and 40% (the recommended national precautionary sensitive range for 2085 to 2115). This will increase the likelihood and frequency of surface water flooding across the entire county. However, it is likely to particularly affect impermeable urban areas that are already susceptible such as Salisbury, Trowbridge and Chippenham.

The Chippenham radial gate is already at risk of overtopping. Wiltshire Council should not be considering building 7500 houses adjacent to the river Avon, to the south and east of Chippenham?

9.3 Cumulative Impact of Development. Building at least 7500 in multiple developments in Chippenham area will increase the flood risk.

Other questions and observations:

Various appendixes were NOT provided.

Appendix J: Recorded Flood History in Wiltshire is missing?

Appendix O: Action 993 What are the options for renewing the radial gate at Chippenham? Appendix Q: Record of flood history. Why are there no records after 2014? The last 7 years are very relevant to this report.

Conclusion:

The Flood assessment submitted for the 2021 Chippenham Local Plan Review completed by JBA Consultants did not address the serious threats to the River Avon & Marden Vales from fluvial flooding.

The last five years has seen ever increasing incidents of flooding in the Chippenham Avon Vale. This flooding has been a threat to the river Avon and the lands in the Vale for many years if not centuries.

In the 15th century Maud Heath made a bequest to the people of Bremhill, and that money was used to create Maud Heath Causeway the oldest private footpath in the world. It is still in community ownership, and the fund maintains the Causeway which connects the parish of Bremhill to Langley Burrell and eventually Chippenham. The Causeway allowed farmers from Bremhill to take their goods to market when the river Avon Flooded. Today the causeway floods several times a year and cars are frequently abandoned after ingesting water into the engine.

The intensity of the rainfall is increasing and it is raining for longer, allowing surface water to run quickly into the watercourses creating flooding.

The JBA report does address the specific history or soil make up of Site 1.

Wiltshire Council has always stated that drainage of the land in Site 1 could be managed by Urban Surface Drainage Units (SUDS). This engineering solution is not suitable for this land as it is impermeable, and the SUDS will over spill and create a considerable flooding risk to properties. With 14 large quantities of surface water much of it will enter the sewer systems contaminating properties and the valued river tributaries threatening fish, and wildlife.

Attenuation ponds could be considered. With 5,000 homes, roads, parking spaces, employment areas all concreted over the run off will be many million tons of water into attenuation ponds with the likelihood that they will be overtopped. This water will again drain towards the valued watercourses.

The size and depth of ponds required to manage the run off from 5,000 houses, driveways, and roads has not been calculated. The risk to Chippenham from flooding from an estate of 3,000 houses on one side of the River Avon, and a further 650 houses on the other side at Rawlings Green must be substantial as Mr. Steve Scothern Wiltshire Council Drainage Engineer stated in his response to the planning application in 2015 to build 1600 houses on this very site this flood risk assessment is considering. On a final note, there should be no house building north of the Chippenham to Calne cycle track as recommended by the Planning Inspector Ann Skippers in 2018 when the Bremhill Neighbourhood Plan was made. Any house building at this location would mean that any runoff from construction would run downhill to the river Marden, and any development this side of the cycle track would threaten the river Marden Vale with flooding.

Summary

The Flood risk to Site 1 will continue to increase as Climate Change increases the intensity of rainfall over a shorter period of time. River levels, especially the River Avon, will continue to rise, and the flows increase. Building 7,500 houses within a few hundred metres of two rivers, on ground that is the Kellaways Formation and Oxford Clay will mean that the run off from the roads, driveways, and houses may over-top any surface urban drainage system, and create incidents of flooding which may threaten life and damage to property. The proximity of zones 2 & 3 so close to such a large development to the East of Chippenham will create a major flood risk.

Rep ID: 32	
Consultee code: Parish/Town Council	Consultee Organisation (if applicable): Bremhill Parish Council
Is this response on behalf of someone else/another organisation? No	
Organisation being represented (if applicable):	
Does this representation refer to attachment(s): N	If this representation refers to attachment(s), these are listed below:
Please provide your comments here	
<p>Local Transport Review Transport - extracts from the Atkins Report with Bremhill Parish comments. The Wiltshire strategic model was reviewed to confirm the model's capability and robustness throughout the process. This review focussed on ensuring that the transport networks in the settlements subject to detailed assessment (Chippenham, Salisbury and Trowbridge) accurately reflect actual base 2018 condition, but now three years out of date! This Local Plan Consultation is so important WC should start again - car number growth over three years; up to 15,000 more vehicles within the plan period; car journey changes - housing development 2018 - 2036; construction traffic for 10 years minimum; High-level sense checks were also undertaken for Wiltshire's market towns; these reviewed the level of network coding detail and zoning structures for each town (what does this actually mean?) The Wiltshire strategic model is based on a 2018 base year. Forecasts of future travel demand were developed based on standard DfT modelling assumptions, together with specific forecasts of housing and employment growth. However, the COVID-19 pandemic has caused unprecedented levels of disruption to the economy and the ways in which people travel since March</p>	

2020. The long-term impacts of the pandemic are likely to cause potentially significant changes in travel demand and behaviour, which are currently impossible to predict. The analyses are therefore based on 2018 base year data and (unadjusted) forecasts of demand to 2036. It is recommended that future analysis includes scenario testing to assess the potential implications of future changes in travel behaviour that could emerge following the pandemic.

This demonstrates that the Local Plan Consultation is being undertaken before it should be.

The specific locations for new housing have not been identified in the market towns. (but would have a large bearing on Chippenham = P7. Table 1.1 Figures do not seem to add up overall. But if they are correct, excluding growth in Chippenham, there will be 7,853 additional homes in the rest of the CMA - shopping, schools etc. How will this ease congestion in Chippenham Town Centre?

The locations of loading of new trips to the network have therefore been assumed to be spread in each location. Given differing numbers of houses how does this work?

The distribution of trips is based on the movements within each settlement which have been derived from the Wiltshire strategic model. It is assumed that trip patterns are consistent with the core forecasts and no allowance is made for changes in self-containment, for example in relation to local trips for employment, shopping, schools, healthcare or attractions across the area as a result of the Local Plan. Further assessment of future changes in employment could inform later stages of work (pretty material now we would say)

The CSAP identified a preferred arrangement would be for the EDR to follow a route from the A4 east of Pewsham to the A350 Malmesbury Road roundabout, to the north of the town. The delivery of 5,100 homes in Chippenham would necessitate the delivery of this route to the north of the town, which would address many of the congestion issues in the town centre. However, this would not tackle all the impacts resulting from an additional 5,100 dwellings. There would still be several challenges: significant congestion problems on the A4 to the east (due to traffic routing via the A4, A342 and A3102 towards Melksham), residual issues in the central area and constraints on the A350 and A4 west. This is shown visually in Figure 2-2. The Do-minimum scenario therefore introduces a more comprehensive solution. This would require an EDR (a northern link from the A4 at Pewsham to the A350 Malmesbury Road roundabout) and a new Southern Distributor Road (to connect from the A4 at Pewsham to the A350 at Lackham Roundabout). A Southern Distributor Road (SDR) provides a route between the A4 and A350 corridors which avoids the town centre. An SDR is further justified, as advised by Wiltshire Highway Authority, to ensure that the scale of development proposed in Chippenham has access to two principal corridors to avoid point loading detrimentally affecting the strategic use of either corridor. So presumably the roads must be built simultaneously to avoid point loading of either the new east or south developments. Has traffic modelling in the surrounding villages been undertaken? A 30 mph distributor road taking traffic to and from a vast housing estate and providing a route through from the A4 to the A350 and from the A350 to the A4. Any congestion at the pinch points will push traffic through Bremhill Parish. Much of which is single carriageway barely able to cope with cut through traffic, agricultural vehicles and HGV traffic now.

Foot note table 2.2

The average number of dwellings from the sample was 79. Residential rates are per dwelling. Private owned houses are based on 67 days of data from 31 regions in England and Wales. (Average of 79 ?, 67 days of data (which years, months, days, includes w/e?) which regions? This sample size is questionably small and probably unrepresentative.

P.7 Footnote Note that this forecast has a higher household trajectory than the 2036 National Trip End Model (NTEM) Core forecasts used by the Department for Transport. Why? to possibly give more credence to the numbers?

P.13 Traffic is expected to increase primarily along the A350 corridor, particularly around Chippenham with an additional 300-600 passenger car units (PCUs) per hour two-way. There is also expected to be an increase of 200-250 PCUs per hour in each direction on the A4 east of Chippenham. (up to 1,700 additional PCUs per hour at peak times).

As previously mentioned, the traffic modelling does not reflect the seismic changes wrought by Covid - 19. It does not include 10 years of construction traffic. It does not include the impact on surrounding villages. It does not include the effects on Chippenham Town of further development in the rest of the CMA.

We are greatly concerned about the validity of this report.

Rep ID: 33	
Consultee code: Developer/Agent	Consultee Organisation (if applicable): Savills
Is this response on behalf of someone else/another organisation? Yes	
Organisation being represented (if applicable): The Society of Merchant Venturers	
Does this representation refer to attachment(s): Y	If this representation refers to attachment(s), these are listed below: SD33
Please provide your comments here	
<p>4.2 Interim Sustainability Appraisal</p> <p>4.2.1. The Interim SA at paragraph 4.2.1 highlights the overall increase in housing and employment requirements in the Chippenham HMA compared to the Core Strategy. In considering three potential strategies to accommodate these needs, the interim SA at paragraph 4.6.3 concludes that:</p> <p>“The SA has not noted any impacts of such significance that would prevent development at the higher level (LHNA) from coming forward in each HMA. But a number of key recommendations have been made to amend the distribution of growth in some areas that would help reduce the significance of impacts and increase benefits. Those key recommendations are:</p> <p>In Chippenham HMA, to explore an additional/amended development strategy that would reduce proposed development levels in/around the more environmentally constrained settlements of Malmesbury, Corsham and Devizes to the lower levels in Strategy CH-B (or lower). Such a strategy would increase the growth requirement at the less environmentally constrained settlements of Melksham, Calne and Chippenham and in the Rest of the HMA...” [our emphasis]</p>	

4.2.2 It is noted that higher and lower growth strategies have been assessed for the Chippenham HMA. The table below demonstrates that based on the housing requirements associated with each of these strategies, the Interim SA has assessed a housing requirement range of between 1715 and 2870 for Devizes. [See table at paragraph 4.2.2 in attachment SD33]

4.2.3 As noted above the recommendation of the Interim SA for Devizes states "...to explore an additional/amended development strategy that would reduce proposed development levels in/around the more environmentally constrained settlements of Malmesbury, Corsham and Devizes to the lower levels in Strategy CH-B (or lower). It is acknowledged that the emerging Preferred Strategy for the Devizes includes a housing requirement of 1,330 and that this has been assessed in the Interim SA. However, it is not clear why a figure of 1,330 has been assessed when the lower level in Strategy CH-B is 1,715. There is no explicit evidence provided as part of this consultation as to how the 1,330 has been calculated and justified. The Interim SA has not assessed any other options which could have delivered a housing requirement between 1,330 and 1,715. The SA must ensure that it considers all reasonable alternatives.

4.2.4 Within consideration of potential development strategies, it is important that the SA takes a positive approach to considering the needs and opportunities of individual settlements and that mitigation, for example, new transport infrastructure/ transport solutions can assist in enabling significant growth at the market towns to come forward.

Rep ID: 34	
Consultee code: Developer/Agent	Consultee Organisation (if applicable): David Jarvis Associates
Is this response on behalf of someone else/another organisation? Yes	
Organisation being represented (if applicable): Catesby Estates PLC	
Does this representation refer to attachment(s): N	If this representation refers to attachment(s), these are listed below:
Please provide your comments here	
<p>Catesby Estates supports the general conclusions of the Interim Sustainability Appraisal (ISA) with regard to the Chippenham HMA. With regard to Melksham, Catesby has noted the conclusions on potential effects associated with the strategy CH-C, which considers the effects of an additional 3950 dwellings at Melksham between 2016 – 2036. Whilst these assessments are obviously based on Melksham as a whole, rather than site-specific effects, Catesby would make the following comments in relation specifically to a potential allocation on the east side of Melksham (i.e. Assessment Site 1 in the Planning for Melksham consultation document, of which Catesby Estates is one of the major promoters):</p> <p>SA Objective 1 - biodiversity The ISA advises there could be Moderate Adverse effects with mitigation “problematic”. Catesby would stress that, with regard to Site 1 specifically, existing watercourses running through the site will be enhanced as biodiversity feature and appropriate mitigation provided to ensure protection of Great Crested Newt and other important habitats.</p> <p>SA Objective 5 – climate change</p>	

The ISA advises there could be Moderate Adverse effects associated with risk of surface water and groundwater flooding. Development of Site 1 will obviously require a comprehensive site-wide drainage strategy, which will incorporate retention and enhancement of existing watercourses and new sustainable drainage measures to ensure appropriate mitigation against the risk of flooding.

Catesby Estates would also make the point that, whilst Melksham does contain significant areas of land within Flood Zones 2/3, these are predominantly to the north and west of the settlement. The vast majority of Site 1 lies within Flood Zone 1 and development will be restricted to these areas. The small areas of Flood Zone 2/3 within the site will not be built upon.

SA Objective 7 – landscape and sense of place

Catesby agree with the assessment that Melksham is the least constrained settlement within the Chippenham HMA, particularly with regard to landscape, ecology and heritage impacts. For example, AONB in the vicinity of Devizes and Corsham, and heritage assets associated with Malmesbury

However, with regard to visual impact, Catesby has undertaken a Landscape Analysis of the potential effects of development to the east of Melksham. This concludes that, subject to appropriate mitigation, development in this location would have limited landscape and visual impact.

Should land to the east of Melksham come forward as an allocation, Catesby will work closely with the Council and other key stakeholder to bring forward an attractive and self-contained new neighbourhood, but which takes into account the existing pattern of development on the east side of Melksham and provides strong connections to the town centre and existing community facilities.

Rep ID: 35	
Consultee code: Developer/Agent	Consultee Organisation (if applicable): David Jarvis Associates
Is this response on behalf of someone else/another organisation? Yes	
Organisation being represented (if applicable): Catesby Estates PLC	
Does this representation refer to attachment(s): N	If this representation refers to attachment(s), these are listed below:
Please provide your comments here	
<p>Catesby Estates supports the conclusions regarding the Melksham bypass, i.e. that this will mitigate the impacts of potential large strategic expansion at the town, by providing new capacity to accommodate additional traffic from new development, as well as reducing congestion along the A350.</p> <p>It should be stressed that strategic network improvements such as this would not in themselves necessarily increase overall car trips; it will increase the efficiency of traffic movements along the A350 corridor and reduce delay but would not make Melksham more of a destination that would lead to additional traffic in the town.</p> <p>Catesby Estates are promoting land to the east of Melksham for large-scale strategic development, which has been included as part of the Assessment Site 1 in the "Planning for Melksham" consultation document. The consultation exercise carried out on the bypass options earlier this year indicated that route option 10c represented the only one that could demonstrate indicative overall value for money; this route crosses land within Catesby's control.</p> <p>Development on the east side of Melksham can provide effective links to the proposed bypass (route 10c), assisting with the goal of reducing congestion in the town. Whilst the land controlled by Catesby Estates is capable of coming forward independently of</p>	

the proposed bypass, it can help facilitate delivery of the bypass in conjunction with providing for a significant portion of Melksham's housing requirements.

Should the land east of Melksham come forward as an allocation, Catesby would ensure that its development proposals focus on delivering a sustainable neighbourhood that maintains and strengthens connectivity, particularly pedestrian/cycle links, to the existing town and its facilities.

Rep ID: 36	
Consultee code: Developer/Agent	Consultee Organisation (if applicable): Carter Jonas
Is this response on behalf of someone else/another organisation? Yes	
Organisation being represented (if applicable): Atwell Wilson Motor Museum Calne	
Does this representation refer to attachment(s): N	If this representation refers to attachment(s), these are listed below:
Please provide your comments here	
<p>Local Housing Needs Assessment (LHNA) - Swindon Borough Council and Wiltshire Council (Opinion Research Services April 2019)</p> <p>It is considered that the LHNA is out of date as it is calculated on the basis that the strategic policies of the Core Strategy are not out of date. It is acknowledged that the minimum Local Housing Needs figure for Wiltshire in 2019/2020 is 2,042 dwellings per year which yields an overall minimum housing need for Wiltshire of 40,840 dwellings over the Local Plan period 2016 – 2036. The report concludes however that the evidence suggests that an additional 6,300 dwellings would have to be provided to enable sufficient workers to live in the combined area going forward (Para 4.26).</p>	

Rep ID: 37	
Consultee code: Parish/Town Council	Consultee Organisation (if applicable): Salisbury City Council
Is this response on behalf of someone else/another organisation? No	
Organisation being represented (if applicable):	
Does this representation refer to attachment(s): N	If this representation refers to attachment(s), these are listed below:
Please provide your comments here	
<p>The data used for Salisbury is considered to be out of date and should be updated in order to fully assess the impacts of proposed site allocations on the future of the City and its rural hinterland. Specifically, the following new and up to date information is required in order to fully assess the proposals and alternative opportunities:</p> <ol style="list-style-type: none"> 1. The Salisbury Transport Strategy should be updated to include recent housing permissions and changes to commuting behaviour post COVID-19. This should include consideration of parking, means of encouraging modal shift across Salisbury, but also within the CAF area, and the functionality of existing roundabouts notably Harnham Gyratory, Exeter Street Roundabout, and College Roundabout. 2. A car parking study is required as a matter of urgency which should: <ol style="list-style-type: none"> a. Quantify the need for surface car parks in Salisbury (including Culvert Street), so that car parks can be utilised to provide attractive town centre housing and services. 	

b. A wider study of parking which considers the introduction of parking zones, for instance residential, commercial and Central Area, with indicative provision standards to allow new development to encourage modal shift.

3. Leadership from WC Highways and Senior Management to encourage the Highways Agency to provide joined-up and progressive highways improvements to Salisbury, which has been ignored in strategic plans for too long.

4. There should also be consideration of an HGV routing strategy, which seeks to reduce the severance and pollution that HGVs cause to Salisbury's historic Conservation Area.

This review fails to adequately take account of the step-change in transport and its relationship to land use planning, which is now underway. The recent report from the RTPI 'Net Zero Transport: The role of spatial planning and place-based solutions' <https://www.rtpi.org.uk/netzerotransport> makes the point (para 1.1) that "transport is the largest contributor to the UK's greenhouse gas (GHG) emissions, and that while emissions from other sectors have fallen dramatically since 1990, those from transport have reduced by under 3%. In an average local authority, transport is responsible for 35.5% of all emissions, with the sector remaining 98% reliant on fossil fuels." The 'Climate Change' report submitted as part of the Local Plan Review makes the point that, in Wiltshire, transport is responsible for some 40% of all emissions.

Rep ID: 39	
Consultee code: Developer/Agent	Consultee Organisation (if applicable): Savills
Is this response on behalf of someone else/another organisation? Yes	
Organisation being represented (if applicable): Miller Homes	
Does this representation refer to attachment(s): N	If this representation refers to attachment(s), these are listed below:
Please provide your comments here	
<p>The Interim Sustainability Appraisal (SA) (paragraph 4.2.1) highlights the overall increase in housing and employment requirements in the Chippenham HMA compared to the Core Strategy. In considering three potential strategies to accommodate these needs, it is noted that the Interim SA rejects Strategy CH-A (rolling forward the equivalent distribution of the Core Strategy) and instead recommends an additional/amended approach more akin to Strategies CH-B (Chippenham Expanded Community) and CH-C (Melksham Focus) which reduces the proposed development levels at settlements which are considered to be more environmentally constrained such as Malmesbury.</p> <p>It is important to note however that Malmesbury has a more positive score against the SA objectives in Strategy CH-A than the average score for other settlements in Strategy CH-A. This indicates that the rejection of Strategy CH-A relates more to the potential for greater adverse potential impacts at other settlements in the HMA than at Malmesbury.</p> <p>Malmesbury scores particularly highly against the SA objectives 8 (housing), 9 (health) and 11 (economy). Indeed the assessment against SA objective 8 in fact highlights that the level of growth planned by Strategy CH-A may not be sufficient – “Given the high affordability ratio and relatively low growth proposed, it is uncertain whether the scale of growth under this</p>	

strategy would be sufficient to address the current imbalance” (Interim SA Appendix I, page 27). It is noted that the SA gives the same ‘minor positive’ score for Malmesbury under SA objective 8 for Strategy CH-B and CH-C, despite each of these approaches proposing a lower level of growth and thereby contributing less to the identified affordability issues. Similarly, it is noted that the SA gives the same ‘minor positive’ score for Malmesbury under SA objective 11 (economy) for each of the three Strategies, despite the potential for additional housing under Strategy CH-A to further support the local economy.

It is noted that Malmesbury is assessed more negatively in relation to environmental SA objectives, such as objectives 3 (water) and 6 (heritage), where the scores are lower against Strategy CH-A compared to Strategies CH-B and CH-C. The assessment is however focused predominantly in relation to the level of growth and does not fully consider the location of growth or appropriate mitigation that can be delivered. Whilst it is acknowledged that Malmesbury town itself is subject to heritage constraints, it is important to consider the potential for development around Malmesbury which is less constrained. Land to the west of Milbourne, for instance, is less constrained but is sustainably located close to Malmesbury and is therefore able to help meet local development needs.

Within consideration of potential development strategies, it is important that the SA takes a positive approach to considering the needs and opportunities of individual settlements.

Rep ID: 40	
Consultee code: Developer/Agent	Consultee Organisation (if applicable): Savills
Is this response on behalf of someone else/another organisation? Yes	
Organisation being represented (if applicable): Miller Homes	
Does this representation refer to attachment(s): N	If this representation refers to attachment(s), these are listed below:
Please provide your comments here	
<p>The Local Transport Review predominantly considers the impact of strategic growth at the Principal Settlements of Chippenham, Salisbury and Trowbridge. In particular, the Review (section 4.2.3) highlights the “significant pressures” forecast on the A350 corridor which require mitigation around and to the south of Chippenham.</p> <p>The acknowledgement at section 4.4 of the Review that further assessment is required to analyse the impact of development at Market Towns (i.e. including Malmesbury located to the north of Chippenham) is noted. It is important that this assessment is undertaken as soon as possible to inform the selection of development sites in the LPR.</p> <p>In this regard, Land to the west of Milbourne is located adjacent to the A429 between Malmesbury and Milbourne, with pedestrian/cycle connections along Blinks Hill to the town centre. As such the site is well placed and sustainably located to accommodate new development.</p>	

Rep ID: 41	
Consultee code: Developer/Agent	Consultee Organisation (if applicable): Savills
Is this response on behalf of someone else/another organisation? Yes	
Organisation being represented (if applicable): Miller Homes	
Does this representation refer to attachment(s): N	If this representation refers to attachment(s), these are listed below:
Please provide your comments here	
<p>6.4. Chippenham HMA: Formulating Alternative Development Strategies</p> <p>6.4.1. The Alternative Development Strategies (ADS) report considers whether it is appropriate to roll-forward the Core Strategy or whether alternative development strategies are required for the Chippenham HMA.</p> <p>6.4.2. Tables 1 and 2 set out that rolling forward the current strategy would result in a housing requirement for Malmesbury of 1,260 homes over the period 2016-2036 (the lowest of the Principal Settlements and Market Towns in the HMA) and an employment requirement for Malmesbury of 7.2ha based on the Employment Land Review (an increase to the current Core Strategy requirement compared to a decrease at other settlements). However despite this, Tables 10 and 11 conclude that a lower level of growth should be sought at Malmesbury due primarily to environmental constraints and land availability.</p> <p>6.4.3. It is notable that the assessment of potential environmental impacts is based on a 'high level environmental assessment' and 'broad judgement' set out on two pages of the report (pages 12-13). Whilst it is acknowledged that Malmesbury is subject to environmental constraints, it is not clear how exactly the assessment has been made and which land has been considered. The conclusions made are therefore not fully evidence-based and justified, as required by NPPF paragraph 35, and full assessment is required in order to fully inform the development strategy. In undertaking a full assessment, consideration should be given to the wider area around Malmesbury (such as at Milbourne) which is less constrained and sustainably located to support Malmesbury's needs.</p>	

6.4.4. It is also considered that a number of the conclusions in Table 10 relating to Malmesbury do not fully reflect the local circumstances and assessment set out in the preceding text. For example:

- Employment – Table 10 concludes that a lower scale of employment growth is required compared with rolling forward the Core Strategy. However, whilst there is some deliverable supply due to outstanding commitments to meet Core Strategy requirements (Figure 6), the Employment Land Review (2018, referred to below) highlights the forecast under-supply in the area moving forward and recommends (at section 7.2.1) “further allocations here [at Malmesbury] would be helpful for accommodating future growth.” The ADS report itself (paragraph 96) continues that “Both Corsham and Malmesbury show stronger prospects for job growth that also suggest higher rates of housing development than rolling forward the current strategy.” The supporting evidence therefore outlines a different picture relating to this indicator compared to the ADS report conclusions.
- Population – Table 10 concludes that ‘neither higher or lower’ growth is required in relation to population based on the Core Strategy. However, Figure 9 shows a projected 9% increase in population distribution in Malmesbury, as well as a 150% increase in rural areas. It is therefore clear that a level of higher growth is required at Malmesbury and surrounding rural areas (such as Milbourne) based on this indicator, in contrast to the ADS report conclusions.
- Affordability – Table 10 also concludes that ‘neither higher or lower’ growth is required in relation to affordability based on the Core Strategy. However, whilst Figure 10 suggests there is not a need for affordable housing in Malmesbury, this is marginal (at -5%), and notably this directly contrasts with the Interim SA. Paragraph 4.2.7 of the Interim SA highlights that “the ratio of house price to earnings in Malmesbury continues to be one of the highest in Wiltshire at 14.13 and delivery of affordable homes should be prioritised.” On this basis there appears to be a clear need for additional growth to improve affordability in Malmesbury, in contrast again to the ADS report conclusions.
- Land availability – Table 10 concludes that land availability indicates a need for a lower scale of growth at Malmesbury. This is based on Figure 4 which indicates that there is 42% of land available in Malmesbury to accommodate the needs of rolling forward the Core Strategy. However, importantly this does not account for land to the west of Milbourne which also provides suitable and available land to accommodate development to support meeting Malmesbury’s needs. It is vital that the LPR considers all potential land around Malmesbury, such as land to the west of Milbourne, in order to meet identified local development needs (as referred to above).

6.4.5. These inaccuracies skew the conclusions and recommendations set out in Table 11 and incorrectly suggest that a lower level of growth should be proposed at Malmesbury in contrast to the evidence base. Instead it is clear that, as a minimum, the distribution of homes and jobs for Malmesbury should be rolled forward from the Core Strategy, as opposed to the alternative development strategies CH-B and CH-C. A positive approach should be taken to considering the potential development opportunities at and around Malmesbury, in line with the NPPF, including consideration of potential development of land to the west of Milbourne.

Rep ID: 42	
Consultee code: Developer/Agent	Consultee Organisation (if applicable): Savills
Is this response on behalf of someone else/another organisation? Yes	
Organisation being represented (if applicable): Miller Homes	
Does this representation refer to attachment(s): N	If this representation refers to attachment(s), these are listed below:
Please provide your comments here	
<p>It is noted that the Local Housing Needs Assessment (LHNA) (2019) identifies Malmesbury within the new Chippenham HMA given the importance of Malmesbury to Chippenham's workforce. Importantly, the LHNA (Figure 14) highlights a shortfall of between 3,800 and 4,200 workers in the Chippenham HMA to support the projected increase in jobs. As such, Figure 15 of the LHNA recommends an additional 2,979 homes above the minimum Local Housing Need in the HMA (increasing the total requirement to 20,400 homes) in order to fulfil the forecast jobs growth. It is noted and welcomed that this total requirement of 20,400 homes is carried forward in the Emerging Spatial Strategy. It will be important to ensure that this requirement of 20,400 homes is subsequently met as a minimum in order to support local jobs as well as local housing needs. Sufficient housing sites should therefore be allocated in the LPR to meet this requirement including at sustainable locations such as Malmesbury. This is particularly important given the specific identified employment needs of Malmesbury (referred to below) and given the current housing land supply shortfall referred to above.</p>	

Rep ID: 43	
Consultee code: Developer/Agent	Consultee Organisation (if applicable): Savills
Is this response on behalf of someone else/another organisation? Yes	
Organisation being represented (if applicable): Miller Homes	
Does this representation refer to attachment(s): N	If this representation refers to attachment(s), these are listed below:
Please provide your comments here	
<p>It is notable that the preparation of the Retail and Town Centres Study (2020) commenced at the start of 2020 with evidence base data collected in October 2020 during the onset of the Covid-19 pandemic. As outlined throughout the study, the pandemic has and is continuing to lead to significant change in retail and town centre uses (in addition to ongoing changes in retail habits prior to the pandemic) and therefore it is important that the Council monitors and considers updates to the assessment to ensure the LPR is informed by up-to-date and accurate evidence.</p> <p>In any case, it is clear that “changes in retailer requirements and market demand will continue to have a significant impact on the UK’s town centres and high streets” (paragraph 3.49) and therefore LPR policies will need to be sufficiently flexible to respond to these changes, particularly given that the LPR covers the plan period up to 2036.</p> <p>With regards to Malmesbury, Table 4.9 of the Study shows that there has been a drop in the number of retail/service uses in the town centre since 2012, below the UK average (Table 4.9). Despite current trends however, the Study (paragraph 8.17) states that overall “Malmesbury is considered to be a healthy town centre which benefits from a small but strong localised catchment, assisted by the attractiveness of the centre for visitors from outside of the local area.” This thereby further emphasises the suitability and sustainability of Malmesbury to accommodate new development which can benefit from and further support local</p>	

services and facilities. As set out previously, Land to the west of Milbourne is located in a sustainable location less than 1km from the centre of Malmesbury and therefore has the potential to accommodate development which can help to support local town centre uses.

Rep ID: 44	
Consultee code: Developer/Agent	Consultee Organisation (if applicable): Savills
Is this response on behalf of someone else/another organisation? Yes	
Organisation being represented (if applicable): Miller Homes	
Does this representation refer to attachment(s): N	If this representation refers to attachment(s), these are listed below:
Please provide your comments here	
<p>The Employment Land Review highlights the importance of the Council allocating and supporting the delivery of employment sites across the county. In particular, section 7.2.1 of the Review emphasises the “immediate need” for new allocations in the Wiltshire part of the M4/Swindon (Wiltshire) FEMA (including Malmesbury) due to the forecast under-supply of around 4ha of employment land in the next 5 years. The Review (section 7.2.1) continues that, “There is only one site available in Malmesbury, giving little choice for new development, including interest from Dyson suppliers, so further allocations here would be helpful for accommodating future growth.”</p> <p>The NPPF (paragraph 104) highlights the need for an appropriate mix of uses across an area in order to minimise journeys and support sustainable development. In light of the need for additional employment land in Malmesbury, it follows that the LPR should also allow for additional housing provision at Malmesbury in order to support sustainable development.</p>	

Rep ID: 45	
Consultee code: Developer/Agent	Consultee Organisation (if applicable): Savills
Is this response on behalf of someone else/another organisation? Yes	
Organisation being represented (if applicable): Miller Homes	
Does this representation refer to attachment(s): N	If this representation refers to attachment(s), these are listed below:
Please provide your comments here	
<p>The Level 1 Strategic Flood Risk Assessment highlights the areas of the county that are subject to flood risk including Malmesbury, which has previously experienced flooding on a number of occasions, including most recently in 2012 (Appendix Q: Recorded flood history).</p> <p>It is noted that a number of the appendices are missing from the SFRA published for consultation including the maps showing Flood Zones 2 and 3 (Appendices B-D). However, the Flood Map for Planning (at Gov.uk) clearly illustrates the flood risk constraints around the south, south-east and north-west of Malmesbury in particular.</p> <p>The NPPF (paragraph 158) is clear that development should be directed to areas with the lowest risk of flooding. In this regard, land to the west of Milbourne, to the east of Malmesbury, is located in Flood Zone 1 and is therefore unconstrained and well-placed in this respect to accommodate development to support Malmesbury's needs.</p>	

Rep ID: 48	
Consultee code: General Public	Consultee Organisation (if applicable):
Is this response on behalf of someone else/another organisation? No	
Organisation being represented (if applicable):	
Does this representation refer to attachment(s): N	If this representation refers to attachment(s), these are listed below:
Please provide your comments here	
<p>There has been a major shift in thinking at a national level in recent years and this Transport Review fails to acknowledge this. The proposals in the Plan, particular in the north and west of Wiltshire, are still based on the presumption of car-based development along a highway corridor. The Climate Emergency is not even mentioned until p.36 of the Transport Review (in an Appendix), and “more explicit consideration of the carbon reduction agenda” is considered to be one the ‘next steps’ proposed in Section 4.4 of the document.</p> <p>This is completely the wrong approach to future planning with a ‘Net Zero’ target in mind. Sustainable Development needs to be the underlying premise for the Local Plan Review and not an afterthought. It is suggested that any future iteration of the Local Plan be informed by the recent report from the RTPi ‘Net Zero Transport: The role of spatial planning and place-based solutions’ https://www.rtpi.org.uk/netzerotransport</p> <p>The ‘Climate Change’ report submitted as part of the Local Plan Review makes the point that in Wiltshire transport is responsible for some 40% of all emissions, so it is absolutely fundamental to tackle this issue as a matter of urgency.</p> <p>Turning to some specific comments:</p>	

Introduction (section 1)

There have been changes in working and shopping habits resulting from the COVID-19 pandemic, some of which may endure. It would therefore be unwise to base future travel demand on 2018 traffic conditions.

Assessing the impacts of local plan growth (section 2)

There has been insufficient modelling and analysis to accurately assess the full impacts in respect of transport. For instance Site 1 in Chippenham is a proposed development which it is acknowledged would “be likely to generate one-way traffic flow that exceeds 1800 vehicles per hour” [LPR Sustainability Appraisal, Annex II, p.12]. While it is admitted that this will have a ‘moderate (significant) adverse effect’ this transport impact has not been taken into account in objective SA 5 (Minimise our impacts on climate change). There is no reference to the carbon generation from increased traffic, despite the evidence which shows that transport in Wiltshire is responsible for 40% of emissions. By disregarding the carbon generated by its transport impacts the site is then deemed to have only a ‘minor adverse effect’ in respect of SA 5. Mitigating impacts of Local Plan Growth (section 3)

Despite that statement (Appendix A, Table A-2) that active modes have the highest priority, with public transport medium and highways schemes the lowest, the strategy proposes spending £31.7 million on walking and cycling, £10.5 million on public transport and £347.6 million on highways schemes. This is ‘predict and provide’ – the discredited philosophy of the last century – on a grand scale.

It is a fallacy to assume that the conversion to ‘clean’ fuels for transport will enable legally binding decarbonisation targets to be met. Those bodies that have done detailed investigations into this area have found that mitigation will need to include significant changes in transport patterns and in assumptions about private car use. For instance:

House of Commons Science and Technology Committee “Clean Growth: Technologies for meeting the UK’s emissions reduction targets” [HC 1454] (August 2019)

“The Government’s current long-term targets for decarbonising transport focus heavily on reducing exhaust emissions and increasing sales of low-emissions vehicles, rather than delivering a low-emissions transport system. In the long-term, widespread personal vehicle ownership does not appear to be compatible with significant decarbonisation. The Government should not aim to achieve emissions reductions simply by replacing existing vehicles with lower-emission versions. Alongside the Government’s existing targets and policies, it must develop a strategy to stimulate a low-emissions transport system, with the metrics and targets to match. This should aim to reduce the number of vehicles required, for example by: promoting and improving public transport; reducing its cost relative to private transport; encouraging vehicle usership in place of ownership; and encouraging and supporting increased levels of walking and cycling. The Government should commit to ensuring that the annual increase in fuel duty should never be lower than the average increase in rail or bus fares.” (Paragraph 131)

Committee on Climate Change “Policies for the Sixth Carbon Budget and Net Zero” (December 2020)

In Box 2.2 (p.66 in the above document) there is a summary of the role of Local Authorities in local transport policies. Some of these are shown below: Wiltshire's Transport Review needs to consider these points and incorporate them into the mitigation measures which are being proposed.

“•Planning policy can steer spatial and local planning that favours housing and commercial developments in the right places to reduce traffic and support efficient logistics.

•Investment in walking and cycling networks and development of Local Plans and Transport Plans to deliver modal shift from cars to active and public transport. These can also identify locations for consolidation centres near road links and urban micro-consolidation centres.

•Introduction of low-emissions zones that set minimum standards for carbon and other emissions.

•Planning and support for installation of EV charging networks across their jurisdictions.

....

•They can use parking powers under Traffic Regulation Orders to repurpose parking spaces for car clubs, cycle parking and EV charge points and use parking charges to discourage private car use and promote public transport. Nottingham City Council is a renowned example, where its Workplace Parking Levy – levied on private car-parking spaces – promoted modal shift to sustainable modes and raised funds for link buses and tram extensions in the city.

•LAs can work jointly with bus operators to provide a bus network that is rapid, reliable and affordable (e.g. through a bus strategy and bus quality partnership)... “

When Wiltshire Council declared a Climate Emergency in February 2019 they resolved to implement best practice methods to limit Global Warming to less than 1.5°C. There is little evidence of best practice being considered in this Transport Review, and a far more radical approach will be needed to ensure that transport emissions in Wiltshire contribute to the ‘carbon neutral by 2030’ target adopted by the Council.

Walking and cycling measures (3.2) Reference should be made to the Local Cycling and Walking Infrastructure Plan (LCWIP) which (presumably) is being prepared to detail the exact plans for improving walking and cycling infrastructure. Improvements to walking and cycling will need to cover all the settlements in Wiltshire, and links between the settlements, not just links within the 3 principal settlements.

It is unclear which schemes are being included in the proposals: there needs to be a breakdown of what is proposed across the principal settlements for the £31.69 million total given in Table G.1.

There is new cycle infrastructure for the three principal settlements shown on Figures 3-1 through 3-3, including ‘on-carriageway cycle lanes’ and ‘segregated two-way cycle track’. There are some question in respect of these maps:

- Has the detailed design been done for these schemes?
- Is there space to construct these schemes to LTN 1/20 standards?
- Is the cost of all of these schemes included in the costs given in Appendix G?

In paragraph 3.2.1 there is reference to 'providing safe, well-signed routes to railway stations from across the three principle settlements of Chippenham, Trowbridge and Salisbury. As well as this consideration needs to be given to other routes to serve employment sites, schools, shops, town centres and other amenities.

Rail Strategy (3.3.2)

Access to existing stations is important, but the Transport Review should also give consideration to further rail improvements. This very limited section on the rail strategy needs to be considerably expanded.

Twenty years ago Wiltshire County Council's Local Transport Plan suggested 'Priority' new stations at Wootton Bassett, Corsham and Wilton as well as 'Possible' new stations at Lacock, Holt, Staverton, White Horse, Codford, Wylde, Dinton, Porton and Alderbury. (WCC LTP1, Fig 3.6.6).

The more recent SWLEP Rail Strategy Report's recommendations for new stations in Wiltshire included Corsham, Devizes Parkway, Porton & Wilton (the latter being subject to results of study on Porton). (see SWLEP Rail Strategy Main Report [July 2019] on <https://swlep.co.uk/about/our-strategies>)

As a minimum, the Local Transport Review needs to reflect the aspirations – which Wiltshire Council presumably supported - in the 2019 SWLEP Rail Strategy.

Bus Strategy (3.3.3/3.3.4)

This section should be expanded to include reference to Salisbury, in particular how routes can be extended/improved to serve the expanding settlement. It would be appropriate to refer to the role which Park & Ride sites, and associated bus services, might be able to contribute to modal shift.

The consideration of 'Dynamic Demand Responsive Transport' (DDRT) is welcome, this is one of the options which could be particularly suitable for some of Wiltshire's scattered rural communities. Across Wiltshire there are households which do not have access to a car, and public transport must be maintained and enhanced across Wiltshire.

Missing section: 'Mobility as a Service' (Maas).

'Maas', or Mobility as a Service refers to the integration of various forms of transport services into a single mobility service accessible on demand.

When responding to a questionnaire sent to local authorities who are members of the Western Gateway Sub-national Transport Body in 2020 Wiltshire Council's response to the question "How much are you thinking about Future Mobility e.g. Mobility as a Service (MaaS), connected vehicles, Active travel measures within your local area?" included the reply that "Wiltshire's priorities are currently set out to maximise economic growth in those large towns where it can be accommodated more sustainably and where MaaS, Active Travel and commercial frequent public transport can be supported." (see December 2020 Agenda and Supporting Papers at <https://westerngatewaystb.org.uk/about/board-meetings-and-minutes/>)

Given the statement that MaaS can be supported there should be to a section to cover the possibilities. This might include reference to existing Car Clubs across Wiltshire – such as Co-Cars in Salisbury – and consideration as to how these could be

expanded both in larger and in smaller settlements. Various models for shared mobility – including Car Clubs, Bike share and Mobility hubs - are covered at CoMoUK's website at <https://como.org.uk/>.

C2 Parking policy recommendations

This appendix reports that there was a recommendation from Atkins in 2018 that there should be a review of car parking processes, that a data bank should be built up and that this should help to inform the car parking strategy across Wiltshire. Furthermore “Once these next steps have been implemented and a good understanding of the parking situation within each principal settlement has been developed, a robust parking policy that aids in the reduction of car trips into the principal settlement and market town centres can be established. It is recommended that these parking policies are used to help manage traffic demand and to mitigate the impacts of growth in each town.”

It is important to undertake this step because not only is a reduction in car parking spaces, and a modal shift from the motor car, needed to cut carbon and congestion, but there is also the possibility that some town centre car parks could be developed as brownfield sites. For example in Salisbury this has been proposed (in the Salisbury Central Area framework) for car parks at Salt Lane, Brown Street and part of Central car park.

Therefore this review is needed as a fundamental pre-requisite to the Local Plan Review.

Missing section: Residential car parking strategy

The net zero transport report from RTPI referred to above gives some guidelines regarding how a modal shift from the private car can be achieved – for example (p.41) “Car ownership is discouraged through the design of the public realm and the ‘decoupling’ of private parking from new home sales. Active and public transport are increasingly the most convenient, affordable and desirable option for travel outside the neighbourhood, with shared car clubs and demand responsive transport providing for journeys where active and public transport are not an option.”

A radical shift is needed from Wiltshire Council's current ‘minimum’ parking standards, such as the following:

- A policy or SPD to reduce parking spaces allocated to residential development. It is suggested that a ‘Zonal’ approach be developed, see for example the SPD recently adopted (5/1/2021) in Bournemouth & Poole (available on the web at: <https://www.bournemouth.gov.uk/planningbuilding/PlanningPolicy/Planning-Guidance/BCP-Parking-Standards-Supplementary-Planning-Document.aspx>)
- Discouraging car ownership through the design of the public realm and the ‘decoupling’ of private parking from new homes sales. Parking spaces for private vehicles in new development could be made available on a leasehold basis, located at least 5 minutes walk from most dwellings.
- Parking for car share vehicles, and stops for public transport (which may be demand responsive) would be more conveniently located than parking for privately owned vehicles.

Rep ID: 49	
Consultee code: Developer/Agent	Consultee Organisation (if applicable): Carter Jonas
Is this response on behalf of someone else/another organisation? Yes	
Organisation being represented (if applicable): Paul Bowerman Discretionary Trust and PH Bowerman Esq	
Does this representation refer to attachment(s): N	If this representation refers to attachment(s), these are listed below:
Please provide your comments here	
<p>LOCAL PLAN REVIEW CONSULTATION – REPRESENTATIONS ON BEHALF OF LAND AT SWAN ROAD, PEWSEY</p> <p>We write on behalf of our client, Paul Bowerman Discretionary Trust and PH Bowerman Esq, in response to the Wiltshire Local Plan Review (LPR) 'Issues and Options' (Regulation 18) consultation.</p> <p>As demonstrated in this document, the site represents an opportunity to deliver a sustainable, distinct and well-connected development reflecting the logical direction of growth at Pewsey. As demonstrated in the attached vision document, the site is suitable to accommodate up to 400 homes set amongst extensive public open space with pedestrian and cycle routes connecting the development to Pewsey.</p> <p>The site has potential to deliver a number of social, economic and environmental benefits to the area through the delivery of new market and affordable housing of varying types and sizes; provision of open space in excess of planning policy requirements; and financial contributions towards infrastructure improvements through Wiltshire Council's CIL and S106 mechanisms. The site's opportunities and constraints, together with the overall concept, are explained in more detail in the attached vision document.</p>	

This representation comments on the Local Plan Review Consultation Documents, namely:-

- Emerging Spatial Strategy
- Empowering Rural Communities

Additionally, we provide comment on the following supporting documents:-

- Local Housing Needs Assessment - Swindon Borough Council and Wiltshire Council (Opinion Research Services April 2019)
- Local Plan Review Interim Sustainability Appraisal – January 2021
- Level 1 Strategic Flood Risk Assessment – JBA Consulting May 2019

The representation is structured in the following sections:

1. Land at Swan Road, Pewsey
2. Local Plan Review Consultation Documents
3. Supporting Evidence Documents

It is considered that the LHNA is out of date as it is calculated on the basis that the strategic policies of the Core Strategy are not out of date. It is acknowledged that the minimum Local Housing Needs figure for Wiltshire in 2019/2020 is 2,042 dwellings per year which yields an overall minimum housing need for Wiltshire of 40,840 dwellings over the Local Plan period 2016 – 2036. The report concludes however that the evidence suggests that an additional 6,300 dwellings would have to be provided to enable sufficient workers to live in the combined area going forward (Para 4.26).

Rep ID: 50	
Consultee code: Developer/Agent	Consultee Organisation (if applicable): Carter Jonas
Is this response on behalf of someone else/another organisation? Yes	
Organisation being represented (if applicable): Paul Bowerman Discretionary Trust and PH Bowerman Esq	
Does this representation refer to attachment(s): N	If this representation refers to attachment(s), these are listed below:
Please provide your comments here	
<p>LOCAL PLAN REVIEW CONSULTATION – REPRESENTATIONS ON BEHALF OF LAND AT SWAN ROAD, PEWSEY</p> <p>We write on behalf of our client, Paul Bowerman Discretionary Trust and PH Bowerman Esq, in response to the Wiltshire Local Plan Review (LPR) 'Issues and Options' (Regulation 18) consultation.</p> <p>As demonstrated in this document, the site represents an opportunity to deliver a sustainable, distinct and well-connected development reflecting the logical direction of growth at Pewsey. As demonstrated in the attached vision document, the site is suitable to accommodate up to 400 homes set amongst extensive public open space with pedestrian and cycle routes connecting the development to Pewsey.</p> <p>The site has potential to deliver a number of social, economic and environmental benefits to the area through the delivery of new market and affordable housing of varying types and sizes; provision of open space in excess of planning policy requirements; and financial contributions towards infrastructure improvements through Wiltshire Council's CIL and S106 mechanisms. The site's opportunities and constraints, together with the overall concept, are explained in more detail in the attached vision document.</p>	

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- Level 1 Strategic Flood Risk Assessment – JBA Consulting May 2019

The representation is structured in the following sections:

1. Land at Swan Road, Pewsey
2. Local Plan Review Consultation Documents
3. Supporting Evidence Documents

It is noted that the Interim Sustainability Appraisal (ISA) tests a range of local housing needs from 40,840 to 45,600 dwellings for the period 2016 to 2036. The Sustainability Appraisal assessment of the alternative development strategies for the HMAs concludes that there would be no adverse effects of such significance

that would prevent the higher figures (of each alternative strategy) from being progressed. Moreover, it concludes that a higher figure level would be more robust when planning for the longer term and has a greater level of contribution to meeting national and local needs for more homes. We are therefore supportive of the

LPR's approach in taking the higher level as a basis for developing the spatial strategy.

We support the conclusion of the ISA that lower levels of growth through strategies A and B are likely to have an adverse effect on rural parts of the HMA that will exacerbate affordability issues. We concur that rural areas can and should, accommodate a higher level of growth and propose that such growth could be accommodated on our client's land at Pewsey.

We consequently support the recommendation in paragraph 4.6.3 (1) that an additional / amended development strategy that reduces proposed development levels around the more environmentally constrained settlements and that growth should be increased in the less environmentally constrained settlements in the rest of the HMA.

Rep ID: 51	
Consultee code: Developer/Agent	Consultee Organisation (if applicable): Carter Jonas
Is this response on behalf of someone else/another organisation? Yes	
Organisation being represented (if applicable): Paul Bowerman Discretionary Trust and PH Bowerman Esq	
Does this representation refer to attachment(s): N	If this representation refers to attachment(s), these are listed below:
Please provide your comments here	
<p>LOCAL PLAN REVIEW CONSULTATION – REPRESENTATIONS ON BEHALF OF LAND AT SWAN ROAD, PEWSEY</p> <p>We write on behalf of our client, Paul Bowerman Discretionary Trust and PH Bowerman Esq, in response to the Wiltshire Local Plan Review (LPR) 'Issues and Options' (Regulation 18) consultation.</p> <p>As demonstrated in this document, the site represents an opportunity to deliver a sustainable, distinct and well-connected development reflecting the logical direction of growth at Pewsey. As demonstrated in the attached vision document, the site is suitable to accommodate up to 400 homes set amongst extensive public open space with pedestrian and cycle routes connecting the development to Pewsey.</p> <p>The site has potential to deliver a number of social, economic and environmental benefits to the area through the delivery of new market and affordable housing of varying types and sizes; provision of open space in excess of planning policy requirements; and financial contributions towards infrastructure improvements through Wiltshire Council's CIL and S106 mechanisms. The site's opportunities and constraints, together with the overall concept, are explained in more detail in the attached vision document.</p>	

This representation comments on the Local Plan Review Consultation Documents, namely:-

- Emerging Spatial Strategy
- Empowering Rural Communities

Additionally, we provide comment on the following supporting documents:-

- Local Housing Needs Assessment - Swindon Borough Council and Wiltshire Council (Opinion Research Services April 2019)
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- Level 1 Strategic Flood Risk Assessment – JBA Consulting May 2019

The representation is structured in the following sections:

1. Land at Swan Road, Pewsey
2. Local Plan Review Consultation Documents
3. Supporting Evidence Documents

Whilst it is acknowledged that Pewsey generally is subject to high flood risk, the development proposal has been designed to mitigate against flood risk and the portion of the site identified in Flood Zones 2 and 3 are not proposed for development. Further technical studies will be undertaken in this regard as promotion of the site progresses.

Indeed, development proposals will be informed by the Council's themes contained within the "Addressing Climate Change and Biodiversity Net Gain" paper by limiting development to Flood Zone 1; incorporating SUDs drainage solutions and natural flood management measures; enhancing and creating new green and blue infrastructure; providing a minimum of 10% biodiversity net gain to be managed in perpetuity; development will be designed to achieve a net zero carbon standard and will seek to minimise embodied carbon and environmental impacts; electric vehicle charge points will be provided; and the site will be designed to encourage sustainable and active travel modes.

Rep ID: 52	
Consultee code: Developer/Agent	Consultee Organisation (if applicable): Carter Jonas
Is this response on behalf of someone else/another organisation? Yes	
Organisation being represented (if applicable): Leafield Logistics Limited (LLL)	
Does this representation refer to attachment(s): N	If this representation refers to attachment(s), these are listed below:
Please provide your comments here	
<p>LOCAL PLAN REVIEW CONSULTATION – REPRESENTATIONS ON BEHALF OF LEA PARK, MONKS LANE, CORSHAM, WILTSHIRE, SN13 9PH</p> <p>We write on behalf of our client, Leafield Logistics Limited (LLL), in response to the Wiltshire Local Plan Review (LPR) ‘Issues and Options’ (Regulation 18) consultation. Leafield Logistics Limited is the owner of Lea Park, a site which provides an opportunity for a sustainable, brownfield residential development to the south of Corsham.</p> <p>As demonstrated in the attached masterplan, the site is suitable to accommodate up to 1.66 hectares of development land which could incorporate both residential and commercial development.</p> <p>The site has the potential to deliver a number of social, economic and environmental benefits to the area through the delivery of new market and affordable housing of varying types and sizes; provision of green infrastructure to benefit the existing and proposed landscape; provision of employment land as well as financial contributions towards infrastructure improvements through Wiltshire Council’s CIL and S106 mechanisms. The site’s opportunities and constraints, together with the site vision, are explained in more detail in the attached vision document.</p>	

This representation comments on the Issues and Options Consultation Documents (IOCD); namely:-

- Emerging Spatial Strategy
- Empowering Rural Communities

Additionally, we provide comment on the following supporting documents:-

- Local Housing Needs Assessment - Swindon Borough Council and Wiltshire Council (Opinion Research Services April 2019)
- Local Plan Review Interim Sustainability Appraisal – January 2021
- Chippenham HMA: Formulating Alternative Development Strategies

The representation is structured in the following sections:

1. Lea Park, Corsham
2. Issues and Options Consultation Documents
3. Supporting Evidence

It is considered that the LHNA is out of date as it is calculated on the basis that the strategic policies of the Core Strategy are not out of date. It is acknowledged that the minimum Local Housing Needs figure for Wiltshire in 2019/2020 is 2,042 dwellings per year which yields an overall minimum housing need for Wiltshire of 40,840 dwellings over the Local Plan period 2016 – 2036.

The report concludes however that the evidence suggests that an additional 6,300 dwellings would have to be provided to enable sufficient workers to live in the combined area going forward (Para 4.26).

Summary and Conclusion

These representations and the attached Vision Document demonstrate the potential that Lea Park has to offer housing and employment opportunities within the Corsham area. The development proposals respond positively to the site's surroundings by creating green infrastructure which connects to the existing public right of way network whilst redeveloping a brownfield site to promote an efficient use of land.

We trust that the information provided assists the Council with its ongoing work as part of the LPR process. However, please do not hesitate to contact me should you have any queries. We look forward to further and continued dialogue with the Council regarding development options at Lea Park would welcome the opportunity to meet with the Council to discuss our proposals in more detail. We look forward to arranging this meeting in due course.

Rep ID: 53	
Consultee code: Developer/Agent	Consultee Organisation (if applicable): Carter Jonas
Is this response on behalf of someone else/another organisation? Yes	
Organisation being represented (if applicable): Leafield Logistics Limited (LLL)	
Does this representation refer to attachment(s): N	If this representation refers to attachment(s), these are listed below:
Please provide your comments here	
<p>LOCAL PLAN REVIEW CONSULTATION – REPRESENTATIONS ON BEHALF OF LEA PARK, MONKS LANE, CORSHAM, WILTSHIRE, SN13 9PH</p> <p>We write on behalf of our client, Leafield Logistics Limited (LLL), in response to the Wiltshire Local Plan Review (LPR) ‘Issues and Options’ (Regulation 18) consultation. Leafield Logistics Limited is the owner of Lea Park, a site which provides an opportunity for a sustainable, brownfield residential development to the south of Corsham.</p> <p>As demonstrated in the attached masterplan, the site is suitable to accommodate up to 1.66 hectares of development land which could incorporate both residential and commercial development.</p> <p>The site has the potential to deliver a number of social, economic and environmental benefits to the area through the delivery of new market and affordable housing of varying types and sizes; provision of green infrastructure to benefit the existing and proposed landscape; provision of employment land as well as financial contributions towards infrastructure improvements through Wiltshire Council’s CIL and S106 mechanisms. The site’s opportunities and constraints, together with the site vision, are explained in more detail in the attached vision document.</p>	

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- Emerging Spatial Strategy
- Empowering Rural Communities

Additionally, we provide comment on the following supporting documents:-

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- Local Plan Review Interim Sustainability Appraisal – January 2021
- Chippenham HMA: Formulating Alternative Development Strategies

The representation is structured in the following sections:

1. Lea Park, Corsham
2. Issues and Options Consultation Documents
3. Supporting Evidence

It is noted that the Interim Sustainability Appraisal (ISA) tests a range of local housing needs from 40,840 to 45,600 dwellings for the period 2016 to 2036. The Sustainability Appraisal assessment of the alternative development strategies for the HMAs concludes that there would be no adverse effects of such significance

that would prevent the higher figures (of each alternative strategy) from being progressed. Moreover, it concludes that a higher figure level would be more robust when planning for the longer term and has a greater level of contribution to meeting national and local needs for more homes. We are therefore supportive of the LPR's approach in taking the higher level as a basis for developing the spatial strategy.

We support the view that Lea Park is considered less environmentally constrained than other brownfield locations. We consequently support the recommendation in paragraph 4.6.3 (1) that an additional / amended development strategy that reduces proposed development levels around the more environmentally constrained settlements and that growth should be increased in the less environmentally constrained settlements. However, we also emphasise the importance of focusing development at brownfield sites.

Summary and Conclusion

These representations and the attached Vision Document demonstrate the potential that Lea Park has to offer housing and employment opportunities within the Corsham area. The development proposals respond positively to the site's surroundings by creating green infrastructure which connects to the existing public right of way network whilst redeveloping a brownfield site to promote an efficient use of land.

We trust that the information provided assists the Council with its ongoing work as part of the LPR process. However, please do not hesitate to contact me should you have any queries. We look forward to further and continued dialogue with the Council regarding development options at Lea Park would welcome the opportunity to meet with the Council to discuss our proposals in more detail. We look forward to arranging this meeting in due course.

Rep ID: 54	
Consultee code: Developer/Agent	Consultee Organisation (if applicable): Carter Jonas
Is this response on behalf of someone else/another organisation? Yes	
Organisation being represented (if applicable): Leafield Logistics Limited (LLL)	
Does this representation refer to attachment(s): N	If this representation refers to attachment(s), these are listed below:
Please provide your comments here	
<p>LOCAL PLAN REVIEW CONSULTATION – REPRESENTATIONS ON BEHALF OF LEA PARK, MONKS LANE, CORSHAM, WILTSHIRE, SN13 9PH</p> <p>We write on behalf of our client, Leafield Logistics Limited (LLL), in response to the Wiltshire Local Plan Review (LPR) ‘Issues and Options’ (Regulation 18) consultation. Leafield Logistics Limited is the owner of Lea Park, a site which provides an opportunity for a sustainable, brownfield residential development to the south of Corsham.</p> <p>As demonstrated in the attached masterplan, the site is suitable to accommodate up to 1.66 hectares of development land which could incorporate both residential and commercial development.</p> <p>The site has the potential to deliver a number of social, economic and environmental benefits to the area through the delivery of new market and affordable housing of varying types and sizes; provision of green infrastructure to benefit the existing and proposed landscape; provision of employment land as well as financial contributions towards infrastructure improvements through Wiltshire Council’s CIL and S106 mechanisms. The site’s opportunities and constraints, together with the site vision, are explained in more detail in the attached vision document.</p>	

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- Emerging Spatial Strategy
- Empowering Rural Communities

Additionally, we provide comment on the following supporting documents:-

- Local Housing Needs Assessment - Swindon Borough Council and Wiltshire Council (Opinion Research Services April 2019)
- Local Plan Review Interim Sustainability Appraisal – January 2021
- Chippenham HMA: Formulating Alternative Development Strategies

The representation is structured in the following sections:

1. Lea Park, Corsham
2. Issues and Options Consultation Documents
3. Supporting Evidence

The challenges associated with increasing the housing delivery within the Chippenham HMA are noted (Para 78) as a substantial proportion of the land necessary to achieve higher rates of development has yet to be identified. Lea Park could help meet that identified need for both residential and employment development.

Summary and Conclusion

These representations and the attached Vision Document demonstrate the potential that Lea Park has to offer housing and employment opportunities within the Corsham area. The development proposals respond positively to the site's surroundings by creating green infrastructure which connects to the existing public right of way network whilst redeveloping a brownfield site to promote an efficient use of land.

We trust that the information provided assists the Council with its ongoing work as part of the LPR process. However, please do not hesitate to contact me should you have any queries. We look forward to further and continued dialogue with the Council regarding development options at Lea Park would welcome the opportunity to meet with the Council to discuss our proposals in more detail. We look forward to arranging this meeting in due course.

Rep ID: 55	
Consultee code: Developer/Agent	Consultee Organisation (if applicable): Savills (UK) Ltd
Is this response on behalf of someone else/another organisation? Yes	
Organisation being represented (if applicable): St. Modwen Developments & Messrs Sealy	
Does this representation refer to attachment(s): N	If this representation refers to attachment(s), these are listed below:
Please provide your comments here	
<p>1.1 These representations have been prepared by Savills on behalf of St. Modwen Developments Ltd (SMD) & Messrs Sealy in response to a consultation on the Wiltshire Council (WC) Local Plan Review (LPR) 2016 – 2036: Emerging Strategy.</p> <p>1.2 SMD & Messrs Sealy have a land interest in an area of land located south-east of Junction 17 (Chippenham) of the M4 Motorway. It is split across the following two parcels of land: - Site A - known as St Modwen Park Chippenham; and - Site B – known as Land to the north of St. Modwen Park Chippenham.</p> <p>1.3 This land is labelled on the accompanying Site Location Plan attached at Appendix 1. Both sites falls within the jurisdiction of Wiltshire Council.</p> <p>1.4 Outline consent was granted at Site A in August 2017 (LPA ref: 17/03417/OUT) for up to 1,000,000 sq. ft. Class B8 (storage and distribution) employment space and associated infrastructure. The consent was principally assessed against Core Policy 34 and was determined to be ‘essential to the wider strategic interest of the economic development of Wiltshire’.</p>	

1.5 Site B represents a further development opportunity as a future expansion of St Modwen Park Chippenham, which is already served by an enhanced vehicular access delivered as part of the permission for Site A. It is contained on all sides by either significant highway infrastructure or existing/consented employment uses.

1.6 Following a review of the LPR and its evidence base, it is considered that the economic evidence underpinning the plan is both out of date and fails to fully assess and respond to the economic potential of Wiltshire to help meet regional and national employment needs. Given the district's advantageous location in the south of England, with the M4 corridor traversing the north of the County, the absence of a broader assessment of market demand for industrial and logistics (I&L) uses represents a deficiency in the evidence base and a missed opportunity for the Council.

1.7 Our comments on the consultation and supporting evidence base are set out below and are made in accordance with paragraph 35 of the NPPF, to assist in ensuring that the LPR is found sound when examined in the future. We note that there is an ongoing consultation in regard to the changes to the NPPF, and that it is likely, given the published timelines for the LPR, that these will be made prior to the LPR reaching a sufficiently advanced stage, and thus it will be this revised Framework upon which the LPR will be examined.

1.8 These representations focus on the questions/ 'thought provokers' set out in the LPR and are structured as follows:

- Section 2: Planning Policy Context: Plan-Making;
- Section 3: National Context;
- Section 4: Response to Emerging Spatial Strategy;
- Section 5: Employment Land – Proposed levels of growth for Wiltshire;
- Section 6: Potential locations for development;
- Section 7: Policy for Site A;
- Section 8: Site B Submission;
- Section 9: How to secure the opportunity at Site B in the plan;
- Section 10: Conclusion.

5 Levels of Employment Growth for Wiltshire Out of Date Evidence Base

6.1 As part of the LPR evidence base, Wiltshire Council undertook an Employment Land Review (ELR) to assess future demand and supply of B use class employment land in Wiltshire. The ELR was published back in April 2018, almost three years ago, and on adoption in Q2 2023, the evidence base would be over five years old. The proposed employment land requirements which the LPR is based upon would not have captured the historic growth witnessed in the I&L sector, the recent boom from Covid-19 or the forecasted unprecedented growth in response to technological innovation, permanent changes to consumer behaviour and stock piling outlined in Section 3.

6.1 Furthermore, the ELR recognises data gathering on the demand for and especially the supply of employment land should be an ongoing process. The report itself acknowledges it 'only provides a snapshot of supply at the moment'. As a result, it

recommends Wiltshire Council regularly reviews the document, updating the supply assessment on an annual basis and updating the demand assessment at least once every five years (emphasis added). Despite these recommendations, there is no mention in the ESS that any further updates to the ELR have taken place, and the document still refers to the defunct Swindon and Wiltshire Spatial Framework Plan dated 2016/17.

6.1 The evidence base is therefore already considered out-of-date and not consistent with national policy, failing to meet paragraph 31 of the NPPF. The ELR does not form an up-to-date evidence base upon which to consider the soundness of the emerging employment land demand figures. It is therefore recommended that the ELR should be reviewed before the LPR progresses to the next stage. Employment Land Requirements

6.1 The ELR acknowledges that overall there is a shortage of readily developable employment sites in areas of strong demand, which is a constraining factor on economic development. Furthermore, it identifies an immediate need for new allocations in the Wiltshire part of the M4/Swindon FEMA, with a forecast undersupply of around 4ha of employment land and 8ha over the full local plan period.

6.1 Notwithstanding identifying a shortfall in development sites, the LPR disregards the ELR conclusions, concluding it is not necessary to allocate further employment sites to meet the forecast demand in Wiltshire. The ESS considers the Core Strategy identified and allocated a significant supply of land for employment need, with supply far exceeding forecast need. Looking forward, the Council considers the evidence base of forecast rates of take up and demand shows the industry and office uses generally continue to meet anticipated needs. However, as outlined above, this assessment has been based on an out-of-date evidence base, which has not taken into account the significant growth in I&L sector since 2019, after the ELR was published.

6.1 This approach is not considered to be in the principle of sustainable development, as it is not sufficiently flexible to adapt to change, and is therefore considered contrary to paragraph 11 of the NPPF.

Housing-led

6.1 The Council's employment requirements are reliant on needs arising from housing numbers and there is a discrepancy between how the housing need and employment need is calculated. The ESS acknowledges Chippenham is set to have by far the largest additional housing need over the plan period. However, whilst the housing need projects forward to take into account future growth, the employment need is focused on historic supply (based on a historic evidence base) and doesn't acknowledge employment need increasing independently (from events such as Covid-19, rise of e-commerce, Brexit etc.). The ESS acknowledges there may be a need to revise the housing numbers in line with government's revised methodology, yet fails to recognise the employment demand may be tweaked too.

6.1 If the ESS does not intend to secure formal allocations to accommodate future growth, a policy should be formed which is sufficiently evolved to provide the market with confidence to pursue applications where demand for logistics uses exist. This is explored further in Section 9. Savills Research

6.1 Savills Economics have calculated that Swindon and Wiltshire require significant additional allocated industrial land to meet the anticipated spaced demands for future job growth. Using Oxford Economics employment forecasts for Swindon and Wiltshire to 2030, it has been calculated that there will be an additional 2,988 employees working in B Class industries across Swindon and Wiltshire. This equates to an additional 1.99 million sq ft of warehouse space will be required by 2030.

6 Potential locations for development

6.1 At a national level, planning policy identifies that the logistics sector has distinct locational requirements⁵, and planning policies should recognise and address the specific location requirements of different sectors, including storage and distribution operations of varying scales and in suitably accessible locations (paragraph 82 of NPPF). However, this focus hasn't been carried through at a local level in the emerging LPR.

6.2 The LPR rightly adopts a settlement hierarchy which focuses housing development at the largest settlements. This is appropriate for that sector, in line with the principles of sustainable development, however some elements of the employment sector have requirements that mean they should not be constrained to particular settlements or market areas. This approach neglects wider opportunities, particularly regional/nationally significant employment opportunities which are not appropriate to site directly adjacent to those settlements because of their scale and the impact they would have on the local road network.

6.3 The sustainability appraisal considered requirements for an additional 9ha of employment land in Chippenham HMA. As shown in Appendix 2, when considering future employment development sites, this was limited to those surrounding the existing Chippenham settlement. This approach for reviewing and identifying sites is not in accordance with paragraph 81 of the NPPF as the approach and quota for development is not flexible enough to accommodate further growth outside of this HMA or recognising and addressing specific locational requirements as per paragraph 82 of the NPPF.

6.4 The ELR identifies a severe shortage of supply of big sheds along the western M4, and acknowledges a market opportunity for Wiltshire, with "the central position of which would give any big shed development, for example on sites with good motorway access at M4 Junction 17, an advantage with its access to both London, the West and Wales." Whilst the ELR acknowledged the locational requirement and opportunity, the Council has failed to acknowledge it by considering and accommodating those demands arising outside of the needs of HMAs. M4 Corridor

6.5 Through the PPG the government recognises that the logistics industry is "critical" in enabling an efficient and sustainable supply of goods which serves national or regional markets. The LPR fails to look at regional or national market demand for B8 logistics and distribution uses, or demand further along the M4 corridor.

6.6 Savills' evidence of the logistics market highlights a particular lack of supply along the M4 corridor which is preventing larger regional/national/international businesses setting up new centres for distribution⁶ as part of the growth and re-shaping of the logistics industry within the UK.

6.7 Nationwide take-up trends for logistics floorspace have been mirrored along the M4 corridor. Savills' research has found that the supply of warehousing space is particularly limited along the M4 corridor. The market 'rule of thumb' is that a market is under

supplied which it has less than two years of supply in the market. Savills' research evidence suggests that prior to the Covid-19 pandemic, the warehousing market along the 'M4 corridor' was already chronically undersupplied with just 0.56 years of supply in 2019⁷. In addition, research from January 2021 shows there is just 1.24 years' worth of supply in the wider south west market⁸, demonstrating a further undersupply.

6.8 Furthermore, the share of all online retail sales is expected to normalise at around 24% in the UK, well-above the pre-Covid trend, and then will continue to grow. This demonstrates that the logistics and distribution sector is experiencing rapid growth, and the market along the M4 corridor is mirroring existing trends.

6.9 The LPR fails to acknowledge its unique location on M4 corridor which will attract various regional/national/international occupiers and provide significant employment opportunities. In order to respond to this increasing demand and maximise economic growth, the LPR needs to provide further policy support for the I&L sector, as set out in Section 9.

6.10 In the absence of an up-to-date assessment of regional or national market demand for logistics and distribution uses in the ELR, the Wiltshire LPR is not considered to be 'justified', 'positively prepared' as required by national planning policy.

10 Conclusion

10.1 Overall, St. Modwen Developments Ltd & Messrs Sealy currently have concerns regarding WC's evidence base underpinning the LPR and the resultant approach to economic need.

10.2 The government recognises that the logistics industry is "critical" in enabling an efficient and sustainable supply of goods which serves national or regional markets. This was recognised before Covid-19 hit, with demand for online shopping, next day delivery and increased stock piling from Brexit heightening demand further.

10.3 It is our clients' view that the economic evidence underpinning the LPR fails to sufficiently account for regional and national economic needs, notably in relation to the chronic shortfall of B8 logistics and distribution uses along the M4 corridor and the significant anticipated growth that needs to be accounted for. This is partly as a consequence of the evidence base being out of date with the plan, upon adoption, being seven years postbase date. The evidence base needs updating to fully identify the additional demand for employment land.

10.4 A combination of the approaches outlined in Section 9 is required for delivering strategic employment land for strategic logistics employment use.

10.5 Our clients control approximately 34.43ha of land to the south-east of J.17 of M4, which the Council has already identified as an appropriate location for strategic logistics development. Site A is an established logistics hub, secured against the tests within Core Policy 34. Site B is available for development. The merits of the site as an appropriate location for a strategic logistics hub are established within the outline consent for Site A, as well as within these representations, but key matters to weigh in the planning balance are set out below.

10.6 The site benefits from excellent highways connections, located on the only motorway junction making it highly convenient for logistics movements.

10.7 The site is generally flat, at low risk of flooding, with no environmental or landscape designations. It is surrounded by commercial built form which makes it suitable for further employment development. The site is considered suitable, available, achievable and developable.

10.8 The physical and locational advantages of this site, coupled with an identified and urgent need for new strategic logistics (B8) sites along the M4 corridor, along with the established St. Modwen Park Chippeham site, are considered to justify the allocation of the site for a new logistics hub within the emerging plan.

10.9 Our clients will engage with Wiltshire Council through the Local Plan process to develop a robust evidence base to demonstrate the allocation of Site B for a strategic logistics development to meet regional/national need and evolve Core Policy 34 as suggested in Section 7 and 9.

Rep ID: 56	
Consultee code: Other Advisory Body	Consultee Organisation (if applicable): Wiltshire Climate Alliance
Is this response on behalf of someone else/another organisation? No	
Organisation being represented (if applicable):	
Does this representation refer to attachment(s): N	If this representation refers to attachment(s), these are listed below:
Please provide your comments here	
<p>3. SUSTAINABILITY APPRAISAL</p> <p>The Interim Sustainability Appraisal (SA), which is used to justify housing numbers and site selection, is of particular concern, claiming that there are no adverse effects of sufficient significance to prevent the higher housing figures being progressed. It concedes that its “evaluation involves forming a judgement on whether the predicted effects are likely to be significant, and that “the principal technique used to assess the significance of effects is a qualitative assessment.” (ISA methodology paragraph 2.3.5)</p> <p>The SA ignores alternative HMA strategies, which had they been appraised would have undoubtedly been more sustainable. For Chippenham for example, no mention is made of the fact that preference for CH-B - the maximum housing numbers option – has never been consulted upon and was only approved for further work in the political context of a Cabinet meeting in 2019. Yet it is falsely presented as if it were an evidence based conclusion, excluding proper appraisal of more sustainable alternatives. The need for significant additional infrastructure and the likelihood of more significant adverse impacts resulting is mentioned in</p>	

passing before finding the 'maximum housing numbers' on a site with 'no existing infrastructure' option to be the most sustainable!

The SA seeks to further negate any objection to the proposed destruction of the Avon and Marden valley between Calne and Chippenham by describing both towns as "less environmentally constrained" but without any evidence to back up the proposition (and plenty of evidence to the contrary).

It goes on to contradict itself by acknowledging that "the proposed level of growth at Chippenham under all three strategies is significant and considered likely to have significant adverse effects on biodiversity, efficient and effective use of land, water resources, transport and environmental pollution, where mitigation measures are likely to be possible but problematic." And that "under CH-B (the maximum housing numbers option) where growth levels are significantly higher, there are also likely significant adverse effects on climate change adaptation, heritage assets and landscapes." In other words, that the proposal being promoted is even more damaging and problematic, yet still remains the 'preferred option', for reasons unrelated to sustainability and without evidence to support them, completing the circle in what is clearly a tautological argument (i.e. a logical fallacy in which a premise of the argument contains a direct or indirect assumption that the conclusion is true). The SA even takes this a step further in asserting that this "significant level of growth should be able to support new secondary level schooling provision" as though that were an additional benefit (there is no current shortage) rather than additional cost associated with the high housing target. Minor changes in these inconsistent and ultimately subjective judgements would completely change the outcome of the SA and therefore justification for the housing numbers and locations being proposed and 'preferred'.

There is also an insufficient level of granularity in the impact assessments such that it is impossible to understand the reasons the scores given. For example, for SA Objective 1 "Protect and enhance all biodiversity and geological features and avoid irreversible losses," the reduction of 800 houses in Devizes between CH-A and CH-B takes the assessment from "moderate adverse" to "minor adverse". However, adding 3,300 houses to the Chippenham settlement does make no difference at all to that assessment score of "moderate adverse". There are many examples of this throughout Annexe 1, for each of the SA objectives. Without the proper detail behind such scores, they can only be assumed to be completely subjective.

As a further example, massive Biodiversity (SA1), Land & Soil (SA2), Water (SA3), Air Quality (SA4), Climate (SA5), Heritage (SA7) and Landscape (SA8) issues are glossed over for Site 1 in Chippenham, summarised as having a minor or moderate adverse effect. The destruction of high quality productive farmland is summarily dismissed in a sentence: "Land/soil: given the significant size of this site, there will be a significant loss of greenfield, agricultural land of medium quality". No indication is given of the weight given to this loss, and it is not mentioned again, so clearly not much. Unsurprisingly there are lots of proposed mitigation measures for Chippenham sites 1 and 2 (the Avon and Marden valley) but none of them refer to the value or loss of productive farm land. Biodiversity fares little better and there isn't even a proper Biodiversity Assessment for the 'preferred sites' in Chippenham, which are 'judged' as having a 'Moderate Adverse' impact without any baseline evidence (reference comments later in this report on the likely impacts on biodiversity and endangered species for these sites).

Other failings include sweeping and unevidenced statements that are made for a huge settlement areas against a single SA Objective. For example, against SA1 Biodiversity for CH-B in Chippenham the analysis is “Additional to housing development, it is likely that significant additional infrastructure will be needed. As a result, moderate adverse impacts are considered likely against this objective. Adverse effects are likely to be more significant than CH-A and CH-C but mitigation measures are possible.” Having said that adverse effects are likely to be more significant than for alternative options, the fate of the Avon and Marden valley is sealed in five words “but mitigation measures are possible.” This seems to be more consistent with fitting the analysis to the desired results than any objective evaluation. Even the rounding process seems to favour the desired outcome, which also happens to be the two sites for which a HIF bid was covertly applied for in 2018, but which are the most environmentally valuable and infrastructure dependent of all the sites.

Guidance on Integrating Climate Change and Biodiversity into Strategic Environmental Assessment (SEA) states that “It is also essential to involve the environmental authorities and targeted stakeholder groups, experts, institutions and the wider public at an early stage, to ensure you capture the most important issues and get agreement for establishing a consistent approach.” Yet these is no evidence that this has been done in relation to the Local Plan Review, which has brought forward ‘preferred sites’ and a set of conclusions before any public consultation whatsoever.

The guidance points out that the key mitigation question should be “How may the climate be affected by implementing the Plan in terms of GHG emissions?” (page 33). Yet far from being a key question the SA/ SEA barely considers the carbon implications of the proposed spatial strategy, either making no mention of these or simply recording that the impact will be significant and ignoring the implications. Consideration of “travel patterns and GHG emissions from transport,” “opportunities for carbon sequestration via investment in forestry and biodiversity,” “habitat loss and degradation” (all listed in the guidance) seem to have been omitted or referred to as needing more information at later stages, by which time, of course, it will be too late, defeating the object purpose of SA/ SEA.

The lack of weight given to anything that would detract from the high housing numbers and preferred site options is illustrated by the SA’s coverage of the loss of productive farmland, a substantial amount of which is classified as the ‘best and most versatile’ in the country. For the Avon/ Marden valley site to the East of Chippenham it simply records that “given the significant size of this site, there will be a significant loss of greenfield, agricultural land of medium quality.” No indication is given of the weight given to this loss and it is not mentioned again, but clearly it is clearly not considered significant given the conclusions that follow in the Spatial Strategy. Even the multitude of proposed mitigation measures for the (mainly Wiltshire Council owned) Chippenham sites don’t address the loss of this high quality, productive farm land or value as a public good, or the value of its continued use as 11 farmland or alternatives uses for renewable energy generation (an urgent requirement with temporary land use) or partial reforestation.

Climate change is the over-riding and most significant challenge we are facing and we are in significant danger of exceeding a global average temperature rise of 1.5C, at which point the medium and longer term impacts on our economy and society will far

outweigh any potential benefits social and economic benefits associated with proposed housing expansion in Wiltshire. The Government and Wiltshire Council have both made commitments to net zero emissions, with a national target of 68% by 2030 (net zero by 2050) and a Wiltshire target of net zero by 2030. The carbon emissions associated with the Local Plan need to be carefully appraised in advance and given significant weight in determining the sustainability and of the housing numbers and their locations.

Despite this, the SA barely considers carbon reduction at all, conflating climate change mitigation and adaptation and judging significance on the developers' (?) potential to "promote the development of renewable and low carbon sources of energy" caveated with this being "for appraisal at subsequent, more detailed/ site-specific SA stages," by which time, it's probably too late to change much in any case (i.e. if there turns out not to be potential). The two other scoring criteria related to adaptation, which conflates separate issues and dilutes the (already inadequate) assessment of mitigation risk still further.

The SA gives no consideration to the climate impact of removing carbon sinks – high quality organic soils, trees and vegetation – either in terms of the release of greenhouse gases or the lost potential for future sequestration. Neither is consideration given to the embodied carbon or that involved in construction, particularly relevant in places like Chippenham where houses are proposed in the Avon and Marden valley, requiring distributor roads, bridges, 0.5km long river crossings, can bridges, sustainable urban drainage schemes and more, all of which could be avoided with lower numbers and locations that connect to existing infrastructure. Finally, the transport emissions that would be locked in as a result of building on greenfield sites, promoting dependency on car travel, particularly to places of employment, get no consideration. Had the combined emissions been taken into account and then given appropriate weight, a very different spatial strategy would have resulted.

In this respect we endorse the approach proposed by Client Earth to Wiltshire Council in its letter of 2nd September 2019, recommending setting a carbon reduction target for the Local Plan based on a comprehensive assessment of the carbon reduction potential, taking account of national and local carbon reduction targets, in order to demonstrate how the Local Plan is consistent in meeting the requirements of the Climate Change Act.

Rep ID: 57	
Consultee code: Other Advisory Body	Consultee Organisation (if applicable): Wiltshire Climate Alliance
Is this response on behalf of someone else/another organisation? No	
Organisation being represented (if applicable):	
Does this representation refer to attachment(s): N	If this representation refers to attachment(s), these are listed below:
Please provide your comments here	
<p>5. TRANSPORT REVIEW</p> <p>Introduction</p> <p>In passing, on 26 Feb 2019, Motion 13 Acknowledging a Climate Emergency and Proposing the Way Forward, the full Wiltshire Council noted, inter alia, “it is imperative that we as a species reduce our CO2eq (carbon equivalent) emissions from the current 6.5 tonnes per person per year to less than 2 tonnes by 2030... Thus, governments at all levels: national, regional and local, must change legislation, standards, infrastructure and their approach, to meet the need to reduce CO2eq emissions...”.</p> <p>Full Council believes that, “1. Wiltshire Council recognises it cannot and should not wait for national governments of any political party to act where it can take action itself. 2. It is important for the residents of Wiltshire that its Council commits to reducing CO2eq emissions and works towards carbon neutrality as quickly as possible.... 4. The consequences of global temperature rising above 1.5°C are so severe that preventing this from happening must be humanity’s number one priority. 5. Bold climate action by Wiltshire Council will demonstrate real leadership and can deliver economic benefits in the County in terms of new jobs, economic savings and market opportunities, as well as improved well-being locally and for people worldwide.”</p>	

Full Council called on the Cabinet to, inter alia:

“1. Acknowledge that there is a ‘Climate Emergency’.

2. Pledge to make the County of Wiltshire carbon neutral by 2030.

6. Continue to work with partners in the private sector and civil society across the County and region to deliver this new goal through all relevant strategies and plans”.

This obligation obviously applies to the Local Plan Review, as the framework for growth, spatial planning, land-use and housing before and after the 2030 carbon neutral target is reached. With the right spatial strategy, the target is still achievable; with the proposed one, it is not.

The pressure on Wiltshire to go carbon neutral, from UK’s international treaty obligations, central government and its own concerned citizens, can only be expected to increase year on year. There may well be pressure, too from citizens and businesses whose own perceived short-term private interests conflict with this commitment. And it is well-known that delays to initiatives will bring the need for abrupt and urgent action. Wiltshire Council needs to act early, and lead with clear commitment, communication and public education.

Highways, Transport and Waste

These are policy areas vital to meeting the target. Transport emissions are some 40% of Wiltshire’s total (all the Council’s own emissions, some 1%). Unlike Housing, where specific growth targets are being imposed by central government. As the Highway Authority, and a Local Transport Authority, Wiltshire Council has extensive powers over network management, parking, Traffic Orders, and transport infrastructure policy and investment, including the ability to draw down large-scale capital funding from central government including DfT and MHCLG.

At least one Wiltshire Council senior officer is in the Association of Directors of Environment, Economy, Transport and Planning (ADEPT). The January 2021 ADEPT report, ‘A blueprint for accelerating climate action and a green recovery at the local level’, supported also by the Local Government Association of which Wiltshire Council is a member, refers to such priorities as “1. Invest in low-carbon and climate-resilient infrastructure” and “4. Make it easy for people to walk, cycle or use public transport and to work remotely / flexibly”. 31

The ‘Addressing Climate Change and Biodiversity Net Gain’ report released as part of the Local Plan Review makes the point that in Wiltshire transport is responsible for some 40% of all emissions, so it is absolutely fundamental to tackle this issue as a matter of urgency. Yet the proposals in the Plan, particular in the north and west of Wiltshire, are based on the presumption of car-based development along a highway corridor, in stark contrast to the shift in thinking at a national level. The Climate Emergency is not even mentioned until p.36 of the Wiltshire Local Plan Transport Review (‘WLPTR’), in an Appendix, and “more explicit consideration of the carbon reduction agenda” is considered to be one the ‘next steps’ proposed in Section 4.4 of the document. This is completely the wrong approach to future planning with a net zero target in mind. Environmentally sustainable development should be the underlying premise for the Local Plan Review and not an afterthought.

We would suggest that a revised version of the Local Plan be informed by the report from the RTPI 'Net Zero Transport: The role of spatial planning and place-based solutions'

Lack of a new Local Transport Plan – LTP4

In a response to a Cabinet 19 May 2020 Question from Colin Gale (Pewsey Community Area Partnership), the response of the Cabinet Member for Highways, Transport and Waste stated, "The Council is currently developing its 4th Local Transport Plan – LTP4 - (largely shadowing the Local Plan Review). LTP4 will comprise a core strategy document supported by a number of daughter documents including a Freight Management Strategy." and added, "Timetables for the Review of the Local Plan and the Local Transport Plan are both affected by the current pandemic due to the difficulties associated with consultation. The working assumption for the Local Transport Plan (and associated Freight Strategy) is that there will be drafts to share in Autumn 2021." Wiltshire's first full LTP (LTP1), published in July 2000, covered the period 2001/02-2005/06. The second Wiltshire LTP (LTP2) covered the period 2006/07 – 2010/11. The current LTP covering 2011 to 2026 was published in March 2011- ten years ago, and two-thirds of the way back in its scope.

Although it paid lip-service to climate change LTP3 was developed long before the 2030 carbon neutral Wiltshire target. It did not quantify modal shift from private car to active travel and public transport. Its plans for these modes have been severely under-implemented compared with road building on the A350. Little has changed in terms of modal share. LTP3 is now unfit for purpose in the context of the climate and biodiversity emergencies.

The contents of LTP3 are entirely incompatible with "Addressing Climate Change and Biodiversity Net Gain" in many details and the main thrust. As an emerging plan, the Local Plan needs to take precedence over the ageing LTP3. This makes current plans and spending under LTP3, such as the proposed A350 Melksham bypass, highly problematic.

Transport and the location of housing and commercial development are intimately linked. It is regrettable that the public phase of an LTP4 process has not started, as the previous iterations took at least two years to from initial consultation to completion. Consultees are having to piece together the transport implications of the Local Plan Review proposals piecemeal, from the Spatial Strategy, Community Area and Supporting Documents.

➤ Strategic Planning should liaise with Transport to speed up the initial LTP4 process, especially if widespread rejection of the Local Plan Review proposals leads to a redrafting, but in any case. 32

➤ Local Plan policies relating to transport should reflect the need for reducing the need/demand for travel, urgent modal shift to active travel, public transport, demand management for road capacity, and the corresponding choices of location for development.

Other transport-related plans that are missing or out-of-date:

Wiltshire Rail Strategy

In response to a Council 26 February 2019 question From Councillor Ian Thorn, Calne Central Division, the Cabinet Member for Highways, Transport and Waste stated, "With funding from Swindon and Wiltshire Local Enterprise Partnership, we are currently

developing a 'Swindon and Wiltshire Rail Strategy' which is planned to be completed by Spring this year. It is anticipated that, following review and further consultation, this will form part of a Wiltshire LTP4 to be developed over the next two years or so." Two years later there is no public evidence of review and this WCA representative knows of no consultation, though the SWLEP report was published in Summer 2019.

➤ At a minimum, the recommendations of the SWLEP Rail Strategy by the consultants Systra, and in view of the climate emergency the "best of the rest" with medium policy scores and deliverabilities should be incorporated into the Local Plan Review on the default assumption that they will be adopted by Wiltshire Council and incorporated into LTP4 in due course. The implications for the spatial strategy should be worked in.

Integrated Transport

The same response continued, "At the local level, Core Policy 63 in the Wiltshire Core Strategy includes that: Packages of integrated transport measures will be identified in Chippenham, Trowbridge and Salisbury to help facilitate sustainable development growth...Transport strategies may also be developed for other urban and rural areas in the Plan area."

➤ An equivalent policy should be in revised Local Plan Review proposals, but with the elements of the packages clearly identified, not left for the future, since this identification was a task for the earlier Core Strategy. Transport strategies for the market towns and rural areas should be identified, with their main features outlined in enough detail to see their implications for development, evaluate them, and allow the community to support the authority in developing and implementing them within the very first years of the Plan.

Walking and Cycling Strategies

LTP4 is to include a review of Cycling & Walking Strategy, with a timetable still not yet clear.

The current "Wiltshire Local Transport Plan 2011-2026 Cycling Strategy" was first scheduled to be consulted on and published in 2011/2012. It came out in March 2014. A review of the strategy, and its fifteen Town Cycle Network Plan, shows that only a minority of its policies and measures have been implemented. It does not, of course, reflect the latest government policies and guidance such as Gear Change and LTN 1/20. It does not reflect the contribution of cycling to modal shift to active travel as part of climate emergency-responsive planning and transport strategies. An updated Cycling Strategy will need to be more ambitious.

33

A Walking Strategy was to have been produced in 2014 in parallel with the Cycling Strategy. At the time of writing, this WCA representative has been unable to find any such document or verify whether one was published.

➤ The Local Plan and LTP4 should both include walking and cycling strategies as supporting documents. Preparation of drafts and consultation on them should start urgently. The location of development and designs for new settlements should follow best practice in promoting active travel and managing the demand for motoring and the supply of road capacity and parking space. Walking and Cycling Strategies should be integrated with the Rights of Way Improvement Plan/Countryside Access Plan and the soon-to-emerge Green and Blue Infrastructure Strategy. See below.

Wiltshire Countryside Access Improvement Plan (CAIP)

The 2015-2025 CAIP ('Rights of Way Improvement Plan 2') was described in the Wiltshire and Swindon's Countryside Access Forum's July 2019 review, "Maintaining the Rights of Way Network in Wiltshire: the Need for a Post Austerity Recovery Plan (PARP)" (Caf-rowpaper-final-5-july-2019-pdf) as being in need of a refresh, and "It is recommended that these recommendations are included in the amendment of the CAIP due in 2020." The review gives a detailed account of under-investment, under-funding and under-staffing.

Instead of post-austerity mode, we are now in a post-pandemic recovery plan mode. We are also in a climate emergency planning mode. Countryside access takes on a new importance and, while much of the Public Right of Way network may stay mainly for leisure, health and wellbeing uses, these are vital in themselves. Some rights-of-way may become important links in active travel and "blue and green infrastructure" networks, and require investment.

➤ Strategic Planning should liaise with Wiltshire's Rights of Way and Countryside Service to procure the overdue refresh of the CAIP, and incorporate this into the new Local Plan with appropriate policies, so that development contributes to enhancing this vital built and natural capital asset.

Green and Blue Infrastructure Strategy

References to the "emerging" Green and Blue Infrastructure Strategy ('GBIS') appear to be incorrect, since the term 'emerging' applies to strategies etc. published in draft form. There are piecemeal references and excerpts distributed through the Local Plan Review documents, in particular illustrative maps in the area plans. Green infrastructure has been described as a multifunctional network, with bodies of water adding the 'blue' element.

This is welcomed as a positive and necessary element of a carbon-neutral-2030 Local Plan. It is unclear, though, which corridors and tracts in the network will accommodate active travel (walking and cycling) links – and it is vital that they do, given the new urgency of modal shift.

➤ The GBIS should be published for consultation, and form an integral part of the Local Plan Review proposals. The place of active travel should be central to the GBIS, with demanding targets for its support for these. Corridors should be added to the GBIS along all Wiltshire's active, disused and planned canals, and its live and disused railway lines. It should show how GBIS network links in the town-based plans connect into and through the surrounding rural areas.

Comments on the Wiltshire Local Plan Transport Review

The Atkins document "Wiltshire Local Plan, Transport Review January 2021" ('WLPTR') is regrettably not an LTP, but just an item of transport planning support using Wiltshire's strategic transport model. However, it uses standardised national assumptions on trip 34 generation and traffic growth. It acknowledges the uncertainty introduced by the COVID-19 pandemic, lockdowns and changes, but not the possibility of proactive "build back better" policies influencing travel habits and the mix of modes. It ignores the very likely onset of proactive transport policy changes resulting from Wiltshire's 'Climate Emergency' target.

➤ Introduction (section 1)

There have been changes in working and shopping habits resulting from the COVID-19 pandemic, some of which may endure. It would therefore be unwise to base future travel demand on 2018 traffic conditions.

➤ Assessing the impacts of local plan growth (section 2)

There has been insufficient modelling and analysis to accurately assess the full impacts in respect of transport. For instance, Site 1 in Chippenham is a proposed development which it is acknowledged would “be likely to generate one-way traffic flow that exceeds 1,800 vehicles per hour” [LPR Sustainability Appraisal, Annex II, p.12]. While it is admitted that this will have a ‘moderate (significant) adverse effect’ this transport impact has not been taken into account in objective SA 5 (Minimise our impacts on climate change). There is no reference to the carbon generation from increased traffic, despite the evidence which shows that transport in Wiltshire is responsible for 40% of emissions. By disregarding the carbon generated by its transport impacts the site is then deemed to have only a ‘minor adverse effect’ in respect of SA 5.

➤ Highway improvements

As a result of the large inherent uncertainties in the emerging post-pandemic situation and the current Wiltshire climate emergency, the assessments in the WLPTR have a high level of spurious accuracy. It is regrettable that there is no sensitivity analysis to test variations to the assumptions.

The mapped indications of near-capacity and over-capacity road links have a value as indicators of locations where modal shift via active travel and public transport may need to be priorities.

Estimates are available from nearby and comparable public authorities that have made similar commitments to become carbon neutral by 2030. Even those that have committed to a 2050 date have provided 2030 or 2035 interim targets for transport emissions and details of the measures needed to achieve these.

Bath and North East Somerset excluding Bath has a population density of 324 per sq. km, compared with Wiltshire’s 207 per sq. km including the large unpopulated Salisbury Plain. The September 2019 “B&NES Climate Emergency Study Discussion Pack” shows these requirements for reducing transport emissions, using the ‘SCATTER Stretch’ criteria:

“Distance reduction: 25% reduction in passenger-km per person per year.

Significant modal shifts: 7% Reduction in car travel.

Shift to zero carbon cars: 76% EV, 14% PHEV, 10% Petrol/Diesel. [etc.]”

The April 2019 Bristol study, “City of Bristol Carbon Neutrality” scenario for “net zero” has:

“Population and journey growth: Radical steps to reduce vehicle numbers and usage by 25% including mass uptake of public and other mobility solutions.”

There is no available evidence that Wiltshire’s 2030 carbon neutral requirements for transport emissions reduction will be substantially different from these. Rural areas currently 35 have relatively high car dependency compared with large cities. It is already clear from studies done outside Wiltshire.

The Local Plan should not base any of its spatial strategy or policies on assuming that highway upgrades such as bypasses and the duelling of sections of the A350 will in fact take place. It should not base its transport assumptions on the ten-year-old LTP3. Routes for such highways should no longer be safeguarded. In the transition from the pandemic emergency to directly and fully addressing the climate and biodiversity emergencies, there should be a moratorium on these schemes.

➤ EV charging infrastructure

A mass shift to EV ownership for private cars and light commercial and good vehicles is anticipated and is to be welcomed. The Local Plan should give details and include policies requiring urgent development of EV charging infrastructure across the county.

However, it needs to recognise that this mass shift will take place too late to bear the main burden of carbon reduction from the transport sector. New petrol and diesel cars will be available until 2030, and hybrids after that. A significant proportion of Wiltshire's driving population buys used cars, at various price points. Measures to reduce car travel overall are of comparable importance.

➤ Mitigating impacts of Local Plan Growth (section 3)

Despite the assertion (3.1 and Appendix A, Table A-2) that active travel has the highest priority, with public transport medium and highways measures the lowest, the strategy proposes spending £31.7 million on walking and cycling, £10.5 million on public transport and £347.6 million on highways schemes. This is 'predict and provide' – the discredited philosophy of the last century – on a grand scale. It is also a fallacy to assume that the conversion to 'clean' fuels for transport will enable legally binding decarbonisation targets to be met. Those bodies that have done detailed investigations into this area have found that mitigation will need to include significant changes in transport patterns and in assumptions about private car use. For instance:

House of Commons Science and Technology Committee "Clean Growth: Technologies for meeting the UK's emissions reduction targets" [HC 1454] (August 2019):

"The Government's current long-term targets for decarbonising transport focus heavily on reducing exhaust emissions and increasing sales of low-emissions vehicles, rather than delivering a low-emissions transport system. In the long-term, widespread personal vehicle ownership does not appear to be compatible with significant decarbonisation. The Government should not aim to achieve emissions reductions simply by replacing existing vehicles with lower-emission versions. Alongside the Government's existing targets and policies, it must develop a strategy to stimulate a low-emissions transport system, with the metrics and targets to match. This should aim to reduce the number of vehicles required, for example by: promoting and improving public transport; reducing its cost relative to private transport; encouraging vehicle usership in place of ownership; and encouraging and supporting increased levels of walking and cycling. The Government should commit to ensuring that the annual increase in fuel duty should never be lower than the average increase in rail or bus fares." (Paragraph 131)

Committee on Climate Change "Policies for the Sixth Carbon Budget and Net Zero" (December 2020): 36

In Box 2.2 of this document (p.66) there is a summary of the role of Local Authorities in local transport policies. Some of these are shown below: Wiltshire's Transport Review needs to consider these points and incorporate them into the mitigation measures which are being proposed.

“Planning policy can steer spatial and local planning that favours housing and commercial developments in the right places to reduce traffic and support efficient logistics.

Investment in walking and cycling networks and development of Local Plans and Transport Plans to deliver modal shift from cars to active and public transport. These can also identify locations for consolidation centres near road links and urban microconsolidation centres.

Introduction of low-emissions zones that set minimum standards for carbon and other emissions.

Planning and support for installation of EV charging networks across their jurisdictions.

They can use parking powers under Traffic Regulation Orders to repurpose parking spaces for car clubs, cycle parking and EV charge points and use parking charges to discourage private car use and promote public transport...

•LAs can work jointly with bus operators to provide a bus network that is rapid, reliable and affordable (e.g. through a bus strategy and bus quality partnership) ...”

When Wiltshire Council declared a Climate Emergency in February 2019 they resolved to implement best practice methods to limit Global Warming to less than 1.5°C. There is little evidence of best practice being considered in this Transport Review, and a far more radical approach will be needed to ensure that transport emissions in Wiltshire contribute to the ‘carbon neutral by 2030’ target adopted by the Council.

➤ Walking and cycling measures (3.2)

Reference should be made to the Local Cycling and Walking Infrastructure Plan (LCWIP) which (presumably) is being prepared to detail the exact plans for improving walking and cycling infrastructure. Improvements to walking and cycling will need to cover all the settlements in Wiltshire, and links between the settlements, not just links within the 3 principal settlements.

It is unclear which schemes are being included in the proposals. There needs to be a breakdown of what is proposed across the principal settlements for the £31.69 million total given in Table G.1.

There is new cycle infrastructure for the three principal settlements shown on Figures 3-1 through 3-3, including ‘on-carriageway cycle lanes’ and ‘segregated two-way cycle track’. A number of questions arise in respect of these maps:

- Detailed design should continue for these schemes.
- The LCWIP should identify the road space to construct these schemes to DfT's LTN 1/20 Cycling Infrastructure Design standards, or a locally appropriate interpretation.
- It should be clarified whether the cost of all of these schemes included in the costs given in Appendix G.

In paragraph 3.2.1 there is reference to providing “safe, well-signed routes to railway stations from across the three principal settlements of Chippenham, Trowbridge and Salisbury”. As well as this, consideration needs to be given to other routes to serve employment sites, schools, shops, town centres and other amenities. 37

➤ Rail Strategy (3.3.2)

Access to existing stations is important, but the Transport Review should also give consideration to further rail improvements. This very limited section on the rail strategy needs to be considerably expanded.

Twenty years ago, Wiltshire County Council’s Local Transport Plan suggested ‘Priority’ new stations at Wootton Bassett, Corsham and Wilton as well as ‘Possible’ new stations at Lacock, Holt, Staverton, White Horse, Codford, Wylde, Dinton, Porton and Alderbury. (WCC LTP1, Fig 3.6.6).

The more recent SWLEP Rail Strategy Report’s recommendations for new stations in Wiltshire included Corsham, Devizes Parkway, Porton & Wilton (the latter being subject to results of study on Porton). (see SWLEP Rail Strategy Main Report, July 2019)

As a minimum, the Local Transport Review needs to reflect the aspirations – which Wiltshire Council presumably supported - in the 2019 SWLEP Rail Strategy.

➤ Bus Strategy (3.3.3/3.3.4)

This section should be expanded to include reference to Salisbury, in particular how routes can be extended/improved to serve the expanding settlement. It would be appropriate to refer to the role which Park & Ride sites, and associated bus services, might be able to contribute to modal shift.

The consideration of ‘Dynamic Demand Responsive Transport’ (DDRT) is welcome, this is one of the options which could be particularly suitable for some of Wiltshire’s scattered rural communities. Across Wiltshire there are households which do not have access to a car, and public transport must be maintained and enhanced across Wiltshire.

➤ Missing section: ‘Mobility as a Service’

(MaaS). ‘MaaS’, or Mobility as a Service refers to the integration of various forms of transport services into a single mobility service accessible on demand.

When responding to a questionnaire sent to local authorities who are members of the Western Gateway Sub-national Transport Body in 2020 Wiltshire Council’s response to the question “How much are you thinking about Future Mobility e.g. Mobility as a Service (MaaS), connected vehicles, Active travel measures within your local area?” included the reply that “Wiltshire’s priorities are currently set out to maximise economic growth in those large towns where it can be accommodated more sustainably and where MaaS, Active Travel and commercial frequent public transport can be supported.” (see December 2020 Agenda and Supporting Papers, WGSTB-Partnership-Board-Combined-Papers_Dec-16- 2020-3.pdf).

Given the statement that MaaS can be supported there should be to a section to cover the possibilities. This might include reference to existing Car Clubs across Wiltshire – such as Co-Cars in Salisbury – and consideration as to how these could be

expanded both in larger and in smaller settlements. Various models for shared mobility – including Car Clubs, Bike share and Mobility hubs - are covered at CoMoUK's website.

C2 Parking policy recommendations

This appendix reports that there was a recommendation from Atkins in 2018 that there should be a review of car parking processes, that a data bank should be built up and that this should help to inform the car parking strategy across Wiltshire. Furthermore “Once these next steps have been implemented and a good understanding of the parking situation within 38 each principal settlement has been developed, a robust parking policy that aids in the reduction of car trips into the principal settlement and market town centres can be established. It is recommended that these parking policies are used to help manage traffic demand and to mitigate the impacts of growth in each town.”

It is important to undertake this step because not only is a reduction in car parking spaces, and a modal shift from the motor car, needed to cut carbon and congestion, but there is also the possibility that some town centre car parks could be developed as brownfield sites. For example, in Salisbury this has been proposed (in the Salisbury Central Area framework) for car parks at Salt Lane, Brown Street and part of Central car park.

Therefore, this review is needed as a fundamental pre-requisite to the Local Plan Review.

Missing section: Residential car parking strategy

The net zero transport report from RTP1 referred to above gives some guidelines regarding how a modal shift from the private car can be achieved – for example (p.41) “Car ownership is discouraged through the design of the public realm and the ‘decoupling’ of private parking from new home sales. Active and public transport are increasingly the most convenient, affordable and desirable option for travel outside the neighbourhood, with shared car clubs and demand responsive transport providing for journeys where active and public transport are not an option.”

A radical shift is needed from Wiltshire Council's current ‘minimum’ parking standards, such as the following:

- A policy or SPD to reduce parking spaces allocated to residential development. It is suggested that a ‘Zonal’ approach be developed, see for example the SPD recently adopted (5/1/2021) in Bournemouth & Poole.
- Discouraging car ownership through the design of the public realm and the ‘decoupling’ of private parking from new homes sales. Parking spaces for private vehicles in new development could be made available on a leasehold basis, located at least 5 minutes’ walk from most dwellings.
- Parking for car share vehicles, and stops for public transport (which may be demand responsive) would be more conveniently located than parking for privately owned vehicles.

The Local Plan should set maximum parking standards instead of minimum, complementing the allocation of new housing to sites with lower car dependency. As Campaign for Better Transport stated in their 2014 consultation response:

“There is strong evidence of the effectiveness of maximum parking standards, in reducing congestion and traffic ... “There is much evidence of the benefits of maintaining maximum parking standards. In many areas, including but not restricted to large

cities, parking policies are a valuable way of ensuring the best use is made of land and that new housing does not contribute to local congestion. Across the country, traffic levels have not grown over the past decade, and in London they have fallen, partly due to the 40-year history of setting clear maximum parking standards across the city. London's economy and the health of its local town centres have not suffered from these measures – in contrast, the evidence is that by promoting higher density development, and encouraging businesses to locate near public transport hubs, there is greater efficiency and less of the 'hollowing out' seen in other towns and cities.”

The Local Plan should incorporate car-free housing. There is a heritage of homes without private or nearby on-street parking, such as terraces in towns such as Bradford on Avon and 39 many others. But there is a severe shortage of modern car-free or low-car housing developments even in Wiltshire's principal settlements and market towns. It is open to the Planning Authority to require developers to make housing car-free by design and through restrictive covenants. This measure will significantly reduce the carbon impact of new houses and the carbon budget of their occupiers. Car-free Housing should incorporate secure bicycle storage including conventional power sockets for charging e-bikes. Another advantage is that land area is not taken up by garages, driveways, turning areas etc. This means that a higher density is achievable for a given land-take. In turn, the total housing requirement for the county can be met with fewer and/or smaller sites. Naturally it implies that such housing sites will be in or near the centres of towns, close to shops, etc. and preferably close to main public transport facilities. A quota of at least one third of all new housing being Car-free is achievable and this, or a specific fraction to be determined, should be included in the Local Plan, both as a headline figure and as site-specific proportions.

E-bikes – an emerging new transport mode

With new battery technologies and developments in the bicycle market, there has been sustained and explosive growth in sales of electrically assisted pedal cycles – e-bikes – in the EU and in Britain. The major part of cycle sales by value, and in many cases the majority by quantity, are e-bikes. This is in spite of supply shortages due to worldwide demand, tariff barriers on China and Brexit complications. Most cycle retailers in Wiltshire stocking e-bikes report customer waiting lists running into the 50s to 100s, and many months long.

They are experiencing severe stock problems, and having to order ahead into 2022 or even later.

Under UK rules, most e-bikes count as pedal cycles (exempt from license, etc., and limited to motor assistance under 15mph). Members of the public are using them in new ways, and in particular are engaging actively in modal shift for journeys of five, ten miles and often far longer. Speeds near to 15mph are easily maintained. A 5 to 7-mile commute can be achieved in half an hour. The often underestimate time overhead of accessing and waling to/from parking places is reduced with cycling and e-biking.

➤ □ The contribution of e-bikes to carbon neutrality should be reflected in the Local Plan. The transport model used in the WLPTR should be revised to reflect scenarios for uptake and use of e-bikes. The Local Plan should include e-bike promotion policies, just as it should for EVs. The role of cargo e-bikes in substituting for “white van” deliveries should be included.

Conclusions

- Wiltshire's 2030 net zero target needs to govern the Local Plan;
- Rising transport emissions need to reduce to a fraction of their current level to meet or get close to the target;
- The Transport Review supports housing locations with dependency on car travel;
- Wiltshire Council's current Local Transport Plan is not fit for purpose and will not help achieve the net zero target;
- The next Local Transport Plan needs to take a radical new approach including promoting modal shift;
- The Local Plan should work with the Local Transport Plan to promote rail, bus and MaaS strategies that will help reduce emissions in the longer-term;
- Local Plan parking policies should be reformed, including 'maximum' standards;
- Local Plan policies should drive investment in active travel, e-bikes/ scooters and EV charging infrastructure.

Rep ID: 58	
Consultee code: Other	Consultee Organisation (if applicable): Keith Cohen Ecology
Is this response on behalf of someone else/another organisation? No	
Organisation being represented (if applicable):	
Does this representation refer to attachment(s): N	If this representation refers to attachment(s), these are listed below:
Please provide your comments here	
<p>RE: Chapter 4 - Assessment Assumptions Physical loss of functionally linked habitat The premise of the screening assumption is flawed. The sites are screened in or out based on the CSZ range in km, but this relates to summer foraging ranges of (primarily) maternity roosts, and yet the key value of the Bath and Bradford on Avon Bats SAC is not simply as a summer site, indeed only greater horseshoe bat is thought to make significant summer use; rather the main value is for swarming (mainly autumn, also spring) and winter for hibernation. For these ecological functions the catchment of the bat populations is much greater than these CSZs. It could be a serious failing of the HRA process if this value is not recognised and taken into account, substantially undervaluing the potential impacts upon all the qualifying species of the site. This will be true of other similar sites such as Mells Valley SAC which although a summer greater horseshoe site will also be a swarming site. Mells Valley SAC should not be scoped out.</p>	

The ZOI to consider for potential impacts on habitats should be a minimum of 20km for Bechstein's bat, based on recapture data from the UK and radio-tracking data from abroad.

Similar changes are necessary in regards to greater and lesser horseshoe bats.

Non-physical disturbance, p I 17

4.26 states an assumption of a 500m distance to scope in European sites in regards to these – including lighting. However, as stated above, the catchment for bats at swarming and winter sites is much greater than 500m, so there is potential for significant impacts on qualifying feature bat populations caused by lighting.

An example might be new lighting at housing developments or by trunk roads where these may cause barriers to bats moving to / from swarming or wintering sites.

Rep ID: 59	
Consultee code: Statutory Body	Consultee Organisation (if applicable): Natural England
Is this response on behalf of someone else/another organisation? No	
Organisation being represented (if applicable):	
Does this representation refer to attachment(s): N	If this representation refers to attachment(s), these are listed below:
Please provide your comments here	
<p>Wiltshire Council Local Plan Review</p> <p>Thank you for your consultation on the above dated 11 January 2021</p> <p>Natural England is a non-departmental public body. Our statutory purpose is to ensure that the natural environment is conserved, enhanced, and managed for the benefit of present and future generations, thereby contributing to sustainable development.</p> <p>We welcome Wiltshire Council's engagement with Natural England from an early stage in the process, we note there are currently no changes to specific policy, therefore we provide broad advice on the plans strategy and what should be considered when developing policy. In addition we will provide advice on each principal settlement and market town where the council has determined allocations moving into the final pool of sites to be assessed in the plan period 2016-2036. We wish to acknowledge that this response is considered as part of an iterative approach to plan design with Wiltshire council and look for to further discussion.</p> <p>Natural England's main concern at this stage is that the new local plan ensures development is directed to the most sustainable places and provides high quality green/ open space for new and existing communities. We would expect to see suitable policies that address the impacts of increased recreation on local green spaces, and for designated sites and landscapes, by ensuring its effects are properly managed.</p>	

Natural England is concerned about the effects of recreation on international and national designated sites within and beyond the local plan area. The impacts of recreational use is widely recognised as a significant issue impacting on designated sites.

Recreational impacts can include soil compaction/loss and eutrophication from dog fouling.

Habitat Regulations Assessment – Screening and Scoping

Natural England welcome iterative dialogue over the points that have been raised and are dedicated to working with the council and Land Use Consultants (LUC) to reach a solution that assists the council and delivers positive environmental outcomes for the inhabitants of Wiltshire.

General guidance and comment on HRA

The HRA is linked from the council's consultation page as a screening document however the document is titled as scoping.

Natural England believe this document to be both the screening and scoping stage and should be labelled accordingly.

As of 1 January 2021, the Conservation of Habitats and Species Regulations 2017 (as amended) and the Conservation of Offshore Marine Habitats and Species Regulations 2017 (as amended) have both been amended so that they continue to operate effectively now that the transition period has ended and the UK has completed its exit from the EU.

The changes that are now in force have been made by the Conservation of Habitats and Species (Amendment) (EU Exit) Regulations 2019. The changes ensure the strict protections afforded to sites, habitats and species as derived from the EU Habitats and Wild Birds directives continue. Most of these changes involve transferring functions from the European Commission to the appropriate authorities in England and Wales.

All other processes (such as HRA) and terms (such as SACs, SPAs and European Sites) found in the 2017 Regulations remain unchanged and existing guidance is still relevant. Natural England note that your HRA makes reference to 'Natura 2000' sites, please cross reference your HRA screening scoping with new current guidance.

Defra and Welsh Government have published their new HRA Guidance on GOV.UK at <https://www.gov.uk/guidance/habitats-regulations-assessments-protecting-a-european-site>. Accompanying this is a new derogation notice template for competent authorities to use <https://www.gov.uk/government/publications/habitats-regulations-assessment-derogation-notice>.

In addition there is also new guidance for competent authorities on their duty to help protect, conserve and restore European sites <https://www.gov.uk/guidance/duty-to-protect-protect-protect-and-restore-european-sites> (which covers the obligations derived from articles 6.1/6.2 of the habitats directives which from part of the general regulation 9 duty).

Natural England agrees with the approach taken to assess European sites within and extending beyond the county boundary.

Reviewing the information provided we agree that all European sites have been identified correctly for HRA screening.

4.4 The HRA makes an assumption that only sites within the county boundary will result in physical damage or loss of habitat, however, increase in recreational pressure can lead to physical damage on the features for which European sites are designated for. Natural England suggest further work is required to understand the level of recreational pressure outside the county boundary to assess likely significant effect of its plan and policies. This is evident in paras 4.41 – 4.46 of your HRA.

4.23 Water voles are a distinctive/typical species supported by the River Avon SAC habitat. A water vole mitigation strategy should be discussed and agreed with Natural England. Similarly, otters also make an important contribution to the structure, function and/or quality of the SAC habitat, and the EIA will fully assess the impacts of the scheme on this species. This should be noted within the HRA.

4.34 Natural England support the application of this guidance and notes the inclusion of an incombination assessment for air pollution.

4.39 Natural England advises that the final pool of assessment sites at Salisbury (namely site 6) has potential to increase traffic on the surrounding road network particularly the A338 and A36 both of which are at various points within 200m of the River Avon SAC. Natural England advise scoping in air pollution when considering impacts on the River Avon SAC and continuing to the Appropriate Assessment stage.

Increases in housing in settlement area such as Bradford-on-Avon, Corsham, Marlborough and Trowbridge will lead to increase vehicle movement in areas near or next to internationally designated sites notified for habitats that are sensitive to changes in air quality and should be assessed.

4.40 Requires clarification.

4.47 Natural England note that site 1 (SHELAA reference 662) is within 7km of Pewsey Down SAC. Increase housing within Devizes has potential to increase recreational disturbance at this designation. Natural England therefore consider that Pewsey Downs SAC should not be scoped out and should continue to the Appropriate Assessment stage

Table 4.2 noted required change to ZOI for North Meadow and Clattinger Farm SAC (NE have agreed a reasonable precautionary figure)

Natural England is confirming the ZOI for Cotswold Beechwoods.

Internationally Designated Sites Strategic Solutions

Trowbridge Bats SPD (Bath and Bradford on Avon Bat SAC)

The Trowbridge Bat Mitigation Strategy (TBMS) SPD was adopted in February 2020 to assist developers in assessing the potential impacts on Wiltshire's bat populations and to assess the impacts of future housing within the Wiltshire Housing Site Allocation Plan.

Natural England advises that additional sites proposed will need to be assessed in relation to TBMS and subsequently their impacts on the Bath and Bradford on Avon Bat SAC.

In particular the local plan must give consideration for its ability to contribute to the potential designation of Trowbridge Woods SSSI. TBMS is underpinned by an evidence base dating back to 2005 which gives us an understanding of the history of usage by bats in the Trowbridge area. Natural England advise that this evidence base requires updating to further consider the use of functionally linked habitat, specifically the area known as the Hilperton Gap, by bats species in the south of Trowbridge to the North West and the wider impacts on the Bath and Bradford on Avon Bat SAC.

River Avon SAC

Natural England recognises the requirement to amend this policy in light of recent agreement between Natural England the Environment Agency, Wessex Water and Wiltshire council. We recognise the challenges faced with conformity with NPPF to conserve and enhance the special qualities of the River Avon SAC and delivering government driven housing targets. Natural England acknowledge the councils drive to work collaboratively with partners to promote nutrient neutral development within the River Avon system catchment in a joint partnership to achieve favourable conservation status.

The agreed strategic solution for ensuring residential developments achieve phosphorous neutrality on the River Avon is a matter for the Wiltshire Council who have undertaken to underwrite the scheme, not Natural England. Proposals that are accepted by your Council into the mitigation strategy may rely on the standard Appropriate Assessment that has previously been agreed by Natural England. However, those developments that your Council considers ineligible for the agreed strategic approach will require a bespoke Appropriate Assessment completed by the competent authority in accordance with Regulation 63 of the Conservation of Species and Habitats Regulations 2017 (as amended).

Consideration will also need to be given to the additional pressure on water resources in the future, in particular with climate change and the increasing trend for consecutive dry summers to impact on the river ecology. In the future it may be that Wessex Water needs to take further action to reduce abstraction at these sensitive times to protect the River Avon SAC.

Salisbury Plain SPA

Since this plan considers further sites for assessment will result in a net increase in residential accommodation, impacts to the Special Protection Area(s) and Ramsar Site(s) may result from increased recreational disturbance. Your authority has measures in place to manage these potential impacts through the agreed strategic solution which we consider to be sound.

Subject to the appropriate financial contribution being secured, Natural England is satisfied that the proposal will mitigate against the potential recreational impacts of the development on the site(s).

North Meadow and Clattinger Farm SAC

Through the work with Swindon BC on their local plan review it has been determined that recreational disturbance is impacting upon the notified features of North Meadow and Clattinger Farm SAC. Discussions with Swindon BC, Cotswold DC, Wiltshire council and NE are ongoing. LUC are developing the evidence base to underpin a strategic solution for North Meadow and Clattinger Farm SAC.

In respect of this SAC we acknowledge the provisional status of the 7km threshold applied for screening purposes. Given the precautionary nature of assessment under the Habitats Regulations it is important to state this distance threshold will need to be reviewed once up to date visitor survey information is available.

New Forest International sites

Natural England advises that all sites within the zone of influence of the New Forest SAC, SPA and Ramsar site will need to avoid recreational impacts. We welcome further discussion on how the council should approach this.

Rep ID: 60	
Consultee code: Statutory Body	Consultee Organisation (if applicable): Natural England
Is this response on behalf of someone else/another organisation? No	
Organisation being represented (if applicable):	
Does this representation refer to attachment(s): N	If this representation refers to attachment(s), these are listed below:
Please provide your comments here	
<p>Wiltshire Council Local Plan Review Thank you for your consultation on the above dated 11 January 2021 Natural England is a non-departmental public body. Our statutory purpose is to ensure that the natural environment is conserved, enhanced, and managed for the benefit of present and future generations, thereby contributing to sustainable development. We welcome Wiltshire Council's engagement with Natural England from an early stage in the process, we note there are currently no changes to specific policy, therefore we provide broad advice on the plans strategy and what should be considered when developing policy. In addition we will provide advice on each principal settlement and market town where the council has determined allocations moving into the final pool of sites to be assessed in the plan period 2016-2036. We wish to acknowledge that this response is considered as part of an iterative approach to plan design with Wiltshire council and look for to further discussion. Natural England's main concern at this stage is that the new local plan ensures development is directed to the most sustainable places and provides high quality green/ open space for new and existing communities. We would expect to see suitable policies</p>	

that address the impacts of increased recreation on local green spaces, and for designated sites and landscapes, by ensuring its effects are properly managed.

Natural England is concerned about the effects of recreation on international and national designated sites within and beyond the local plan area. The impacts of recreational use is widely recognised as a significant issue impacting on designated sites.

Recreational impacts can include soil compaction/loss and eutrophication from dog fouling.

In our view, the Sustainability Appraisal provides a fair and detailed assessment of the sustainability performance of the priorities, building blocks, guiding principles and various policy and locational options for accommodating growth and new development. It identifies a number of aspects that could be strengthened and makes recommendations for subsequent stages of the local plan, all of which Natural England would support, particularly with respect to making more explicit the role of GI in addressing the effects of climate change and the health benefits of enhancing access to green space and active travel.

Natural England understands that Wiltshire council are aware of recreational pressure on designated sites, we recommend that strategic approaches to mitigating and managing this issue should be discussed with New Forest DC to meet the duty to cooperate. Designated sites and landscapes are the heart of nature recovery and ecological networks and we consider that the issue of recreation on these assets is significant and will require more specific consideration in the SA and HRA as part of the local plan review.

Given the challenge of meeting raised ambitions across many of the Plan's priorities, the SA is an important tool for furthering integration of objectives and policies and helping to avoid 'trade-offs' between what can be viewed as conflicting goals.

Based on the level of assessment carried in conjunction with the final pool of potential sites for further detailed assessment Natural England offer the following comments.

Rep ID: 62	
Consultee code: Statutory Body	Consultee Organisation (if applicable): Network Rail Property (Southern)
Is this response on behalf of someone else/another organisation? No	
Organisation being represented (if applicable):	
Does this representation refer to attachment(s): N	If this representation refers to attachment(s), these are listed below:
Please provide your comments here	
<p>Transport Review January 2021 prepared by Atkins Comments</p> <p>Introduction</p> <p>This sets out the methodology. The key tool appears to be the Wiltshire Transport Model which in practice appears to be aimed at traffic modelling. Most local authorities have access to similar modelling techniques. It is stated that this has been updated to a 2018 base and is pre-COVID. It is far from clear how public transport modes are accounted for in this model.</p> <p>Section 2 Assessing Impacts of Local Plan Growth</p> <p>Section 2 provides some interesting maps showing the forecast impact of the proposed new housing on the road network and some road schemes to alleviate the impact of this growth. There were proposals for new stations (developer funded) at Corsham, Royal Wootton Bassett and Grove and Wantage (where there was the likelihood of significant housing development) to deter residents of those communities driving to Swindon or Didcot Parkway to access the rail network. This does not seem to be referred to here.</p> <p>Section 3 Mitigating Impacts of Local Plan Growth</p>	

There is talk in 3.2.1 of improved walking and cycling provision to the railway stations in Chippenham, Trowbridge and Salisbury with maps showing additional cycle lane provision and other infrastructure. There is some mention of additional facilities that should be provided at the railway stations including the creation of hubs.

3.3 Public Transport Mitigation Measures

3.3.1 sets out principles mainly to do with buses. These do not appear to be very ambitious, particularly given the success pre-COVID of bus services in cathedral cities elsewhere in the UK such as York, Oxford and Cambridge, and this is surprising particularly in the case of Salisbury. There is no mention of Quality Bus Partnerships, merely commercial bus services, nor of what the local authority is proposing to do to enhance commercial bus service provision, namely bus priority measures and charging for car parking to make bus more competitive.

3.3.2 Rail Strategy ,

This starts by reiterating the concentration of development at Chippenham, Trowbridge and Salisbury, then has a rather peculiar comparison of rail services and usage for Chippenham, Trowbridge and Melksham (but not Salisbury!). It seems perfectly reasonable to expect that there will be better rail services and greater usage at Chippenham given it is on the main line between Bristol and London Paddington with a number of key destinations en route, for example, Bath Spa, Swindon, Didcot Parkway, and Reading, as opposed to less frequent services from Trowbridge and Melksham (including none to London), hence rail usage is likely to be lower from those stations. In the case of Trowbridge, there may well be more employment available locally given the Council offices there, hence there is less requirement to commute elsewhere. No mention is made of any aspiration for new or re-opened stations in Wiltshire to alleviate commuting by car to stations outside the county such as Didcot Parkway. The potential role of rail in helping to support sustainable housing growth in Wiltshire is dramatically understated in this review. No reference is made to the work led at Sub-national Transport Body level, including the Western Gateway Rail Strategy and Strategic north-south corridor development. Equally there is no reference to the developing Wiltshire rail strategy that is being supported by Network Rail, Great Western Railway and South Western Railway. Rail industry led work, specifically the strategic study for the West of England line is disregarded, this being particularly relevant for Salisbury.

Properly aligned planning amongst industry stakeholder groups can ensure that rail plays a crucial role in supporting growth. It is key that recommendations within this review should align with the relevant strategic approach including, that being led by the STB in partnership with rail stakeholders. Further, new development should be concentrated and consolidated at or close to existing and proposed rail infrastructure and hubs. Opportunities such as the TransWilts rail strategy and the potential new station at Devizes Gateway are not mentioned in the review but could and should play a major role in supporting growth. There is no assessment of the potential impact that these enhancements could have, by helping to identify where sustainable investment should be focused.

The role of rail deserves substantial amplification in this review, to help ensure that opportunities to deliver sustainable development are not missed.

3.3.3 Bus Strategy

Please see earlier comments regarding partnership working, bus priority measures and car parking pricing. The omission of targets for frequency or accessibility (for example, developments to be designed so all households are within 400 metres of a bus stop with a frequency of x buses per hour) may hinder securing developer funding.

3.3.4 Mitigation Recommendations

There is an extremely bold assertion about the reliability of bus services in Chippenham which begs the question what is the local authority doing to assist the bus operators, for example by providing bus priority measures, and increasing parking charges? The Demand Responsive Transport suggestion may be of marginal benefit, but is really the public transport of last resort if bus services can no longer be funded or provided commercially. It is not a panacea for congestion or modal shift. This is discussed in 3.3.5. There may be some best practice experience that would assist with this based on pre-COVID schemes in other areas of the country (Oxford and Ashford?).

4.2 Proposed Mitigation

4.2.2 Public Transport

A figure of £10.5m is quoted for public transport measures. This appears to conflate both capital costs (new bus shelters and real time information), and revenue costs. It is to be hoped that there will be revenue funding not just for improved bus services but also for bus stop information, bus shelter cleaning and repairs on an on-going basis. In addition, consideration should be given to telemarketing providing targeted public transport marketing material to residents of new housing, encouraging them to use bus and rail services.

Atkins does have a good track record of work on public transport improvements in places such as Kettering and Wellingborough. It is a pity that the people who prepared this study do not appear to have referenced any of the good work that their organisation has been involved in elsewhere in the UK.

Rep ID: 63	
Consultee code: Developer/Agent	Consultee Organisation (if applicable): Blue Fox Planning
Is this response on behalf of someone else/another organisation? Yes	
Organisation being represented (if applicable): Persimmon Homes	
Does this representation refer to attachment(s): N	If this representation refers to attachment(s), these are listed below:
Please provide your comments here	
<p>The Sustainability Appraisal 4.30 We set out below our review of the Council's Interim SA and how this considers the reasonable alternative development strategies for Calne. In do so, this identifies a number of specific matters which we consider do not provide for a robust or consistent assessment through the SA process and critically, that the overall assessment of the reasonable alternatives does not provide a robust basis upon which the proposed approach to Calne is based. [See table on pp 15-18 of attachment 63]</p> <p>Based on our review of the SA, we do not support the conclusion of this process and the resulting lower level of development proposed at Calne. There is an absence of specific detail through the SA process to provide adequate justification to support the conclusion that in SA terms, the rolling forward of the current strategy (i.e. reasonable alternative CH-A) does not represent an appropriate strategy for Calne.</p> <p>4.32 Set alongside our comments on historic delivery at Calne and the lack of any clear justification to support the conclusion that lower levels of growth are appropriate, it is our view that the strategy for Calne should be based on the assumption that the rolling</p>	

forward of the current strategy is appropriate. In doing so, the level of housing to be directed to Calne should be increased from the proposed figure of 1,610, to reflect the figures that emerge from the CH-A option, i.e. 2050 dwellings.

4.33 Furthermore, as explained previously, a reasonable alternative that tests for levels of growth higher than the rolling forward strategy should also form part of the SA in order to add robustness to this process. The findings of which should then be considered as the development strategy for Calne is finalised.

Rep ID: 64	
Consultee code: Parish/Town Council	Consultee Organisation (if applicable): Britford Parish Council
Is this response on behalf of someone else/another organisation? No	
Organisation being represented (if applicable):	
Does this representation refer to attachment(s): N	If this representation refers to attachment(s), these are listed below:
Please provide your comments here	
<p>WLPR Interim Sustainability Appraisal.</p> <p>Much of the findings of the Site Selection Report and indeed, our criticism of it, claim to be based on the Interim Sustainability Appraisal (SA) that forms part of the evidence base for the WLPR. However, the SA has also considered various strategies for distributing growth at the HMAs and is therefore equally relevant to the first part of our representations and we cover this aspect before returning to the site-specific matter.</p> <p>With respect to the various strategies considered for the Salisbury HMA, paragraph 4.3.4 sets out a summary of conclusions and recommendations to inform the evolving Local Plan.</p> <p>Key Recommendation 1 states that:</p> <p>“whilst Strategy SA-B (Focus on Salisbury) has been shown to be the more sustainable strategy overall, there are likely significant environmental effects at Salisbury given several significant environmental constraints. It is recommended that growth levels be reduced at Salisbury to reduce the likelihood of significant effects and to re-distribute to other areas in the HMA.” (Our emphasis).</p>	

Key Recommendation 2 states:

“the SA has found that both Amesbury and Tidworth/ Ludgershall are likely to have minor adverse effects overall against environmental objectives and could possibly accommodate growth at a higher level. The scale of housing growth proposed for these settlements under all strategies is considered likely to have negative effects overall on affordable housing delivery with low or zero residual requirements. It is recommended that the higher requirements contained in Strategy SA-A are considered for both towns, whilst reducing requirements at Salisbury.” (Our emphasis)

Both these Key Recommendations therefore support our position set out above that the WLPR should go further in considering further adjustments to housing numbers in the HMA which, whilst retaining the Principal Settlement status of Salisbury, reduces the significant environmental effects of such high levels of residential growth.

Specifically, in terms of land north of Downton Road, we also note that the Interim Sustainability Appraisal (page 61) provides further information on the potential to mitigate the impact of development on the site. In respect of Heritage, it states:

“further assessment of level of impact required. Mitigation likely to be difficult. A modest level of development on the western side of the site could provide an opportunity for mitigation/enhancement via softening harsh edge of existing development.

Development towards the north and east of the site should be lower density or left as open space” (Our emphasis).

The immediate conclusion that must be reached therefore is that the Plan does not have sufficient information as to the heritage impact of developing this site. This and the conclusion that “mitigation is likely to be difficult” must completely undermine the findings of the Site Selection Report for Salisbury (set out above) that suggested that the heritage impact would be “neutral”.

In respect of landscape impact, the Sustainability Appraisal (also at page 61) states:

“avoid development that reduces the sense of separation between Salisbury and Britford and conserve open views towards the Cathedral and over the river valley and water meadows that contribute to the distinctive approach to Salisbury” (Our emphasis)

It is clear that the only way these findings of the WLPR’s Sustainability Appraisal can be met is for the site to remain undeveloped.

In support of this position, we draw attention to Appendix 2 of the Interim Sustainability Appraisal entitled “Principal Settlements: Site Assessments”. This Appendix provides the further detail that lies behind the main Interim Sustainability Appraisal with the relevant extract relating to heritage and landscape impacts shown overleaf. [see STRAT330a for extract from Appendix]

As can be seen, this includes the statements on heritage impacts that are repeated in the main Sustainability Appraisal. The Appendix adds includes further detail of significance including that

“Development of the site would impact on the Salisbury Conservation Area, Britford Conservation Area, as well as impact upon the setting of Grade II Listed Bridge Farmhouse and farm buildings in Britford. The site would impact on the rural setting of both conservation areas and approaches to medieval city. Noted as within a 'strategic approach view' within CA Appraisal. Further assessment of level of impact required. Site would contribute to erosion of separate identity of Britford. Bridge Farm is a

substantial historic farmstead which has a fundamental relationship with its surrounding hinterland.” (Appendix 2 of the Interim Sustainability Appraisal, page 124 – Our emphasis).

Crucially, it also states that in both cases:

“...the public benefit of significant development which spreads across the entirety of the site appears highly unlikely to be such that it can outweigh the harm to the designated asset”. (Our emphasis).

In our view, this further confirms the unsuitability of this site, even taking into account mitigation, which is viewed as “likely to be difficult” for development.

Rep ID: 65	
Consultee code: Other	Consultee Organisation (if applicable):
Is this response on behalf of someone else/another organisation? no	
Organisation being represented (if applicable):	
Does this representation refer to attachment(s): N	If this representation refers to attachment(s), these are listed below:
Please provide your comments here	
<p>The Sustainability Appraisal (and therefore the Spatial Strategy) is fatally flawed The Interim Sustainability Appraisal is at best completely inadequate and at worst has been used to justify the conclusions being sought. Huge development areas are selected on the basis of being slightly less adversely impacted or being said to be mitigatable without any evidence (at all) to back up the assertions. Sites are selected with no real rationale on how assessment outcomes were reached. And perhaps least surprisingly, those areas that support the building of the distributor road under the HIF Bid somehow come out “best” according to the sustainability criteria (sometimes 11, sometimes 12) being used. Climate change mitigation is conflated with adaptation and together forms a single criterion, to be compared against multiple others, including aspirational (and completely unevidenced) economic benefits, which then justify writing off vast swathes of countryside and high-grade agricultural land. There is no explanation as to the weight given to sub-elements of these criteria such as greenhouse gas emissions. There is no attempt to quantify the extent of the climate and environmental destruction. All of the above underlines the unspecified and hence unaccountable balance of qualitative judgements and evidence acknowledged contained within the Interim Sustainability Appraisal, which is seriously deficient, yet used to as a justification for the</p>	

site selections put forward in the Spatial Strategy. With regards land use; no attempt seems to have been made to assess the value of existing farms, their contributions to public benefit or their future potential in the Plan period. This serious shortcoming is embedded in the construction and application of the site selection criteria. For the 'preferred sites' for Chippenham, for example, the SA (Section 5.2.5) comments that "given the significant size of this site, there will be a significant loss of greenfield, agricultural land of medium quality," ignoring the fact that this includes a significant amount of the 'Best and Most Versatile' agricultural land. Similarly, there is no consideration of the use of local farms for local food production (including ec/organic), tree planting or renewable energy generation, as an alternative land use, or any value placed on the loss of such. Neither is its value considered in terms of minimising vulnerability to surface water flooding or locally valued landscapes, or in relation to the landscape aim to "conserve and enhance the character and quality of rural and urban landscapes, maintaining and strengthening local distinctiveness and sense of place" and "minimise the impact on locally valued landscapes"

Rep ID: 66	
Consultee code: Developer/Agent	Consultee Organisation (if applicable):
Is this response on behalf of someone else/another organisation? Yes	
Organisation being represented (if applicable): Stoford	
Does this representation refer to attachment(s): N	If this representation refers to attachment(s), these are listed below:
Please provide your comments here	
<p>Review of the Council's Evidence Based on Employment Needs</p> <p>5.1 The NPPF requires Local Plans to be based on "relevant and up-to-date evidence" which is focused on "supporting and justifying the policies concerned" and takes "relevant market signals" into account⁹. The PPG confirms the continued requirement to prepare and maintain robust evidence of both existing businesses' needs and likely changes in the market¹⁰.</p> <p>5.2 The Council's assessment of the need for employment land over the emerging plan period (2016 – 2036) is presented within two documents:</p> <ul style="list-style-type: none"> • The Functional Economic Market Area Assessment¹¹ (FEMAA), which was finalised in December 2016; and • The Employment Land Review (ELR), which was finalised in May 2018 and takes a consistent approach that builds upon the FEMAA. Appendix 5 (produced in December 2017) in particular reviews 'floorspace and employment land demand'. <p>5.3 The evidence base assesses likely employment growth and associated land requirements, initially broken down to three functional economic market areas (FEMAs) defined through the FEMAA:</p>	

- Swindon/M4 corridor FEMA;
- A350/West Central Wiltshire Towns FEMA; and
- Salisbury/Amesbury/A303 Corridor FEMA.

5.4 It is of note that Junction 17 of the M4 falls within both the Swindon/M4 Corridor and the A350 and West/Central Wiltshire Towns FEMAs as defined by this Assessment. This is to be expected given the location is highly strategic and relates strongly to both the M4 and A350.

5.5 Whilst this overlap is acknowledged, evidence prepared by Savills highlights a concern regarding subsequent stages of assessment which, by virtue of seeking to match the identified FEMAs to best-fit HMAs, erroneously locates Junction 17 solely within the A350 FEMA¹² for the purposes of the assessment. Savills highlight that unlike the other HMAs, the Chippenham HMA within which the site is located, is not confined to any one proposed FEMA area with the northern part of the HMA, incorporating the M4, clearly falling within both the Swindon/M4 Corridor FEMA, as well as the A350 FEMA.

9 National Planning Policy Framework, MHCLG, July 2018, paragraph 31

10 PPG Reference ID 61-033-20180913

11 Swindon and Wiltshire Functional Economic Market Assessment, Hardisty Jones Associates, December 2016

12 Savills (2018) Market Assessment Report, paragraph 5.13 and 5.14 (see Appendix 4)

5.6 This is considered to be a fundamental flaw with employment land requirements and subsequent recommendations established for the A350 FEMA having little regard to the role of the M4 as being a key driver of demand and lead to an inaccurate analysis of the economic and market conditions affecting this location¹³. This omission severely limits the reliance that can be placed on both the evidence base and employment policies it informs.

5.7 Although it is considered that the characteristics of both the A350 FEMA and Swindon/M4 FEMA are relevant to any assessment of need in this location, it is of note that the assessment of need – initially presented in the FEMAA, and latterly within the ELR - relies heavily on baseline forecasts sourced from Cambridge Econometrics and Oxford Economics that were produced in 2016. These forecasts no longer constitute the “relevant and up-to-date evidence” upon which emerging employment policies should be based.

5.8 The forecast employment growth for sectors occupying B8 Storage and Distribution (600 jobs over 20 years, or 30 job per annum) are also considered to significantly underplay the role and potential future contribution of the sector. For example, the forecasts take no account of drivers of logistics demand, particularly the growth of ecommerce since 2016, nor will they capture unmet market needs emanating at a regional level.

5.9 The inclusion of B8 storage and distribution land requirements within a generalised ‘industrial’ category also limits full consideration of the extent to which the specific needs of the logistics sector will be met within Wiltshire over the period to 2036.

5.10 The consideration of past take up over the period from 1996 – which is subsequently used in both the FEMMA¹⁴ and the ELR¹⁵ to justify and support the conclusions of the forecasting exercise – is also considered to be unreliable. Such an approach

will be heavily influenced by land supply and previous policy approaches which will not reflect more recent market trends and the changing land and property requirements of the sector.

5.11 A key concern, therefore, is that in the absence of a suitably robust assessment of logistics needs there is a risk that the employment land policies will be ineffective at meeting the specific needs of the sector.

5.12 Within this context, it is of note that the revised NPPF now makes explicitly clear the importance of providing for “storage and distribution operations at a range of spatial scales and in suitably accessible locations” through “planning policies and decisions” which “recognise and address the specific locational requirements of the sector”¹⁶.

5.13 The PPG was subsequently updated in July 2019 to guide authorities’ assessments of the need to allocate space for logistics space. It now emphasises that:

13 Ibid, paragraph 5.15

14 Hardisty Jones Associates (2016) Swindon and Wiltshire Functional Economic Market Assessment, paragraph 6.8

15 Hardisty Jones Associates (2017) Wiltshire Employment Land Review, Appendix 5 paragraph 2.5.4

16 MHCLG (2019) National Planning Policy Framework, paragraph 82

“The logistics industry plays a critical role in enabling an efficient, sustainable and effective supply of goods for consumers and businesses, as well as contributing to local employment opportunities, and has distinct locational requirements that need to be considered in formulating planning policies (separately from those relating to general industrial land)”¹⁷

5.14 It recognises that these requirements range from “strategic facilities serving national or regional markets” through to “last mile facilities serving local markets”, with the former in particular requiring “significant amounts of land, good access to strategic transport networks, sufficient power capacity and access to appropriately skilled labour”¹⁸. Authorities are expected to draw together “a range of up-to-date evidence” to establish “the appropriate amount, type and location of provision”, informed by “market signals, anticipated changes in the local population and the housing stock, as well as the local business base and infrastructure availability”¹⁹.

5.15 It is evident that the value of logistics as an economic contributor, both in its own right and in terms of supporting other business sectors and meeting societal demands, has been overlooked in the preparation of the emerging Local Plan and its informing evidence, which is now outdated and considered to be inadequate for plan making.

5.16 It is therefore incumbent on the Council to robustly assess the needs of the logistics sector based on evidence that is current and robust. Indeed, the dynamic nature of the economy is precisely why the NPPF expects planning policies to be underpinned by ‘upto-date evidence’, and subjected to ongoing monitoring and review to respond to changing circumstances.

5.17 In addressing the notable deficiencies it is strongly recommended that the Council has regard to updated market evidence presented by Savills (Appendix 5) alongside recent published evidence on the strategic importance and contribution of the logistics sector to the sustainable operation of the UK economy. These aspects are considered in more detail below.

17 PPG Reference ID 2a-031-20190722

18 Ibid

19 PPG Reference ID 2a-031-20190722

6. The Strategic Importance of the Logistics Sector

6.1 As an industry, logistics has grown significantly in recent years, employing over 1 million people and generating £130 billion Gross Value Added for the UK's economy annually by latest estimates²⁰.

6.2 The sector is an integral and essential element of the national economy and underpins the efficient operation of activity in most sectors. It supports a range of industries from manufacturers to wholesalers and importers, retailers and E-commerce businesses as well as parcel carriers and third party logistics providers.

Drivers of demand – online retail

6.3 The continuing growth of E-commerce – accelerated by the Covid-19 pandemic – has been, and will continue to be, an important structural driver of logistics demand.

6.4 Retail is driving strong levels of take up, accounting for a third of transactions due to strong e-commerce growth, with other occupier sectors that have experienced increased demand during the pandemic (such as 3PLs, parcel carriers and food producers) also contributing significantly to leasing activity²¹.

6.5 Whilst the Covid-19 pandemic has accelerated demand, this trend is not expected to dissipate. The trend of people now shopping online, has installed new habits and behaviours which will continue to drive demand for logistics space.

6.6 Recent research prepared by Turley on behalf of Tritax Symmetry cites evidence that indicates that ten years of forecast e-commerce growth occurred in the first month of the national lockdown reflecting the pace of this change in consumer spending patterns which in turn influence warehouse floorspace demand²².

6.7 This trend can be further evidenced with reference to the chart below produced by Savills, which shows the gradual growth in online retail sales from 2007, with these increasing sharply during 2020.

Figure 1: Online retail sales as a proportion of total retail sales (Source: Savills, 2021) [see attachment 66 for graph]

6.8 The impact on demand is quantified in the accompanying Savills evidence²³ which cites research by Prologis that estimates every additional £1 billion of online sales results in, on average, an additional 775,000 sq ft of demand for warehouse space. It goes on to reference forecasts that indicate that by 2024 an additional 44.9 million sq ft of warehouse space is needed across the UK to meet the demand of the online retail sector alone. This is a pre-pandemic estimate however, and Savills estimate that if online retail grows at 5% above the previous assumptions – as could be reasonably expected given the rapid growth of online retail during 2020 - then an additional 71.1 million sq ft of warehousing will be required in the UK to meet the forecast need²⁴.

6.9 This demand will not just be confined to established logistics locations. With instant gratification becoming the norm, and the number of companies offering next day, same day and on demand deliveries increasing, there is increasing demand for additional local level logistics facilities in accessible locations to meet customer demands²⁵. This in turn is resulting in stronger demand in less established and emerging logistics markets across the country.

6.10 These factors are also resulting in new operational models that require ‘the right type of logistics space in the right locations’, from national and regional distribution through to last mile fulfilment and pick up points²⁶. Last mile operations in particular must be located in the ‘sweet spot’ that balances immediate proximity to the consumer, labour force availability and accessibility via the road network, and generally requires units of 23 Savills (2021) Supplemental Market Assessment (Addendum to the November 2018 Report), para 4.1

²⁴ Ibid, para 4.4 ²⁵ National Infrastructure Commission (2019) Better Delivery: The Challenge for Freight, Freight Study Final Report, ²⁶ BPF (2019) What Warehousing Where? Understanding the relationship between homes and warehouses to enable positive planning, p11 and p21 up to 100,000sqft²⁷ (c. 9,300sqm). This in turn is resulting in stronger demand in less established and emerging logistics markets across the country.

6.11 However, a lack of available sites and stock continues to act as a major barrier preventing occupiers from achieving the desired ‘sweet spot’, resulting in longer travel distances, more carbon emissions, greater fuel and driver cost to the business and a reduced ability to meet customer demand for quick deliveries²⁸.

Drivers of demand - supply chain storage

6.12 The critical nature of an efficient logistics supply-chain also needs to be considered and proactively planned for. Research prepared by Turley on behalf of Tritax Symmetry in late 2020, highlighted that manufacturing related demand is likely to continue to increase, particularly as operators look to build in supply chain resilience to enable them to more quickly respond to unforeseen events²⁹.

6.13 In responding to wider macro-economic issues which may restrict the import of international goods, manufacturers are also increasingly looking at near-shoring manufacturing and storage, moving from ‘just in time’ to ‘just in case’ solutions. The report cites research undertaken by Savills³⁰ which indicates that this alone could increase demand for warehouse space by 20%.

Drivers of demand – housing growth

6.14 Consumer demand is highly sensitive to changes in population. Evidently as the population grows, and more homes are delivered across the country, additional space for the required logistics response will also be needed, as demonstrated by previous Turley research³¹. Drawing on commercial market data on warehouse floorspace, it was identified that there is presently 69 sq ft of warehouse floorspace, on average, for every home in England³².

6.15 There are, however, significant variations in this ratio, reflecting the role of different areas at the time of the research in terms of meeting national, regional and local needs within a national logistics network³³. It is of note that the South West had a ratio of 45 sqft of warehouse floorspace for every home³⁴. Although this is lower than other regions, it was found that residents’ living in the region had a higher propensity to spend online, resulting in increased demand for last mile logistics responses.

²⁷ Ibid, p21 and p46

²⁸ Ibid, p49-50

²⁹ Tritax Symmetry (2020) The Increased Importance of Logistics During Covid-19 and Beyond, p6

30 Savills (30 September 2020) Increase in UK Manufacturing to Cause Ripple Effect on Warehouse Demand in The Logistics Point <https://www.thelogisticspoint.com/post/increase-in-uk-manufacturing-to-cause-ripple-effect-onwarehouse-demand>

31 BPF (2019) What Warehousing Where? Understanding the relationship between homes and warehouses to enable positive planning,

32 Based on 1.64 billion sqft of warehouse floorspace divided by 24 million homes in England in 2017

33 BPF (2019) What Warehousing Where? Understanding the relationship between homes and warehouses to enable positive planning, p29

34 Ibid, p30

6.16 The above ratios, although not representing absolute figures, are evidently beneficial in highlighting an important and measurable relationship between homes and warehousing, in turn providing a useful benchmark against which to consider the level of logistics space that has been delivered and is being planned to meet needs over the period to 2036.

6.17 In preparing the Local Plan Review, the emerging Spatial Strategy identifies a potential need for up to 45,630 new homes over the plan period of 2016 to 2036. Given the scale of planned housing growth, the relationship between homes and warehousing evidently represents an important consideration for Wiltshire Council in preparing the new Local Plan.

6.18 By way of illustration, the application of the regional ratio to the housing requirement over this period suggests that over 2 million sq ft of additional warehouse space would need to be provided on this measure alone to maintain the current relationship. The increased importance of logistics during the Covid-19 pandemic and beyond

6.19 The logistics sector has also helped the UK to be resilient and ensured that household and business needs have been met under unprecedented lockdown conditions implemented in response to the Covid-19 pandemic.

6.20 As well as being an essential component of how the UK has been able to continue to operate during Covid-19, the sector also has an important part to play in economic recovery. The Government has made the economic prerogative to support economic recovery clear, with local authorities and city regions encouraged to put economic recovery plans in place, while longer term Government ambitions to support 'levelling up' across the country have been evident since the publication of the Industrial Strategy in 2017³⁵.

6.21 Unemployment has increased significantly across the country in the wake of the pandemic, with the number of people claiming out-of-work benefits standing at around 2.23 million³⁶. Total claimant have increased by 120% across England since January 2020, highlighting the severity of the unemployment challenge that is faced. This challenge is affecting all areas of the country including businesses and people in regions which have historically been relatively strong and resilient to economic shocks.

6.22 The Government is alert to the need for labour market flexibility and the imperative to provide support to help those that have lost their jobs back into employment. The scale and widespread nature of the unemployment challenge means that people affected may have to adapt, learn new skills and work in different business sectors.

6.23 It is of note within this context, that the retail sector has been disproportionately affected by the Covid-19 pandemic, and since the start of 2020 has lost 125,000 jobs nationally. In contrast, the take up of logistics space over Q1 – Q3 is of a scale that would support approximately 54,000 on-site jobs³⁷. It is therefore evident that the

35 HM Government (2017) Industrial Strategy: Building a Britain Fit for the Future

36 ONS (2020) Claimant count by sex and age

37 Tritax Symmetry (2020) The Increased Importance of Logistics During Covid-19 and Beyond, p3

growth in logistics has the potential to support some of the individuals who lost their jobs in retail.

6.24 Employees in the two sectors have similar qualifications profiles, with around 70% of staff in both sectors having qualifications equivalent to NVQ3 or below, with a number of skills being transferable³⁸.
The role of logistics in providing higher value employment opportunities

6.25 It would be a misconception, however, to conclude that the sector only provides jobs in lower skilled occupations. Indeed, the sector is increasingly requiring a range of skills with research³⁹ finding that the proportion of office-based and managerial jobs have increased significantly over recent years, with a corresponding decrease in the percentage of jobs that are on the warehouse floor. The increase in office based roles also reflects the role of modern logistics units as integrated business operations - incorporating HQ offices with warehouse operations wrapped around⁴⁰.

6.26 Advances in technology have been a significant driver. Research⁴¹ published in 2020 highlights that the adoption of technology is being mirrored by increases in technical positions and up-skilling of staff. Indeed, the report notes that technology is becoming ever more prevalent within the sector including vehicle technology, big data paired with artificial intelligence for load optimisation, multi-shuttle systems, smart storage, 3-D printing, swarm autonomous vehicle robots, smart glasses and picking robotics. These technologies can lead to larger throughput, increased productivity and efficiencies within the system as well as changes in the skills required of the labour force, including IT skills, engineering, and analytics. Logistics companies are increasingly hiring technical staff or up-skilling existing staff in IT skills to adapt to this change in operational approach⁴².

6.27 This is a trend that is set to continue, with survey research published by the CBI suggesting that almost 80% of UK logistics firms expect to increase the number of higher-skilled logistics roles over the coming years⁴³.

Reducing Impacts on the Environment

6.28 The availability of land for distribution centres and other infrastructure has previously been recognised as being crucial for the efficient operation of the sector, and in particular for enabling optimised ‘last mile’ facilities from which to run efficient and low congestion operations⁴⁴. Conversely, locating a facility in sub-optimal locations can lead to longer travelling distances giving rise to more carbon emissions, greater fuel

38 Ibid.

39 Prologis (September 2019) Delivering the future: the changing nature of employment in distribution warehouses

40 Tritax Symmetry (2020) The Increased Importance of Logistics During Covid-19 and Beyond

41 BPF (2020) Delivering the Goods in 2020

42 Ibid, p6

43 FTA (2019) FTA Logistics Skills Report: 2019

44 National Infrastructure Commission (2019) Better Delivery: The Challenge for Freight, Freight Study Final Report and driver time costs to business, and a reduced ability for logistics operators to meet customer demands for quick deliveries. Access to labour may also be reduced⁴⁵.

6.29 It follows that locating local (or 'last mile') logistics facilities near to existing concentrations of population and likely areas of housing and population growth has the potential to facilitate more efficient patterns of distribution, reducing operating costs and environment effects⁴⁶.

6.30 To proactively manage the impacts of the industry on climate change and congestion the NIC has also previously made calls for better planning at an early stage of statutory plan making process to mitigate the environmental impacts of the sector. This included, amongst other recommendations, the need to:

"provide and protect sufficient land/floorspace for storage and distribution activities on the basis of population and economic need, with particular consideration for the floorspace requirements for last mile distribution and consolidation centres" and "support the clustering of related activities within a supply chain, minimising the distance that goods must be moved and maximising the potential for efficient operations"⁴⁷.

6.31 Within this context, failing to properly plan for the needs of a logistics sector that forms an integral and essential element of the way our economy works will have far reaching consequences:

"Not providing enough land, in the right location at the right time will inevitably force operators to make compromises to meet their needs (or worse withhold investment), with suboptimal locations resulting in both economic and environmental costs – directly at odds with two of the fundamental tenets of the NPPF and ultimately the achievement of sustainable development"⁴⁸.

45 BPF (2019) What Warehousing Where? Understanding the relationship between homes and warehouses to enable positive planning, p50

46Ibid

47 National Infrastructure Commission (2019) Better Delivery: The Challenge for Freight, Freight Study Final Report, p14

48 Turley (2015) The Land that Time Forgot

Rep ID: 66	
Consultee code: Developer/Agent	Consultee Organisation (if applicable): Carter Jonas
Is this response on behalf of someone else/another organisation? Yes	
Organisation being represented (if applicable):	
Does this representation refer to attachment(s): N	If this representation refers to attachment(s), these are listed below:
Please provide your comments here	
<p>Local Housing Needs Assessment (LHNA) - Swindon Borough Council and Wiltshire Council (Opinion Research Services April 2019)</p> <p>It is considered that the LHNA is out of date as it is calculated on the basis that the strategic policies of the Core Strategy are not out of date. It is acknowledged that the minimum Local Housing Needs figure for Wiltshire in 2019/2020 is 2,042 dwellings per year which yields an overall minimum housing need for Wiltshire of 40,840 dwellings over the Local Plan period 2016 – 2036. The report concludes however that the evidence suggests that an additional 6,300 dwellings would have to be provided to enable sufficient workers to live in the combined area going forward (Para 4.26)</p>	

Rep ID: 67	
Consultee code: Developer/Agent	Consultee Organisation (if applicable): Carter Jonas
Is this response on behalf of someone else/another organisation? Yes	
Organisation being represented (if applicable):	
Does this representation refer to attachment(s): N	If this representation refers to attachment(s), these are listed below:
Please provide your comments here	
<p>Local Plan Review Interim Sustainability Appraisal - January 2021</p> <p>It is noted that the Interim Sustainability Appraisal (ISA) tests a range of local housing needs from 40,840 to 45,600 dwellings for the period 2016 to 2036. The Sustainability Appraisal assessment of the alternative development strategies for the HMAs concludes that there would be no adverse effects of such significance that would prevent the higher figures (of each alternative strategy) from being progressed. Moreover, it concludes that a higher figure level would be more robust when planning for the longer term and has a greater level of contribution to meeting national and local needs for more homes. We are therefore supportive of the LPR's approach in taking the higher level as a basis for developing the spatial strategy.</p> <p>We support the conclusion of the ISA that lower levels of growth through strategies A and B are likely to have an adverse effect on rural parts of the HMA that will exacerbate affordability issues. We concur that rural areas are able to accommodate a higher level of growth and propose that such growth could be accommodated on our client's land at Colerne.</p> <p>We consequently support the recommendation in paragraph 4.6.3 (1) that an additional / amended development strategy that reduces proposed development levels around the more environmentally constrained settlements and that growth should be increased in the less environmentally constrained settlements in the rest of the HMA.</p>	

Rep ID: 68	
Consultee code: Developer/Agent	Consultee Organisation (if applicable): Carter Jonas
Is this response on behalf of someone else/another organisation? Yes	
Organisation being represented (if applicable):	
Does this representation refer to attachment(s): N	If this representation refers to attachment(s), these are listed below:
Please provide your comments here	
<p>Chippenham HMA: Formulating Alternative Development Strategies</p> <p>The acknowledgement that Box, Colerne and Rudloe have together accommodated less than a hundred additional homes over a decade is welcomed, as is the recognition of the housing need at these settlements with the expectation that they will accommodate a greater scale of development. However, we disagree that the recognised under delivery and need does not justify an exceptional circumstance for an assessment of the green belt. If there is a need for additional housing in Colerne, due to local connections, then this need should be met at Colerne and not at other settlements.</p> <p>It is recognised at paragraph 69 of the Formulating Alternative Development Strategies for the Chippenham HMA that development at the Corsham Community Area has been much less than that forecasted over 2016- 2036 and that by rolling forward the current strategy would require housing rates at the Corsham Community Area to increase by 54%.</p> <p>The challenges associated with increasing the housing delivery within the Chippenham HMA are noted (Para 78) as a substantial proportion of the land necessary to achieve higher rates of development has yet to be identified. The LPR Review therefore provides us with an opportunity to table our clients land at Colerne as being available to meet the recognised housing need.</p>	

It is noted at paragraph 104 that the proportion of the population living in the rest of the HMA is high and that a greater allowance for new homes should be made for rural settlements, especially in light of 1,435 dwellings being required at Large Villages within the Chippenham HMA. Our client's land in the Large Village of Colerne could help to meet this need. Indeed, we concur with the conclusions in Table 11 that the rest of the HMA should see a higher level of growth than the current strategy to better support the local community and to widen the mix of sites helping to enable housing delivery. Additional housing growth at Colerne will help support the identified ICT business cluster at nearby Corsham, which has the potential to grow.

Rep ID: 69	
Consultee code: Other	Consultee Organisation (if applicable): CAUSE
Is this response on behalf of someone else/another organisation? Yes	
Organisation being represented (if applicable): CAUSE	
Does this representation refer to attachment(s): N	If this representation refers to attachment(s), these are listed below:
Please provide your comments here	
<p>4. Comments on the Wiltshire Local Plan Transport Review with particular focus on Chippenham This section to be included as a single response to the Supporting Evidence consultation response form in respect of the document Local Transport Review</p> <p>1) The requirement for an Eastern Link has not previously been established: Paragraph 2.3.1 states "Previous work has shown that any meaningful growth would require a new Eastern Distributor Road (EDR) connecting the east of the town to the A350 to the north." And at para 4.2.3 "The previous Chippenham Site Allocations Plan (CSAP) established the requirement for a new Eastern Distributor Road, connecting around the north of the town from the A4 east of Pewsham to the A350 at Malmesbury Road."</p> <p>Both these statements are incorrect. The CSAP Examination in Public on 28th September 2016 examined under Matter 5 – General: Has the selection process taken full account of the potential performance of a southern link road?</p>	

After listening to the evidence, the Inspector and WC agreed to Main Modification 5:

4.21a Both proposals (South West Chippenham and Rawlings Green) safeguard the potential for future road alignments to the east and south of the town and require that their design and layout must not prohibit road connections in the future. This is based on evidence prepared for the Plan that indicates an Eastern Link Road and/or a Southern Link Road may be longer term solutions to improving the town's network resilience. The policies ensure that development during the Plan period does not undermine the future development of the town and will enable further investment in roads to support the growth of the town if required in future plan periods.

2) You have not provided evidence that an Eastern Link Road is needed

The pre-Covid traffic congestion in Chippenham reflected the volume of East/West traffic which builds up at the Bridge centre, and at Rowden Hill on the A4 West Bath Road, being particular issues experienced on the ground and showing up on Google Maps and Sat Navs. This will be made worse as the 1,500 homes approved in the last Chippenham Local Plan are built to the Southwest of Chippenham.

The Local Plan workshop with Chippenham representatives on 25th Oct 2018 concluded that there was "more support for a southern link road ...to relieve current congestion." One Wiltshire councillor spoke out at the Chippenham Town Council meeting on Future Chippenham and stated that an SLR would take cross town traffic from Devizes and Calne.

The traffic modelling for the CSAP Transport and Accessibility Evidence Paper Part 2a: Assessing Alternative Development Strategies at Figure 3.8 showed that, even with an Eastern Link Road (ELR), there was still an increase in traffic on Rowden Hill and the A4 Bath Road, but this was relieved with a Southern Link Road (SLR).

This Wiltshire Local Plan Transport Review traffic modelling does not contain a scenario with just a SLR, and yet at Figure 2-2 there is a scenario with just an ELR which shows traffic congestion on both the A4 East to Calne and on the A4 West on the Bath Road at Rowden Hill. Indeed, your commentary at 2.3.1 confirms this: "There would still be several challenges: significant congestion problems on the A4 to the east (due to traffic routing via the A4, A342 and A3102 towards Melksham), residual issues in the central area and constraints on the A350 and A4 west. This is shown visually in Figure 2-2. The Do-minimum scenario therefore introduces a more comprehensive solution. This would require an EDR (a northern link from the A4 at Pewsham to the A350 Malmesbury Road roundabout) and a new Southern Distributor Road (to connect from the A4 at Pewsham to the A350 at

Lackham Roundabout). A Southern Distributor Road (SDR) provides a route between the A4 and A350 corridors which avoids the town centre”.

There needs to be a traffic model with just the SLR for comparison. This is likely to show that it functions better at relieving the East/West traffic congestion.

3) The assumptions on distribution of the Local Plan housing growth are incorrect and strongly bias the traffic modelling to favour an ELR.

Table B1, for Chippenham, up to 2036 show that most traffic models are based on an additional 3,300 houses at Site 1 East of Chippenham and only 1,300 houses at Site 2 South of Chippenham. In fact, the draft for the Local Plan is for 2,975 dwellings to the East, and 2,415 to the South.

Your incorrect housing allocations bias the need for an Eastern Link Road

4) There is strong opposition to the proposed additional 5,100 houses allocated to Chippenham. Alternative scenarios have not been modelled.

Reasonable alternative traffic models might evaluate the impact of placing -

a) 500 houses on brownfield sites in the centre of Chippenham which should have less car trips; and

b) 900 houses on Site 7, Barrow Farm to the North of Chippenham which will provide sustainable access to schools and the railway station and enable out-commuting to the A350 and A4 without adding to congestion in the centre of Chippenham

With additional variations to add a further say 1,500 houses

c) to either the South of Chippenham with an SLR, or

d) to the East of Chippenham with an ELR for traffic relief.

Such alternative scenarios would enable a better assessment of both the total housing capacity for Chippenham and where it is best located from a traffic perspective.

5) Further road traffic mitigation measures should be considered as an alternative to a new link road between the A4 and A350

These should include a link road from Avenue La Fleche to St Luke's Drive (between the Rowden Surgery and the Chippenham hospital) leading onto Rowden Hill. This would relieve East/West traffic congestion at the Bridge Centre.

The traffic lights on the one-way system at the Little George have been an unmitigated disaster. The traffic lanes need to be reconsidered and the timings re-evaluated to ease the congestion on the one-way system at the top of New Road.

6) The traffic models need to be updated for changed travel patterns emerging from Covid and Climate Emergency awareness

Your report correctly points out at para 1.2 that "The long-term impacts of the pandemic are likely to cause potentially significant changes in travel demand and behaviour". Whilst this is difficult to predict, we already know that at least some Working from Home will continue, which will significantly reduce the number of car trips, and consequent impact on journey times and congestion. Your traffic models based on 2018 data are already outdated.

Your report allows for an increase in cycle trips from 2.3% to 5.5%. But to reach zero carbon by 2030 there needs to be a step change from travelling by car to alternative modes of transport.

These behavioural changes will reduce road traffic and should be factored in to your model scenarios so that we can understand their potential impact on the need for the proposed additional road infrastructure, in particular the ELR and SLR.

7) The impact of traffic on Calne has not been evaluated

The A4 through the centre of Calne already exceeds safe NO2 emission levels. Figure 2-3 shows an additional 200-250 car trips per hour in each direction on the A4 East of Chippenham. This is a very significant increase in traffic to Calne and its impact needs to be modelled and considered in detail. We suggest modelling the impact of the ELR separately to the SLR, as this is likely to show that the greatest increase in traffic through Calne is caused by opening up a shorter route to the M4 at junction 17, via an ELR.

River Marden towards New Leaze Farm [see attachment 70_CAUSE for image]

8) The impact of traffic rat running on country lanes has not been evaluated. The ELR crosses Stanley Lane, and the Local Plan map shows another development access further East on Stanley Lane. Traffic will take the shorter routes via either Studley or Bremhill to/from Calne adding to the traffic on unsuitable narrow country lanes. Before Site 1, East of Chippenham is progressed, the effect of traffic on the country lanes must be properly evaluated. Such modelling is likely to show that the further any distributor or access roads onto Stanley Lane are from the A4, then the greater propensity for traffic taking short cuts via the country lanes.

9) Figure 2-3 doesn't make sense!

With Local Plan growth and an ELR and SLR, this figure shows no change in traffic over the prospective river Avon bridges on both the ELR and SLR! It is as if the river bridges have not been built and the proposed sites 1 and 2 to the East and South are only provided with access roads from the A4 East. We have raised a query on this and Tim McCombe has responded that this is a mistake and will be corrected. Please provide a copy of the revised figure.

10) The report is extremely difficult for a typical resident to follow!

Apart from the mistakes – example above, the misleading scenario titles where “do nothing” includes both the ELR and SLR, the abbreviations and assumptions are difficult to follow. For example, how is your 2018 baseline reconciled to the 2016 to 2036 housing projections?

In conclusion, there is nothing in this Transport Review to contradict the proposal we put to the 2016 Examination in Public that a Southern Link Road, from the Lackham roundabout to Pewsham way, would be the preferred option for relieving traffic congestion in Chippenham.

Rep ID: 70	
Consultee code: Other	Consultee Organisation (if applicable): CAUSE
Is this response on behalf of someone else/another organisation? Yes	
Organisation being represented (if applicable): CAUSE	
Does this representation refer to attachment(s): N	If this representation refers to attachment(s), these are listed below:
Please provide your comments here	
<p>Comments on the Strategic Flood Risk Assessment This section to be included as a single response to the Supporting Evidence consultation response form in respect of the document Level 1 Strategic flood Assessment The world is facing a major crisis of Climate Change, the planet is heating up and there appears to be little willingness to stop, or even reverse this trend. The consequences for the continued asset stripping of the environment will be increased temperatures, rising to over 40 degrees in summer months by 2040, and increased storm damage through severe weather systems bringing intense rain and wind. [NAME REDACTED, Chair of the Adaptation sub-committee of the Climate Change Committee³ stated: “the six immediate priority areas are related to the risks of flooding and coastal change, the impact of high temperatures on health and wellbeing, risks of future water shortages, impacts on the global food system, and risks arising from new and emerging pests and diseases (COVID)” Flooding in Monkton Park – building on Site 1 will make this worse [see attachment 70_CAUSE for image] ³ UK Climate Change risk assessment 2017. Synthesis report: priorities for the next 5 years.</p>	

The Scott Wilson report 2011 on the Bristol River Avon states:

“Within the county of Wiltshire, the river is predominately underlain by the Kellaways formation and in the west Great Oolite Group. The low permeability of this area results in rapid response to rainfall.”

“Communities that have experienced flooding from this river system include Malmesbury, Chippenham, Melksham and Bradford Upon Avon.”

At Para 3.3 “The areas that are identified as being the most susceptible to ground water flooding are located close to the Upper Bristol Avon and the River Marden.” (All land to the East of Chippenham)

This is not the first-time developers and Wiltshire Council have proposed development to the East of Chippenham. In 2012 [NMAE REDACTED] formed a company Chippenham 2020, which put in a planning application for New Lease farm to the East of Chippenham, and in 2015 an Examination in Public was held to consider the building of 1600 homes:

On 14th September 2015 the Planning Inspector leading the EIP in his initial appraisal stated:

“The plan acknowledges the landscape impact for this area is a significant concern as is the need for considerable work to avoid the flood risks to the town and elsewhere”

The former point is recognized in the Landscape setting report (docceps06) Para 6.25.

“The open character and strong association with the rivers and floodplain are important characteristics to safe guard. The generally remote character to the north of the North Wilts River Route and the eastern end of Stanley Lane is important to conserve.”

The matter of concern here is that the plan is over-allocating in both housing and employment land requirements specifically in the area, which the evidence base suggests is environmentally sensitive and least attractive in terms of flood risk.

Soundness Issues:

[NAME REDACTED] the EIP’s Planning Inspector, went on to state at Paragraph 19 of his report:

“Over-allocation of both housing and employment land is driven primarily by the need to support and justify the eastern part of the ELR4. This appears to ignore significant and legitimate environmental, landscape and flood risk concerns which would suggest that inclusion of housing allocation to the north of the North Wilts Rivers Route and the larger of the two employment sites intended for development beyond the plan period are unsound.”

4 ELR = Eastern Link Road

Wiltshire Council is again putting forward an over-allocation of housing in order to benefit from the £75m being offered by the Government. The over-allocation this time is far greater than that proposed in 2015.

From the notes of the progress meeting following the suspension of the EIP on 18th January 2016, [NAME REDACTED] stated “The Flood risk report (CEPS10-EP6) on balance Area C (Land to the East of Chippenham) appears least attractive for development in the terms of flood risk, surface water management compared to others because of the degree to which flooding is an issue to tackle and the extent of flood risk land”

The notes recorded that it was noted that the consequences of management measures being miscalculated or failing would be potentially far more serious than other areas, and that the links across the river could disrupt the natural flows. For these and a number of other questions including changes in perception nationally resulting in recent flood events- it was necessary to re-visit the issue of flood risk associated with strategic Area C (Land to the East of Chippenham).

[NAME REDACTED] Senior Drainage Engineer for Wiltshire Council stated in the planning application for the Riverside Development to the East of Chippenham on 15th January 2016.

“It is clear from casual observations in the area of the Radial Gate weir and the river Avon immediately upstream of the Chippenham Town Bridge that the running tolerances in terms of “freeboard” already leave little room to manoeuvre since the purpose of the radial gate is to maintain an elevated flow level in the river. Following severe storm events, this “freeboard” almost disappears and the radial gate has been overtopped. The amount of rainfall falling on large developments on each bank of the River Avon will influence the expected peak flows.”

As Climate Change takes hold and more severe rainfall is expected over the lifetime of this proposed development of 9,000 plus houses the flood risk to Chippenham Town and its residents will increase.

Comments on the JBA Consulting Level 1 Flood Risk Assessment report (May 2019): This Flood assessment for the Chippenham Site Allocation process for land to the East of Chippenham is not appropriate for a level 1 assessment as the area has been subject to numerous flooding incidents, which are increasing year on year.

At 2.3.1 Bristol Avon- The data was collected in 2011 and is out of date. It is no longer relevant today due to Climate Change - the numbers of homes at risk from flooding is out of date, and should be significantly increased, as will the risk.

Table 2-2

Just how is Wiltshire Council managing the flood risk for Chippenham? Building 10,000 houses upstream from the town will bring an increased risk of flooding the town. How does the Council propose to mitigate this risk – build fewer houses?

2.7 Wiltshire LFRMS is out of date and due for renewal. Will Wiltshire Council proceed to the EIP with this out of date and with the concerns of flooding land to the East of Chippenham which were raised by the last Planning Inspector Mr. Whitehead in 2016.

2.8.1 NPPF

Sequential testing must be undertaken for the planning, as this area is high risk to flooding. (See above)

2.8.2 Wiltshire Council must take into account the cumulative impact on flood risk including:

- Developing Rawlings Green
- Proposed development to the east of 10,000 houses
- Proposed river crossing at Rawlings Green
- Impact of Climate Change - increase in river levels, and flow of the river Avon.

Impacts of Climate Change:

Climate Change is expected to increase flood risk and lead to development to be become unsustainable, opportunities should be taken to relocate developments away from downstream flood risk areas.

2.10 Surface water management plan (SWMPs)

Chippenham is ranked 2nd in the Wiltshire properties at risk from flooding at 1,192 properties.

However, this report was published in 2011 and is now over 10 years old and out of date. It should not be used in this report.

Please let's have an up-to-date report.

2.15 Sewers for adaption

The risk to the river Marden and river Avon of foul water escaping into the rivers cannot be overemphasized. The waters of the river Marden are pristine, and there is an abundance of fish, otters, kingfishers and other threatened species. Protection of this watercourse is imperative.

3.2 South West River Flows:

It is noted at the river Avon flow will increase by 20% between 2020 -2039

Geology, the Kellaways formation and Oxford Clay make up the soil to the East of Chippenham. The soil construction is impermeable, and leads to flooding.

Surface water flooding for Salisbury, Trowbridge and Chippenham will increase between 20% and 40% in the period 2020-2039 These are massive increases when the Chippenham radial gate is already at risk of overtopping. Wiltshire Council should not be considering building 10,000 houses adjacent to the river Avon, to the south and east of Chippenham?

9.3 Multiple developments: Building 10,000 in multiple developments in Chippenham area will increase the flood risk.

Other questions and observations:

Various appendixes were NOT provided. Appendix J Recorded Flood History is missing?

Appendix O Action 993 What are the options for renewing the radial gate at Chippenham? Q Record of flood history.

Why are there no records after 2014? The last 7 years are very relevant to this report.

Conclusion:

The Flood assessment submitted for the 2021 Chippenham local Plan Review completed by JBA Consultants did not address the serious threats to the River Avon & Marden Vale from fluvial flooding.

The last five years has seen ever increasing incidents of flooding in the Chippenham Avon Vale. However, this flooding has been a threat to the river Avon and the lands in the vale for many years if not centuries.

In the 15th century Maud Heath made a bequest to the people of Bremhill, and that money was used to create Maud Heath Causeway the oldest private footpath in the world. It is still in community ownership, and the fund maintains the Causeway which connects the parish of Bremhill to Langley Burrell and eventually Chippenham. The Causeway allowed farmers from Bremhill to take their goods to market when the river Avon Flooded. Today the causeway floods several times a year and cars are frequently abandoned after ingesting water into the engine.

The intensity of the rainfall is increasing and it is raining for longer, allowing surface water to run quickly into the watercourses and creating flooding.

The JBA report fails to address the specific history of this location. It fails to acknowledge the soil make-up of the area, being Kellaways and Oxford Clay.

Wiltshire Council has always stated that drainage of the land in Site 1 could be managed by Urban Surface Drainage Units (SUDS), this engineering solution is not suitable for this land as it is impermeable, and the SUDS will over spill and create a considerable flooding risk to properties. With large quantities of surface water much of it will enter the sewer systems contaminating properties and the valued river tributaries threatening fish, and wildlife.

Attenuation ponds could be considered, but with 5,000 homes, roads, parking spaces, employment areas all concreted over the run off of many million tons of water into attenuation ponds, there is a likelihood that they will be overtopped. This water will again drain towards the valued watercourses.

Nobody is prepared to calculate the size and depth of ponds required to manage the run off from 5,000 houses, driveways, and roads.

The risk to Chippenham from flooding from an estate of 5,000 houses on one side of the River Avon, and a further 700 houses on the other side at Rawlings Green must be substantial as [NAME REDACTED] Wiltshire Council Drainage Engineer stated in his response to the planning application in 2015 to build 1600 houses on this very site this flood risk assessment is considering.

Where is [NAME REDACTED] statement and photographs he sent to the planning department in 2013 showing the radial gate being topped and flood waters in Chippenham Town. Just where is this evidence?

On a final note, there should be no house building north of the Chippenham to Calne cycle track as recommended by the Planning Inspector Ann Skippers in 2018 when the Bremhill Neighbourhood Plan was made. Any house building at this location would mean that any runoff from construction would run downhill to the river Marden, and any development this side of the cycle track would threaten the river Marden Vale with flooding.

SUDS - Surface Urban Drainage Systems

The SUDS system is not appropriate drainage system for Site 1 for the following reasons:

The land is Kellaways Oxford Clay and therefore impermeable, and will not act as a soak away.

In recent months during 2021 SUDS have over topped in Gloucestershire and closer to home a new site in Calne

As the soil is impermeable the run off into SUDS will increase the risk of over topping. In conclusion SUDS is not the right drainage engineering solution for Site 1.

It has to be added that Site 1 borders a large area of flood plain of zone 2 & 3, this flood plain will grow larger with climate change, any drainage system must not filter into this flood plain contaminating the pristine waters of the river Marden.

It is all the more important that there is no development north of the North Rivers Cycle Track not only to preserve the ecology and bio diversity of the river Marden valley but also the landscape setting.

Summary

The Flood risk to site 1 will continue to increase as Climate Change increases the intensity of rainfall over a shorter period of time. River levels, especially the River Avon, will continue to rise, and the flows increase. Building 9,500 houses within a few hundred metres of two rivers, on ground that is Kellaways Oxford Clay, will mean that the run off from the roads, driveways, and houses may over-top any surface urban drainage system, and create incidents of flooding which may threaten life and damage to property. The proximity of zones 2 & 3 so close to such a large development to the East of Chippenham will create a major flood risk.

Avenue La Fleche from the old playing fields in Chippenham [see attachment 70_CAUSE for image]

Rep ID: 71	
Consultee code: Other	Consultee Organisation (if applicable): CAUSE
Is this response on behalf of someone else/another organisation? Yes	
Organisation being represented (if applicable): CAUSE	
Does this representation refer to attachment(s): N	If this representation refers to attachment(s), these are listed below:
Please provide your comments here	
<p>6. Comments on the Interim Sustainability Appraisals</p> <p>This section to be included as a single response to the Supporting Evidence consultation response form in respect of the documents Interim Sustainability Appraisal, Interim Sustainability Appraisal Annex I and Interim Sustainability Appraisal Annex II</p> <p>The Interim Sustainability Appraisal (SA) should be demonstrably shown to be fair, proportioned and adequate. We believe that if the SA is subject to any detailed examination it would become readily apparent that it is not adequate. This Interim Sustainability Appraisal has many of the fatal flaws that were in the Chippenham Site Allocations Plan in 2015 that made that SA inadequate, in fact many of these flaws are even more visible in 2021.</p> <p>Choosing a Preferred Strategy for the Chippenham Housing Market Area (HMA)</p> <p>The first comment is on the first activity in assessing sites with the methodology; Stage B - Developing and refining alternatives and assessing likely effects.</p> <p>The crucial paragraph on the SA methodology is 2.3.5, which makes it clear how subjective and unaccountable it is: "Evaluation involves forming a judgement on whether the predicted effects are likely to be significant. The principal technique used to assess</p>	

the significance of effects is a qualitative assessment based on expert judgement and supported by specific evidence." As far as we can see, no information is given about who's 'expert judgement' or which 'specific evidence' is being used. This is an inadequate methodology, resulting in invalid conclusions. Consequently, the whole set of Local Plan preferences and proposals are fatally flawed.

Beyond that there are many other weaknesses in the SA process, as set out below.

Three Chippenham HMA strategies are set out in paras 4.24 to 4.27. No mention is made of the fact that preference for CH-B (the maximum numbers for Chippenham) was approved for further work in a political Cabinet meeting in 2019 and cannot therefore be presented as an evidence-based conclusion.

It is a complex argument but it can be seen that any SA for a HMA will always be biased towards huge development in a single settlement if the process adopted by Wiltshire Council is followed. Why?

- There are more "negative" environmental SA objectives evaluated than "positive" economic ones for each individual settlement in a housing market area.
- Therefore, less development in a settlement within the HMA, although being less positive for economic opportunities is outweighed by lower negative environmental impacts to provide an overall more positive (or less negative) score for the SA. i.e., the settlement looks more sustainable.
- The bias towards a single settlement being chosen then comes about by the SA for the Chippenham HMA strategy being totalled up using the total score for ALL settlements in the HMA (Chippenham, Devizes, Melksham, Malmesbury, Corsham, Calne and Rural) and then divided by the number of these settlements (7). This is hidden away only in footnote 31 on page 20 of the report "Calculated by adding the scores for each settlement (including 'Rest of HMA') and dividing by the number of settlements".
- It is obvious that less damaging environmental impacts on all the other six settlements in the Chippenham HMA will always outweigh the large environmental impact on a single settlement (Chippenham itself), making a single large development area likely to be promoted by Wiltshire Council.

In addition, there are serious shortcomings in the detailed evaluation of the Chippenham HMA in Annexe 1 of the SA report.

There are three main categories of problems:

- 1) There is not enough granularity in the impact assessments, for example minor adverse and moderate adverse. As an example, for SA Objective 1 "Protect and enhance all biodiversity and geological features and avoid irreversible losses." the reduction in numbers of 800 houses in Devizes between CH-A and CH-B takes the assessment from "moderate adverse" to "minor adverse". However, adding 3,300 houses to the Chippenham settlement does not impact the assessment for Chippenham from "moderate adverse". There are many, many examples of this throughout Annexe 1, for each of the SA objectives.

2) The evaluation is based on selecting a strategy based on the housing number in Chippenham for CH-B for 9,225 homes. However, the areas eventually selected have a housing capacity of 18,500 homes. This would have a massive impact on the SA evaluation of each objective, particularly the environmental objectives, even at the HMA Assessment decision making stage.

3) Single statements are made for a whole settlement against a SA Objective, huge areas being evaluated in a few short sentences. For example, against SA1 Biodiversity for CH-B in Chippenham the analysis is “Additional to housing development, it is likely that significant additional infrastructure will be needed. As a result, moderate adverse impacts are considered likely against this objective. Adverse effects are likely to be more significant than CH-A and CH- C but mitigation measures are possible.”

4) Amazingly, then results seem to be further refined with the footnote on page 4 of Annexe 1 which states “Average scores in this annexe are rounded up or down to nearest significance category e.g., -1.4 is rounded down to -1, -1.6 is rounded up to -2, -1.5 is rounded up to -2.”

It can be seen that the whole process of evaluation is shooting in the dark, with no proper analysis of these huge areas for sustainability. Instead, we have subjective judgements, biased evaluation, rounding of numbers and insignificant differences between strategies.

In 4.2.4 in preferring the focus on Chippenham CH-B development the report states “Under CH-B where growth levels are significantly higher, there are also likely significant adverse effects on climate change adaptation, heritage assets and landscapes. However, at this stage, the assessment of likely significant effects is based on the level of growth proposed and a high-level assessment of constraints around the town, not on actual development locations, which are not known.”

Based on this flawed strategy, the key assessments for the Chippenham HMA eventually appear in Table 5.2 on page 45, and in the subsequent paras. 5.2.4 and 5.2.5 of the main report.

A preferred strategy is somehow chosen out of this exercise, where the evidence is ludicrously unhelpfully thin or entirely missing. Amazingly (or not), this strategy just happens to match the requirement to support the Housing Infrastructure Fund agreement made between Wiltshire Council and Homes England to increase housing numbers in Chippenham settlement to above 7,500. The weasel words on pp 21-22 provide no support, thrashing around with a belief that the huge environmental negatives might be mitigated “with infrastructure”.

2) Site Selection and the Sustainability Appraisal

This SA has major similarities with the failed SA in 2015 for the CSAP. Two areas that the Planning Inspector commented on are still concerns here:

a) Huge sites have a single evaluation and scoring, where there may be issues impossible to mitigate in parts of the site, whereas other parts of the site could well have potential for development. This was highlighted in the Barrow Farm site (Site 7) in the 2105 evaluation. This flawed evaluation applies again here, even more so as there is a road infrastructure already built next

to the site, so environmental damage has already taken place to impact its SA score. Here in 2021 the sites are even larger than those in 2015 and the process is even more flawed.

b) In the Table, tiny changes in what are subjective judgements that lead to scoring taken as gospel would completely change the futures proposed for Chippenham.

For Site 1, massive Biodiversity (SA1), Land & Soil (SA2), Water (SA3), Air Quality (SA4), Climate (SA5), Heritage (SA7) and Landscape (SA8) issues are glossed over, summarised as a minor or moderate adverse effect. For example, the text includes just one sentence on the loss of productive farmland: "Land/soil: given the significant size of this site, there will be a significant loss of greenfield, agricultural land of medium quality". No indication is given of the weight given to this loss, and it is not mentioned again, but clearly it is not high, given the conclusions that follow in the Site Selection process. Unsurprisingly there are lots of proposed Mitigation Measures for Chippenham, but none of them refer to the loss of productive farm land.

Our comments on Site 1 are as follows:

In the WC document 'Interim Sustainability Appraisal Annexe I – Assessment of Alternative Development Strategies for the four Housing Market Areas (HMAs)' –

Sustainability Appraisal Objective 1: Protect and enhance all biodiversity and geological features and avoid irreversible losses

The assessment for Chippenham in all three strategies is the same – Likely effects: Moderate.

Wiltshire Council have not yet carried out a proper biodiversity assessment for Site 1, relying it appears on a scant PEOAR report in the Future Chippenham consultation (not even included as part of this consultation). Somehow Wiltshire Council can still assess the impact "Moderate Adverse" without any of the baseline evidence.

Yet we know from the recent assessments commissioned by Bremhill Parish Council, and available on their website (River_Marden_Draft_v2.pdf and Wildlife Update on the River Marden.pdf) that the Marden Valley has a particularly rich biodiversity and should be protected rather than destroyed.

Yet, even though their own decision-aiding question (DAQ) 1 asks "Avoid potential negative impacts of development on designated wildlife sites, protected species and priority species and habitats (international, national, local) and enhance these where possible?", WC still prefers the overdevelopment of Chippenham in Strategy CH-B (Chippenham Expanded Community), without recognising that, where the effects are always going to be 'moderate adverse', those adverse effects will be cumulative in direct proportion to any increase in the housing numbers required. There is no recognition of the fact that at some point, the effect will swing into major adverse – there is only so much 'mitigation' which can be planned in, and that is usually very ineffective anyway, except in the view of developers and WC.

There are no measures described to evidence that the significant adverse effects can possibly be mitigated! The huge area of land being proposed for inclusion cannot possibly be replaced or mitigated elsewhere, and the potential damage to the town of Chippenham not least due to excessive rainwater run-off from any new developments has not been taken into account. The town centre is already prone to flooding, as is the Avenue LA fleche by-pass, mainly due to excessive expansion of the urban areas

with no thought of what might happen due to future climate change – the more grassland and woodland that is built on the worse the adverse effect will be.

Option 2 is the preferred option for WC, even though the effect on Chippenham will be much more than moderate adverse! The WC comment in the average score section is that overall, it is likely to lead to MINOR ADVERSE EFFECTS overall, ignoring the threat to Chippenham itself. Chippenham is glibly thrown to one side as everywhere else will be OK, Jack!

In DAQ 3: Aid in the delivery of a network of multifunctional Green Infrastructure? is stated “the design of developments may incorporate measures to enhance biodiversity and contribute to networks of multifunctional green space known as green infrastructure. The preparation of a Green Infrastructure (GI) Strategy will help to provide a long-term vision and strategic framework to aid the delivery of GI. However, at this stage of the process, it is not possible to comment on the likelihood of GI being adopted as part of development.”

Why is it not possible to comment? Surely this is precisely when such comment requiring a Green Infrastructure to be adopted should be made!

Various recent wildlife surveys have shown that in the Avon and Marden river vale, there are many protected species such as otters, bats, newts and more, yet no account has been taken of those, even though the WC is aware of them.

What better green infrastructure could you have than the one already in place – multiple farms contributing to the food economy of the area, whilst assisting with water retention, CO2 retention, etc.?

The conclusion reached that “The SA findings suggest that the levels of growth proposed would not lead to any ‘major’ adverse effects at any of the settlements which would mean that mitigation measures are not achievable” is staggering, and completely without merit, specifically in relation to Chippenham!

Stanley bridge towards New Lease Farm with runner on the cycle track [see attachment 70_CAUSE for image]

Sustainability Appraisal Objective 2: Ensure efficient and effective use of land and the use of suitably located previously developed land and buildings

The first requirement in DAQ 1 is to ensure efficient use of land. Nowhere, in the documents provided, is there any recognition of either climate change requirements or changing patterns of use of dwellings due to post-Covid working arrangements, such as more and more people who can, not commuting but choosing to largely work from home. This entails having the space to do so, which most national-developer built boxes do not take into account.

The second requirement is the reuse of Previously Developed Land where possible, and the statement that “There is a lack of previously developed land (PDL) across the whole of the HMA. Therefore, all strategies are likely to result in significant loss of greenfield land”! Certainly, in relation to Chippenham this is not true! At ground floor level, and certainly on upper floors, in the High Street area there are many opportunities for change of use to dwellings. Bumpers Farm Industrial Estate has empty units, and the new development at Chippenham Gateway next to J17 on the M4 has yet to find a tenant, even though work is about to begin on a second large-scale unit there.

Perhaps an option would be to increase development at Chippenham Gateway to provide business premises to replace Bumpers Farm, then use the site to provide dwellings? The land at Chippenham Gateway is already scheduled for development anyway. In DAQ 4: Result in the permanent loss of the Best and Most Versatile Agricultural land (Grades 1, 2, 3a)? WC states “The majority of the agricultural land surrounding Chippenham is Grade 3 (good to moderate) with areas of Grade 2 (very good) land in the north east and south, where there are also smaller areas of Grade 1 (excellent).” Most of the areas that WC wish to build 2 new suburbs of Chippenham in, are Grade 2, and again there appears to be no thought applied to the need to reduce food-miles - or indeed any joined-up long-term thinking at all.

Again, the conclusions for Chippenham are all moderate adverse. “Further assessment is needed on the proportion of Grade 3a land within Grade 3 at Chippenham to understand the potential loss of the best and most versatile (BMV) agricultural land as well as any potential impacts associated with the MSA. As this strategy proposes a high level of growth proportional to the settlement combined with the relatively low amount of previously developed land (PDL) available for development, a moderate adverse effect is considered likely. Furthermore, this strategy proposes the highest level of comparative housing and employment growth in Chippenham...” This statement ignores the fact there are available brown-field sites in Chippenham, many of which are already, or being, developed for housing (numbers in the hundreds) which WC considers as ‘windfalls’ and steadfastly refuses to include in the housing numbers. Nor is any effort made either by WC or developers to ensure that existing permissions are built! The fact that unbuilt permissions are not included towards the 5-year land supply is staggering beyond belief. The developers can use that exclusion to ‘prove’ that WC doesn’t have the required land supply, even though it possibly does – and just as incomprehensible is the fact that a unitary authority doesn’t even know whether or not it can meet its obligations, and relies on land- speculating developers to provide that evidence! It also fails to provide any evidence that building more houses in Chippenham produces jobs – in fact the contrary is true. Prior to the Covid emergency, some 64% of Chippenham residents commuted out of Chippenham, either by road or rail, to work. The increase in dwellings over the last 30 years has produced no discernible benefits to the town at all, and there is no reason to expect that future increases will do so either.

The conclusion in DAQ 4 still recommends Strategy CH-B whilst it gives the nod to moderate adverse effects on Chippenham but still claims to be more sustainable.

Sustainability Appraisal Objective 3: Use and manage water resources in a sustainable manner.

At Chippenham, Wessex Water have identified a need to invest in water network assets to improve capacity between 2025 and 2036. There is a moderate probability that the roll forward would require construction works to accommodate development.

The underlying geology of the area consists of Kellaways or Oxford Clay. Increased run off from urbanized sprawl will not be absorbed by the surrounding land, and can only increase the pressure on an already stretched flood management regimen along the Tetbury and Chippenham Avon.

In view of the current pressures on Wessex Water in Chippenham because of climate change, increased rainfall and less absorption of rainfall into land (due to all the building that has taken place over the last 30 years with no increase in water run-off provisioning), the risk level should be HIGH, not moderate!

Site 1 is rated the equivalent of Site 2 "Minor Adverse", which is just not believable. Site 1 is in a Source Protection Zone; Site 2 is not. Site 2 includes a STW within its boundaries, Site 1 is remote from the STW and "it is very probable that this site (Site 1) will require a significant investment in water, sewerage and drainage infrastructure".

Site 1 is the only site upstream of Chippenham with the potential consequent impact on flooding. Added to this the SA states that "Consideration should be given to the inclusion of SUDS to control the risk of surface water flooding from impermeable surfaces. As this site covers a Source Protection Zone, the extent to which SUDS can be used may be affected."

For all these reasons it is amazing that Site 1 is rated as Site 2 as "minor adverse", there are issues that may prove difficult to mitigate or even insurmountable and questions the viability of Site 1.

Sustainability Appraisal Objective 4: Improve air quality and minimise all sources of environmental pollution

There are no baseline measures whatsoever of PM10, PM2.5 or PM or suspended particulate matter (all Group One carcinogens) in Chippenham. This objective is completely meaningless in the absence of time series data collection or comparison of before/after quantification of the relevant measures, whether of air quality, noise pollution (undoubtedly influenced by Chippenham's low-lying location), or light pollution.

Minimise and, where possible, improve on unacceptable levels of noise, light pollution, odour, and vibration?

Chippenham has been highlighted as a settlement at risk of an AQMA declaration, due to rising levels of Nitrogen Dioxide.

Chippenham continues to be monitored for exceedance of Nitrogen Dioxide and commitments to improving air quality form part of the Air Quality Strategy.

Sustainability Appraisal Objective 8 Conserve and enhance the character and quality of rural and urban landscapes, maintaining and strengthening local distinctiveness and sense of place.

There are comments in this document for Site 1 that are not reflected in the Wiltshire Council Core Strategy Landscape Assessment, and for which no evidence at all is provided. The claims are value judgements, apparently based on no systematic assessment, quantification, or context, so we wonder who made them and what evidence there is to back them up:

"...in combination with some absent and weak field boundary hedgerows with few hedgerow trees suggest that this is a landscape in decline." (repeated twice in the assessment)

"The landscape is considered to be in generally moderate condition."

"It is a relatively ordinary, rural landscape with some distinctive characteristics such as the tree-lined rivers."

The site has strong landscape characteristics that should be recognized in DAQ1 and DAQ2. The appalling conclusion reached by Wiltshire Council of this only being a Minor Adverse Impact on Landscape in the SA should be reviewed and better reflect the assessments from ourselves, independent consultants and Wiltshire Council's own consultant.

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 conservation village of 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.'

CAUSE'S ASSESSMENT OF THE LANDSCAPE

- 1) The Wider Landscape: As does Chippenham itself, the site sits in a bowl of surrounding hills over the Rivers Avon and Marden Vale, rarely rising above 60m AOD, creating ideal conditions for air pollution, temperature inversions (exacerbated by urban sprawl), and for flooding. The view from higher ground of the limestone ridge would be impacted at Lyneham Banks, Charlcutt Ridge and Bencroft Hill, Studley and Bowood, and Spye Park. From the North Rivers Cycle Route even Cherhill and the White Horse can be seen, so the visual impact would affect views from a great distance, both during day and night time.
- 2) Locally valued landscape: From the south the site is the landscape view for Chippenham residents along London Road from Abbeyfield to Chippenham Town Centre, sloping down to the river vale. From the west the landscape is the context of the

view for the residents of Monkton Park. From the north the rising ground provides the landscape view of the Marden Vale from the conservation village of Tytherton Lucas. From the east the landscape provides the rural character of Stanley.

The site also provides “the countryside” for residents of Chippenham using the North Rivers Cycle track for walking and cycling, usage of which has increased exponentially during the Covid crisis. It is possible to cycle or walk from Chippenham to Calne from the Bridge in Chippenham to Castlefields in Calne along this route without once passing between two buildings, a wonderful green landscape corridor between two towns in Wiltshire.

Through Site 1 the cycle track is on a ridge, and therefore provides landscape views to both the south and north of low-lying river landscape with rich riparian vegetation, meadowland and a sense of place.

INDEPENDENT ASSESSMENT OF THE LANDSCAPE

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 to Moderate/Minor 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.

WILTSHIRE COUNCIL'S APPALLING ASSESSMENT FOR SA8 IN THE SUSTAINABILITY APPRAISAL

The Landscape Assessment after taking into account the assessments above and covering this landscape with 3,000 houses and employment land is an Assessment Outcome of a Minor Adverse effect.

This is an affront to the residents of Chippenham and the surrounding villages and a total embarrassment for Wiltshire Council. It is a complex landscape site, as noted by the Planning Inspector in 2017 who stated that it would be virtually impossible to mitigate the landscape impact to the north of the cycle track and difficult to do so to the south. The rolling countryside rising to the low ridge of the North Rivers cycle track from both the south and north means that the land is visible for most views from east Chippenham and also highly visible from the surrounding higher ground of the limestone ridge. The route alignment description is exactly as set out in Atkins (19 February 2015) and remains impossible to mitigate.

Sustainability Appraisal Objective 10 Reduce poverty and deprivation and promote more inclusive communities with better services and facilities Site 1 (together with Site 7) rank positively most high as “Major Positive” in the SA assessment document (page 11 of Annexe II). There are some serious questions about this assessment.

The assessment states: “This site falls within an area where there are concerns relating to deprivation, as indicated by the Indices of Multiple Deprivation (IMD) 2019. Development at this site would create opportunities for better social cohesion.”

No evidence whatsoever is given for this assertion. It is a meaningless claim.

Leaving aside that this is a green field site that itself would have no deprivation, even looking at the IMD 2019 map for Chippenham, it is difficult to see where these concerns are – the areas of high deprivation are orange to red, and are mainly in the centre of town and to the west. [see attachment 70_CAUSE for image]

The assessment also states: The site could deliver a significant level of affordable housing alongside employment land. This is at odds with the quotes from the lead developer in the past who has wanted to build executive style homes modelled on Poundbury. In terms of DAQ2, Be accessible to educational, health, amenity greenspace, community and town centre facilities which are able to cope with the additional demand? The site is the worst for distance to the town centre, as the assessment itself says “The western edge of this site is within cycling distance of the town centre, but walking would be more difficult”. Unfortunately, all the

land proposed is to the east. In addition, the only secondary school near is full, there are no doctors' surgeries within walking distance. This will lead to increased travel by car, or the creation of a Swindon style mini suburb with its own facilities disconnected from the rest of the town.

The site is said to have potential to "capable of delivering a sizeable amount of public open space and additional community facilities." However, this sustainability appraisal is entirely silent on the existing residents of Chippenham. For the residents of large areas of London Road, Hardens Mead, Monkton Park, they have had their access to public open space destroyed and they find themselves up to 2km away from the countryside that was on their doorstep previously. If a sustainability appraisal of these communities who now become an inner urban ward was carried out, there would be more chance of social deprivation and lack of inclusivity and a major adverse rating for this objective. The wanton destruction of the natural capital such as river vales accessible to the people of Chippenham is a huge price to pay for the provision of a bit of "public open space" and a "community centre".

New Leaze Farm from Anscombe Bridge 1 [see attachment 70_CAUSE for image]

Rep ID: 72	
Consultee code: Developer/Agent	Consultee Organisation (if applicable): Pegasus Group
Is this response on behalf of someone else/another organisation? Yes	
Organisation being represented (if applicable): Barratt Homes (Bristol)	
Does this representation refer to attachment(s): N	If this representation refers to attachment(s), these are listed below:
Please provide your comments here	
<p>SUSTAINABILITY APPRAISAL5.1The principal criticism of the Sustainability Appraisal is that is has assessed the distribution options for each HMA on the basis of Employment Land evidence which is now out of date and has not been subject to consideration of current market signals (i.e. it does not account for the potential impacts of Brexit and COVID-19). This evidence should be revisited to ensure that the Council is planning appropriately based on the latest evidence. Otherwise, the credibility of the SA is undermined.5.2For reasons set out above, we also consider that the failure to consider alternative distribution options between he HMAs is an oversight and something that should also be subject to the SA process.</p>	

Rep ID: 73	
Consultee code: Developer/Agent	Consultee Organisation (if applicable): Pegasus Group
Is this response on behalf of someone else/another organisation? Yes	
Organisation being represented (if applicable): Wainhomes (Severn Valley)	
Does this representation refer to attachment(s): N	If this representation refers to attachment(s), these are listed below:
Please provide your comments here	
<p>INTERIM SUSTAINABILITY APPRAISAL 4.1The principal criticism of the Sustainability Appraisal is that is has assessed the distribution options for each HMA on the basis of Employment Land evidence which is now out of date and has not been subject to consideration of current market signals (i.e. it does not account for the potential impacts of Brexit and COVID-19). This evidence should be revisited to ensure that the Council is planning appropriately based on the latest evidence. Otherwise, the credibility of the SA is undermined. 4.2For reasons set out above, we also consider that the failure to consider alternative distribution options between he HMAs is an oversight and something that should also be subject to the SA process.</p>	

Rep ID: 74	
Consultee code: Developer/Agent	Consultee Organisation (if applicable): Pegasus Group
Is this response on behalf of someone else/another organisation? Yes	
Organisation being represented (if applicable): Barratt Homes and David Wilson Homes	
Does this representation refer to attachment(s): N	If this representation refers to attachment(s), these are listed below:
Please provide your comments here	
<p>5. SUSTAINABILITY APPRAISAL</p> <p>5.1 The principal criticism of the Sustainability Appraisal is that it has assessed the distribution options for each HMA on the basis of Employment Land evidence which is now out of date and has not been subject to consideration of current market signals (i.e. it does not account for the potential impacts of Brexit and COVID-19). This evidence should be revisited to ensure that the Council is planning appropriately based on the latest evidence. Otherwise, the credibility of the SA is undermined.</p> <p>5.2 For reasons set out above, we also consider that the failure to consider alternative distribution options between the HMAs is an oversight and something that should also be subject to the SA process.</p>	

Rep ID: 75	
Consultee code: Developer/Agent	Consultee Organisation (if applicable): Andrew Black Consulting
Is this response on behalf of someone else/another organisation? Yes	
Organisation being represented (if applicable): 1215 Heritage Homes	
Does this representation refer to attachment(s): N	If this representation refers to attachment(s), these are listed below:
Please provide your comments here	
<p>Sustainability Appraisal–Reasonable Alternatives An integral part of producing a sound Local Plan is for the council to demonstrate that they have adequately considered reasonable alternative approaches to the delivery of the spatial strategy. The PPG sets out consideration on how a Sustainability Appraisal should assess alternatives and identify likely significant effects as follows: The sustainability appraisal needs to consider and compare all reasonable alternatives as the plan evolves, including the preferred approach, and assess these against the baseline environmental, economic and social characteristics of the area and the likely situation if the plan were not to be adopted. In doing so it is important to:•outline the reasons the alternatives were selected, and identify, describe and evaluate their likely significant effects on environmental, economic and social factors using the evidence base(employing the same level of detail for each alternative option). Criteria for determining the likely significance of effects on the environment are set out inschedule1totheEnvironmentalAssessmentofPlansandProgrammesRegulations2004;•as part of this, identify any likely significant adverse effects and measures envisaged to prevent, reduce and, as fully as possible, offset them;•provide conclusions on the reasons the rejected options are not being taken forward and the reasons for selecting the preferred approach in light of the alternatives.Any assumptions used in assessing the significance of the effects of the plan</p>	

will need to be documented. Reasonable alternatives are the different realistic options considered by the plan-maker in developing the policies in the plan. They need to be sufficiently distinct to highlight the different sustainability implications of each so that meaningful comparisons can be made. The development and appraisal of proposals in plans needs to be an iterative process, with the proposals being revised to take account of the appraisal findings. Paragraph: 018 Reference ID: 11-018-20140306 Revision date: 06 03 2014

Alongside the Emerging Spatial Strategy, the council has published a series of papers on this matter including the Formulating Alternative Development Strategies (ASDs) Wiltshire Council Salisbury paper. The Alternative Development Strategies as set out within this paper are as follows:

- SA-A –Roll forward the Wiltshire Core Strategy Distribution of homes and jobs
- SA-B –Focus on Salisbury
- SA-C –Focus on the Rest of the HMA
- SA-D –Boscombe/Porton New Community

The alternative scenario under SA-C for Focus on the Rest of the HMA is ambiguous and lacks clarity on how this would work and has been assessed. The justification as set out in the ASDs document states that the scale of development envisaged for the rest of the HMA would take the form of a number of sites determined in large part through the preparation of Neighbourhood Plans. However it is not clear on how other forms of development such as infill / brownfield / previously developed land would be considered through this approach. It also lacks consideration of areas such as Alderbury where a Neighbourhood Plan area has been designated but where no substantive progress has been made. Overall, it is not considered that the council has adequately considered the reasonable alternatives as required in order for the Emerging Spatial Strategy to be found sound. Further analysis of how delivery from the Large Villages must be properly considered in order to advance a sustainable form of development for the future local plan.

Rep ID: 76	
Consultee code: Developer/Agent	Consultee Organisation (if applicable): Persimmon Homes
Is this response on behalf of someone else/another organisation?	
Organisation being represented (if applicable):	
Does this representation refer to attachment(s): Y	If this representation refers to attachment(s), these are listed below: SD76
Please provide your comments here	
<p>HABITATSREGULATIONSASSESSMENT68.The Council has commenced work ona HabitatsRegulationsAssessment (HRA) to support the Plan. As part of the draft Plan consultation, the Council has published a HRA scoping report. Given the important international ecological designations in the County(and in adjoining areas), and the potentialfor likely significant effects on these sitesas a result of development, aHRA assessmentof the emerging Planis welcomed and necessary.Persimmon does not have any comments on the Scoping report but we look forward to inputting towards the moreetailed HRA report in due course.</p>	

Rep ID: 77	
Consultee code: Developer/Agent	Consultee Organisation (if applicable): Pegasus
Is this response on behalf of someone else/another organisation? Yes	
Organisation being represented (if applicable): GLP	
Does this representation refer to attachment(s): N	If this representation refers to attachment(s), these are listed below:
Please provide your comments here	
<p>The Emerging Spatial Strategy consultation document states at paragraph 1.1 that; " Forecasts predict Wiltshire will need between 40,840 and 45,630 new homes over the plan period of 2016 to 2036..... Other forecasts estimate an additional 26 hectares of land will be needed for business and jobs. The Local Plan must accommodate these scales of growth." (emphasis added)</p> <p>The evidence published to support the consultation with regard to employment land comprises;</p> <ol style="list-style-type: none"> 1. The Wiltshire Employment Land Review (April 2018) and its associated Appendices (ELR) 2. The Functional Economic Market Assessment (Dec 2016) (FEMA) <p>No up-to-date evidence or employment land monitoring has been published by the Council to support the level of employment growth proposed for the plan period up to 2036. The Council's website states that an Annual Monitoring Report is currently under preparation.</p> <p>It is noted that the adopted Core Strategy (2015) which covered the plan period 2006 -2026 allocated 42,000 homes and made provision for 178ha of employment land. The emerging WLPR suggests growth of between 41,000-45,630 homes and just 26ha</p>	

of employment land. The disparity between the two documents is evident and with no published justification for such a reduction in proposed employment land it is necessary to;

1. Interrogate the Council's published evidence
 2. Consider the NPPF with regard to reviewing existing allocations
 3. Provide the Council with up-to-date statistics with regard to job growth in Wiltshire and Swindon
 4. Provide the Council with up-to-date evidence of current growth needs in a particular sector of the employment land market and consider the approach taken to this matter by the adjacent authority of West Berkshire in plan making
 5. Consider national planning policy requirements with regard to emerging growth sectors and the need for the WLPR to plan for emerging needs and to also retain flexibility to respond to changing circumstances.
5. Consider market signals reports relating to the logistics sector for the need for land warehousing development to be allocated through development plans. The Council provides no explanation in its consultation documents or evidence as to why such a small quantum of employment land is proposed to support the economic growth and prosperity of the whole of Wiltshire up to 2036. No evidence of the take of adopted employment land allocations is provided or reasons given as to why it may not have come forward and therefore remain as supply.

Paragraph 120 of the NPPF is clear that;

"120. Planning policies and decisions need to reflect changes in the demand for land. They should be informed by regular reviews of both the land allocated for development in plans, and of land availability."

Where there is no evidence of deliverability sites should not be re-allocated for employment purposes in the WLPR. A lack of delivery may relate to delay in the delivery of strategic infrastructure or may reflect the fact that a site is not attractive to the market for employment purposes.

Section 7.3 of the FEMA considers the trends which are likely to affect the need for additional land suitable for distribution and logistics, including the forecast growth in online retailing, the move towards a 'business-to-customer' model, and the growth of 'click-and-collect', all of which will support the growing need for the development of sites suitable for such uses.

The need for distribution and logistics capacity has become even more pronounced as a result of the pandemic. The FEMA assumed that 20-25% of retailing would be undertaken online in 2020. However, including as a result of the pandemic some 31.9% of sales were online in the final quarter of 2020, as evidenced by the Pegasus Economic note attached at Appendix 2. Market signals reports attached at Appendices 10 and 11 provide evidence of recent trends in logistics development required to support the increases in online sales.

It is therefore clear that the need for distribution and logistics capacity has increased substantially from that identified in the FEMA in 2016 such that there is a pressing need for additional floorspace now. It is also considered likely that the changing retailing behaviour of the population will be maintained and that as such the need will continue to grow. As such the Council's evidence base is outdated.

The demand for such uses will be strengthened by the UK's departure from the EU which has significant implications for the way in which businesses operate, particularly those businesses that import or export to and from the EU. As a result, businesses are likely to require a greater amount of warehousing floorspace to secure the necessary supply to support their continued operation. Accordingly, not only as a result of underlying structural trends but also as a direct result of both the pandemic and the UK's departure from the EU the demand for industrial and logistics floorspace is likely to be greater than identified in the Council's Employment Land Review (2018) which has not taken these most recent matters into account.

The local need and demand for distribution and logistics capacity is difficult to forecast because the facilities cater to a sub-regional or broader need and occupiers are more footloose and will seek the appropriate premises regardless of the precise location. This is very succinctly set out in paragraphs 2.33 and 2.34 of the West Berkshire District Council Employment Land Review (August 2020) (Stantec with Aspinall Verdi) the latter of which states:

" In summary, the needs of logistics should be considered more qualitatively than may otherwise be the case – informed by, but not held to job forecasts or a projection of past take-up. This is why we overlap the quantitative assessment with the qualitative property market assessment. Practically where a council has a site or area known to be attractive to logistics then it should be considered favourably – even if it is in excess of 'need'."

(emphasis added)

The attractiveness of locations to logistics providers is largely determined by the proximity to a workforce and particularly by the proximity to a motorway junction. Research by Peter Brett Associates has identified that the costs associated with an HGV driver having to travel 10km to the nearest motorway junction are 1,735% greater than for a site located adjacent to a motorway junction. As is evident from the location of large logistics sheds delivered in recent years there is a very significant attraction to being located immediately adjacent to a motorway junction such as those within Wiltshire, particularly at Junctions 16 which is also in very close proximity to the workforce of Royal Wootton Bassett and Swindon. It is therefore considered that in accordance with the approach adopted by neighbouring West Berkshire, every opportunity should be explored in Wiltshire to support the delivery of such employment sites at attractive locations to respond to sub-regional and broader needs.

The reports attached at Appendix 3 prepared by Savills and Appendix 11 by the British Property Federation demonstrate that 69 sqft of warehousing floorspace was attributed per household in 2019. Given the increase in online retailing and first-mile/last-mile logistics, especially as a result of the pandemic, it would be expected that the average warehouse floorspace per household will need to increase significantly in the future. Nevertheless, even conservatively relying upon the maintenance of this dated ratio, the proportionate needs for logistics floorspace can be estimated.

The Local Housing Need Assessment identifies a need for 67,300 homes across Wiltshire and Swindon, including between 24,900 and 26,400 in the Swindon HMA. This would mean that there would be a need for 431,414m² (or 4,643,700 sqft) of

logistics floorspace in Wiltshire and Swindon including 159,617-169,232m² (or 1,718,100-1,821,600 sqft) in Swindon FEMA over the plan period if Wiltshire and Swindon were to meet a proportionate level of need even without taking account of the recent growth of online retailing and first-mile/last-mile logistics.

It is likely that there will actually be a greater demand for logistics floorspace in Wiltshire than this baseline figure as a result of the attractiveness of locations that are accessible to motorways and close to a workforce which are available in Wiltshire particularly at Junction 16 of the M4. It will therefore be necessary to take advantage of this opportunity to secure the needs not only of Wiltshire but also of the surrounding rural authorities that do not benefit from sites adjacent to motorway junctions in close proximity to a significant workforce.

The Wiltshire ELR recognises this and identifies in section 4.1.2 that there is an "unprecedented demand" for logistics space and in section 4.1.3 that there is a "severe shortage" of big sheds on the western M4 to meet this need. The ELR also notes average delivery of employment land at 15ha per annum. For a 20- year plan period this would equate to 300ha of land.

It is clear therefore that there is a significant need for employment sites across Wiltshire, and that there was a particular demand for logistics sites along the M4 to meet local need even prior to the pandemic which has since increased substantially. It is also clear that J16 of the M4 provides an attractive site to respond to needs locally and sub-regionally and that it would be necessary to facilitate the delivery of such sites to respond to needs even prior to the increased demand arising from the pandemic and new business models of logistics operators. This need is now even more pronounced.

Supply of Logistics Sites

It should be acknowledged that 1,000,000 sqft of development suitable for logistics uses gained planning permission at J17 in 2018. This however still leaves a shortfall of significantly more than 718,100-821,600 sqft of warehousing floorspace to meet even the proportionate needs of the Swindon/M4 FEMA. Once the already apparent increased usage of online retailing and firstmile/last-mile logistics and the opportunities and comparative attractiveness of this FEMA to logistics providers which are not available in other areas are taken into account, the need will be significantly greater.

The sites proposed in the Royal Wootton Bassett consultation document for development purposes will not be attractive or suitable for logistics uses owing to their size, distance from the motorway and proximity to existing residential areas.

Similarly, around Swindon a number of employment sites are retained in the emerging Local Plan, however these are not located immediately adjacent to motorway junctions and are therefore unlikely to be attractive to or suitable for logistics uses. Indeed, even if logistics providers were able to be attracted to other sites around Swindon or within Royal Wootton Bassett notwithstanding the additional and unnecessary costs associated, this would unsustainably increase the distance travelled by hauliers contrary to paragraph 103 of the NPPF and have adverse and potentially unsustainable effects on the highway network, noise pollution and air quality.

A study of the M4 from Swindon eastwards to the M25 undertaken by Pegasus, the Executive Summary of which is attached at Appendix 4, has identified that there are no sites allocated in recently adopted development plans expressly for the purposes of

B8 logistics development. The Savills study at Appendix 3 identifies no current availability of consented sites greater than 100,000ft² able to accommodate B8 warehousing between Heathrow and Chippenham (J17 being consented) and points to the delivery of an additional 27,790 new homes in the next five years in the M4 corridor from Wiltshire to Reading creating a need for an additional 1.92 million sqft of B8 warehouse development.

Our client is promoting a site at J16 of the M4 - Spittleborough Farm - for employment uses, the site is shown at Appendix 1. This site is adjacent to Junction 16 of the M4 and in close proximity to the workforce of Royal Wootton Bassett and Swindon and benefits from regular and frequent public transport services as evidenced by Appendix 8. This site provides a ready-made solution to address the significant shortfall in the provision of industrial employment capacity proposed in the WLPR, and as identified at Appendix 4, in the M4 corridor, and will therefore not only assist in meeting the needs of Wiltshire and Swindon but also those of more rural surrounding districts.

The Royal Wootton Bassett consultation document states that Swindon have not requested Wiltshire to meet any of their unmet needs for economic development purposes and therefore insinuates that there is no need for the site to come forward in the plan period for employment purposes, however as evidenced above;

1. The unevidenced low quantum of employment land allocated in the WLPR;

2. The unprecedented growth in online and just-in-time retail practice evidenced in the Pegasus and Savills reports at Appendices 2 and 3 and market signals reports at Appendices 10 and 11 3. The increased demand and take up of floorspace nationally for B8 logistics and the changing nature of logistics development evidenced by the Savills report and Appendices 10 and 11 and 4. The lack of suitable alternative allocated or speculative deliverable sites in the M4 corridor evidenced by the Pegasus and Savills reports;

all point to the need for the Council to allocate land at junction 16 of the M4 for employment purposes.

Such an allocation would result in substantial inward investment and economic growth in the County in terms of construction, job growth and training plus spending and contributions to local physical and social infrastructure and within the community of Royal Wootton Bassett. Appendix

10 concluding;

" In terms of the sector's future potential to assist in recovery, every 1 million sq ft of new logistics floorspace per annum creates 1,400 jobs and almost £100 million GVA economic output during construction, and once operational supports 2,400 jobs and generates £110 million GVA economic output annually."

Further site specific representations are made in response to the Royal Wootton Bassett consultation documents.

Rep ID: 78	
Consultee code: Developer/Agent	Consultee Organisation (if applicable): Savills
Is this response on behalf of someone else/another organisation? Yes	
Organisation being represented (if applicable): The Society of Merchant Venturers	
Does this representation refer to attachment(s): N	If this representation refers to attachment(s), these are listed below:
Please provide your comments here	
<p>4.3 Wiltshire Local Plan: Transport Review</p> <p>4.3.1 The Wiltshire Local Plan: Transport Review focuses on Chippenham, Trowbridge and Salisbury (with some mention of highway improvements in Melksham) and simply notes that the modelling has identified issues around Devizes. It is noted that section 4.4.1 of the Review acknowledges that further assessment work is required to investigate the growth options for the market towns such as Devizes:</p> <p>“In addition, potential issues have been identified in other market towns across Wiltshire. These issues relate to the growth that was assumed in the modelling work to date and will need to be investigated as growth options are explored for the towns. For example, issues have been identified around Devizes... These should be addressed in the next phase of work.”</p> <p>4.3.2 It is important that this assessment is undertaken as soon as possible to inform the selection of development sites in the LPR. The Transport Appraisal prepared by i-Transport explains in paragraph 4.7.1 and 5.1.4 that:</p> <p>“Traffic modelling demonstrates that a number of junctions within Devizes are currently approaching or exceeding their theoretical capacity, without the addition of further development.</p>	

4.3.3 In undertaking further assessment of the reasonable alternatives sites in Devizes, consideration must be given to the sustainability of their location and also the opportunities for modal shift. The SMV land north east of Roundway Park is in a location that offers the opportunity for walking and cycling access to other local residential areas as well as retail, education, employment, healthcare and leisure facilities around Devizes. The town centre is approximately 1.25km walk from the site via Quakers Walk which provides a direct and attractive route for pedestrians and cyclists. This is a really positive benefit that other potential alternative sites in Devizes being considered by the Council do not offer. There are regular bus services operating close to the site which provide opportunities to travel into Devizes or to higher order settlements including Swindon. As such the site is well placed and sustainably located to accommodate new development.

4.3.4 The Transport Appraisal prepared by i-Transport has considered the opportunity to improve a number of key junctions within Devizes. It concludes in paragraph 5.1.5 that:

“There is scope to improve the A361 London Road / Brickley Lane junction by converting the mini roundabout into a ghost island junction. Two options have been identified to improve the A361 Estcourt Street / Gains Lane / Southbroom Road junction. One option involves some relatively modest improvements to the Gains Lane arm of the junction and improving the existing controlled crossing. The second option is a more comprehensive scheme, which seeks to improve traffic flow by removing the ‘bottleneck’ on Gains Lane.”

4.3.5 The development on land north east of Roundway Park could contribute to these improvements at two key junctions along the A361 London Road. These are junctions that are anticipated to experience the most congestion in the future, with or without development.

4.3.6 The SMV would be happy to engage with the Local High Authority to discuss potential improvements to key junctions within Devizes.

Rep ID: 79	
Consultee code: Developer/Agent	Consultee Organisation (if applicable): Savills
Is this response on behalf of someone else/another organisation? Yes	
Organisation being represented (if applicable): The Society of Merchant Venturers	
Does this representation refer to attachment(s): N	If this representation refers to attachment(s), these are listed below:
Please provide your comments here	
<p>4.4 Chippenham HMA: Formulating Alternative Development Strategies</p> <p>4.4.1 The Alternative Development Strategies (ADS) report considers whether it is appropriate to roll-forward the Core Strategy or whether alternative development strategies are required for the Chippenham HMA.</p> <p>4.4.2 Tables 1 and 2 set out that rolling forward the current strategy would result in a housing requirement for Devizes of 2,870 homes over the period 2016-2036 and an employment requirement for Devizes of 5.5ha based on the Employment Land Review. However despite this, Tables 10 and 11 conclude that a lower level of growth should be sought at Devizes due primarily to environmental constraints and land availability. Table 11 concludes the following for Devizes:</p> <p>“The town is amongst the more environmentally constrained in the HMA and the pool of potential land opportunities appears to be relatively limited. Consultation highlighted a priority to deliver local employment. Air quality was also a concern. There was a view that larger sites might help deliver new roads to help to tackle it. There also appears to be a relatively significant need for affordable homes.</p>	

Prospects for employment growth do not seem to match rolling forward the current strategy and trends seem to align with concern over local employment. Rolling forward the current strategy involves a pro-rata increase on past requirements. In this context it would be appropriate to test a strategy that included a lower rate of growth.”

4.4.3 It is notable that the assessment of potential environmental impacts is based on a ‘high level environmental assessment’ and ‘broad judgement’ set out on two pages of the report (pages 12-13). It is not clear how exactly the assessment has been made and which land has been considered. The conclusions made are therefore not fully evidence-based and justified, as required by NPPF paragraph 35, and full assessment is required in order to fully inform the development strategy.

4.4.4 It is not clear from the evidence as to why a lower level of growth should be proposed at Devizes. It is considered that as a minimum, the distribution of homes and jobs for Devizes should be rolled-forward from the Core Strategy, as opposed to the alternative development strategies CH-B and CH-C. A positive approach should be taken to considering the potential development opportunities at Devizes, in line with the NPPF.

4.4.5 The Council should also closely consider the comments relating to Devizes made to the Issues Consultation in 2017 which are outlined on page 18 and 19 of the Chippenham HMA: Formulating Alternative Development Strategies document such as:

- It was suggested that the main issues for Devizes were due to the recent lack of strategic sites in Devizes, with a suggestion that small sites are not capable of providing the infrastructure needed to begin to solve the highlighted problems.
- Devizes was therefore proposed as a suitable location for strategic housing and employment development over the plan period, to try to provide some of the infrastructure needed.
- Opinion seemed to indicate that there is a general appetite/need for affordable housing within Devizes.
- It was suggested that large strategic sites, whilst having the potential to increase vehicle usage, provide the opportunity for highway improvements (secured through section 106 obligations) which may improve traffic flows - in turn reducing air quality issues caused by congestion.

4.4.6 In addition, the Council should consider the matters raised during the Devizes town workshops in 2018 which were held with local members, the town council and representatives of the neighbourhood plan group. These are outlined on page 24 of the Chippenham HMA: Formulating Alternative Development Strategies document:

- The exercise emphasised a concern over infrastructure capacity, specifically road infrastructure. It was also identified that when accommodating housing growth, new facilities should be delivered alongside the development, namely but not exclusively, road infrastructure, medical and education provision.

4.4.7 The more comprehensive site Roundway Park, comprising 549b and part of 549a would be able to make proportionate contributions to the infrastructure improvements required, as well as delivering housing in line with local objectives, such as need for housing (including significant affordable housing) and also enable further opportunity to deliver new areas of green infrastructure and the creation of areas of public open space. The benefits of the site are further discussed in section 5.

Rep ID: 80	
Consultee code: Developer/Agent	Consultee Organisation (if applicable): Carter Jonas
Is this response on behalf of someone else/another organisation? Yes	
Organisation being represented (if applicable): Atwell Wilson Motor Museum Calne	
Does this representation refer to attachment(s): N	If this representation refers to attachment(s), these are listed below:
Please provide your comments here	
<p>Local Plan Review Interim Sustainability Appraisal - January 2021</p> <p>It is noted that the Interim Sustainability Appraisal (ISA) tests a range of local housing needs from 40,840 to 45,600 dwellings for the period 2016 to 2036. The Sustainability Appraisal assessment of the alternative development strategies for the HMAs concludes that there would be no adverse effects of such significance that would prevent the higher figures (of each alternative strategy) from being progressed. Moreover, it concludes that a higher figure level would be more robust when planning for the longer term and has a greater level of contribution to meeting national and local needs for more homes. We are therefore supportive of the LPR's approach in taking the higher level as a basis for developing the spatial strategy.</p> <p>We support the view that Calne is considered less environmentally constrained than other market towns within the HMA (Page 26) albeit this is contrary to the assessment on page 7 under the Chippenham Strategy B (CHB). Whilst there are concerns in relation to peak time congestion and air quality management in the town centre, we consider that development of the land at the Atwell Wilson Motor Museum will not exacerbate the existing situation through the inclusion of robust sustainable transport measures as part of the development proposals providing good access and reasonable walking and cycling opportunities to the</p>	

town. The development of the site could provide in the region of 150 to 200 dwellings which will go some way to address the identified need of 360 additional dwellings to 2036.

Additionally, we support the key recommendation that an amended or additional strategy be explored for the Chippenham HMA which redistributes growth to the less environmentally constrained settlement of Calne. Increasing the level of housing development at Calne will not only meet identified needs but will provide infrastructure solutions to resolve traffic congestion and subsequent air quality issues.

We consequently support the recommendation in paragraph 4.6.3 (1) that an additional / amended development strategy that reduces proposed development levels around the more environmentally constrained settlements and that growth should be increased in the less environmentally constrained settlements of Calne and the rest of the HMA.

Rep ID: 81	
Consultee code: Developer/Agent	Consultee Organisation (if applicable): Carter Jonas
Is this response on behalf of someone else/another organisation? Yes	
Organisation being represented (if applicable): Atwell Wilson Motor Museum Calne	
Does this representation refer to attachment(s): N	If this representation refers to attachment(s), these are listed below:
Please provide your comments here	
<p>Chippenham HMA: Formulating Alternative Development Strategies</p> <p>The challenges associated with increasing the housing delivery within the Chippenham HMA are noted (Para 78) as a substantial proportion of the land necessary to achieve higher rates of development has yet to be identified. Land at the Atwell Wilson Motor Museum could help meet that identified need for both residential and employment development as there is very little (2.7% Figure 6) additional employment land in the pipeline at Calne (Para 86). Indeed, owing to the development potential and availability of this site for a mix of uses, we disagree that the current strategy at Calne shouldn't be rolled forward and, as acknowledged at paragraph 100, that some additional employment land up to 2036 may still be required.</p>	

Rep ID: 82	
Consultee code: Developer/Agent	Consultee Organisation (if applicable): Carter Jonas
Is this response on behalf of someone else/another organisation? Yes	
Organisation being represented (if applicable): Atwell Wilson Motor Museum Calne	
Does this representation refer to attachment(s): N	If this representation refers to attachment(s), these are listed below:
Please provide your comments here	
<p>Whilst the Employment Land Review (ELR) is a little dated and consequently doesn't consider the impact of the pandemic, the report confirms concerns in relation to employment within Calne having stagnated since 2009. The relocation and redevelopment of the Atwell Wilson Motor Museum will help contribute to employment generation.</p>	

Rep ID: 83	
Consultee code: Developer/Agent	Consultee Organisation (if applicable): Carter Jonas
Is this response on behalf of someone else/another organisation? Yes	
Organisation being represented (if applicable): Atwell Wilson Motor Museum Calne	
Does this representation refer to attachment(s): N	If this representation refers to attachment(s), these are listed below:
Please provide your comments here	
<p>Whilst it is acknowledged that Calne is subject to high groundwater flood risk, the development proposals for the Atwell Wilson Motor Museum are focussed on the areas not susceptible to flooding and could potentially provide the opportunity for drainage betterment to the surrounding area. Further technical studies will be undertaken in this regard as promotion of the site progresses.</p>	

Rep ID: 84	
Consultee code: Other Advisory Body	Consultee Organisation (if applicable): Wiltshire Climate Alliance
Is this response on behalf of someone else/another organisation? No	
Organisation being represented (if applicable):	
Does this representation refer to attachment(s): N	If this representation refers to attachment(s), these are listed below:
Please provide your comments here	
<p>6. FLOOD RISK Introduction To enable proper spatial planning, all planning for future development should be holistic, to avoid inadvertently increasing flood potential downstream of a development, be it housing or other infrastructure. Planning for the whole flood catchment area must be considered. Creation of new developments will inevitably mean more runoff that, if not properly managed locally through proper SuDS installation in new developments and retrofitting to existing, will create downstream impacts. For example, a 1,000 house development on a greenfield site will typically create 8ha of new impermeable area. Without properly designed SuDS attenuation, downstream flooding risk will be significantly increased. Comments on the JBA statement on flood risk process: The statement says: "The cumulative impact should be considered throughout the planning process, from the allocation of sites within the Local Plan, to the planning application and development design stages. Once preferred options are identified, their cumulative impact can be considered in more detail within a Level 2 SFRA, where necessary. In addition, site-specific FRAs must consider the cumulative impact of the proposed development on flood risk within the wider catchment area. In consultation with the Environment Agency, conditions set by the Council should support the implementation of SuDS and appropriate flood mitigation measures. As a minimum, development should have a neutral impact on flood risk, and where</p>	

possible it should improve existing issues, to ensure that flood risk is not exacerbated either within, or outside of, the Council's administrative area". By way of example, albeit at high level: the Chippenham proposed development area gives scale to the problem in an area already suffering from frequent flooding and has a major impact on flood frequency, both directly and downstream. There could be in excess of 600ha of development land all on or adjacent to flood zone 2 land. If we assume, conservatively, that the hard development takes 1/3 of the land, then we have 200ha of impermeable area. A typical storm run-off assuming 25mm in 3 hours is 50,000m³ entering the flood plain area in that time. Even with SuDS installed, there will be a significant inflow to the river which will impact Melksham and Bradford upon Avon. All are cumulative. And if you follow the Avon from Malmesbury (and Brinksworth Brook from Wotton Bassett) to Chippenham, then through to Bradford upon Avon there are over 1,000ha of land potentially allocated for housing in or on adjacent to flood zone 2 areas, all with their associated runoff. This will impact areas further downstream out of the County. These cumulative impacts must be taken into account. At present the draft Local Plan does not seem to take any of this into account and references to the SFPA are limited, if not non-existent. In summary, development in all of these areas specifically from increased flood risk is at the least, imprudent and demands proper study of flood risks.

Comments on the JBA Consulting Level 1 Flood Risk Assessment report (May 2019): Impacts of Climate Change
Climate change is developing faster than expected (UKCP20) implying that current strategic flood risk assessments need to be treated with caution. JBA recommend they are revisited on a regular basis, at least annually. However, a significant number of the studies used in their analysis are out of date, some by as much as 10 years. As a minimum this makes the whole report on flood risk inadequate, and potentially dangerous to use as a management tool for Plan development.

2.3.1 Bristol Avon CFMP
An example is Bristol Avon (2011) This should be updated annually. JBA use 2010 figures which estimates 20,000 properties at risk of flooding in the Bristol Avon catchment. Climate Change impacts are going to be significantly greater than those forecast at that date, and along with the increase in housing in the catchment since that date, suggests that the at risk figure will be much higher. This even before the proposed developments in the Local Plan proposals.

2.7 Wiltshire LFRMS
This is out of date (2015) and overdue for renewal. Wiltshire Council cannot proceed with this out of date information and with the concerns of flooding land, particularly along the Avon.

2.8.2 Cumulative Flood Risk
Wiltshire Council must take into account the cumulative impact on flood risk. As described above, the impact of storm conditions will be significant and make a large number of the sites proposed in the Local Plan unviable and, if implemented, make downstream areas more prone to flooding.

2.8 Surface water management plan (SWMPs)
According to the, very out of date, 2011 Wiltshire Council SWMP report there were 18,000 properties at risk in Wiltshire. Of those ranked in the top 10, over 4,400 were in the Avon-Bristol catchment. Adding another 9,000 makes no sense whatsoever.

2.13 National Infrastructure Assessment
Directly from the JBA report "Flood resilient design should allow for climate change up to 2°C in global temperatures, with the ability to be adapted to provide resilience up to a 4°C rise." AND "Updated catchment flood management plans and shoreline management plans by 2023." In other words, prudent Councils will be designing for 4°C warming and delivering their revised flood management plans by 2023. Development of the Local Plan must

take this into account, otherwise it will need to be rewritten immediately the flood resilience report is released.² Murphy JM, Brown S and Fung F (2020). UKCP Factsheet: Probabilistic Projections of Climate Extremes. Met Office, Exeter³ Bristol Avon: Catchment Flood Management Plan, Environment Agency (2012). Accessed online at: <https://www.gov.uk/government/publications/bristol-avon-catchment-flood-management-plan>⁴ 25 Local Flood Risk Management Strategy, Wiltshire Council (2015). Accessed online at: <http://www.wiltshire.gov.uk/downloads/4287> on: 06/07/2018⁵ This figure is in conflict with that given at 2.3.1 of 20,000

42 Flood Risk Assessment 3.3.4 Climate Change (Flood Zone 3a (1 in 100-year event) plus climate change)) From the JBA report "The Flood Map supplied by the Environment Agency does not provide any allowance or indication of the impact of climate change on the Flood Zones. Updated government guidance on assessing the impact of climate change on flooding in line with the UKCP09 Climate Change Projections was released in February 2016." The section concludes with a statement that "The key allowances to consider for Flood Zone 3a are therefore the higher central and upper end (for example, 35% and 70% in the Thames river basin respectively) as shown in Table 3-2." Note: even this has now been superseded by the UKCP 2020 report reference¹. These are the percentage increases in flows. To add to this with ill-conceived housing developments, and put more households at risk of flooding, makes no sense whatsoever.

2.15 Sewers for adaption It is noted at the river Avon flow will increase by 20% between 2020-2039.

Conclusions

- The document produced by JBA contains a great deal of out-of-date data and also fails in some instances to recognise the large increase in flooding in the catchments over the past 10 years. To rely on any of its conclusions regarding flood risk would be unwise;
- The flood risk to the whole county of Wiltshire will increase significantly over the coming 15 years;
- The risk to the various catchments in Wiltshire being inundated through changes in the climate is high, with as much as 70% increase in peak flows (2018 data) without any additional urban run-off;
- There are already somewhere in excess of 20,000 homes at risk of flooding in Wiltshire. Adding to that number by ill-conceived development will create a major burden on the Local Authority who have the responsibility as Lead Local Flood Authority to manage flood risks and the outcomes of flooding;
- The proposed Local Plan addition of over 1,000ha of urban landscape in or adjacent to flood zone 2 areas is, to say the least, unwise;
- The LLFA also has a responsibility to its neighbours to manage flood flows. It should take that responsibility seriously