

CLIMATE135A

Working towards a Green Infrastructure Strategy for the Salisbury area: Notes to accompany Salisbury Area Greenspace Partnership's concept plan

Background & Context

The attached plan illustrating ideas for a local green infrastructure strategy is work in progress.

It is based on surveys (using Google, Bing, site surveys & local knowledge) carried out by SAGP between 2013 & 2016 which identified existing green & blue space assets for the Salisbury area, mapping where they are, what they are with reference to a commonly used typology, & how well they are connected. Local groups with an interest in greenspace were involved, including the cycling group COGS & Walking for Health.

Looking at the bigger picture of the Salisbury area – see plan, it is possible to see the potential for & value of establishing a high quality multifunctional network of dedicated mainly off-road routes or greenways for people on foot & for cyclists especially in the face of the Climate emergency & the issues around air quality & traffic congestion, the issues around the very significant loss of species & biodiversity which we are now experiencing on a global scale & the issues we are currently facing with the Covid pandemic.

The Greenways

As the plan shows, it would be possible to establish over time a **peripheral greenway** linking Salisbury & communities in neighbouring parishes. This greenway would provide connections to main employment centres such as Salisbury District Hospital, Porton Down, Amesbury, Old Sarum, with a spur to Churchfields, & including a new footbridge for pedestrians & cyclists across the River Nadder. The peripheral greenway would also link with the Park & Ride facilities so that users can choose either to cycle, walk or drive to the P&R & use the bus or walk or cycle into the city centre.

The **radial greenways** would make use of the valley corridors where possible connecting homes in the suburbs with schools, local facilities, the city centre, the station, the community hub & workplaces around the area. One good example of an existing greenway is the Avon Valley path connecting some of Salisbury's northern suburbs with the central area. Also, the Town Path from West Harnham to the city centre. Both routes are currently heavily used & urgently require upgrading & enhancement. Wiltshire Council's River Valley Park Project, part of the recently developed Central Area Framework (CAF) & the Environment Agency's flood alleviation scheme for Salisbury, will help to address these issues in due course. It is important to note that a comprehensive network of well-designed **greenways**, routes accompanied by appropriate tree & hedge planting where possible, would not only provide important corridors for people, but would support safe active travel, health & wellbeing & community cohesion. In addition, such a network would support biodiversity & provide connectivity for wildlife too. It is therefore important that these potential routes are safeguarded & protected from development.

SAGP's aspiration for Radial Greenway 1 St Peters Place to City Centre has been fed into the River Park Project's Phase 1 Landscape Design for Fisherton Recreation Ground & Ashley Green & this has been supported by Salisbury City Council.

The Country Parks/Reserves

SAGP has identified locally important green & blue spaces which are also in need of protection from development. The green & blue infrastructure (GBI) of the Salisbury area is important for several reasons. It provides valuable habitats, refuges & corridors for wildlife, floodplain, water catchment, amenity & recreation space which is easily accessible for local people, landscape setting & views which make this area such a distinctive & a special place, & if well managed, it delivers the fundamentally important natural capital & ecosystem services necessary for resilient & sustainable communities.

Ecosystem services balance & mitigate the effects of climate change & global warming by regulating temperature, providing shade & shelter, carbon capture (or sequestration), biodiverse wildlife habitat & pollination services, connectivity for wildlife & people, help in maintaining good air and water quality & soil health, reducing the potential for flooding by absorbing water run-off & providing water filtration & nutrient management.

As the plan illustrates, the higher ground & downland in the area, which also provide important viewpoints, as for example at Lime Kiln Down & Rowbarrow could be given **Country Park/Reserve** status. Castle Hill Country Park is a good example of this type of thinking, & Laverstock & Ford the Parish Council have worked hard to achieve a successful outcome which the wider community is now benefitting from. In the same way key parts of the river valleys could be designated **Valley Parks/Reserves** and this is starting to happen in the Avon Valley as the River Park Project, gets underway. This would ensure that these important landscapes, including designed urban parks & gardens as well as valuable habitats are not only safeguarded but are connected on a broader scale which provides vital support for wildlife, maintains the distinctiveness of Salisbury and the surrounding smaller settlements & ensures that valuable views, particularly of the cathedral, are protected and remain safe for the longer term.

These areas could remain in private or mixed ownership & remain in use, preferably low intensity agricultural production with the emphasis on management for the benefit of wildlife. They would be protected from development &, where appropriate, public access would be improved.

The Future

Further work is needed to develop these ideas more fully & to share them with the parish councils in the area. Salisbury City Council used this plan in its consultation response to Wiltshire Council's Transport Strategy Refresh in June 2018 & has also been shared with Wiltshire Council this year as part of the consultation on the Wiltshire-wide Green Infrastructure Strategy currently under development & long overdue.

A high quality multifunctional GI network for the Salisbury area would help to deliver a number of Local Plan aspirations & policies, & is an important consideration for the preparation of neighbourhood plans in the area. It should be an important part of the transport strategy & spatial plan for the Salisbury area as well as a key part of the response of local parish councils & Wiltshire Council to the current emergencies affecting the climate, public health & the very significant loss of species & biodiverse habitats.

Salisbury Area Greenspace Partnership Updated Jan 2021

SAGP website address:

<https://www.google.com/search?client=firefox-b-g=salisbury+area+greenspace+partnership>

CLIMATE135B

CLIMATE143

Wiltshire Local Plan Review Consultation

Response on behalf of Miller Homes



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1. Executive Summary

1.1. Spatial Strategy

- 1.1.1. The benefits of focusing new development towards the County's main settlements, in terms of making the best use of existing infrastructure, better supporting existing businesses, reducing the need to travel and opportunities for renewable energy are all supported.
- 1.1.2. Based on information provided within the consultation, the approach of dividing the county into four different Housing Market Areas (HMAs) within which the majority of the local population live and work, is supported. The role of the HMAs is to target addressing need where that need arises; which is a logical approach.
- 1.1.3. Page 14 of the Emerging Spatial Strategy sets out a total housing requirement of 20,400 for the Chippenham HMA during the period 2016 to 2036. The basis of this overall total housing requirement is supported, subject to increasing it to reflect a plan period up to at least 2038, assuming the plan is adopted in 2023 in accordance with the most recent Local Development Scheme (LDS) dated July 2020.

1.2. Strategy for Malmesbury

- 1.2.1. High level constraints at Malmesbury and the nearby area, including Milbourne, are illustrated at Figure 4 on page 18 of the Malmesbury site selection report (January 2021). This shows that two rivers run through Malmesbury; the Tetbury Avon to the north and the River Avon to the south, both converging on the eastern side of Malmesbury. Land around both rivers is identified as being in flood zone 2 and 3. Land to the west of Malmesbury is designated as an Area of Outstanding Natural Beauty (AONB). The eastern half of Malmesbury, including the area where the two rivers converge is designated as a Conversation Area, which extends up to the A429.
- 1.2.2. These constraints demonstrate the fairly constrained nature of Malmesbury. However, these constraints need to be balanced with the need for appropriate growth to continue to contribute towards alleviating affordability issues in the area and support the role of Malmesbury as an *'important tourist location in Wiltshire'* (paragraph 5.72 of the Core Strategy). The changing requirements as a result of the pandemic, including an increase in home working permanently, reducing net out commuting to other settlements and boosting local demand for many goods and services are all also recognised, alongside Neighbourhood Plan aspirations.
- 1.2.3. Notwithstanding these stated aims and trends in the emerging spatial strategy, the Local Plan Review (LPR) proposes a reduction in the levels of housing at Malmesbury from 885 from 2006 to 2026 in the Core Strategy to 665 from 2016 to 2036. Whilst the environmental constraints at Malmesbury are noted, there does not appear to be any evidence to justify the quantum of the proposed reduction.

- 1.2.4. The Emerging Strategy must allow for growth around Malmesbury to support both its employment function, meet local housing need and support its role as a tourist destination. Whilst development must be sensitively designed around its constraints, which themselves contribute to the special character of the area, these in themselves should not be a barrier to further development around Malmesbury. Additionally, the Emerging Strategy must demonstrate it appropriately responds to changing and current requirements.
- 1.2.5. Areas close to the centre of Malmesbury, such as at Milbourne should be considered in terms of their ability to fulfil this role. Sensitively designed development, can maintain the separate identify of Milbourne, but are actually located much closer to the centre of Malmesbury than some of the sites put forward for assessment, helping meet the wider objectives of the Council relating to sustainability and addressing climate change for example.
- 1.2.6. The spatial strategy must be flexible enough for sites such as this to properly be considered and address current need and objectives within the Emerging Spatial Strategy.

1.3. The Role of Villages

- 1.3.1. The increased threshold for rural exception schemes of up to 20 dwellings or 5% of the settlement size (compared to the threshold of up to 10 dwellings in the adopted policy) is generally welcomed as this will give greater allowance for the varied needs of rural settlements to be met. However, this threshold remains a somewhat arbitrary limit, particularly given there is a '*substantial need*' for affordable housing in the county, as referred to in the Strategic Housing Market Assessment (SHMA) 2017. Instead, the appropriate scale (and type) of residential development at rural settlements should be informed by local needs and site-specific circumstances.
- 1.3.2. Milbourne, for example, is located less than 1km away from the Market Town of Malmesbury, and whilst being defined as a rural settlement (Small Village), it offers potential to also support the development needs of Malmesbury. The Emerging Spatial Strategy (page 3) identified Malmesbury with '*potential for significant development*' but also recognises it as being a '*more constrained settlement*' in the Chippenham HMA (page 12). In this instance it is therefore not appropriate to restrict development at Milbourne only to rural exception housing subject to the above limits. Instead sites such as Land to the west of Milbourne, Malmesbury offer less constrained land which is capable of helping to meet both Malmesbury's needs and the emerging objectives of the Local Plan Review.
- 1.3.3. Paragraph 32 of the consultation paper indicates that the intention to separate Small Villages from Large Villages / Local Service Centres is because, "*Small Villages may accommodate small-scale development that responds to local needs and they therefore do not have such a wider role.*" However, it is important to recognise that some Small Villages have the potential to perform a necessary wider role owing to their location and proximity to larger settlements. Indeed the National Planning Policy Framework (NPPF) encourages sustainable development in such rural areas. The intention to separate Small Villages and further limit potential development in these locations is therefore not supported.

1.3.4. The LPR should instead take a flexible approach to the settlement hierarchy in order to respond appropriately to development needs. The LPR should also consider the potential for additional development at Small Villages, such as Milbourne, where appropriate to support wider development needs.

1.3.5. Given that the Council is currently unable to deliver a 5-year housing land supply, with only 4.29 years supply in the North and West Wiltshire HMA (Housing Land Supply Statement (2019)), it is even more important that the Council identifies sufficient housing sites. The contribution that suitable and deliverable sites at Smaller Villages, such as Land to the west of Milbourne, can make to housing supply should therefore be considered positively.

1.4. Inclusion of Climate Change considerations and balancing requirements

1.4.1. In February 2019, the Council acknowledged a climate emergency and agreed to seek to make the county of Wiltshire carbon neutral by 2030. Part of the consultation relates to the role of planning policy in contributing to achieving this goal.

1.4.2. A specific policy that encourages a *'proactive approach'* to climate change mitigation and adaptation through design would reflect national guidance (NPPF paragraph 149), as well as reflecting the objectives of the Climate Emergency, and is generally supported. However, the suggestion that all *'new development is rated as zero carbon'* from adoption of the plan in 2023 is considered too onerous and could impact deliverability of housing. Instead, any policy wording should therefore target 1) a stepped approach to reducing carbon and 2) seek to achieve being 'net' carbon neutral by 2030.

1.4.3. This would allow additional flexibility in how the overall target will be achieved, through enabling some emissions to be offset elsewhere if necessary/appropriate, whilst still ensuring that overall the carbon emissions are zero. Viability evidence to consider both this requirement and other requirements cumulatively will be key alongside a flexible approach, to help ensure that housing delivery and other objectives are not compromised.

1.4.4. To support the Climate Emergency, the principle of increasing the level of self-containment within Wiltshire's settlements which should include Milbourne and Malmesbury (as it is considered to offer *'the best solution for tackling unsustainable, carbon-based travel patterns'*) is a logical and sound approach.

1.5. Potential sites

1.5.1. The proposed place-shaping principles for Malmesbury currently do not capture all messages and objectives within the various consultation documents. In particular, this includes the way the current pandemic is changing our behaviour and the different long-term roles of settlements, including an increased level of home working and reducing net out commuting to other settlements. This position is emphasised again through the *'Addressing Climate Change and Biodiversity Net Gain'* document, which highlights the need for *'increasing the level of self-containment within Wiltshire's settlements'* as this *'offers the best solution for tackling unsustainable, carbon-based travel patterns'*.

- 1.5.2. The Malmesbury site selection paper notes the importance of historic patterns of growth. It is agreed that this should be considered, however, this must be appropriately considered within the relevant context of Malmesbury and its immediate locality. Understanding the character of an area is important. Given historic/environmental constraints, growth could have been forced in a particular direction. Continuing with this pattern of growth could actually result in new development being located a significant distance from the town centre and services upon which there is an interdependency. An alternative growth strategy could therefore be more appropriate.
- 1.5.3. Through reducing the levels of proposed housing at Malmesbury, despite the evidence, and thereby artificially constraining development in this location, out commuting levels won't be reduced nor self-containment achieved, which are both key elements of the Climate Change agenda.
- 1.5.4. Whilst development must be sensitively designed around its constraints, which themselves contribute to the special character of the area, these should not be an overall barrier to further development around Malmesbury. The Emerging Strategy must allow for such growth around Malmesbury in order for the objectives around sustainability and climate change to be delivered.
- 1.5.5. The spatial strategy must be flexible enough for sites such as 'Land to the west of Milbourne' to properly be considered to enable these wider objectives to be delivered.
- 1.5.6. Areas close to the centre of Malmesbury, such as at Milbourne should be considered in terms of their ability to fulfil the role of accommodating some of the necessary growth around Malmesbury and supporting its role as a tourist destination. Sensitively designed development, can maintain the separate identify of Milbourne, but could actually be located much closer to the centre of Malmesbury than some of the sites put forward for assessment. This would therefore help to meet the wider objectives of the Council associated with tackling unsustainable carbon based travel patterns in particular.
- 1.5.7. Land to the west of Milbourne (see plan at Appendix 1) fulfils all of these criteria. Sensitively designed development focusing on the eastern side of the site, would enable the separate identify of Milbourne to be retained, has no overarching constraints in terms of impact on the historic settlement, the AONB, the conservation area and is located away from the rivers.
- 1.5.8. Further in terms of accessibility, the closest primary school (St Joseph's Catholic Primary School) is located approximately 0.6 miles away, Malmesbury School (a Secondary School) is located only 1.2 miles away, Malmesbury medical partnership is less than a mile away and Malmesbury Town Centre is also less than a three quarters of a mile away, based on streetcheck.co.uk. (Note these distances are all approximate and will depend upon which part of the site they are measured from.) These factors all support the sustainability credentials of 'Land to the west of Milbourne' which could provide a positive contribution to the overall strategy of for Malmesbury and overall objectives of the emerging LPR.

2. Introduction

2.1. Introduction

2.1.1. This report has been prepared on behalf of Miller Homes in relation to Wiltshire Council's (WC) current Local Plan Review (LPR) consultation.

2.1.2. Miller Homes have an interest in land to the west of Milbourne, which is located adjacent to Milbourne and approximately 1km to the east of the centre of Malmesbury. The site measures approximately 5.3ha and is bound by the A429 to the west, Blicks Hill to the south and existing residential dwellings to the north-east. A copy of the site location plan is enclosed at Appendix 1.

2.1.3. The current consultation seeks to inform preparation of the LPR which will provide for future housing and employment need in the county over the period 2016-2036. The consultation is thereby based on a number of documents relating to: the amount and location of development in the county's main settlements (including a 'Planning for Malmesbury' paper), how growth is distributed around the county (the 'Emergency Spatial Strategy' paper), the framework for rural communities to meet housing needs (the 'Empowering Rural Communities' paper), and the approach to policies relating to climate change and biodiversity net gain (the 'Addressing Climate Change and Biodiversity Net Gain' paper).

2.1.4. On this basis, this report is structured as follows based on the details and questions contained within the consultation documents:

- Chapter 2: Emerging Spatial Strategy
- Chapter 3: Empowering Rural Communities
- Chapter 4: Addressing Climate Change and Biodiversity Net Gain
- Chapter 5: Supporting Documents (Interim Sustainability Appraisal, Local Transport Review, Chippenham HMA: Formulating Alternative Development Strategies, Local Housing Needs Assessment, Level 1 Strategic Flood Risk Assessment, Retail and Town Centre Studies and Employment Land Review);
- Chapter 6: Planning for Malmesbury; and
- Chapter 7: Summary.

2.1.5. Our response provides comments regarding the overall approach, development requirements and spatial strategy and explains that the land to the west of Milbourne provides an opportunity to accommodate residential development to contribute towards the aims and objectives of the LPR.

3. Emerging Spatial Strategy

3.1. Introduction

3.1.1. The Emerging Spatial Strategy considers the pattern of development and proposes a distribution of that development and growth around the county. The strategy is split into various chapters which are considered below.

3.2. Growth and climate change

3.2.1. This chapter of the Emerging Spatial Strategy acknowledges the Council's resolution to seek to '*make the county carbon neutral by 2030*' as part of the Climate Emergency, that Wiltshire Council declared in February 2019.

3.2.2. It is right to acknowledge the '*key role*' that the LPR will play in helping achieve this. Support is also given to having a 'sustainable pattern of development' with appropriate distribution of growth.

3.2.3. There is also recognition of the fact that '*A large proportion of Wiltshire residents live in the countryside and smaller rural settlements. On a smaller scale, growth to meet local needs can also facilitate carbon reduction in similar if more modest ways... Affordable homes are needed for local people and planning must help support rural jobs...*' These statements and aspirations are all broadly supported

3.2.4. The benefits of focusing new development within the County's main settlements, in terms of making the best use of existing infrastructure, better supporting existing businesses, reducing the need to travel and opportunities for renewable energy are all supported. We suggest that the main objective of '*focusing new development **within** the County's main settlements*' given this reduces carbon in different ways...' should be amended to refer to '*new development **within or close to** the County's main settlements....*'

3.2.5. This will ensure a slightly greater number of sites are assessed, to ensure the objectives, particularly those emerging objectives focusing on climate change, can be delivered. Looking only at sites '*within*' the main settlements would rule out any sites currently outside those main settlements. Additionally, to have a strategy with greater certainty of achieving the objectives, some flexibility is required to enable sites that could be physically closer to a 'main settlement' and potentially unconstrained by physical constraints (therefore arguably more sustainable than other sites) not to be ruled out.

3.3. Delivering the spatial strategy

3.3.1. This chapter explains the background and context that has informed the 'delivery principles' of the spatial strategy. Responses on specific delivery principles are set out below.

'Each main settlement will have a set of 'place shaping priorities' to guide how and where development will take place and what distinct priorities there may be to manage change in the local environment. They will be agreed between the Council and the relevant Town and Parish Councils'

3.3.2. In principle this is a logical approach. The background/ supporting text to this section also sets out:

- That the spatial strategy focuses on the different long-term roles of settlements and apportioning growth accordingly.
- Covid-19 is changing the way we look at our surroundings, changing our behaviour and, longer term, how we manage our environment.
- It is likely to increase home working permanently, reducing net out commuting to other settlements and boosting local demand for many goods and services. This may create opportunities to reconsider how we use town centres. A distribution of growth needs to be delivered with these and other factors in mind to ensure each community has an appropriate planning framework.

3.3.3. There appears little/no evidence to explain what the 'long-term role' is envisaged to be for Malmesbury for example and little if any, evidence to demonstrate how this 'long-term role' has influenced the apportioning of the growth. Further, the changes to our behaviour and managing the environment have not been specifically identified in order for these measures to be transparently translated into the longer term strategy. Only if these steps are followed through can the '*distribution of growth needs*' be '*delivered with these and other factors in mind*'.

3.3.4. Therefore, whilst the principle of the 'Place Shaping Priorities' is supported, the background work and evidence base must demonstrate how the proposed strategy fully responds to these objectives to successfully deliver the 'long-term' role.

3.3.5. Emerging strategies must also demonstrate how they have the ability to flexibly adapt to these changing requirements, (including the climate change agenda etc.) and ensure future development can be planned to be sustainable.

'To maximise the use of previously developed land and support urban renewal where needed, each of the main settlements will have a target amount of new homes that will need to be planned for within its urban area.'

3.3.6. The aim of this 'delivery principle' is supported and a 'target' amount of new homes on brownfield land reflects national guidance.

3.3.7. As explained at paragraph 3.8 of the 'Emerging Spatial Strategy', '*the strategy includes a **possible** brownfield target for each settlements; an indicative number of new homes to be built over the period 2021-2031 using previously developed land... [our emphasis]. The brownfield target is derived from a 'windfall' allowance for Wiltshire used in the housing land supply.'*

3.3.8. Paragraph 3.12 then notes that, '*The amount of greenfield land needing to be identified for development will depend upon the brownfield land that can be relied upon, which is land identified in neighbourhood plans or other allocations and planning permissions. **It is not possible to assume each target will be met and just a target amount cannot count toward the land we need to plan for.***' [again our emphasis].

- 3.3.9. It is notable that the Council's Brownfield Land Register (2019) identifies only around 1,000 units on brownfield sites with planning permission in the county (with none appearing to be in Malmesbury), of which a large proportion were granted permission over 3 years ago, further emphasising that this provision cannot be relied upon.
- 3.3.10. This statement about how the 'target' for brownfield land is fully supported but the acknowledgement that *'just a target amount cannot count toward the land we need to plan for'*, also does not appear to have informed the *'Planning for Malmesbury'* consultation document, discussed further below under this section.

3.4. Formulating the spatial strategy

- 3.4.1. Based on information provided within the consultation, the approach of dividing the county into four different Housing Market Areas (HMAs) within which the majority of the local population live and work, is supported. It is a logical approach to propose that addressing need is targeted to where that need is. Land to the west of Milbourne, Malmesbury falls within the proposed new Chippenham HMA.
- 3.4.2. Paragraph 2.17 explains that housing needs has been calculated to produce both a minimum and a higher figure for the period 2016 to 2036. This is a logical approach to test at this stage. The most recent Local Development Scheme (LDS), dated July 2020, envisages adoption of the Local Plan Review in Q2 of 2023. A plan period to 2036 would therefore cover only 13 years and fall short of the NPPF requirement (para 22) that, *'Strategic policies should look ahead over a minimum 15 year period from adoption..., to anticipate and respond to long-term requirements and opportunities, such as those arising from major improvements in infrastructure.'*
- 3.4.3. It is also worthy to note that the MHCLG consultation on proposed updates to the NPPF (closing on 27 March) refers to the timescale for strategic policies being amended with larger-scale developments or new settlements to be considered with a 30-year vision. Reducing the plan period to only 13 years is therefore clearly contrary to the direction of travel. Policies, such as the housing requirements, should be updated to reflect an extended plan period.

3.5. Emerging Spatial Strategy and Chippenham Housing Market Area

- 3.5.1. As above, Land to the west of Milbourne is located just to the east of Malmesbury, which falls within the proposed Chippenham HMA. Page 14 of the Emerging Spatial Strategy sets out a total housing requirement of 20,400 for the Chippenham HMA during the period 2016 to 2036, see Table below.
- 3.5.2. The basis of this overall total housing requirement (rather than specific apportionment) is supported, subject to increasing it to reflect a plan period up to at least 2038, (as explained above), to respond to the most recent LDS where adoption is envisaged in 2023.

Wiltshire Local Plan Review Consultation

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			Overall Housing Requirement (Dwellings)		Overall Employment Requirement (Hectares)
	Wiltshire Core Strategy 2006-2026	Brownfield target 2021-2031	Emerging Strategy 2016-2036	Residual at 1 April 2019	
Calne	1440	60	1610	360	4
Chippenham	4510	240	9225	5100	5
Corsham	1220	160	815	120	0
Devizes	2010	150	1330	330	0
Malmesbury	885	70	665	95	0
Melksham	2240	130	3950	2585	0
Rest of HMA	1992		2805	1270	0
TOTAL	14297		20400	9860	9

- 3.5.3. The LPR proposes a reduction in the levels of housing at Malmesbury from 885 from 2006 to 2026 in the Core Strategy to 665 from 2016 to 2036.
- 3.5.4. Paragraph 3.33 of the Emerging Spatial Strategy sets out that, *'The results of sustainability appraisal identified the level of environmental constraints at other main settlements within the HMA (Corsham, Devizes and Malmesbury) should lead to a smaller proportion of growth if possible.'* Whilst the environmental constraints at Malmesbury are noted, there does not appear to be any evidence to justify the quantum of the proposed reduction.
- 3.5.5. Malmesbury itself, located on the opposite side of the A429 is identified as a 'market town'. The Core Strategy sets out that, *'Outside the Principal Settlements, Market Towns are defined as settlements that have the ability to support sustainable patterns of living in Wiltshire through their current levels of facilities, services and employment opportunities. Market Towns have the potential for significant development that will increase the jobs and homes in each town in order to help sustain and where necessary enhance their services and facilities and promote better levels of self containment and viable sustainable communities.'*
- 3.5.6. This role of the market towns and focus of development in these locations, along with the principal settlements is rightly continued in the emerging Local Plan Review. The Table on page 3 confirms that, *'Market towns have the potential for significant development that will increase the number of jobs and homes to help sustain/ enhance services and facilities and promote self-containment and sustainable communities.'* It is also entirely right that constraints are properly considered in the spatial strategy.
- 3.5.7. The Emerging Strategy must allow for growth around Malmesbury to support both its employment function, meet local housing need and support its role as a tourist destination. Whilst development must be sensitively designed around its constraints, which themselves contribute to the special character of the area, these in themselves should not be a barrier to further development around Malmesbury.

- 3.5.8. High level constraints at Malmesbury and the nearby area, including Milbourne, are illustrated at Figure 4 on page 18 of the Malmesbury site selection report (January 2021). This shows that two rivers run through Malmesbury; the Tetbury Avon to the north and the River Avon to the south, both converging on the eastern side of Malmesbury. Land around both rivers is identified as being in flood zone 2 and 3. Land to the west of Malmesbury is designated as AONB. The eastern half of Malmesbury, including the area where the two rivers converge is designated as a Conversation Area, which extends up to the A429.
- 3.5.9. These constraints demonstrate the fairly constrained nature of Malmesbury and how these constraints will need to be balanced with the need for appropriate growth to continue to contribute towards alleviating affordability issues in the area, support the role of Malmesbury as an 'important tourist location in Wiltshire' (paragraph 5.72 of the Core Strategy) alongside supporting its employment function and meeting housing need.
- 3.5.10. Additionally, the emerging Strategy must demonstrate it appropriately responds to changing requirements as a result of the pandemic. These changing requirements include an increase in home working permanently, reducing net out commuting to other settlements and boosting local demand for many goods and services are all also recognised in the Emerging Strategy as a principle and it must be demonstrated how these changing requirements are appropriately reflected in the emerging apportionment of dwellings.
- 3.5.11. Areas close to the centre of Malmesbury, such as at Milbourne should be considered in terms of their ability to fulfil this role and the wider objectives of the plan. Sensitively designed development, can maintain the separate identity of Milbourne, but are actually located much closer to the centre of Malmesbury than some of the sites put forward for assessment, helping meet the wider objectives of the both the LPA and Council associated for example with sustainability and addressing climate change.
- 3.5.12. The spatial strategy must be flexible enough for sites such as this to properly be considered.

Role of Chippenham

- 3.5.13. It is noted that the largest proportion of dwellings is proposed to be allocated to Chippenham. It is accepted that there is some logic to this given that this settlement is a 'principal settlement' i.e. at the top of the settlement hierarchy. However, the total requirement is proposed to be delivered through three sites; site 1: East Chippenham with 2,975, site 2: South Chippenham with 2,415 and site 3, East of Showell Farm with 196 dwellings. All three sites are located around the south eastern part of Chippenham and appear to be part of one large urban extension.
- 3.5.14. It is recognised that there can be many benefits of large extensions such as this, not least in terms of infrastructure provision. However, it is widely acknowledged that larger sites are more complex to deliver and therefore have much longer build out periods; in the case of Chippenham, potentially extending beyond the plan period. There must therefore be flexibility within the plan to deliver on small sites more quickly to address the need within the Chippenham HMA.

3.6. Summary

- 3.6.1. The key points from this chapter are summarised below:

- The Local Plan Review has a key role in contributing to the delivery of the Climate Change Agenda, particularly in terms of having a 'sustainable pattern of development' with appropriate distribution of growth.
- The approach of dividing the county into four different Housing Market Areas (HMAs) within which the majority of the local population live and work, is supported. It is a logical approach to propose that addressing need is targeted to where that need is.
- The Plan Period should be extended to at least 2038 to ensure it covers a 'minimum 15 year period from adoption' as per the NPPF requirements with associated increases in housing requirements.
- The Local Plan Review proposes a reduction in the levels of housing at Malmesbury from 885 from 2006 to 2026 in the Core Strategy to 665 from 2016 to 2036 in the emerging Local Plan Review. Whilst the environmental constraints at Malmesbury are noted, there does not appear to be any evidence to justify the quantum of the proposed reduction.
- The Emerging Strategy must allow for growth around Malmesbury to support both its employment function, meet local housing need and support its role as a tourist destination. Whilst development must be sensitively designed around its constraints, which themselves contribute to the special character of the area, these in themselves should not be a barrier to further development around Malmesbury.
- Emerging strategies, particularly around Malmesbury and Milbourne must demonstrate how they have the ability to flexibly adapt to the changing requirements, (including the climate change agenda, sustainable development and reducing net out commuting) and these requirements should be reflected in the emerging apportionment of dwellings.
- This flexibility should enable sites that could be physically closer to a 'main settlement' and potentially unconstrained by physical constraints (therefore arguably more sustainable than other sites) not to be ruled out such as at Land to the West of Milbourne.
- There must therefore be flexibility within the plan to deliver on small sites more quickly to address the need within the Chippenham HMA.

4. Empowering Rural Communities

4.1. Introduction

4.1.1. This chapter relates to the Empowering Rural Communities consultation document. Our response below is structured according to the sections and questions contained within the document.

4.2. Empowering Rural Communities

4.2.1. The introductory text of the consultation paper (paragraphs 3-6) indicates a desire to change the emphasis towards considering development in rural areas. Specifically, paragraph 6 of the consultation paper states that, “*The Local Plan Review is looking at ways it can **empower** and not frustrate local initiatives and **facilitate meeting needs** whilst continuing to protect the countryside*” [our emphasis]. This stance reflects the positive approach taken in the NPPF which encourages the promotion of sustainable development in rural areas and states that planning policies should “*identify opportunities for villages to grow and thrive*” (NPPF paragraph 77). The overall intended approach towards considering development in rural areas is therefore supported.

4.2.2. Paragraph 8 of the consultation paper add that rural settlements (with specific reference to Large Villages and Local Service Centres) should continue to accommodate new homes based on their size, importance and ability to meet local needs. Whilst this is a sustainable approach to accommodating new development, it is also important to also allow for new development in Small Villages in order to support the vitality of rural areas and contribute to overall housing needs. Indeed, Small Villages such as Milbourne can play an important role in supporting the development needs of nearby larger settlements such as Malmesbury as noted further below.

Question: Do you agree there should be a target of 40% affordable homes on all new schemes of more than five dwellings in the rural area? What other approaches might there be?

4.2.3. The appropriate proportion of affordable housing provided at new developments in the rural area should be informed by up-to-date evidence of local needs, market requirements and viability. Whilst the overall desire to simplify planning requirements and encourage affordable housing supply (as proposed in paragraphs 15-18 of the consultation paper) is positive, it is important to ensure that this is not at the expense of meeting identified local housing needs in rural areas.

4.2.4. The Core Strategy (paragraph 6.44) set out the need for different affordable housing requirements across the county (a 30% zone and 40% zone) as it was identified that “*there are clear geographical disparities in terms of residential land values*” affecting viability, based on the Wiltshire Local Plan Viability Study 2014. It is noted that the Swindon and Wiltshire Strategic Housing Market Assessment (SHMA) 2017 highlights the ‘substantial need’ for affordable housing in the county. However the proposed approach to set a higher blanket target of 40% affordable provision on sites of more than 5 dwellings must be justified through an up-to-date viability assessment. Without this there is a risk that development, particularly smaller-scale development, will not come forward as envisaged, which will impact on the vitality of rural areas and overall housing supply.



4.2.5. It is notable that the Council is currently unable to deliver a 5-year housing land supply (based on the latest Housing Land Supply Statement (2019)), with 4.56 years supply across the county (Table 2a) and 4.29 years supply in the North and West Wiltshire HMA (including Malmesbury and Milbourne) (Table 3a). As a result the Council will not currently be able to meet its housing requirement over the Core Strategy plan period 2006-2026. It is therefore crucial that the LPR does not prohibit overall future housing delivery with overly restrictive affordable housing targets.

Question: Do you think this approach is worth pursuing? What local evidence would be needed to justify applying restrictions like these?

4.2.6. It is assumed that this question relates to the proposed approach to control development of large replacement dwellings and house extensions in rural areas, as set out in the preceding paragraphs 23-25 of the consultation paper.

4.2.7. The NPPF (paragraphs 61 and 78) encourages the need for a mix of housing to support local needs and the vitality of rural communities, as also acknowledged at paragraph 23 of the consultation paper. It is therefore important to ensure that the LPR contains planning policies which facilitate this.

4.2.8. The proposals to prevent replacement dwellings and extensions in rural areas takes a restrictive approach towards new development and appear to place unnecessary restrictions on market demand. This approach therefore appears at odds with the NPPF which is clear that planning policies should be positive (NPPF paragraph 35) and support sustainable development in rural areas (NPPF paragraph 78). Instead the LPR should be focused on facilitating new development to come forward in rural areas which is of an appropriate size and type to meet identified local needs.

4.2.9. The Swindon and Wiltshire SHMA 2017 (Figure 77) highlights a need for 3 and 4-bed market housing in the county and therefore it is important to ensure that appropriate provision is made for this in the LPR. Greenfield sites and rural areas in particular offer the opportunity for a greater proportion of larger family units with increased private amenity space to meet this identified need. Indeed Land to the west of Milbourne is well-placed to help meet this need given its location adjacent to Milbourne and close to Malmesbury.

Question: Do you agree with the approach set out in the suggested revised Core Policy 44? If not, why not? How could it be improved?

4.2.10. It is important to ensure that in the first instance the LPR fully considers the housing needs of rural settlements through an evidence-based approach. This will help to inform the policy requirements needed to meet these identified needs. The overall intention to include a rural exception policy and help to deliver affordable housing is consistent with paragraph 77 of the NPPF and is supported. However, consideration should be given as to whether such a policy enables identified need to be sufficiently met or whether additional provision for development in rural areas is required. Additional comments on the development needs of rural areas are provided elsewhere in this report.

4.2.11. Notwithstanding the above, we have several specific comments regarding the proposed revised Core Policy 44 as noted below.

- 4.2.12. Firstly, the proposed revised policy refers only broadly to 'rural settlements'. It is important for clarity that 'rural settlements' are clearly defined in the LPR to include 'Small Villages', as well as Large Villages and Local Service Centres, as noted at paragraph 20 of the consultation paper and in the current adopted Core Policy 44.
- 4.2.13. The increased threshold for rural exception schemes of up to 20 dwellings or 5% of the settlement size (compared to the threshold of up to 10 dwellings in the adopted policy) is generally welcomed as this will give greater allowance for the varied needs of rural settlements to be met. However, this threshold remains a somewhat arbitrary limit, particularly given there is a 'substantial need' for affordable housing in the county, as referred to in the SHMA 2017. Instead, the appropriate scale (and type) of residential development at rural settlements should be informed by local needs and site-specific circumstances.
- 4.2.14. Similarly, there appears to be no justification for the proposed approach to allow only 'up to 25% open market housing' at rural exception schemes, particularly when compared to the current adopted policy and the NPPF. Whilst rural exception sites are primarily affordable housing-led proposals, the NPPF (paragraph 77) states broadly that 'some' market housing should be considered to help meet local needs. In line with the current adopted Core Policy 44 states only that affordable housing should make up the 'majority' of the development. It is considered that the proposed revised policy should be revised accordingly in line with NPPF paragraph 77, more akin to the current adopted policy, in order to give greater allowance for local needs and site-specific circumstances to be met.
- 4.2.15. Milbourne, for example, is located less than 1km away from the Market Town of Malmesbury, and whilst being defined as a rural settlement (Small Village), it offers potential to also support the development needs of Malmesbury. The Emerging Spatial Strategy (page 3) identified Malmesbury with 'potential for significant development' but also recognises it as being a 'more constrained settlement' in the Chippenham HMA (page 12). In this instance it is therefore not appropriate to restrict development at Milbourne only to rural exception housing subject to the above limits. Instead sites such as Land to the west of Milbourne offer less constrained land which is capable of helping to meet Malmesbury's needs.

4.3. Supporting Rural Business, Services and Facilities

The role of local service centres, large and small villages

- 4.3.1. It is noted that the consultation paper does not propose to change the settlements designated as Small Villages but intends to make more of a distinction between Small Villages and Large Villages / Local Service Centres to inform the location of new development.
- 4.3.2. The general approach to direct development according to the relative sustainability of settlements is logical. However, it is important that this grouping is subject to ongoing monitoring and review to account for any changes in local circumstances and in the provision of local services and facilities, which may lead to changes to the relative sustainability of settlements to accommodate growth. It is notable that the evidence informing the current adopted settlement hierarchy ('Topic paper 3: Settlement strategy', January 2012) is almost 10 years old and therefore it is recommended that a full review is undertaken to accurately inform the LPR.



4.3.3. Paragraph 32 of the consultation paper indicates that the intention to separate Small Villages from Large Villages / Local Service Centres is because, “*Small Villages may accommodate small-scale development that responds to local needs and they therefore do not have such a wider role.*” However, it is important to recognise that some Small Villages have the potential to perform a necessary wider role owing to their location and proximity to larger settlements. Milbourne, for example, is located less than 1km to the east of Malmesbury (a constrained Market Town) and therefore has potential to accommodate additional development in a sustainable location to support the wider area. Indeed the NPPF encourages sustainable development in such rural areas. The intention to separate Small Villages and further limit potential development in these locations is therefore not supported.

4.3.4. The LPR should instead take a flexible approach to the settlement hierarchy in order to respond appropriately to development needs. The LPR should also consider the potential for additional development at Small Villages, such as Milbourne, where appropriate to support wider development needs.

Question: What do you think to the housing requirements for Local Service Centres and Large Villages? Should requirements be higher or lower? If so which ones and why?

4.3.5. In the Chippenham HMA, it is noted that the housing requirement for Local Service Centres is relatively small (100 units at Market Lavington) and that the amount of development ‘elsewhere’ (i.e. including Smaller Villages) is broadly akin to that of ‘Large Villages’ (page 9). This is despite the aim that Local Service Centres will accommodate more growth than Large Villages (paragraph 47) and is markedly different to that of other HMAs. The table at page 9 of the consultation paper also highlights the significant housing requirement at Market Towns (including Malmesbury) in the Chippenham HMA. This further highlights the importance of development in Smaller Villages in the Chippenham HMA, such as at Milbourne, to contribute to the overall development needs of the HMA and the Market Town of Malmesbury.

4.3.6. Tables 2.3 and 2.4 indicate that a large proportion of the housing requirement for Local Service Centres and Large Villages in the Chippenham HMA has been met by completions and commitments. It is however important that ongoing monitoring is undertaken to consider whether these sites remain likely to be delivered in the plan period, as noted at paragraph 53 of the consultation paper. Indeed the NPPF is clear that local authorities should monitor and maintain a deliverable housing supply to meet local needs (paragraph 73).

4.3.7. Given that the Council is currently unable to deliver a 5-year housing land supply, with only 4.29 years supply in the North and West Wiltshire HMA (Housing Land Supply Statement (2019)), it is even more important that the Council identifies sufficient housing sites. The contribution that suitable and deliverable sites at Smaller Villages, such as Land to the west of Milbourne, can make to housing supply should therefore be considered positively.

Neighbourhood planning

- 4.3.8. The consultation paper (paragraph 42) states that, '*elsewhere in the countryside*' (outside of Local Service Centres and Large Villages) local communities will bring forward housing proposals through neighbourhood planning, neighbourhood development orders or planning applications. Paragraph 44 notes that historic delivery of housing in these areas has largely been through small-scale windfall permissions.
- 4.3.9. Whilst the encouragement given towards neighbourhood planning is generally supported, it is important to ensure that sufficient housing is delivered via this means in order to support overall development needs.
- 4.3.10. The Malmesbury Neighbourhood Plan was made in 2015 and states that, alongside the allocation of 2 sites at Malmesbury, housing at Smaller Villages (including Milbourne) should only be on windfall sites and 'the number of dwellings should ideally not exceed single figures' (Policy 3). The Neighbourhood Plan is now 6 years old and will be in need of review to accompany the new LPR.
- 4.3.11. Given the scale of housing provision required 'elsewhere' in rural areas outside the Local Service Centres and Larger Villages in the Chippenham HMA (as referred to above), as well as the current housing land supply shortfall, it will be important to ensure that sufficient housing is provided for in these areas. Accordingly, the LPR itself should be prepared to make adequate provision for housing in Smaller Villages in the event that a review of the Neighbourhood Plan is not undertaken.
- 4.3.12. Whilst including a windfall allowance in the LPR is appropriate, as above given the scale and need of housing provision in smaller rural areas, the LPR should consider allocating smaller rural sites to provide greater certainty of delivery. This should include consideration of Land to the west of Milbourne which is sustainably located and suitable to support overall housing needs.

4.4. Summary

- 4.4.1. The key points from this chapter are summarised below.



- The positive intentions towards considering development in rural areas is supported in line with the NPPF and this must be reflected in LPR policies.
- The general approach to direct development according to the relative sustainability of settlements is logical.
- Consideration must be given to the potential for Small Villages to support the wider local needs of nearby larger settlements particularly where there is under-supply (e.g. the contribution of Milbourne to Malmesbury's needs and housing supply in the HMA)
- The LPR should make specific provision for housing in Small Villages, particularly where new Neighbourhood Plans do not come forward, to help provide certainty of delivery
- The appropriate proportion of affordable housing provided in the rural area should be informed by up-to-date evidence of local needs and should not be at a level that prohibits overall housing delivery in areas of under-supply.
- The LPR should reflect the predominant need for 3 and 4-bed market housing in the county and consider favourably greenfield sites and rural areas which are able to meet this need.
- The proposed revised Core Policy 44 should be amended to enable rural exception schemes of varying scales and with increased levels of market housing to be delivered to meet local needs.

5. Addressing Climate Change and Biodiversity Net Gain

5.1. Introduction

5.1.1. This chapter relates to the Addressing Climate Change and Biodiversity Net Gain consultation document. Our response below is structured according to the sections and questions contained within the document.

5.2. Section 3: The role of land-use plans in tackling climate change

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

5.2.1. A specific policy that encourages a '*proactive approach*' to climate change mitigation and adaptation through design would reflect national guidance (NPPF paragraph 149), as well as reflecting the objectives of the Climate Emergency. This approach is therefore generally supported and should make a contribution towards reducing carbon emissions.

5.2.2. It will however be important that such a policy should incorporate sufficient flexibility without setting prescriptive requirements as to how these aspirations are met. A target reduction in energy consumption over and above building regulations could be established (subject to being supported by evidence) however, the policy should not set out prescriptively how this should be achieved. For example, it should not include a specific proportion of energy consumption to be provided by a certain type of energy.

5.2.3. Prescriptively setting out proportions of energy that should come from a particular source will not enable the flexibility to address site-specific or changing circumstances during the plan period. A prescriptive approach could therefore result in the delivery of housing / other development being compromised and would not be supported.

5.2.4. Further, such a prescriptive policy would not take account of the fact that all policies should be focused on energy reduction in the first instance. The overall target to reduce energy consumption should first be achieved, where possible, through use of energy efficiency measures such as a 'fabric first approach' and remaining energy requirements secured through measures such as on or off-site renewable energy and other low carbon technologies, which could include 'allowable solutions'.

5.2.5. Appropriate account must also be taken of the financial and viability implications of any such policy, and additionally the financial and viability implications when considered cumulatively with other policies, to ensure that the delivery of housing and other objectives is not compromised.

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

5.2.6. As set out above, residential development in particular should be required to reduce energy consumption in the first instance through a fabric-first approach, prior to considering the use of renewable and/or low carbon energy either on or off-site alongside potential offsetting measures.

5.2.7. The policy should also incorporate sufficient flexibility to address site specific or changing circumstances during the plan period and should not prescriptively set out how these requirements are met (for example policies should avoid requiring energy to be provided via a specific method, e.g. solar panels, district heating etc.).

5.2.8. As part of achieving 'net zero carbon', measures such as off-setting and allowable solutions should be considered. As part of the consideration of off-setting and allowable solutions, we would therefore welcome details as to how the cost per tonne of carbon/ other measures associated with allowable solutions will be calculated to ensure that the financial and viability implications of any such policy are fully considered.

Question A3: How should these actions be delivered and measured?

5.2.9. No comment.

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

5.2.10. The measures set out provide a good framework for the consideration of future development. The first line of policy theme 1, '*Development should be planned for with the future in mind*' is particularly important. A flexible approach to site selection should inform how sites are future proofed. This must include carefully considering how the sustainability and climate change criteria can most appropriately be achieved, whilst balancing these requirements with the fact that some development, around, for example Malmesbury, is necessary. Sites adjacent to the existing built form of Malmesbury may actually be less sustainable, for reasons including flood risk than sites not previously considered, such as land to the west of Milbourne.

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

5.2.11. Whilst in principle this approach is positive, any policy should incorporate sufficient flexibility to address site specific or changing circumstances during the plan period and should not prescriptively set out how these requirements are met. The financial and viability implications of such a policy must also be considered both in meeting the individual policy requirements and cumulatively with other policy requirements to ensure the delivery of housing and other objectives is not compromised.

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

5.2.12. The measures set out provide a broad framework for moving towards a net zero carbon future. It is noted that the policy theme 3 includes the following, '*This effectively means that the zero carbon 'rating' of all new development should be achieved on-site through the fabric of the buildings (energy efficiency), plot orientation, plus the incorporation of renewable energy generation.*'

5.2.13. It is not considered realistic to require all new development to be 'zero carbon' from adoption of the plan. To ensure the net zero carbon target is achievable by 2030, without compromising the delivery of housing

and other objectives in the plan, it would seem more realistic and viable to implement a 'stepped approach' towards this target.

- 5.2.14. Further, a requirement to achieve 'zero carbon' (not 'net zero carbon'), means there appears to be no flexibility in how the policy is achieved, for example through off-setting or allowable solutions.
- 5.2.15. Having a target of 'zero carbon' within a policy would go beyond both the national target (which relates to 'net zero carbon' and Wiltshire's own target, of being a 'net carbon neutral' by 2030'.)
- 5.2.16. Carbon neutral means that while some emissions are still being generated by a building/process these emissions are being offset somewhere else making the overall net emissions zero. Wiltshire's target of being 'net carbon neutral by 2030', appears to be ahead but in accordance with the national target.
- 5.2.17. Any policy wording should therefore target 1) a stepped approach to carbon reduction and 2) seek to achieve being 'net' carbon neutral by 2030. This would allow additional flexibility in how the overall target will be achieved, through enabling some emissions to be offset elsewhere if necessary/ appropriate, whilst still ensuring that overall the carbon emissions are zero. A flexible approach will help ensure that housing delivery and other objectives are not compromised.

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

- 5.2.18. As set out in B3 above, it is not considered realistic to require all new development to be 'zero carbon' from adoption of the plan. To ensure the net zero carbon target is achievable by 2030, without compromising the delivery of housing and other objectives in the plan, it would seem more realistic and viable to implement a 'stepped approach' towards this target.
- 5.2.19. Further, a requirement to achieve 'zero carbon' (not 'net zero carbon'), means there appears to be no flexibility in how the policy is achieved, for example through off-setting or allowable solutions.
- 5.2.20. Having a target of 'zero carbon' within a policy would go beyond both the national target (which relates to 'net zero carbon' and Wiltshire's own target, of being a 'net carbon neutral' by 2030'.)
- 5.2.21. Carbon neutral means that while some emissions are still being generated by a building/process these emissions are being offset somewhere else making the overall net emissions zero. Wiltshire's target of being 'net carbon neutral by 2030', appears to be ahead but in accordance with the national target.
- 5.2.22. Any policy wording should therefore target 1) a stepped approach to carbon reduction and 2) seek to achieve being 'net' carbon neutral by 2030. This would allow additional flexibility in how the overall target will be achieved, through enabling some emissions to be offset elsewhere if necessary/ appropriate, whilst still ensuring that overall the carbon emissions are zero. A flexible approach will help ensure that housing delivery and other objectives are not compromised.

Question B5: Would a move to support the delivery of zero carbon new development materially affect scheme viability?

5.2.23. As above, a requirement to achieve 'zero carbon' (not 'net zero carbon'), means there appears to be no flexibility in how the policy is achieved, for example through off-setting or allowable solutions.

5.2.24. Again, as above, any policy wording should therefore target 1) a stepped approach to carbon reduction and 2) seek to achieve being 'net' carbon neutral by 2030. This would allow additional flexibility in how the overall target will be achieved, through enabling some emissions to be offset elsewhere if necessary/appropriate, whilst still ensuring that overall the carbon emissions are zero. Viability evidence to consider both this requirement and other requirements cumulatively will be key alongside the flexible approach as outlined above, to help ensure that housing delivery and other objectives are not compromised.

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

5.2.25. No comment.

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

5.2.26. No comment.

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

5.2.27. As above, any policy wording should therefore target 1) a stepped approach to carbon reduction and 2) seek to achieve being 'net' carbon neutral by 2030. This would allow additional flexibility in how the overall target will be achieved, through enabling some emissions to be offset elsewhere if necessary/appropriate, whilst still ensuring that overall the carbon emissions are zero.

5.2.28. It is important that the policy wording does not restrict potential opportunities for the supply of energy from renewable energy sources, such as those from nearby off-site renewable sources. These policy alterations should ensure such opportunities are not ruled out.

5.2.29. Furthermore, a more flexible approach will help ensure that housing delivery and other objectives are not compromised.

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

5.2.30. It is understood that the purpose of the policy is to reduce carbon emissions to contribute to Wiltshire's target of being a 'net carbon neutral district by 2030'. If the overall target is to reduce carbon emissions, (rather than increasing renewable energy use) then the policy should not be prescriptive as to how the carbon reductions will be achieved. The targets should be referenced and refer to the fact that these 'could', for example, be achieved by including certain on or off-site types of renewable energy.

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

5.2.31. As above, it is understood that the purpose of the policy is to reduce carbon emissions to contribute to Wiltshire's target of being a 'net carbon neutral district by 2030'. If the overall target is to reduce carbon emissions, (rather than increasing renewable energy use) then the policy should not be prescriptive as to how the carbon reductions will be achieved and should not set targets for the production and use of renewable energy.

5.2.32. Furthermore, assuming the primary aim of any policy is about achieving a reduction in energy use and in particular carbon reduction, the policy should firstly promote a reduction in the actual energy use, through a 'fabric first' (or energy efficiency in the design of buildings) approach. Any policy which focuses on targets for the production and use of renewable energy could conflict with the overall aim of energy reduction, by placing more weight on achieving a target around the production and use of energy rather than an actual reduction in energy consumption.

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

5.2.33. No comment.

Question B12: If we are to tackle issues associated with air quality would the measures set out above go far enough and be effective in improving air quality in Wiltshire? If not, what measures are we missing and how should they be framed in land-use planning policy?

5.2.34. The principle of increasing the level of self-containment within Wiltshire's settlements as it is considered to offer 'the best solution for tackling unsustainable, carbon-based travel patterns' is a logical and sound approach.

5.2.35. Whilst development must be sensitively designed around its constraints, which themselves contribute to the special character of the area, these in themselves should not be a barrier to further development around Main Settlements such as Malmesbury. The Emerging Strategy must allow for such growth around Malmesbury in order for the objectives around sustainability and climate change to be delivered.

5.2.36. Areas close to the centre of Malmesbury, such as at Milbourne should be considered in terms of their ability to fulfil the role of accommodating some of the necessary growth around Malmesbury. Sensitively designed development, can maintain the separate identity of Milbourne, but could actually be located much closer to the centre of Malmesbury than some of the sites put forward for assessment. This would therefore help to meet the wider objectives of the Council associated in particular with tackling unsustainable carbon based travel patterns.

5.2.37. The spatial strategy must be flexible enough for sites such as this to properly be considered to enable these wider objectives to be delivered.

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

5.2.38. As above, a practical step is ensuring the spatial strategy is flexible enough to allow for the necessary

growth around 'Main Settlements' such as Malmesbury to accommodate growth on sites unconstrained by flooding or other key constraints and located physically close to Malmesbury, such as at Milbourne.

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

5.2.39. No comment.

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

5.2.40. As above, any policy wording should target 1) a stepped approach towards being 'net carbon neutral' by 2030 and 2) ensure any planning policy also has a target of being 'net carbon neutral' (not zero carbon) by 2030. This would allow additional flexibility in how the overall target will be achieved, through enabling some emissions to be offset elsewhere if necessary/ appropriate, whilst still ensuring that overall the carbon emissions are zero.

5.2.41. It is important that the policy wording does not restrict potential opportunities for the supply of energy from renewable energy sources, such as those from nearby off-site renewable sources. These policy alterations should ensure such opportunities are not ruled out.

5.2.42. Furthermore, a more flexible approach will help ensure that the energy reduction requirements do not negatively impact on the design and viability of schemes to the same extent. However, further evidence is required to enable the energy requirements to be considered cumulatively with other requirements to ensure housing delivery and other objectives are not compromised.

5.3. Summary

5.3.1. The key points from this chapter are summarised below.

- The proposed pro-active approach to climate change mitigation and adaptation is generally supported and should make a contribution towards reducing carbon emissions.
- Prescriptively setting out proportions of energy that should come from a particular source will not enable the flexibility to address site-specific or changing circumstances during the plan period. A prescriptive approach could therefore result in the delivery of housing / other development being compromised and would not be supported.
- The overall target to reduce energy consumption should first be achieved, where possible, through use of energy efficiency measures such as a 'fabric first approach' and remaining energy requirements secured through measures such as on or off-site renewable energy and other low carbon technologies, which could include 'off-setting' and 'allowable solutions'.
- In considering off-setting and allowable solutions, details of the cost per tonne of carbon/ other measures associated with how allowable solutions will be calculated would be welcomed.
- It is not considered realistic to require all new development to be 'zero carbon' from adoption of the plan. Further, a requirement to achieve 'zero carbon' (not 'net zero carbon'), means there appears to be no flexibility in how the policy is achieved, for example through off-setting or allowable solutions.
- Any policy wording should target 1) a stepped approach to carbon reduction up to 2030 and 2) seek to achieve being 'net' carbon neutral by 2030.
- If the overall target is to reduce carbon emissions, (rather than increasing renewable energy use) then the policy should not be prescriptive as to how the carbon reductions will be achieved.
- Appropriate account must also be taken of the financial and viability implications of any such policy/ies, to ensure that the delivery of housing and other objectives is not compromised.
- The principle of increasing the level of self-containment within Wiltshire's settlements as it is considered to offer 'the best solution for tackling unsustainable, carbon-based travel patterns' is a logical and sound approach.
- A flexible approach to site selection should inform how sites are future proofed. For example, sites adjacent to the existing built form of Malmesbury may actually be less sustainable, for reasons including flood risk than sites not previously considered, such as land to the west of Milbourne.

6. Supporting Documents

6.1. Introduction

6.1.1. This chapter relates to the supporting consultation documents (Interim Sustainability Appraisal, Local Transport Review, Chippenham HMA: Formulating Alternative Development Strategies, Local Housing Needs Assessment, Retail and Town Centre Study, Employment Land Review and the Level 1 Strategic Flood Risk Assessment). Our response below is structured according to the relevant sections contained within these documents.

6.2. Interim Sustainability Appraisal

6.2.1. 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.

6.2.2. 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.

6.2.3. 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 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.

6.2.4. 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.

6.2.5. 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.

6.3. Local Transport Review

6.3.1. 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.

6.3.2. 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.

6.3.3. 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.

6.4. Chippenham HMA: Formulating Alternative Development Strategies

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.

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.

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.

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.
- 6.5. Local Housing Needs Assessment (2019)**
- 6.5.1. 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.

- 6.5.2. 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.
- 6.5.3. 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.

6.6. Retail and Town Centre Study (2020)

- 6.6.1. 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.
- 6.6.2. 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.
- 6.6.3. 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 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.

6.7. Employment Land Review (2018)

- 6.7.1. 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.”*

6.7.2. 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.

6.8. Level 1 Strategic Flood Risk Assessment (2019)

6.8.1. 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).

6.8.2. 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.

6.8.3. 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.

6.9. Summary

6.9.1. The key points from this chapter are summarised below.

- The Interim SA should consider the needs and opportunities of individual settlements when considering potential development strategies. Strategy CH-A should not be rejected for Malmesbury as it scores more positively than other settlements and the SA indicates that additional growth at Malmesbury is required beyond that proposed by Strategy CH-A (and even more so compared to alternative strategies)
- The evidence base has been incorrectly applied to inform the conclusions regarding Alternative Development Strategies. It is clear that, as a minimum, the level of growth for Malmesbury should be rolled-forward from the Core Strategy.
- It is welcomed that the total housing requirement for the Chippenham HMA takes account of forecast job growth, as noted in the Local Housing Needs Assessment.
- The Local Transport Review should assess the impact of development at Market Towns to inform the amount and location of sites around these settlements.
- It is welcomed that Malmesbury is recognized as a healthy and sustainable town centre in the Retail and Town Centre Study, and therefore the area should accommodate new development to benefit from and support this.
- Sufficient housing is also required in Malmesbury to support the need for additional employment supply in Malmesbury, as identified by the Employment Land Review.

7. Planning for Malmesbury

7.1. Introduction

7.1.1. This chapter relates to the Planning for Malmesbury consultation document. Our response below is structured according to the sections and questions contained within the document.

7.2. Scale of growth

Question MM1. What do you think to this scale of growth? Should there be a brownfield target? Should it be higher or lower?

7.2.1. In 2019, Wiltshire Council committed to becoming 'net carbon neutral by 2030' and is seeking to make the County carbon neutral by 2030. To achieve this aspiration, the 'Addressing Climate Change and Biodiversity Net Gain' document highlights the need for 'increasing the level of self-containment within Wiltshire's settlements' which 'offers the best solution for tackling unsustainable, carbon-based travel patterns'. Alongside the design of new development, the location of new development is therefore critical in contributing to meet this aspiration.

7.2.2. As set out above, 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.

7.2.3. 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.

7.2.4. 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 and further that opportunities to meet this need as close to where it arises are taken. Sufficient housing sites should therefore be allocated in the LPR to meet this requirement including at sustainable locations such as around Malmesbury. This is particularly important given the specific identified employment needs of Malmesbury, the current housing land supply shortfall referred to above and ensuring all development is sustainably located in response to the climate emergency.

7.2.5. As explained above, at paragraph 3.8 of the 'Emerging Spatial Strategy', *'the strategy includes a possible brownfield target for each settlements; an indicative number of new homes to be built over the period 2021-2031 using previously developed land... [our emphasis]. The brownfield target is derived from a 'windfall' allowance for Wiltshire used in the housing land supply.'*

7.2.6. Paragraph 3.12 notes that, *'The amount of greenfield land needing to be identified for development will depend upon the brownfield land that can be relied upon, which is land identified in neighbourhood plans or other allocations and planning permissions. It is not possible to assume each target will be met and just a target amount cannot count toward the land we need to plan for.'*

7.2.7. In accordance with national guidance, it is entirely reasonable to include a target for delivery of houses on brownfield sites. As recognised in the Spatial Strategy, it is not possible to assume the target will be met and it cannot count towards the land being planned for. On this basis, there should be specific sites identified to meet the identified need (not a constrained version of the need) and any windfall development on brownfield sites should be in addition to the allocated sites.

7.3. Place shaping priorities

Question MM2. Are these the right priorities? What priorities may be missing? How might these place shaping priorities be achieved?

7.3.1. The three place shaping principles (delivering a range of housing to meet local needs with supporting infrastructure, recognising environmental constraints, support good prospects for economic growth and developing a town centre strategy) are all credible. However, these place shaping principles alone do not capture other messages within the various consultation documents such as the way the current pandemic is changing our behaviour and the different long-term roles of settlements, including an increased level of home working and reducing net out commuting to other settlements. This position is emphasised again through the *'Addressing Climate Change and Biodiversity Net Gain'* document, which highlights the need for *'increasing the level of self-containment within Wiltshire's settlements'* as this *'offers the best solution for tackling unsustainable, carbon-based travel patterns'*.

7.3.2. These over-arching messages must actually come through in the individual documents, such as *'Looking to the Future, Planning for Malmesbury'*. By artificially constraining development in this location, out commuting levels won't be reduced nor self-containment achieved.

7.3.3. The Malmesbury site selection paper notes the importance of historic patterns of growth. It is agreed that this should be considered, however, this must be appropriately considered within the relevant context. Understanding the character of an area is important. However, if growth has been forced along a particular direction given the constraints in a location, and continuing with this pattern actually results in new development being located a significant distance from the town centre and services upon which there is an interdependency, an alternative growth strategy could be more appropriate.

7.3.4. Therefore, the Place Shaping Principles should specifically include 1) meeting the need where that need arises, and 2) promoting self-containment, reducing out commuting to help contribute to meeting the aspirations of the Climate Emergency. To facilitate this, in the case of Malmesbury, an alternative approach should include consideration of sites in for example Milbourne, which could meet these objectives, whilst ensuring the separate identity of Milbourne is retained.

7.4. Potential Development Sites

Question MM3. Is this the right pool of potential development sites? Are there any other sites we should be considering?

7.4.1. Yes, there are other sites that should be considered.

- 7.4.2. As above, the proposed place shaping principles for Malmesbury currently do not capture all messages and objectives within the various consultation documents. In particular, this includes the way the current pandemic is changing our behaviour and the different long-term roles of settlements, including an increased level of home working and reducing net out commuting to other settlements. This position is emphasised again through the *'Addressing Climate Change and Biodiversity Net Gain'* document, which highlights the need for *'increasing the level of self-containment within Wiltshire's settlements'* as this *'offers the best solution for tackling unsustainable, carbon-based travel patterns'*.
- 7.4.3. By artificially constraining development in this location, out commuting levels won't be reduced nor self-containment achieved.
- 7.4.4. The Emerging Strategy must allow for growth around Malmesbury where that need arises to support both its employment function, meet local housing need and support its role as a tourist destination. Whilst development must be sensitively designed around its constraints, which themselves contribute to the special character of the area, these in themselves should not be a barrier to further development around Malmesbury.
- 7.4.5. Areas close to the centre of Malmesbury, such as at Milbourne should be considered in terms of their ability to fulfil this role. Sensitively designed development, can maintain the separate identify of Milbourne, but are actually located much closer to the centre of Malmesbury than some of the sites put forward for assessment, helping meet the wider objectives of the Council associated for example with sustainability and addressing climate change.
- 7.4.6. Land to the west of Milbourne (see plan at Appendix 1) fulfils all of these criteria. Sensitively designed development focusing on the eastern side of the site, would enable the separate identify of Milbourne to be retained, has no overarching constraints in terms of impact on the historic settlement, the AONB, the conservation area and is located away from the rivers.
- 7.4.7. Further in terms of accessibility, the closest primary school (St Joseph's Catholic Primary School) is located approximately 0.6 miles away, Malmesbury School (a Secondary School) is located only 1.2 miles away, Malmesbury medical partnership is less than a mile away and Malmesbury Town Centre is also less than a three quarters of a mile away, based on streetcheck.co.uk. (Note these distances are all approximate and will depend upon which part of the site they are measured from.) However, these factors all support the sustainability credentials of this location.

Question MM4. What land do you think is the most appropriate upon which to build? What type and form of development should be brought forward at the town?

- 7.4.8. As above, in identifying land most 'appropriate to build' on, relates to the key priorities in an area. From reading all of the consultation material and adopted Core Strategy, for Malmesbury this appears to be:
- Supporting both the employment function of Malmesbury, meeting local housing need and supporting its role as a tourist destination;
 - Ensuring development is sensitively located around the environmental constraints in Malmesbury and an understanding of its special character;

- Contributing to meeting the aspiration to achieve net zero carbon by 2030, including measures such as the promotion of self-containment (which Wiltshire consider to be the best solution for tackling unsustainable, carbon-based travel patterns);
- Responding to new behaviours as a result of the pandemic including a reduced level of out commuting and increased home working.

7.4.9. To achieve all of these aspirations and ensure development is 'future proofed' the identified housing need should be met where that need arises and if new objectives are successfully to be achieved, previous growth patterns should not automatically be continued.

7.4.10. As above, areas close to the centre of Malmesbury, such as at Milbourne should be considered in terms of their ability to fulfil this role. Sensitively designed development, can maintain the separate identify of Milbourne, but are actually located much closer to the centre of Malmesbury than some of the sites put forward for assessment, helping meet the wider objectives of the both the LPA and Council associated for example with sustainability and addressing climate change.

Question MM5. Are there important social, economic or environmental factors you think we've missed that need to be considered, generally or in respect of individual site?

7.4.11. As above, the site selection approach for Malmesbury currently does not capture all messages and objectives within the various consultation documents. In particular, this includes the way the current pandemic is changing our behaviour and the different long-term roles of settlements, including an increased level of home working and reducing net out commuting to other settlements. This position is emphasised again through the '*Addressing Climate Change and Biodiversity Net Gain*' document, which highlights the need for '*increasing the level of self-containment within Wiltshire's settlements*' as this '*offers the best solution for tackling unsustainable, carbon-based travel patterns*'.

7.4.12. By artificially constraining development in this location, out commuting levels won't be reduced nor self-containment achieved.

7.4.13. For the reasons set out above, sites such as 'Land to the west of Milbourne' provides the opportunity to successfully help meet housing need where that need arises and meet the objectives of the existing Core Strategy regarding supporting the economy of Malmesbury but additionally has the ability to contribute to meeting the new objectives that are clearly a key focus at Wiltshire as a result of declaring the Climate Emergency.

7.5. Summary

7.5.1. The key points from this chapter are summarised below.

- The proposed place shaping principles for Malmesbury does not capture all objectives within the various consultation documents. In particular, this includes the way the current pandemic is changing our behaviour and the different long-term roles of settlements, including an increased level of home working and reducing net out commuting to other settlements.
- Alongside the design of new development, the location of new development is critical in 'increasing the level of self-containment within Wiltshire's settlements' which 'offers the best solution for tackling unsustainable, carbon-based travel patterns'.
- By artificially constraining development in this location, out commuting levels won't be reduced nor self-containment achieved.
- The requirement of 20,400 homes should be met as a minimum in order to support local jobs as well as local housing needs in addition to wider objectives of the LPR and further that opportunities to meet this need as close to where it arises are taken.
- Sufficient housing sites should therefore be allocated in the LPR to meet this requirement including at sustainable locations such as around Malmesbury.
- The Emerging Strategy must allow for growth around Malmesbury where that need arises to support both its employment function, meet local housing need and support its role as a tourist destination. Whilst development must be sensitively designed around its constraints, which themselves contribute to the special character of the area, these in themselves should not be a barrier to further development around Malmesbury.
- Areas close to the centre of Malmesbury should be considered in terms of their ability to fulfil this role. Land to the west of Milbourne (see plan at Appendix 1) fulfils all of the identified criteria and has no over-arching constraints.
- Here, sensitively designed development, can maintain the separate identify of Milbourne, but is actually located much closer to the centre of Malmesbury than some of the sites put forward for assessment, helping meet the wider objectives of the Council associated with sustainability, addressing climate change and being located with easy access to services and facilities for example.

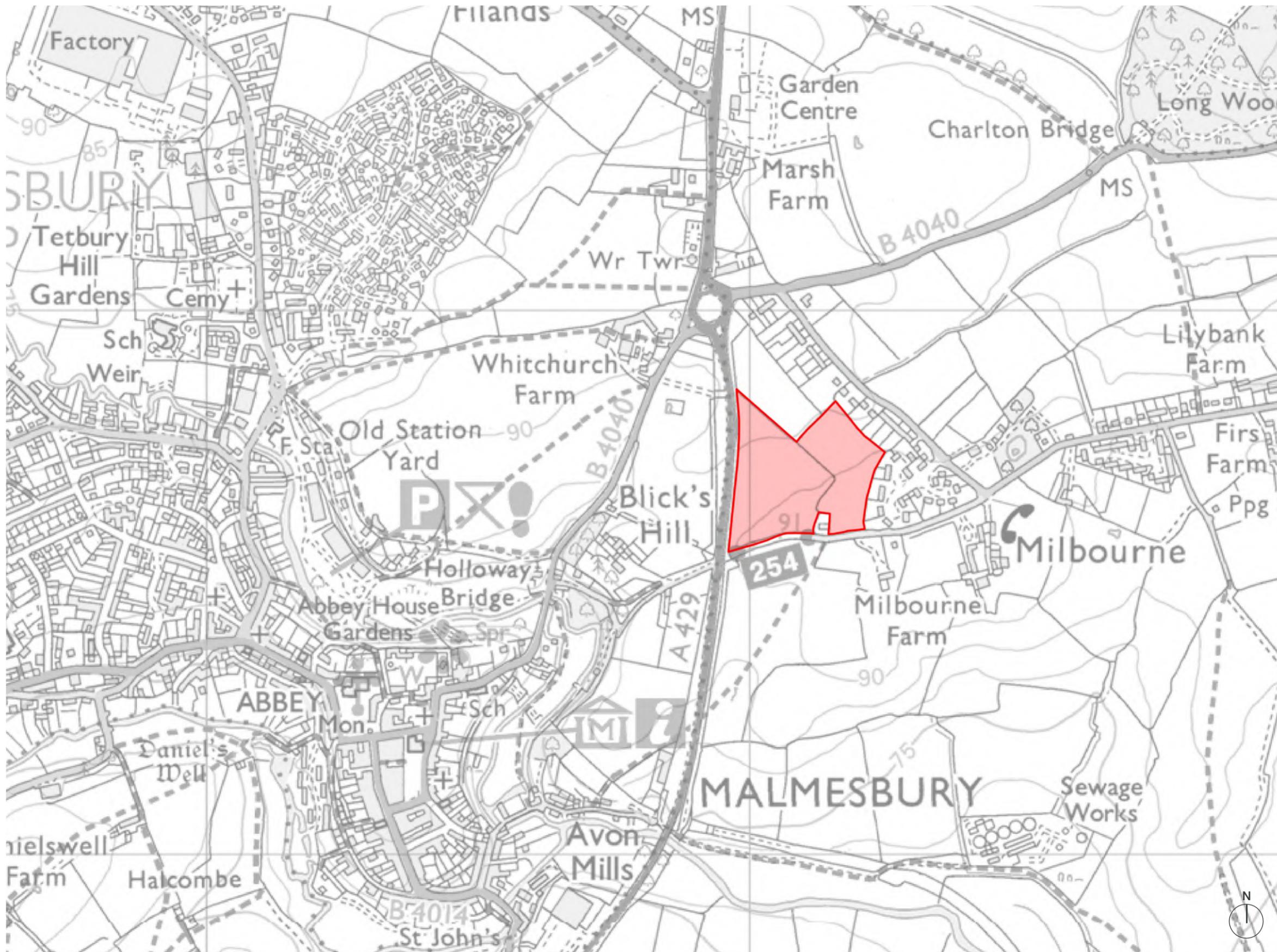
8. Conclusion

8.1. Summary

- 8.1.1. These representations have been prepared on behalf of Miller Homes in relation to the current LPR consultation. Miller Homes have an interest in land to the west of Milbourne and therefore wish to inform the preparation of the LPR.
- 8.1.2. Comments have been provided based on the details and questions within the consultation documents relating to: the Emerging Spatial Strategy, Empowering Rural Communities, Addressing Climate Change and Biodiversity Net Gain, Planning for Malmesbury and supporting consultation documents.
- 8.1.3. Our response supports the overall spatial strategy, changes to HMAs and the overall housing requirement for the Chippenham HMA. However, concerns are raised regarding the approach and amount of housing proposed at and around Malmesbury. Concerns are also raised that place-shaping principles and changing behaviours have not been taken into account.
- 8.1.4. Whilst it is acknowledged that Malmesbury itself is constrained, our response explains this should not be a barrier and the LPR must allow for sufficient growth in areas around the town (such as at Milbourne) in order to support its local housing needs, employment function and its role as a tourist destination. The emerging strategy must also allow for such growth around Malmesbury in order for the objectives around sustainability and climate change to be delivered. Indeed the supporting evidence base documents highlight the level of growth required and do not justify any reduction in development at Malmesbury compared to the Core Strategy. Land to the west of Milbourne is located less than 1km away from local services and facilities in Malmesbury and is therefore sustainably-located and relatively unconstrained to support the identified needs of Malmesbury.
- 8.1.5. The LPR should therefore fully review the level of growth proposed at and around Malmesbury and consideration should be given to the potential development at Land to the west of Milbourne to supporting Malmesbury's needs.



Appendix 1



Site Boundary

Land to the West of Milbourne, Malmesbury

on behalf of Miller Homes

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drawing no.	RL03	drawing	Site Location Plan - Wider Capture
revision	-	scale	1:25,000 @ A3
drawn by	CJM	checked by	AR
date	March 2021	job no.	-

Urban
Design
Studio





- Site Boundary
- ➔ Potential Vehicular Access from A429
(location to be determined)
- W W No development within green gap to
retain separate identity of Milbourne
- - - - - Pedestrian / Cycle Route

Land to the West of Milbourne, Malmesbury

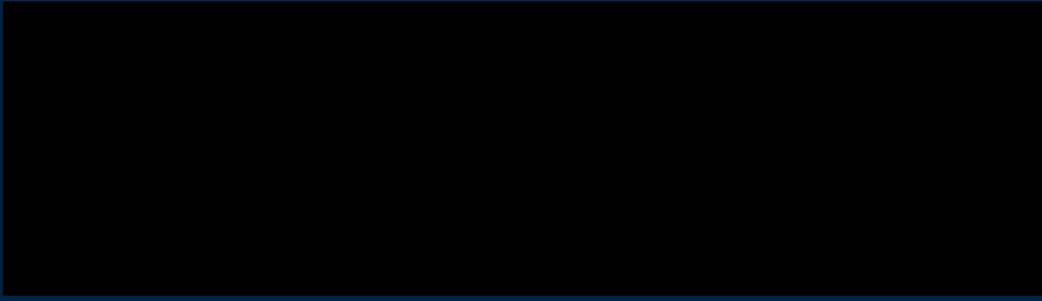
on behalf of Miller Homes

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drawing no.	RL02	drawing	Site Location Plan - Aerial
revision	A	scale	1:1,000 @ A3
drawn by	CJM	checked by	AR
date	March 2021	job no.	-

Urban
Design
Studio





CLIMATE144

Wiltshire Local Plan Review 2016-2036: Emerging Strategy

Prepared by Savills
on behalf of Hallam Land Management

1. Introduction

- 1.1 This Representation is made in response to the consultation on the Wiltshire Council (WC) Local Plan Review (LPR) 2016-2036: Emerging Strategy. The representation is submitted by Savills on behalf of Hallam Land Management (HLM) who has an interest in land to the south of Western Way, Melksham. A copy of the Site Location Plan is attached at **Appendix 1**.
- 1.2 By way of context, HLM controls an area of land comprising approximately 10.5 hectares adjacent to the southern edge of Melksham. Prior to the LPR, through the 2017 Strategic Housing and Employment Land Availability Assessment (SHELAA), the site has been identified as suitable, available, achievable, deliverable and developable in the short-term (Reference: 1025).
- 1.3 The site is currently subject to a pending planning application up to 240 dwellings, a 70-bed care home, open space including parkland, community orchard and informal recreation, alongside appropriate supporting infrastructure (App Ref: 20/08400/OUT). We discuss the application in further detail later in the representations.
- 1.4 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.

2. Emerging Spatial Strategy

Plan Period

- 2.1 The proposed timelines for the LPR, with adoption planned for Q2 2023, would mean that it fails to accord with the NPPF's requirement for a "*minimum 15 year plan period from adoption*" (paragraph 22). This must be rectified before proceeding to the next stage of the Local Plan Review. In setting the future end date, we would suggest sufficient flexibility is included to allow for any potential slippages in the plan making process.
- 2.2 In addition, it is not appropriate to retain the base date of 2016. This is already 5 years out of date, and on adoption, the plan would be seven years post-base date. The published evidence base needs a full update, with reliance on reports from the defunct Swindon and Wiltshire Spatial Framework Plan dated 2016/17 not forming a robust evidence base upon which to consider the soundness of the emerging LPR. As such, the plan should be rebased to 2019; with the associated updated evidence base.

Housing Need

- 2.3 We note that WC have not chosen to update the Local Housing Needs (LHN) Assessment (2019) published as part of the informal consultation in August 2019, and recognise that at the point of drafting this consultation document, that the outcome of the national consultation on the standard method was unknown. Subsequently, the Government have published their response, and as such, a comprehensive update of the evidence supporting the proposed housing target is required.
- 2.4 In accordance with the NPPF and PPG, the standard method should be used to identify the 'minimum annual housing need figure'; and then consideration given to whether there is a need for the housing requirement to be higher to account for local circumstances; such as economic projections, previous rates of delivery and the need to deliver affordable housing to meet demonstrable local needs (see PPG 2a-010-20201216 and 2a-024-20190220).
- 2.5 The current 2020 standard method figure for Wiltshire is 2,006 dwellings per annum. As per the PPG, in moving towards the Examination of the LPR, the housing need figure must be "kept under review and revised where appropriate" (PPG: 2a-008-20190220). The updated affordability ratios are due for publication on the 25 March 2021; and thus a 2021 based LHN figure can be calculated prior to the next stage of the LPR. It is noted that the outcome of the 2019 LHN suggest an annualised requirement of 2,285 was required.
- 2.6 In this regard, we note that the LHN cannot be used retrospectively; with the annual affordability ratio responding to any 'oversupply' earlier in the plan period. Thus, the minimum housing requirement for Wiltshire is 2,006 homes per annum from 2020 (32,096 over the current 16 year remaining plan period) – with this to be updated shortly to a 2021 base date; and there is no ability to reduce this due to housing delivery between 2016-2020.

2.7 The implications on the housing requirement for Wiltshire (based on 2020) would therefore be:

Plan Period	Housing Delivered	LHN
2016-2019	7,817 ¹	
2019-2020	2,020 ²	
2020-2036		32,096 ³
Housing Requirement	41,933	

2.8 The PPG questions the appropriateness of a housing target which is lower than previous levels of delivery (PPG: 2a-010-20201216); which is the case for Wiltshire, where housing delivery has been above the LHN figure in seven of the last ten years. A housing target which seeks a reduction in housing delivery cannot be considered to be “significantly boosting” the supply of homes; contrary to the Government’s objective set out in paragraph 60, NPPF.

2.9 In addition to ensuring that the housing requirement is reflecting the national objective of significantly boosting the supply of homes, it is also necessary to consider economic growth projections and strategies: including, but not limited to: “situations where increases in housing need are likely to exceed past trends because of:

- *growth strategies for the area that are likely to be deliverable, for example where funding is in place to promote and facilitate additional growth (e.g. Housing Deals);*
- *strategic infrastructure improvements that are likely to drive an increase in the homes needed locally; or*
- *an authority agreeing to take on unmet need from neighbouring authorities, as set out in a statement of common ground.”*

2.10 The LHN Assessment (2019) recognised this, and considered a number of adjustments to LHN, including anticipated employment growth, and longer term migration trends. In updating this evidence base, it will be necessary to review the economic evidence, including the Economic and Development Needs Assessment (EDNA) (2017) which itself utilised forecasts provided in January 2016 (Oxford Economics) and November 2015 (Cambridge Econometrics); but also to reflect the growth aspirations of the Swindon and Wiltshire Strategic Economic Plan, and the strategies coming forward to support the economic recovery.

2.11 Finally, the PPG affirms that a further adjustment to the housing requirement may be required in response to the need for, and delivery of, affordable housing. We note that at this time, no evidence has been provided on the affordable housing needs of Wiltshire – which should be informing both the overall housing requirement, but also the spatial strategy. This evidence must be published as part of the next consultation stage on the LPR.

¹ Wiltshire AMR

² MHCLG Table 253a Housing Completions by LPA

³ 16 x 2,006

Housing Delivery

- 2.12 It is not immediately clear within the consultation document the strategy for housing delivery outside of the three Principal Settlements, with references made to both Neighbourhood Plans and a future review of the Wiltshire Housing Site Allocations Plan (WHSAP).
- 2.13 Paragraph 3.4 of the Emerging Spatial Strategy consultation document stats that:
- “At Market Towns, preferred sites have not been selected. Instead, their Planning for Settlement Statements present sites considered to be the reasonable alternatives at each place. Views are invited on the most appropriate to allocate. Generally, only a small number of sites will need to be allocated. They may be selected by local communities if they are progressing or reviewing a neighbourhood plan. In other places, it will be the role of the Local Plan Review”.*
- 2.14 It is concerning to see such a suggestion included within the consultation document, and in our view it is entirely inappropriate to suggest that market towns should only deliver growth as part of a Neighbourhood Plan (if being prepared). Given the plan period proposed and the wider housing need, the LPR must look to allocate sites at the market towns as well as the principal settlements in order to ensure a balanced spread of housing delivery.
- 2.15 We therefore consider that more emphasis should be placed within the LPR on the need to deliver housing and allocate appropriate sites at the market towns.
- 2.16 With a plan period of less than 15 years, and a significant existing issue in regard to five year housing land supply, there is a clear need to allocate housing sites which will deliver in the short/medium term. This is emphasised by the requirement for the LPR to be able to demonstrate a five year housing land supply at adoption (paragraph 73, NPPF).
- 2.17 This will not be accomplished with the singular large scale strategic sites proposed in the Principal Settlements, or indeed any single large scale allocations at any of the Market Towns; which will take years to come forward (particularly if they are tied to the delivery of substantive infrastructure items such as bypasses which are reliant on external funding). This has been illustrated in the Core Strategy strategic sites, where, whilst adopted in January 2015, there are a significant number of strategic sites which have yet to deliver a single unit: including West of Warminster, Ashton Park and Ludgershill – which combined account for nearly 4,000 units; and none will deliver until 2024 at the earliest.
- 2.18 Housing delivery is best accomplished through a suitable mix of housing sites – indeed this is a requirement of the NPPF (paragraph 67). This should reflect both location and site size to ensure a robust supply of housing land, and a varied housing market; ensuring there is no over-reliance on the delivery of a handful of larger, difficult to deliver sites.

2.19 In this regard, we note that the Market Towns need to identify an additional 7,330 dwellings: 1,240 via brownfield sites, and 6,090 dwellings on greenfield sites. This is substantial, and a significantly higher quantum of development than any Neighbourhood Plans have delivered to date. It forms a significant element of the spatial strategy; thus it must be demonstrated that it is deliverable through the allocation of a suitable range of housing sites.

3. Addressing Climate Change and Biodiversity Net Gain

Land Use Policies

- 3.1 The most appropriate mechanism to address climate change through the local plan process is the distribution of development – directing development to those locations where there are opportunities for employment, and/or are well served by the public transport network

Flood Risk and Sustainable Drainage

- 3.2 Flood risk policy must reflect national policy and guidance. The Environment Agency set the level of greenfield runoff rates, including the appropriate plus climate change scenario. This will change over the course of the plan-making process, and then again over the plan period. As such, we suggest no explicit standard is provided. We assume this pertains to the reference to a 20% betterment – with the delivery of the plus climate change scenario creating a betterment against existing rates of runoff. This should be clarified, and if a separate measure is being proposed locally this must be clearly set out – in terms of precisely what the requirement is and what it is measured against, the additional costings must factor into the LPR Viability Assessment, and the additional land-take identified for the Preferred Sites.

Natural Capital

- 3.3 The introduction of the concept of Natural Capital is unhelpful – this reflects a specific policy approach which differs from the national approach.
- 3.4 The Authorities response to the Green and Blue Infrastructure Network should be captured through the national requirement to draft Local Nature Recovery Strategies, and the forthcoming legislative requirement to deliver net biodiversity gain.
- 3.5 We note that Figures from the GBI Plan have been published within the Topic Papers, but not the strategy in full. This should have informed part of the consultation evidence base, and would have otherwise informed respondent's answers to this question.
- 3.6 We support the intention to implement biodiversity net gain in accordance with the forthcoming regulations, and suggest that it is not necessary to repeat these in detail in the LPR.

Zero Carbon Homes

- 3.7 The Government is progressing with national changes to building regulations associated with zero carbon ready homes through the Future Homes Standard; and we note that an update has been published since the drafting of the consultation document.

- 3.8 The Future Homes Standard is a two-stage approach to reach 'carbon ready homes' by 2025. This is expressly referenced as a staged approach to changing the Building Regulations to reflect the need to develop supply chains, skills and construction practices. The role of developers is to achieve a 75-80% reduction in carbon emissions – with the residual reduction a society wide move towards decarbonised energy sources.
- 3.9 Whilst we generally support the Council's ambition to ensure that new developments mitigate and adapt to the impacts of climate change, we would have very significant concerns if local policies set the bar higher than the Future Homes Standard, and to do so earlier than the proposed timelines set out by the Government.
- 3.10 The NPPF paragraphs 16b), 34 and 57 all relate to the need for Local Plans to be deliverable (at the point of adoption) and have regard to viability and the PPG section in relation to 'climate change' advises that:

"The National Planning Policy Framework expects local planning authorities when setting any local requirement for a building's sustainability to do so in a way consistent with the government's zero carbon buildings policy and adopt nationally described standards. Local requirements should form part of a Local Plan following engagement with appropriate partners, and will need to be based on robust and credible evidence and pay careful attention to viability". [Paragraph Reference ID: 6-009-20150327]

- 3.11 Any standards set above the national Building Regulations, will need to be demonstrated as feasible, viable and achievable in practice, and will need to be balanced against wider aspirations in the LPR, such as the delivery of affordable housing.

Decarbonising Energy

- 3.12 Decarbonising energy through new development is integrated into the Future Homes Standard – there is therefore no explicit requirement for a separate policy. Traditionally, local plan policies have set an explicit standard for the delivery of renewable/low carbon energy on site; however, this will no longer be required with the Future Homes Standard.
- 3.13 Every site and scheme will differ – and the most appropriate technology will need to respond to this. We therefore suggest that the policy should remain flexible, and no particular technologies should be favoured.
- 3.14 In line with the wider societal move to decarbonising our energy supply, and recognising that this pertains to existing housing/development, WC should enact a permissive policy to the delivery of standalone low carbon/renewable energy schemes.

Air Quality

- 3.15 The Department for Transport undertook a consultation in 2019 which considered potential regulations for the installation of smart charging. This included indicative costs, which must be factored into the viability

assessment, but it also recognised that there will be circumstances whereby the costs of charging provision will escalate due to the need for electrical capacity reinforcements; and that in these circumstances, there would be an exemption to the requirement to provide charging points. We suggest that any policy should specifically recognise such circumstances to avoid situations where development may be rendered unviable due to grid capacity constraints.

- 3.16 We recognise that WC have committed to undertaking proactive discussions with the energy providers in this regard, and this is supported. The cost of any upgrades to the energy network to support any draft policy requirement will need to be factored into the Viability Assessment, and also the Infrastructure Delivery Plan.
- 3.17 There will need to be a balance between passive and active charging facilities, and we suggest that this balance needs to be informed by an evidence base on 1) current demand (i.e. ownership), and 2) immediate future ownership (i.e. within the first 5 years of the plan period). Any development plan must be reviewed every five years, and thus the policy will be able to respond to the rapidly evolving technology at its next review.

4. Planning for Melksham

- 4.1 Melksham represents a sustainable location for development – scoring equal to Chippenham in terms of accessibility (Table 6), it has delivered the most employment development out of all the towns in the HMA over the 2006-2018 period (Figure 5) and is projected the largest employment increase, at 128% in WC's economic growth scenarios (Figure 8).
- 4.2 The delivery of the town's residual need, at 2,585 dwellings by 2036, will require a proactive and positive approach to development, and an appropriate delivery mechanism to ensure that proposals can come forward in a timely manner.
- 4.3 This must be through site allocations within the LPR – given the importance of the town, the need for a coordinated approach, and the scale of housing required. There is clearly a role for the local community and Town Council to engage with this process; however it would be entirely inappropriate to allow a Neighbourhood Plan to take the lead in delivering this scale of development.
- 4.4 Whilst this is the case for Neighbourhood Development Plans (NDP) across the UK, in particular regard to Melksham, we note that the Neighbourhood Plan Area was designated on the 14 July 2014, and a draft NDP was published for consultation in February 2021. It has taken 7 years to progress to a draft NDP, with additional time still required before it is made (should it proceed through Examination). The NDP proposes makes a single allocation for 18 units for a settlement of over 24,000 people. This is despite the Town Council being made aware in 2017 that their housing requirement would increase, and with the figures affirmed in 2018. The NDP has sought to resist this emerging housing need.
- 4.5 We would have significant concerns with a strategy which sought to deliver the strategic housing needs of Wiltshire through reliance on a future NDP – and do not consider that this strategy would be effective or justified in accordance with paragraph 35, NPPF. The LPR must allocate the required strategic sites in Melksham; and in accordance with our comments above on housing delivery, must do this through the allocation of a range of housing sites.

Place Shaping Priorities

- 4.6 We support the Place Shaping Priorities identified for the town, and have the following comments to make:
- Out-commuting – we support the objective of improving the employment offer to reduce out-commuting. As set out elsewhere in our representation, this reflects the historical and projected future employment growth of the town.
 - A350 Bypass – whilst we appreciate the objective of delivering a bypass, the case needs to be more clearly evidenced that this is a place shaping priority, or that the cost of delivering the bypass could not be better used on other infrastructure or initiatives

Land to the south of Western Way, Melksham (Site 9/1025)

4.7 The Land South of Western Way, Melksham, is currently subject to a pending planning application (ref 20/08400/OUT) submitted in September 2020. A copy of the latest outline masterplan is enclosed at **Appendix 2.**

4.8 During its determination a number of technical matters have been resolved, and we provide a summary of these below. It is important that this is reflected in the evidence base for the LPR as it progresses.

4.9 We note that the Site Selection Report scores the site 'green' in regard to Accessibility, Flood Risk and Heritage, and this is supported by the planning application submitted (discussed further below). In terms of the two categories which scored red (Landscape) and amber (traffic), we have the following points to make:

Landscape - Red

4.10 The single landscape point raised pertains to the potential of the development to cause coalescence of Bowerhill Industrial Estate and Melksham; however, the Site Selection Reports then concludes that the site is large enough that a degree of separation could be maintained (p14); thus it is unclear why it still scores red.

4.11 The site is surrounded by development – to the north is Western Way (A365), beyond which is housing. Adjacent to the south is the employment area of Bowerhill, which is a designated Principal Employment Area. To the east of the site, there is a planning consent for up to 235 dwellings, primary school with early years nursery and open space provision. This scheme, Pathfinder Place, is under construction, with the site anticipated to be complete by 2025. To the west of the site is the A350 and the A350/A365 roundabout. New residential development is also under construction on land to the west; Land East of Semington Road, Melksham (16/00497/OUT) which was consented in May 2017 for up to 150 dwellings. This site is also under construction, with first completions in 2019/20, with the site due for completion in 2022/23.

4.12 The consented site to the east appropriately dealt with the matter of coalescence and there is no evidence to indicate that this could not be achieved for this site. Indeed, we note that the draft NDP specifically identifies the extent of land required to remain 'open' to maintain the separation between these two areas (as a 'Important Green Gap' draft Policy 17); and our pending planning application appropriately reflects this.

4.13 Therefore, the analysis underpinning the site assessment from a landscape perspective is flawed, and must be revised in accordance with WC's own analysis.

Traffic – Amber

4.14 It is unclear why the site scored amber from a traffic perspective. We note that it references that "direct access onto Western Way may be possible"; but this does not indicate a ground for a negative score.

- 4.15 The outline planning application has been revised, with amended plans submitted in February 2021 to show vehicular access into the site via Pathfinder Place to the east. To support the changes, a Transport Assessment Addendum – Technical Note has also been prepared and submitted alongside the wider pack of information.
- 4.16 The amended plans have been informed by extensive discussions with WC’s Highways Officer in relation to the access options for the site, resulting in the amended proposal for a single vehicular access via Pathfinder Place.
- 4.17 In terms of traffic the planning application documentation, particularly the junction capacity modelling presented in the TA, has demonstrated that the four assessed junctions are forecast to operate within capacity with the addition of the traffic generated by the proposed development. The TA concludes that the proposed development is not anticipated to result in a severe residual cumulative impact and as such no mitigation works are required to the junctions assessed.
- 4.18 We therefore recommend that the traffic analysis supporting the site assessment should be reviewed further, taking into account the technical information provided as part of the pending planning application.

Accessibility – Green

- 4.19 The site scores green for accessibility and this is agreed. The planning application supporting documentation confirms that the site is very well connected to local services and facilities in Melksham and that there are opportunities for sustainable travel by foot, bicycle and bus.
- 4.20 Indeed, the site is located close to many of the services and facilities available in Melksham. Listed below are the distances from the site to a number of the key facilities within the local area.
- Pathfinder Place Primary School (not yet built):- 380 metres walking distance (5 minutes);
 - Aloeric Primary School:- 1,310 metres walking distance (16 minutes);
 - Bowerhill Primary School:- 1,410 metres walking distance (17 minutes);
 - Melksham Oak Community School (Secondary):- 1,320 metres walking distance (16 minutes);
 - Bowerhill Industrial Estate:- 965 metres walking distance (11 minutes);
 - Hampton Business Park:- 1,125 metres walking distance (13 minutes);
 - Melksham Community Hospital:- 1,130 metres walking distance (13 minutes);
 - Spa Medical Centre:- 945 metres walking distance (11 minutes);
 - St Anthony of Padua Church:- 1,360 metres walking distance (16 minutes);

- Playing Fields at Burnet Close:- 930 metres walking distance (11 minutes);
- Morrisons Daily:- 1,105 metres walking distance (13 minutes);
- Sainsbury's Supermarket:- 2,215 metres walking distance (26 minutes);
- Melksham Post Office:- 1,840 metres walking distance (22 minutes);
- Melksham town centre:- 1,600 metres walking distance (20 minutes)

4.21 This demonstrates that development of the site would offer future residents with school aged children safe access to the two closest primary schools, Aloeric Primary School and Bowerhill Primary School, whilst also at an easy walking distance of 16 and 17 minutes respectively. This does not currently account for the new primary school planned to be delivered on the Pathfinder Place site, adjacent to the site. Once delivered this would provide excellent access for primary school children living on the site. For secondary school children, Melksham Oak Community School is also a 16 minute walk from the site (or 6 minute cycle).

4.22 To facilitate walking and cycling, the application proposals include new pedestrian footpaths and cycle ways along Western Way.

4.23 To assist in explaining the proximity of the site to local services and facilities, we have appended a plan at **Appendix 3**. This not only shows how well the site can easily integrate with the existing urban form on the edge of Melksham, but also how the site is located at the centre of an even spread of local services and facilities. In addition, the plans attached at **Appendix 4** shows the walking routes available, split into three key routes, to the town centre to the north, Melksham Oak Community School to the east and both Bowerhill Industrial Estate and Primary School to the south. Figure 4.5 also shows the existing, committed and proposed signalled crossings along these walking routes, including Western Way to the north of the site.

4.24 Overall, given its location, the range of services and facilities available within walking and cycling distance, and the opportunities for public transport, the application site is considered to represent an extremely suitable and sustainable location for residential development.

Flood Risk – Green

4.25 The site scores green for flood risk and this is agreed.

4.26 A Flood Risk Assessment and Drainage Strategy was submitted in support of the outline planning application for the site and this demonstrates that the site falls within flood zone 1 and is therefore in a preferable location for residential development in the context of the sequential test in the Framework. The technical assessment also concludes that the land has a low probability of flooding from overland flow, ground water and sewer flooding.

4.27 The proposed drainage strategy for the development will be to introduce a detention basin in the north west corner of the site. This will manage the surface water runoff from the proposed development. Careful

integration of this feature into the site will create potential habitats for wildlife and promote biodiversity, providing valuable open space and amenity value.

Heritage – Green

- 4.28 We agree with the conclusion that the site scores green for heritage.
- 4.29 The likely harm to heritage assets has already been assessed by a qualified heritage specialist on behalf of HLM as part of the outline planning application. Indeed, the supporting Heritage Assessment, confirms that the site is located beyond the setting of all designated heritage assets within the study area and therefore, there will be no effects on the significance of these heritage assets.
- 4.30 During the determination of the planning application the County Archaeologist sought further information on potential underground remains, and a geophysical survey was subsequently provided. This resulted in the County Archaeologist agreeing that, considering the results of the geophysical survey, it is unlikely that any archaeology surviving within the proposed footprint would prove an overriding constraint to development

Ecology

- 4.31 The site assessment references the site's location within a wider area which supports a meta-population of great crested newts.
- 4.32 The application is supported by an Ecological Appraisal which confirms that, in general terms, other than the boundary features and the arable fields, other habitats are scarce with most grassland field margins restricted in nature with the exception of that on the northern boundary adjacent to the A365 Western Way where the wide band of scrub accommodates a highway drainage ditch and mosaic of scattered native scrub, semi improved grassland and areas of more contiguous scrub. Although arable fields would be lost, the proposed landscaping scheme will buffer and enhance the existing semi-natural habitats and provide larger areas of higher quality habitat post-development. This has been evidenced using the Defra v2 metric demonstrating clearly that the proposed development can achieve a measurable net gain in biodiversity.
- 4.33 The survey work undertaken on site has confirmed via eDNA survey from waterbodies in land adjacent west of the site and given that most habitat on site is suboptimal terrestrial habitat for the species and the proposed development neither involves the loss of any waterbodies nor substantial amounts of suitable terrestrial habitat the District Level Licensing route is considered the most appropriate form of mitigating any potential adverse impacts of the proposed development.
- 4.34 All other protected species (including badger, hazel dormouse and riparian mammals) are not considered likely to constrain the development proposals, and as such precautionary mitigation measures and/or enhancement measures alone have been recommended.
- 4.35 Habitat enhancements have also been recommended, including inclusion of native, wildlife friendly and where possible fruit bearing species in the proposed planting schedule, creation of species rich grassland

wildflower meadows, the inclusion of bat and bird boxes on retained trees and proposed buildings and consideration of a 'hedgehog highway' scheme.

Deliverability

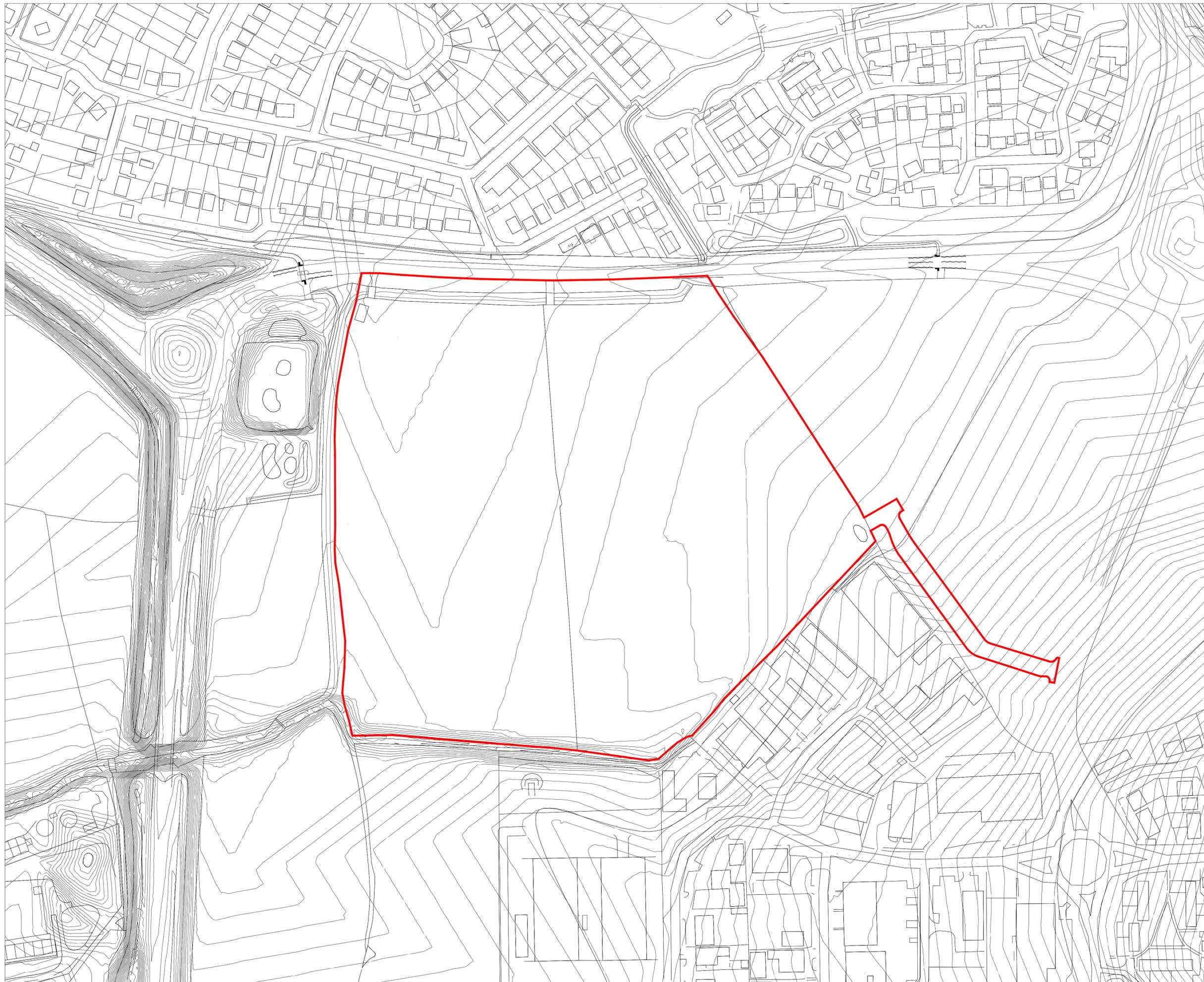
- 4.36 The site is subject to a planning application for up to 240 dwellings and a 70-bed care home. Following the grant of planning consent, the site would progress quickly through the reserved matters process, and we would anticipate construction commencing within a 18/24month period. First completions would then be expected in late year 3/early year 4; ensuring that the site is delivering housing to aid WC in meeting its five year housing land supply requirement.

5. Summary and Conclusions

- 5.1 Overall, we currently have concerns over WC's approach to housing need and the plan period within the consultation documentation.
- 5.2 We note that the evidence base is dated and will require a refresh prior to progressing the LPR, and also that prior to progressing any further, a detailed assessment of affordable housing need should also be undertaken.
- 5.3 Melksham is identified as a sustainable location for further growth reflecting the market town's wide range of services and facilities as well as employment opportunities. The town is also strategically located between Wiltshire's principal settlements of Chippenham and Trowbridge, and is also well placed to provide access to neighbouring settlements and locations further afield, via sustainable transport modes. Directing additional development to the town is therefore supported.
- 5.4 The Land South of Western Way, Melksham (Site 9/1025) is suitably located to the south of the town, and will soon be surrounded by built development on all four sides. The site has been acknowledged by WC as a suitable, available, achievable, deliverable and developable site and was considered as a reasonable option in the 2015 assessment work accompanying the site allocations plan. Furthermore, the fact that there is a pending outline planning application for the site demonstrates that there is a strong intention to deliver the site.
- 5.5 The site represents a logical solution to addressing the identified housing needs of both the town and the Chippenham HMA and we strongly support the inclusion of the site as a draft allocation in the next version of the LPR.



Appendix 1: Site Location Plan



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KEY
 Application Site Boundary 10.9 ha

PLANNING				
D	21.01.2021	Site boundary amendment.	SJD	KEF
C	18.08.2020	Northern boundary landowner amendment.	JUB	KEF
B	17.08.2020	Northern boundary landowner amendment.	JUB	KEF
-	23.07.2020	First issue.	JUB	KEF
rev	date	description	dm	chkd

fpcr

- masterplanning
- environmental assessment
- landscape design
- urban design
- ecology
- architecture
- arboriculture

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Hallam Land Management Ltd

project
**Land off Western Way,
 Melksham**

drawing title
SITE LOCATION PLAN

scale
 1:1250 @ A1

drawn / checked
 JUB / KEF

revision date
 21 January 2021

drawing number
7611-L-06

rev
D

CAD file: J:\7600\7611\LANDS\Plans\7611-L-06 D - Location Plan.dwg



Appendix 2: Illustrative Masterplan

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0 25 50 75 100 125m

-  Site Boundary 10.9ha
-  Proposed Residential Development [main streets]
-  Proposed Residential Development [secondary streets & green lanes]
-  Proposed Care Home
-  Equipped Play Space
1.MUGA
2.LEAP
-  Proposed SuDS Basin
-  Indicative Swales
-  Proposed Vehicular Access
-  Proposed Pedestrian, Cycle & Emergency Access
-  Proposed Pedestrian Access
-  Indicative Pedestrian / Cycle Routes
-  Orchard Tree Planting
-  Proposed Structural Tree Planting
-  Allotments

rev	date	description	dnr / chkd
C	03/02/2021	Updates based on LPA comments	SJD / KEF
B	21/01/2021	New site boundary line added	LAN
-	16.09.20	First Issue	JUB/KEF

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project
 Land off Western Way Melksham

drawing title
 ILLUSTRATIVE MASTERPLAN

scale
 1:1250@ A1

drawn / checked
 JUB/KEF

revision date
 02.02.21

drawing number
7611-L-07

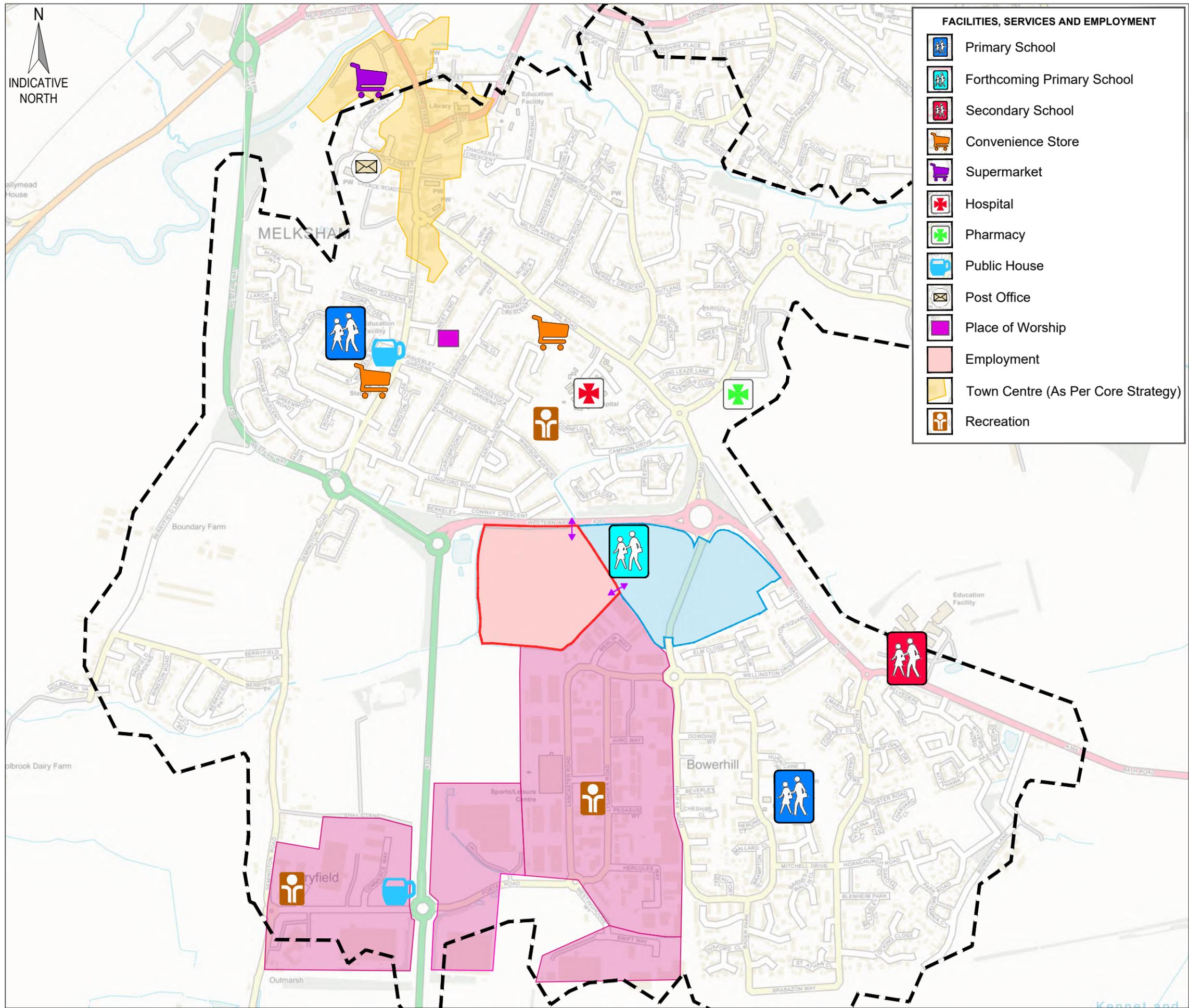
rev
C

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Appendix 3: Plan of Local Services and Facilities



- FACILITIES, SERVICES AND EMPLOYMENT**
-  Primary School
 -  Forthcoming Primary School
 -  Secondary School
 -  Convenience Store
 -  Supermarket
 -  Hospital
 -  Pharmacy
 -  Public House
 -  Post Office
 -  Place of Worship
 -  Employment
 -  Town Centre (As Per Core Strategy)
 -  Recreation

- KEY**
-  Site Location (Illustrative)
 -  2km Walking Isochrone
 -  Pedestrian Access
 -  'Pathfinder Place' (Illustrative)

P2	09.03.21	Minor Revisions	TB	MG
P1	04.11.20	Preliminary Issue	TB	MG
<i>Rev</i>	<i>Date</i>	<i>Description</i>	<i>By</i>	<i>Apvd</i>

PROJECT:
LAND SOUTH OF WESTERN WAY
MELKSHAM

TITLE:
ACCESSIBILITY TO LOCAL FACILITIES,
SERVICES AND EMPLOYMENT
OPPORTUNITIES

CLIENT:
HALLAM LAND MANAGEMENT

SCALE@A3:
1:10,000

PROJECT REF:
16307

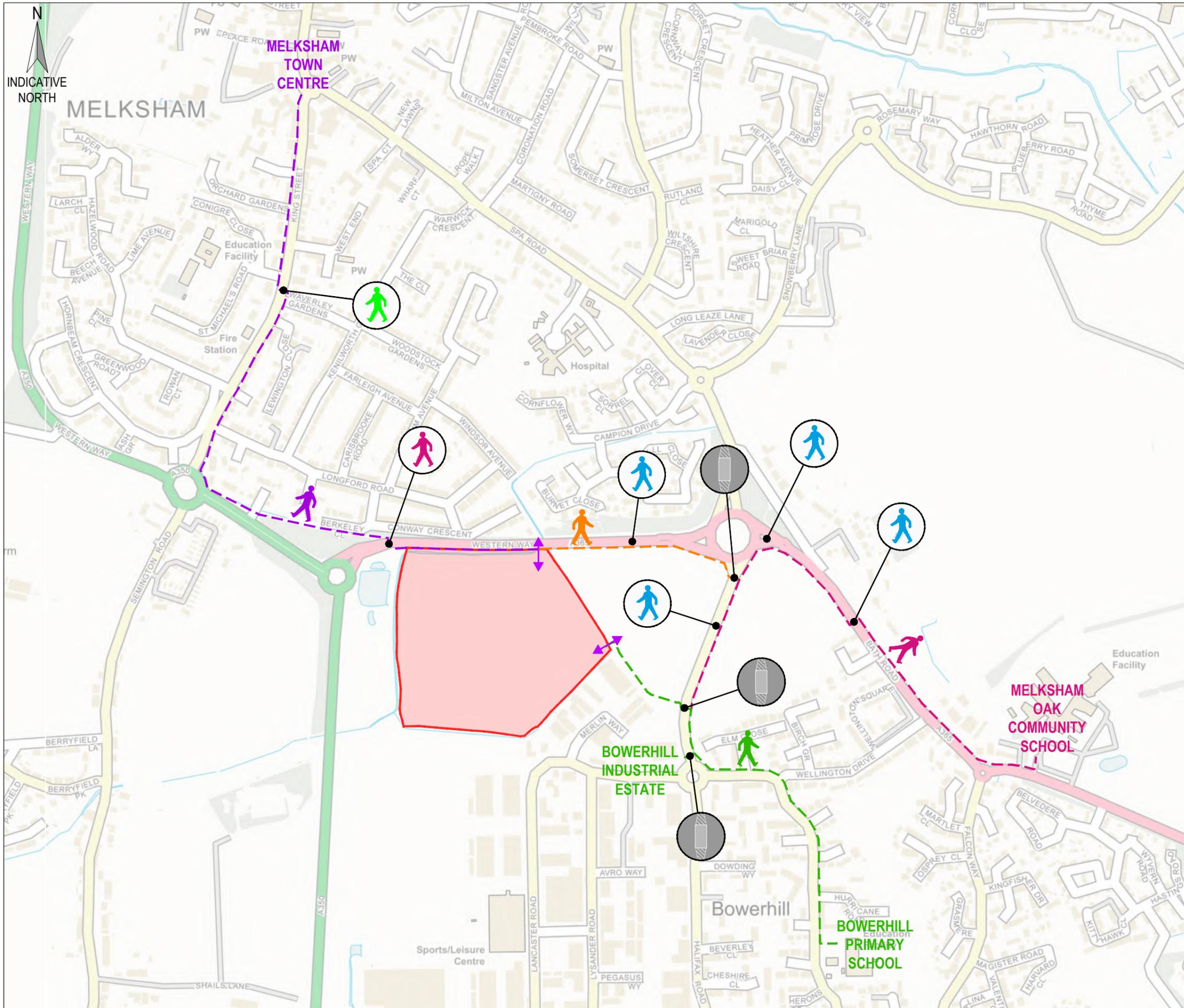
DRAWING No: 017 **REV:**
P2

Revision Referencing
P = Preliminary A = Approval T = Tender C = Construction





Appendix 4: Walking Routes



KEY

-  Site Location (Illustrative)
-  Walking Route 1
-  Walking Route 2
-  Walking Route 3
-  Walking Route 4
-  Signal-Controlled Crossing (Existing)
-  Signal-Controlled Crossing (Committed)
-  Signal-Controlled Crossing (Proposed)
-  Refuge Island
-  Pedestrian Access

P2	09.03.21	Minor Revisions	TB	MG
P1	04.11.20	Preliminary Issue	TB	MG
<i>Rev</i>	<i>Date</i>	<i>Description</i>	<i>By</i>	<i>Apvd</i>

PROJECT:
LAND SOUTH OF WESTERN WAY
MELKSHAM

TITLE:
WALKING ROUTES

CLIENT:
HALLAM LAND MANAGEMENT

SCALE@A3:
NOT TO SCALE

PROJECT REF:
16307

DRAWING No:
018

REV:
P2

Revision Referencing
P = Preliminary A = Approval T = Tender C = Construction



CLIMATE146

Land at Arnolds Hill Farm, Trowbridge

Representations by Savills on behalf of Barratt
Homes plc in response to:

Wiltshire Local Plan Review – Emerging Strategy

Land at Arnolds Hill Farm, Trowbridge

Representations to Wiltshire Local Plan Review



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1. Introduction

- 1.1 These representations have been prepared and submitted by Savills on behalf of Barratt Homes plc in response to the Wiltshire Local Plan Review (LPR).
- 1.2 Barratt Homes have an interest in an area of 38ha of land adjacent to the western edge of Trowbridge (Site Location Plan attached in Appendix 1).
- 1.3 The decision to progress with the LPR despite the emerging Planning White Paper (PWP) is supported. It is of critical importance that Wiltshire progress with their local plan update given the plan period for the adopted Core Strategy is due to expire shortly, and in light of the current five year housing land supply deficit. The Council's decision is consistent with the advice of the Chief Planner and Secretary of State, both of whom have expressly confirmed that the PWP should not delay plan-making.
- 1.4 Our representation is made with regard to the legal requirements of bringing forward a new Development Plan Document, and in respect to the tests of soundness set out in paragraph 35 of the NPPF. Given the timelines associated with the LPR, we assume that the current consultation on changes to the NPPF will have concluded and a revised Framework issued prior to the LPR having reached an advanced stage. We therefore reference the draft NPPF (dNPPF) where appropriate in this consultation response.

2. Emerging Spatial Strategy

Plan Period

- 2.1 At the outset, we raise a significant concern in regard to the proposed plan period 2016-2036. This concern is two-fold:
- Plan End Date: the LPR would currently fail to accord with the NPPF paragraph 22 which requires a 15 year plan period on adoption of the relevant plan. With adoption of the LPR not anticipated until Q2 2023 (at the earliest), the Local Plan would have a 13 year period at best and would not therefore be consistent with this aspect of national policy. In setting the appropriate end date, we suggest that the plan period is extended beyond the minimum requirement to include a sufficient buffer to accommodate any further slippage in the progression of the LPR.
 - Plan Start Date: a base date of 2016 is no longer appropriate – this was predicated on the Swindon and Wiltshire Joint Spatial Framework which would have been adopted now. The delay by at least 2 years requires the rebasing of the LPR; given at adoption in 2023 – 7 years would have passed since the start of the plan period.

Housing Need

- 2.2 The Government has recently published the outcome of the consultation on the standard method, and as such, it will be necessary for the Authority to update the LHN Assessment (2019).
- 2.3 The standard method figure for Wiltshire with a 2020 base date is 2,006 dwellings per annum. However, as per the PPG, the housing need figure must be “*kept under review and revised where appropriate*” (PPG: 2a-008-20190220); thus it will go through at least two updates between now and the submission of the LPR (with the 2021 based LHN figure available from the end of March 2021).
- 2.4 Local Housing Need (LHN) is a forward looking figure, it cannot be used retrospectively. Any ‘over-supply’ from any years prior to the base date of the LHN would have already been accounted for – with this impacting on the affordability ratio used within the calculation which is updated annually.
- 2.5 The implications on the housing requirement for Wiltshire would therefore be:

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Plan Period	Housing Delivered	LHN
2016-2019	7,817 ¹	
2019-2020	2,020 ²	
2020-2036		32,096 ³
Housing Requirement	41,933	

- 2.6 The housing minimum housing requirement for the LPR is therefore **41,933 homes** (not 40,840 as expressed in the consultation document).
- 2.7 The LHN represents the minimum housing requirement, and as per the PPG, it is necessary to consider whether the actual housing need is higher; taking account of local circumstances. The PPG explains that local circumstances should include economic growth, historical rates of delivery and the need for affordable homes (2a-010-20201216 and 2a-024-20190220).
- 2.8 The rates of historical delivery for Wiltshire have been higher than the proposed housing target in 7 out of the last 10 years; and taking account of the completions between 2016-2036; the Authority's currently proposed approach will result in a decrease in housing delivery over the remainder of the plan period; contrary to the objective of the NPPF (paragraph 59).
- 2.9 In regard to economic growth, we note that the 2019 LHN Assessment is based upon future job growth scenarios from 2015 and 2016 economic growth forecasts; which are now out of date. It will be necessary to consider the regional growth strategies and projects; for example those of the Swindon and Wiltshire Local Enterprise Partnership, and more widely the recovery plans associated with the covid-19 economic recovery.
- 2.10 Aside from basic summaries provided across the evidence base, there has been no detailed evidence provided in respect to the scale of affordable housing need across Wiltshire. This is important evidence and must be produced to inform the discussions on the overall housing requirement, and also the distribution of housing within the emerging strategy.

¹ Wiltshire Housing Trajectory 2019

² MHCLG Table 253a Housing Completions by LPA

³ 16 x 2,006

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Housing Delivery

- 2.11 The two Principal Settlements within the north of Wiltshire are identified to deliver two new major suburbs of c5,500 dwellings and c2,600 dwellings (2,100 before 2036) within the plan period. This constitutes 7,686 dwellings across two sites by 2036 – and equates to 60% of the residual housing need across these two HMAs. This is a substantial component of the housing land supply for the new Local Plan and therefore requires careful scrutiny.
- 2.12 The evidence base currently however fails to provide sufficient information in regard to the deliverability of these sites; both as a whole⁴, and in respect to the likely extent of development which will take place over the remaining plan period.
- 2.13 In accordance with the NPPF, paragraph 72, the evidence base must set out a “*realistic assessment of likely rates of delivery, given the lead-in times for large scale sites*”. This is particularly pertinent given a number of the strategic allocations from the Core Strategy which will not deliver a single home in the first 10-years post adoption (including West of Warminster, Ashton Park and Ludgershill – which combined account for nearly 4,000 units). In addition to the delay in commencement and first completions, the build out rates for each of the sites are significantly lower than original anticipated.
- 2.14 This is illustrated below⁵:

	Ashton Park (2,500 dwellings)		West of Warminster (600 dwellings)		Rawlings Green (650 dwellings)		Rowden Park (660 dwellings)	
	LPA	2019	LPA	2019	LPA	2019	LPA	2019
2017/18	100		90				60	
2018/19	250		125		45		150	
2019/20	250		140		80		150	
2020/21	250		145		80		150	10
2021/22	250		145		80		150	50
2022/23	250		140		85		150	70
2023/24	250		115		85		150	70
2024/25	250	170		138	85		40	70
2025/26	250	225		185	80	20		70

⁴ The evidence base does not confirm that all of the land identified within the new suburbs is available for development; and Savills have in the last few years sought to engage with a number of key landowners to consider the development of their land, and they have indicated that it is not available for development.

⁵ LPA figures taken from 2015 AMR (when Core Strategy adopted); and 2019 figure taken from April 2019 LPA Housing Trajectory.

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	Ashton Park (2,500 dwellings)		West of Warminster (600 dwellings)		Rawlings Green (650 dwellings)		Rowden Park (660 dwellings)	
	LPA	2019	LPA	2019	LPA	2019	LPA	2019
2026/27	250	?		?	80	?		70
2027/28	250	?		?		?		70
2028/29		?		?		?		70
2029/30		?		?		?		70
2030/31		?		?		?		70
2031/32		?		?		?		70
2032/33		?		?		?		70
2033/34		?		?		?		70
2034/35		?		?		?		70
2035/36		?		?		?		30
2036+		?		?		?		

Trowbridge HMA

- 2.15 The approach taken in the Emerging Spatial Strategy to Green Belt (set out at paragraphs 20-23, Trowbridge HMA Formulating Alternative Development Strategies (the ‘Strategy Paper’)) is not in our view consistent with national planning policy and guidance, and is contrary to the significant body of case law which explores this further.
- 2.16 Whilst the Framework, does not explicitly define ‘exceptional circumstances’; there is a clear framework for applying the test derived from legal precedent. Whilst this is a planning judgement, it is intrinsically linked to the over-arching statutory obligation to plan for the delivery of sustainable development⁶.
- 2.17 Indeed, as Mrs Justice Patterson confirmed “*the only statutory duty is that in Section 39(2)*” to promote the achievement of sustainable development⁷. The obligations placed upon local planning authorities by paragraph 138 of the Framework when considering Green Belt, are clear and explicit. Consistent with Section 39(2) of the Act, and also paragraph 11 of the Framework, the overarching objective or golden thread, of the planning system is to promote sustainable development.
- 2.18 Mrs Justice Patterson continued in IM Properties⁸ by stating:

⁶ Section 39 of the Planning and Compulsory Purchase Act 2004.

⁷ Paragraph 97, IM Properties Development Ltd v Litchfield DC [2014] EWHC 2440 (Admin)

⁸ In regard to paragraph 84 2012 NPPF; now paragraph 138

“98. That is clear advice to decision makers to take into account the consequences for sustainable development of any review of Green Belt boundaries. As part of that patterns of development and additional travel are clearly relevant.” [our emphasis]

2.19 The Calverton Judgement⁹ draws many of the proceeding case law and guidance together, with Mr Justice Jay stating that:

“The issue is whether, in the exercise of planning judgment and in the overall context of the positive statutory duty to achieve sustainable development, exceptional circumstances existed to justify the release of Green Belt.”

2.20 Paragraph 51 of the Judgement goes on to provide a very helpful framework for the assessment of ‘exceptional circumstances’:

“In a case such as the present, it seems to me that, having undertaken the first-stage of the Hunston approach (sc. assessing objectively assessed need), the planning judgments involved in the ascertainment of exceptional circumstances in the context of both national policy and the positive obligation located in section 39(2) should, at least ideally, identify and then grapple with the following matters:

- i. the acuteness/intensity of the objectively assessed need (matters of degree may be important);*
- ii. the inherent constraints on supply/availability of land prima facie suitable for sustainable development;*
- iii. (on the facts of this case) the consequent difficulties in achieving sustainable development without impinging on the Green Belt;*
- iv. the nature and extent of the harm to this Green Belt (or those parts of it which would be lost if the boundaries were reviewed); and*
- v. the extent to which the consequent impacts on the purposes of the Green Belt may be ameliorated or reduced to the lowest reasonably practicable extent.”*

2.21 This exercise has not been undertaken; with the prima facie decision made to not review the Green Belt. The justification for the emerging spatial strategy is therefore not robust.

⁹ Calverton Parish Council v Nottingham City Council [2015] EWHC 1078 (Admin)

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- 2.22 Further, we note that the decision not to review the Green Belt should also have been kept under review as the LPR progressed from the initial informal consultations undertaken between 2017-2019; noting that the strategy must be underpinned by the Sustainability Appraisal; which is an iterative process.
- 2.23 We note that the Sustainability Appraisal in fact recommends the review of the Green Belt around the town of Trowbridge (Main Report p35, 36, 39, 41 and 76): with the specific reference that there is a shortage of available greenfield sites on the edge of the town which would not have significant adverse environmental effects (p36); and that there may be opportunities to deliver development in the Green Belt which would not affect its openness (p35).
- 2.24 This follows the analysis on the Assessment of Alternative Development Strategies (Annex 1); which concluded that the only land suitable outside the Green Belt was to the north and north east; but that only localised parcels were considered capable of accommodating development due to heritage (SA Objective 6) and landscape (SA Objective 7) effects; and that this provided a strong 'rationale' for the review of the Green Belt. SA10 (Travel and Sustainable Transport) whilst not directly referencing sites; explicitly recognised that the accessibility to the rail and bus options varied depending on the locations being considered, and that as a result, not all sites would offer a suitable alternative to the private car.
- 2.25 The Sustainability Appraisal clearly indicates an alternative strategy should have been taken; and that Green Belt Review should have been considered. At the very least, it forms a reasonable alternative for the purposes of the legal requirements of the Strategic Environmental Assessment Regulations, and should be tested as such.

3. Addressing Climate Change and Biodiversity Net Gain

- 3.1 It is not anticipated that the LPR will be adopted until Q2 2023. Between now and then the Government has indicated that there will be significant changes at the national level in regard to climate change and biodiversity net gain. It will therefore be necessary for the LPR to be mindful of the changes to the national legislative regime, in particular in regard to Future Homes Standard, biodiversity net gain, energy provision, and electric vehicular charging.
- 3.2 Barratt have committed to becoming the country's leading national sustainable house builder and have published a sustainability framework which aligns their ambitions with the UN Sustainable Development Goals¹⁰. It is these goals that are referenced in the dNPPF, at paragraph 7, and are being used by many Authorities in setting the sustainability framework for emerging Local Plans.
- 3.3 This commitment includes new homes design to be net zero carbon from 2030; with improvements towards this standard made over the coming 9 years, pre-empting the Government legislation by committing to biodiversity net gain from 2020, and seeking to increase the use of Modern Methods of Construction to 25% of homes by 2025.
- 3.4 Barratt welcome the commitments set out by Wiltshire Council in seeking to actively address climate change and biodiversity net gain through the LPR; and commit to working positively with the Authority to deliver enhanced sustainability standards over the coming years. The scale of change required in the industry is substantial, and it is necessary to ensure that developers and Authorities work collaboratively to the end goal of zero carbon in a phased process – which sets the step change in standards at a rate which is deliverable by the industry.

Land Use Policies

- 3.5 By far the most significant opportunity to address climate change and reduce carbon emissions is through a spatial strategy which promotes sustainable patterns of growth, and maximises the opportunities for sustainable travel.
- 3.6 Central to this is understanding where people live and work, and the opportunities for walking/cycle and public transport to create modal shift. This will also need to be informed by changing working patterns as a result of Covid. This should inform the distribution of housing within the spatial strategy. We have not

¹⁰https://www.barrattdevelopments.co.uk/~/_media/Files/B/Barratt-Developments/sustainability/Sustainability%20Framework%202020.pdf

seen any analysis in this regard – and the focus on the delivery of two bypasses as major indicators for growth appears fundamentally opposed to this objective.

- 3.7 We note in this regard that the Wiltshire Local Plan Transport Review (January 2021) indicates that the 'Next Step' is to consider the 15 minute neighbourhood, and how development can aid the carbon reduction agenda (Section 4.4). This confirms our fundamental concern that the consideration of the most sustainable locations for large scale development have not appropriately considered this at the outset because reasonable alternatives have been discounted too early in the process.

Flood Risk

- 3.8 We agree with the measures set out in the consultation document, and it will be necessary to demonstrate that they are compliant with the Framework. In line with the NPPF, there is no need to duplicate policies from the Framework (paragraph 16) in the LPR.

Natural Capital

- 3.9 We support the intention of the consultation document in emphasising the importance of blue and green infrastructure. The emerging Green and Blue Infrastructure Strategy (GBIS) needs to be published in full as part of the evidence base informing the LPR, as it is difficult to comment on the individual maps provided within the contextual information.
- 3.10 We suggest that the concept of the GBIS is amended in the LPR to align with the national requirement to create Nature Recovery Networks.

Zero Carbon Homes

- 3.11 As set out above, Barratt Homes committed in 2020 to their homes being net zero by 2030; and will be moving towards this target over the 10 year period. The Government have subsequently published its response to the consultation on the Future Homes Standard – with this confirming a two-stage approach to reach 'carbon ready homes' by 2025 (being a 75% reduction in carbon emissions). The first stage in reaching this target has recently been published with draft Building Regulation changes at consultation.
- 3.12 Barratt Homes remain committed to their net zero target, and will be aligning the stages in reaching net zero by 2030 with the Future Homes Standard. This reflects the need to develop supply chains, skills and construction practices. Where there are opportunities to go beyond Building Regulations – these will be explored, and there are numerous examples of Barratt Homes doing just that such as the first ever large scale zero carbon community at Hanham Hall. At present, these schemes are individual, based upon site

specific characteristics (and viability), and we do not consider that a Wiltshire-wide zero carbon homes standard would be achievable or deliverable in the short term.

- 3.13 In bringing forward local policies which differ from national standards, or are implemented earlier, it will be necessary to provide evidence on the feasibility, deliverability and financial cost of these policy requirements.

Decarbonising Energy

- 3.14 The Future Homes Standard includes the decarbonisation of energy, and there are also individual legislative changes coming forward, for example the forthcoming ban on gas boilers. There are a significant range of low carbon/renewable energy technologies available for new homes, and the sector is constantly evolving. We suggest that the LPR should not set out a preferred type of technology – and that it will be for the individual site conditions to determine which represents the best opportunity both in terms of feasibility and viability.

- 3.15 In bringing forward local policies, it will be necessary to provide evidence on the feasibility, deliverability and financial cost of these policy requirements.

Air Quality

- 3.16 We set out our comments above on the role of sustainable travel choices and modal shift in underpinning the spatial strategy; and this is intrinsically linked to addressing air quality.
- 3.17 In regard to the installation of smart charging, we note that a Department for Transport 2019 consultation considered potential regulations in this regard – and this included analysis of the ability to deliver this at scale; including indicative costs, and also the implications on the capacity of the electric network. This indicated that in some instances, the costs would render a scheme unviable due to grid capacity constraints. We therefore welcome the intention of the Council to engage now with the network operators to produce the evidence base on the costs associated with the network upgrades and the cost of installation. This will need to be factored into the Viability Assessment and Infrastructure Delivery Plan (IDP) supporting the LPR.
- 3.18 Any policy requirement should be based upon an assessment of need – both current and future, and should balance the need for passive and active charging.

4. Planning for Trowbridge

Housing Needs

- 4.1 We have commented elsewhere on the scale of housing need within Wiltshire, and will consider the appropriate quantum for Trowbridge when the evidence base is updated as part of the next stage of the consultation on the LPR.

Brownfield Land

- 4.2 The assumption that Trowbridge will deliver 370 dwellings from brownfield sites over the period 2021-2031 appears to be an over-estimate. Supply from at least the first five years of this period would most likely be on sites which are already permitted. The 2019 Housing Trajectory identifies 118 dwellings with permission on 'small sites'¹¹; with 102 of these anticipated to be completed by 2026. If the same figure was assumed over the second half of the ten year period; then the brownfield site allowance would reduce by 252 dwellings¹².

Housing Supply and Delivery

- 4.3 In regard to Trowbridge, we note that the Paper indicates that there is a current supply of 3,627 dwellings. This is significant, and it is not immediately clear from the evidence base or the 2019 Housing Trajectory, where these numbers are from.
- 4.4 We assume a large proportion of this, at 2,500 dwellings, pertains to Ashton Park – the allocation from the Core Strategy. This site has still yet to achieve planning consent, with a planning application submitted in 2015. Given the significant length of this delay and the recognised complexities with the site, it is crucial that the Authority provide evidence that this extant allocation, and the associated pending planning application, remain deliverable in accordance the PPG (3-018-20190722).
- 4.5 If the site is still considered deliverable, then a robust housing trajectory is required. The site is scheduled to commence and first allocations anticipated in 2024/25; however, with outline consent still pending, and the requirement for reserved matters and discharge of conditions alongside site preparatory works, we do not consider this a likely date for first completions. It will then be necessary to identify a robust delivery rate for the site – recognising that it is for the most part under the control of a single developer.

¹¹ Assumedly including some greenfield, but this is likely to be limited, and as such, no reduction is made.

¹² 370 – assumed none in first five years (accounted for in committed supply), minus 118 dwellings (anticipated supply for years 6-10 based upon current supply).

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- 4.6 The Preferred Strategy relies entirely on a new suburb to the north of Trowbridge – with this anticipated to deliver 2,100 dwellings by 2036. This isn't considered realistic; as per NPPF paragraph 72.
- 4.7 As a result, the housing trajectory for Trowbridge is not considered to be robust, and will fall short of the proposed housing requirement for the town. We have analysed this below and provided our alternative delivery assumptions:

Year	Ashton Park – 2,500		NE Trowbridge	
	LPA - 2019	Savills	LPA - 2021	Savills ¹³
2024/25	170			
2025/26	225	50 ¹⁴		
2026/27	?	100 ¹⁵		
2027/28	?	120 ¹⁶		
2028/29	?	120		50
2029/30	?	120		100
2030/31	?	120		150 ¹⁷
2031/32		120		150
2032/33		120		150
2033/34		120		150
2034/35		120		150
2035/36		120		150
Total	2,500	1,230	2,100	1,050

¹³ Assumptions: planning application submitted and/or comprehensive masterplan/design code etc agreed for Sites 6months after adoption of LPR (Q2 2023); 2 years planning application process; site disposal; reserved matters and discharge of conditions – by Q4 2027, construction commences, with first completions 2028/29.

¹⁴ Individual full application for c100 dwellings on part of the Allocation site envisaged to deliver from 2025/26; at 50dpa.

¹⁵ Main site commences delivery at 50dpa in first year

¹⁶ Subsequent years at 120dpa based upon two outlets on the site delivering at 60dpa (reflecting the highest rates being achieved on sites across the HMA)

¹⁷ Assumed 2.5 outlets across the site given disparate land ownership

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- 4.8 This removes 2,320 dwellings from the Authority's anticipated supply over the period up to 2036; and alongside the reduction of 252 dwellings from brownfield supply; results in a deficit of 2,572 dwellings.
- 4.9 Additional housing allocations are required in the town to meet the residual requirement, and to ensure a robust housing supply.

Employment Needs

- 4.10 The Paper indicates that there is no further requirement for employment land in Trowbridge, and makes no allocations. The Employment Land Review (2018) and underlying Swindon and Wiltshire Functional Economic Market Area Assessment (2016) are out of date, and an update is required in light of the time elapsed, but also the changing regional economy and wider growth plans. For example, we note that the Emerging Swindon and Wiltshire Local Industrial Strategy (2006-2036) identifies Trowbridge as a key employment area within the 'A350 Growth Zone' – with a particular emphasis placed on the number of rail stations within this area (and thus the opportunities to access wider employment); alongside the opportunity to seek inward investment and the allocation of employment land in those areas with the highest potential for significant economic benefit.
- 4.11 In moving to the next stage, it will be necessary to fully review the extant allocations – and whether the delivery of employment is a realistic prospect. In particular, we note that the Ashton Park scheme has reduced its employment area from the policy requirement of 15ha to 13.6ha; and that this does not need to be delivered until occupation of the 1,250 home. This trigger will not be reached until after the end of the plan period – in 2037. It is therefore not available for the purposes of this LPR.
- 4.12 We note that in the 2018 assessment; there was potential expansion of 19.2ha across three further sites – and it will need to be demonstrated that this remains available and suitable.
- 4.13 This is important given the chosen Preferred Site Options are seeking to deliver a 'self-contained and sustainable new community' (paragraph 27, Trowbridge Paper). The evidence would appear to indicate that the new suburb should include a strategic employment allocation, and/or that housing will need to be well located to maximise opportunities for sustainable travel (with the emphasis on the rail station as per the Local Industrial Strategy) – discussed further below.

Place Shaping Priorities

- 4.14 We broadly support the Place Shaping Priorities set out in the consultation document, however, for reasons set out within this representation, it doesn't appear that these have necessarily informed the Preferred Strategy. For example, the reference to delivering job growth and increased self-containment does not appear to be supported by the emerging approach to employment land, and there is no indication as to

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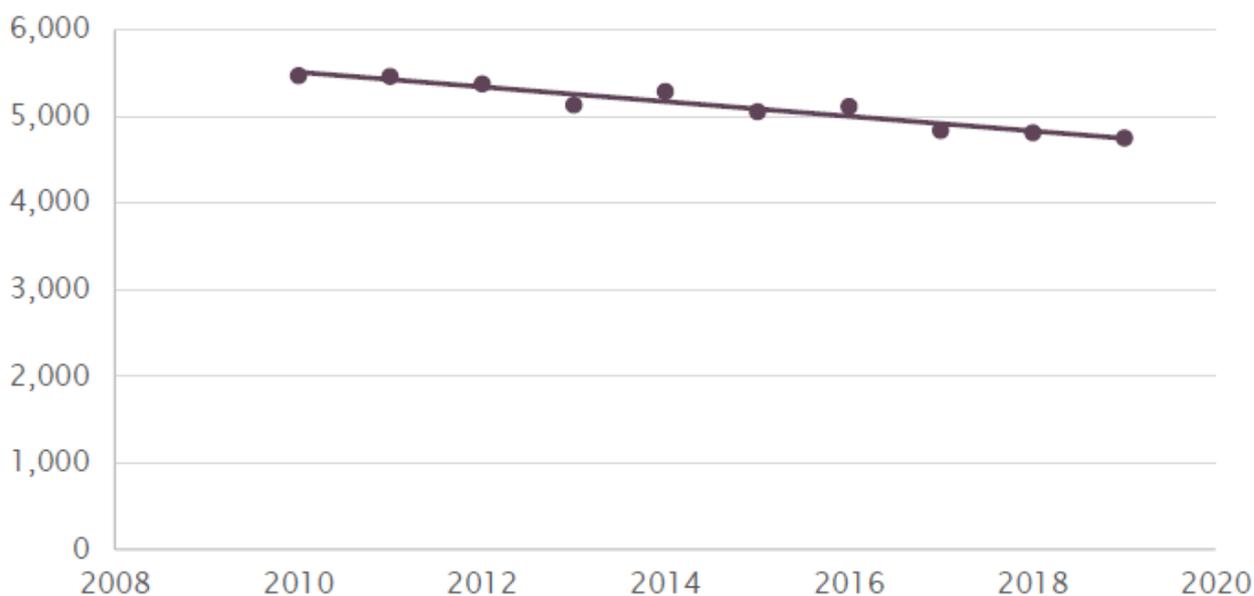


how the selection of sites has been informed by the need to deliver a change in the transport strategy for the town – achieving modal shift. We comment on these further below as required.

4.15 The Paper indicates that the decision to allocate a single large scale suburb has focused on the need to plan for the long term education needs of the town – with the suburb proposed to deliver the equivalent of 4FE primary school places, and an 8FE secondary school. No evidence is provided to support this assertion, with the last Wiltshire School Places Strategy dated 2017-2022.

4.16 This Strategy was based upon birth rates up to 2016 – from which there has been a considerable and sustained fall. This isn't unique to Wiltshire; and the requirement for new primary schools is dropping across the South West. In terms of the current roll, there is the equivalent of 1.2FE of spare primary school places across Trowbridge; with the largest number of spare places within the Reception year reflecting the falling birth rates.

Birth Rates within Wiltshire



4.17 The Ashton Park development is scheduled to open two new primary schools; which will provide for places surplus to the pupils the development will itself generate. Notwithstanding whether there is a need for new primary school provision within Trowbridge, we note that there are multiple opportunities to deliver new primary schools on alternative locations around the town; and there is no requirement for provision to only be delivered through a new suburb to the town. In itself, this is not a justification for the selection of the Preferred Strategy.

- 4.18 In regard to secondary school provision, we note that the drop in birth rates will come through to these age categories over the plan period; and there is currently capacity of 16-24% across the Y7-Y11 age groups in the town, which will increase to 510 surplus places by 2025-26. The Ashton Park scheme includes a 5.3ha secondary school site (eqv. 750 places); and would also create a surplus of secondary school places against its own projected pupil generation. Thus it is necessary to understand if, in light of falling pupil numbers, and the likely housing trajectory for the two major sites¹⁸, another new secondary school (for 1,200 pupils) would be required. This would equate to 5,454 dwellings against the Authorities current pupil projections (at 22 per 100 dwellings).
- 4.19 We do not consider that the evidence base currently indicates a need to deliver a new secondary school within the town; given the committed school at Ashton Park, and the falling pupil roll over the plan period; or indeed whether any need may be more appropriately met through an extension to the existing (and committed) secondary schools in the town. The need for a new secondary school, as the justification for a large scale new suburb, will need to be fully evidenced based upon realistic assumptions on housing delivery against projected pupil numbers.

Exceptional Circumstances

- 4.20 In Section 2 of these representations we outlined the background to 'exceptional circumstances' and the helpful staged process that was outlined in the *Calverton* judgement. Aside of also addressing the 'exceptional circumstances' test, this provides a useful framework within which to assess the planning strategy and site options for Trowbridge. We have used this staged framework below.

Green Belt – Stage 1

- 4.21 In accordance with *Calverton*, we undertake the first two stages exceptional circumstances 'test':

<i>The acuteness/intensity of the objectively assessed need</i>
There is a clear and demonstrable housing need within Wiltshire; and Trowbridge, as one of the three Principal Settlements, has a key role in meeting this need. The scale of the housing need and the current level of shortfall clearly indicates that a large proportion of growth must be directed to Trowbridge.
<i>The inherent constraints on supply/availability of land prima facie suitable for sustainable development</i>
The Sustainability Appraisal expressly references the shortage of available sites around the town that would not lead to a significant adverse environmental effect (p36).

¹⁸ Aston Park and the new suburb

4.22 There are no other suitable locations identified within the evidence base to meet the deficit of the housing needs of Trowbridge, and as such, a Green Belt Review is required. This is demonstrated with or without the retention of the entire Preferred Sites options; given the inability of these to deliver sufficient housing within the plan period.

Potential Development Sites at North East Trowbridge

4.23 In regard to the Site Selection Report, and associated Sustainability Appraisal assessment of the site options (Annex II – Principal Settlements: Site Assessments), we have the following comments to make.

Availability

4.24 As a matter of course, it is necessary to confirm that all of the land is available for development. We identify above that at least two of the landowners have previously (and recently) indicated that their land was not available for development.

Deliverability

4.25 We also note that the number of individual SHLAA submissions, and land registry titles (16 on Site 5) require the Authority to demonstrate that the delivery of a coordinated new suburb at the scale envisaged is achievable, and in the timeframe required. Or alternatively, to identify the scale of development which is deliverable on the Sites.

4.26 The next stage of the LPR must be accompanied by a viability assessment demonstrating that these Sites are viable. Noting the identified requirement for a £24m Staverton bypass in the Wiltshire Local Plan Transport Review (2021).

Suitability

4.27 We have the following detailed comments to make on the Sites:

Landscape	<p>The Main Sustainability Report explicitly states that from a landscape perspective, there are limited opportunities to the north and north east of the town. This is supported by a number of the site specific assessments, notably that development would affect wider views of the River Avon Valley (723) and that development would create an expanse of urban development in a rural setting (736). The detailed Site Assessment within the Sustainability Appraisal for Site 5 explicitly states that development should be avoided in the north of the Site on landscape grounds (p216).</p> <p>However, the Concept Plans fail to reflect this conclusion – with a significant and protruding area of development within the northern corner of Site 5 into the open countryside, and with no clear development edge created.</p>
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Land at Arnolds Hill Farm, Trowbridge

Representations to Wiltshire Local Plan Review



	<p>The evidence base provides no landscape evidence that the Sites are suitable for the scale of development proposed.</p>
Heritage	<p>The Sustainability Appraisal explicitly states that future development should ensure a separation from the WWII defensive stop line to the north of the town; and that this would limit development to the north (p259). However, the subsequent detailed assessment merely indicates that this requires further assessment.</p>
Accessibility	<p>Neither sites offer a full range of sustainable travel options, and are not able to due to their location. Whilst the southern part of the sites may be considered accessible; the northern parts of Site 5 and all of Site 4 are identified as either below average or poor in terms of accessibility in the Site Selection Report.</p> <p>The Sustainability Appraisal goes on to confirm that the Town Centre and Rail Station are “too far to be walkable”; and that the Sites have a poor level of accessibility through sustainable modes. On p206, it questions whether bus services to the Sites would be commercially viable; indeed the proposed allocations are not located on either of the Bus Corridors proposed in the Local Plan Transport Review (2021). The Local Plan Transport Review (2021) indicates that bus patronage is low (para 4.2.2), and that public transport improvements would have a limited impact on car use; and thus no assumptions were made on how bus use would reduce congestion.</p> <p>The Sustainability Appraisal concludes that mitigation measures are likely to be achievable but problematic. The selected Sites therefore appear to be reliant on private car use to access the services and facilities across Trowbridge.</p>
Employment	<p>The Sites score positively in the Sustainability Appraisal (Objectives 11 and 12) because it is specifically referenced that they will also deliver employment land – noting that the main employment centres and rail station within Trowbridge are beyond walkable distances. The decision not to include employment within the Sites must be reflected in the Sustainability Appraisal; and in the Stage 4 Selection of Sites which indicates that the Sites meet PSP3 (Employment).</p>

Green Belt – Stage 2

The consequent difficulties in achieving sustainable development without impinging on the Green Belt;

Notwithstanding the de facto need for additional housing within the Green Belt, the identification of Preferred Sites that, when considered as a whole, raise significant adverse effects in regard to biodiversity, environmental pollution, climate change, heritage, landscape and transport cannot be considered sustainable.

In this regard, we note the dNPPF, which explicitly includes the requirement that all plans promote a sustainable pattern of development (paragraph 11). Whilst we recognise that there will be parts of the Preferred Sites which will be within acceptable walking distances of the Town’s key services and facilities, it is clear that the northern parts of these sites are not.

Land at Arnolds Hill Farm

4.28 Barratt Homes are promoting 38ha of land adjacent to the western edge of Trowbridge (Site Location Plan attached in Appendix 1). This directly borders the existing built up area to the east, and borders land being promoted by Vistry Homes to the north. Barratt Homes and Vistry are working together to show how a comprehensive scheme to the west of the town would represent a sustainable opportunity for the growth of Trowbridge.

4.29 The site has not been assessed within the evidence base, and as such, we provide a summary below.

Accessibility	<p>The site is well located to access a range of services and facilities within Trowbridge by walking, cycle and public transport – this includes the Town Centre and Rail Station that both fall within acceptable walking distances.</p> <p>An Access and Connectivity Appraisal (Appendix 2) has been undertaken jointly with Vistry to demonstrate the significant sustainability benefits of this general location for development. This demonstrates that the full range of services and facilities of Trowbridge are within acceptable walking and cycling distances, and further that the rail station is within walking and cycling distances.</p> <p>A public transport isochrones plan has been produced which demonstrates that the sites are able to access significant wider employment destinations within a 60min journey – including Bath, Bristol, Chippenham and Swindon.</p>
Landscape	<p>The site is not within any designated landscapes – with no inter visibility with the AONB (over 2km to the northwest). There are no local landscape designations relevant to the Site.</p> <p>A Preliminary Landscape and Visual Appraisal and Green Belt Assessment (March</p>

Land at Arnolds Hill Farm, Trowbridge

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	<p>2021) is enclosed at Appendix 3.</p> <p>The site abuts the settlement edge of Trowbridge; and the existing urban area is a prominent feature and contains peri-urban features such as overhead cabling, the loss of hedgerows etc; which reduce the landscape sensitivity. The site topography reflects the gently rolling nature of the wider landscape area; with a high point on the western side of the site; with land then falling east towards the settlement.</p> <p>The assessment concludes that the Sites are well screened, and that any impacts would be localised. It concludes with masterplanning recommendations; which have been accounted for in the emerging concept plan.</p>
Heritage	<p>The Grade II listed Arnolds Hill Farm sits c200m to the west of the site; and is well screened by modern agricultural buildings from the site. Any future development would be located c500m from the listed building, and with intervening agricultural buildings in between.</p> <p>There are a number of listed structures to the west in Wingfield – the closest, the Church of St Mary (Grade II*) at c650m. Development within the site would be c720m from the church. In accordance with landscape analysis, development would be set down the hill, at the height where existing development from Trowbridge is already visible, and an enhanced landscape buffer would be provided.</p> <p>There are considered to be no heritage considerations which would preclude the development of the site.</p>
Flood Risk	<p>An area of flood zone 2 and 3 borders the eastern edge of the site associated with the Lambrok Stream. Any development on the site would deliver a multi-functional sustainable drainage system which provides a reduction in peak greenfield run off rates to create a betterment.</p>
Traffic	<p>The highly accessible nature of the Site, and the opportunities for sustainable travel, enable a scheme which seeks to maximise modal shift. This can be achieved through various interventions capable of being delivered through future planning applications. These interventions include assisting in the delivery of the new cycle route along the A366, delivering pedestrian/cycle improvements in the immediate vicinity and the implementation of a Travel Plan which encourages active travel into the town centre, maximising the substantial benefits of the train station being within walking and cycling distance.</p>
Ecology	<p>The Site's location to the west of Trowbridge means that it is not within immediate proximity to the woodlands associated with the Bath and Bradford on Avon Bat SAC. Indeed, the Site falls outside of the yellow medium risk zone which surrounds all other sides of Trowbridge, and is outside of the recreational impact zones established in the SPD. Whilst any key bat habitat would be required to be protected, and new habitat provided in accordance with the principles of delivering net biodiversity gain, the Site raise no significant issues in regard to the designation.</p>

- 4.30 The opportunity presented by delivering a comprehensive scheme between Arnolds Farm, and the Vistry site to the north, has been recognised. A combined Concept Masterplan has been created (Appendix 4) which combines the more detailed work which has been undertaken by both parties on their respective sites.
- 4.31 Barratt Homes and Vistry have committed to working together to bring forward a comprehensive scheme for the town, and would seek to work with the Authority and the Town Council in progressing proposals for the Sites. This would include discussions on a range of matters, including for example, the provision of education facilities, a coordinated approach to the delivery of open space, and the opportunities to deliver pedestrian and cycle improvements to the wider network.

Green Belt – Stage 3

the nature and extent of the harm to this Green Belt (or those parts of it which would be lost if the boundaries were reviewed); and

the extent to which the consequent impacts on the purposes of the Green Belt may be ameliorated or reduced to the lowest reasonably practicable extent.”

These two steps from Calverton, are most appropriately considered together. We therefore consider the five purposes of the Green Belt to consider the potential for, and extent of, any harm. Opportunities to reduce harm are noted where relevant.

The Preliminary Landscape and Visual Appraisal and Green Belt Assessment (March 2021) considers these aspects from an openness perspective alone. The below provides the overview commentary on the purposes.

To check the unrestricted sprawl of large built-up areas

This purpose is to ensure that development into the Green Belt is managed, and effectively to restrict it to planned development. The Assessment concluded that the Site make only a limited contribution to this objective, and that an allocation, with an appropriate requirement to comprehensively plan the development, would effectively overcome this purpose. The delivery of a new defensible boundary would ameliorate the development.

To prevent neighbouring towns merging into one another

The Assessment confirms that the Site makes a limited contribution in this regard, with no potential merger of Trowbridge with surrounding towns as a result of development on the Site.

To assist in safeguarding the countryside from encroachment

At its broadest interpretation, all greenfield land within the Green Belt outside of existing urban areas contributes to this purpose of the Green Belt and there would be little value in a comparative assessment of the merits of this Green Belt purpose in determining the appropriate locations to release. Recognising

Land at Arnolds Hill Farm, Trowbridge

Representations to Wiltshire Local Plan Review



this shortcoming, the LGA and PAS19 guidance explains one possible approach to assessing this purpose:

“The most useful approach is to look at the difference between urban fringe – land under the influence of the urban area - and open countryside, and to favour the latter in determining which land to try and keep open, taking into account the types of edges and boundaries that can be achieved.”

Defining and preserving the more highly valued open countryside ahead of the urban fringe land makes eminent sense and is consistent with broad planning objectives.

The Assessment concludes that the Site makes a moderate contribution to this objective, but that it is clearly an urban fringe – with Trowbridge immediately adjoining the site. The delivery of a defensive, robust Green Belt boundary will be key in ameliorating any impacts.

To preserve the setting and special character of historic towns

This purpose is not relevant to this site.

To assist in urban regeneration, by encouraging the recycling of derelict and other urban land

Any development on Green Belt would ‘harm’ this objective. However, there is a clear need for additional development within the town; notwithstanding any development which may come forward on brownfield sites.

4.32 We would welcome the opportunity to discuss the site further with the Authority.

¹⁹ Planning on the Doorstep: The Big Issues – Green Belt, updated February 2015

Land at Arnolds Hill Farm, Trowbridge

Representations to Wiltshire Local Plan Review



Appendix 1 – Location Plan

Land at Arnolds Hill Farm, Trowbridge



North



Appendix 1
Site Location Plan



Appendix 2 – Access and Connectivity Appraisal

Project name	Arnolds Hill Farm, Trowbridge		
Design note title	Access and Connectivity Appraisal		
Document reference	10711-HYD-XX-XX-RP-TP-1002		
Author/Approver	[REDACTED]		
Revision	P02		
Date	5 March 2021	Approved	✓

1. INTRODUCTION

- 1.1.1 The following document offers an access and connectivity appraisal for the potential delivery of housing on the western edge of Trowbridge, Wiltshire.
- 1.1.2 The site comprises of two parcels of land to the north and south of the A366 respectively. The northern parcel (Vistry) shares a border with the north-western residential boundary of Trowbridge. The southern parcel (Barratts) is located to the north of Southwick Country Park and also borders Trowbridge’s western residential area.
- 1.1.3 This access and connectivity appraisal summarises the sustainable accessibility of the site with regard to walking and cycling connections, access to local facilities within the surrounding area, and vehicular access.

2. SUSTAINABLE CONNECTIONS

2.1 Walking

Existing Facilities

- 2.1.1 There are a number of Public Rights of Way (PRoWs) within the vicinity of the site. To the south-east of the southern parcel, a footpath connects Lambrok Road to the site and up to the A366 as well as to Wingfield to the south-west. This footpath is currently unsurfaced and crosses over Lambrok Stream. It is recommended that this route be upgraded to accommodate pedestrian movements associated with the site.
- 2.1.2 Another footpath PRoW runs north-south through the eastern side of the northern parcel of land, connecting the A366 to Westwood Road directly north of the site. This provides a pedestrian and cycle link through the northern site, linking two of the key transport routes in the vicinity of the site. This PRoW takes the form of an unsurfaced footpath.
- 2.1.3 The PRoW's within the vicinity of the site are displayed at Figure 2.1.



Figure 2.1: PRow's within the vicinity of the site.

- 2.1.4 There is currently no footway provision along the A366 until it enters the suburban area of Trowbridge in line with the eastern boundary of the site. Likewise, there is no footway provision along Westwood Road to the north of the site until it enters the Trowle Common residential area 200m to the east.
- 2.1.5 Within the surrounding residential area to the east there is an established network of pedestrian footways on either side of the local streets. These connect with surrounding local facilities and amenities within the local area, including Studley Green primary school, local convenience stores and Trowbridge town centre.

Potential Pedestrian Facility Enhancements

- 2.1.6 As identified, the sites are not currently served with footways in the immediate vicinity of both parcels of land, notably along the A366 and Westwood Road. It is recommended that upgrades to the pedestrian infrastructure will be required to realise development potential therefore.
- 2.1.7 Pedestrian connection points will be focussed on the eastern side of the sites, reflecting the desire line to travel eastwards towards the local services/facilities in Trowbridge. Within the sites themselves, the internal pedestrian networks would facilitate travel westwards, meaning that pedestrian footways on the A366 along the entirety of the site frontage to reach the west of the site is not deemed necessary.
- 2.1.8 However, it is recommended that pedestrian infrastructure is upgraded and a footway installed on the A366 from the eastern boundaries to connect to the existing infrastructure which commences east of Lambrok Stream. This would require the installation of c.360m of footway in order to connect to the southern site vehicular access.
- 2.1.9 Highway verge exists on both sides of the carriageway, which could be utilised to realign the road and install a footway. It is noted that a drainage ditch exists on the southern side, and a strategy will need to be developed to accommodate this. The provision of a footway on the eastern stretch of the A366 is subject to further investigation regarding third party land ownership and highway constraints.

- 2.1.10 Similarly, potential pedestrian links from the northern parcel's Westwood Road vehicular access points would require c.340m of footway installation, albeit it is recognised this route is unlikely to experience significant footfall.
- 2.1.11 Beyond the sites themselves, there are few pedestrian attractors to the west and hence limited desire for existing residents to walk westwards. The pedestrian infrastructure will predominantly serve travel to/from the east therefore.
- 2.1.12 In addition, pedestrian access could be achieved through the east of the northern parcel into the neighbouring residential area as per the EDP Masterplan displayed at Figure 3.1. Similar provision could be considered for the southern parcel, providing access through the east of the site onto the neighbouring Lambrok Road. However, access of this nature is already available to the south of the site via an existing PRow that crosses Lambrok Stream and as such further pedestrian access points may not be required. It is recommended that this footpath be upgraded in order to accommodate pedestrian movements to and from the site.
- 2.1.13 A pedestrian crossing could be considered between the two vehicular access points in order to provide access from the northern parcel to the southern parcel. This would connect the two site's PRow's and internal road/pedestrian networks and allow for through access for both sites, enhancing the accessibility of both sites and their adjoining pedestrian networks.

Local Walking Routes

- 2.1.14 Given the sites' locations on the western edge of Trowbridge, the majority of walking routes are generally within Trowbridge to the east of the site.
- 2.1.15 The following represents a selection of potential key routes to local attractors within close proximity to the site which are considered suitable as walking routes:
- Route 1 - Southern parcel to the Manor Road Stores, Clarendon Academy (Secondary School), Wiltshire College, Studley Green Primary School, Green Shoots day nursery and Trowbridge Sports Centre via the existing PRow southern pedestrian access and Manor Road.
 - Route 2 - Both parcels to the Town Centre and railway station via Studley Green Community Centre, St John's Primary School, Wildbrook Medical Practice and the John of Gaunt School and St Augustine's College. Accessed via A366 vehicular access points (if pedestrianised) and the A366 Wingfield Road.
 - Route 3 - Northern parcel to Walwayne Court Primary School and Tesco Express via pedestrian central eastern access onto Sherborne Road and link to Brook Road or via Brook Road access for those situated further south within the site.
 - Route 4 – Northern parcel secondary access at Brook Road connecting to Route 2 (A366 Wingfield Road). Quiet, pedestrian friendly connection south from Brook Road access and along Fairleigh Avenue, joining up with route 2.

2.1.16 These routes are displayed at Figure 2.2.

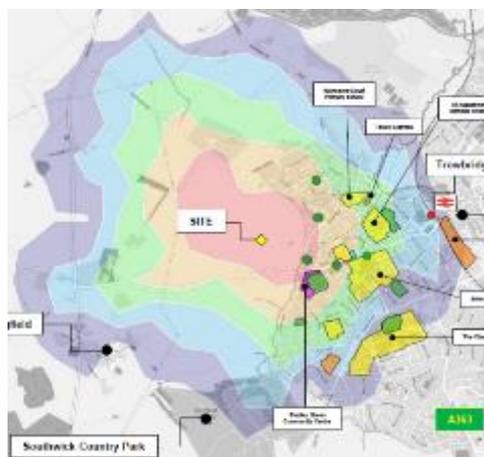


Figure 2.2: Local walking routes

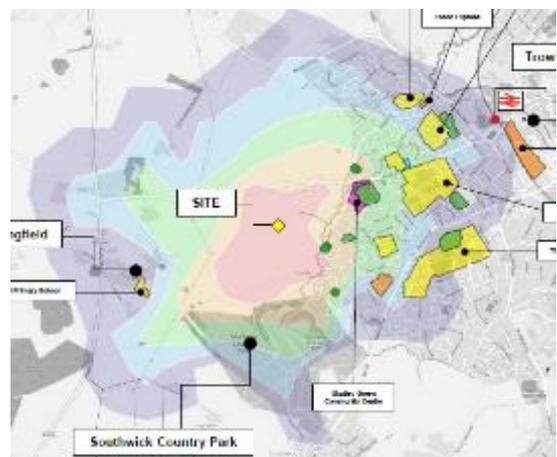
Walking time analysis isochrone plans

2.1.17 An analysis of walking journey times has been undertaken using TRACC Basemap software. This provides an illustrative output in isochrone form as to the potential connectivity of the site and their journey times to local destinations/facilities.

2.1.18 An extract of this analysis is provided below, with the full plans included at Appendix B and Appendix C respectively.



Northern site: walking time analysis extract (2km)



Southern site: walking time analysis extract (2km)

2.1.19 As is demonstrated, a range of local services and facilities are located within recommended walking distances.

2.2 Cycling

2.2.1 There are a number of dedicated national, regional and local cycle routes within the vicinity of the site. Furthermore, as the site is located on the edge of Trowbridge, residential suburbs to the east of the site are considered suitable for on-street cycling including the A366 Wingfield Road to the east of the site, which contains a shared pedestrian footway and cycleway.

2.2.2 The National Cycle Network (NCN) Route 4 passes through to the south of Bradford-on-Avon, within 3km north of the site. There is an NCN link which provides access to the route from Trowbridge approximately 2.8km east of the site.

2.2.3 In addition to this, Wiltshire cycleway joins up with NCN 4 at a point 3km north of the site, before deviating from the route, instead passing some 4km west of the site. The Wiltshire cycleway is a ring route around Wiltshire, passing through areas including Malmesbury, Bradford-on-Avon and Salisbury.

2.2.4 Cycling routes in the vicinity of the site are displayed at Figure 2.3.

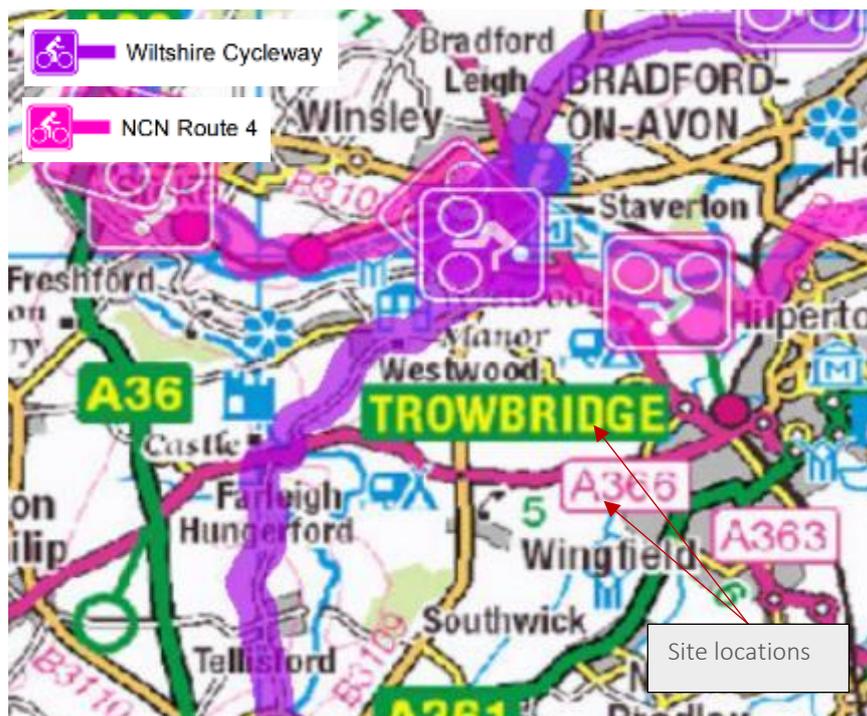


Figure 2.3: Cycling Routes in the vicinity of Trowbridge

2.2.5 In addition to the existing cycle infrastructure within the vicinity of the site, the Wiltshire Local Plan Transport Review (January 2021) proposes a series of new radial cycle routes that focus on connecting new developments with the town centre and Trowbridge railway station. These routes consist of on-carriageway cycle lanes as well as segregated two-way cycle tracks, facilitating cycle transport from the site to a range of attractors to the east, enhancing the site's overall cycling connectivity. Proposed routes within the vicinity of the site include the A366 on-carriageway cycle lane less than 100m from the site's eastern boundary, and the Frome Road on-carriageway cycle lane just 600m south-east of the southern parcel's south-eastern boundary.

2.2.6 A map of the proposed routes has been extracted from the Wiltshire Local Plan Transport Review and provided at Figure 2.4.

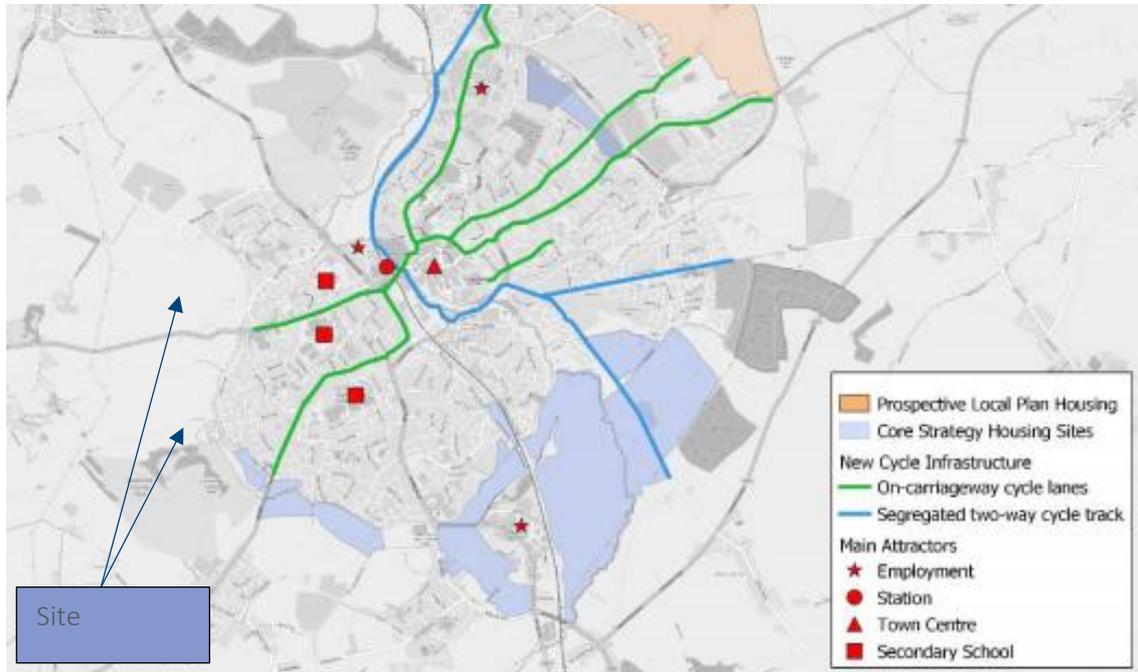
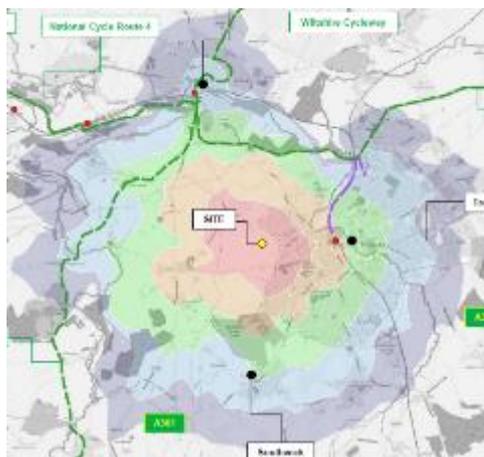


Figure 2.4: Proposed cycling routes as shown in Wiltshire Local Plan Transport Review

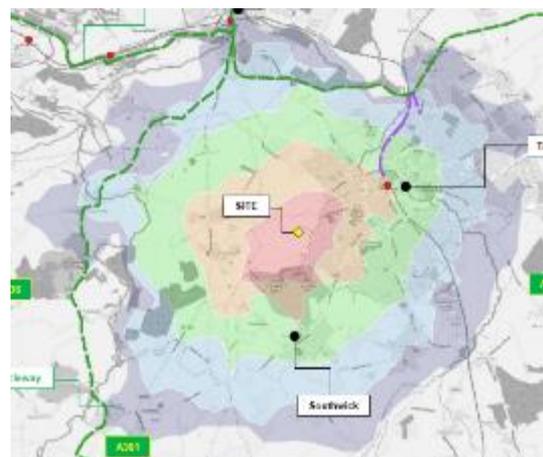
Cycle time analysis isochrone plans

2.2.7 An analysis of cycle journey times has been undertaken using TRACC Basemap software. This provides an illustrative output in isochrone form as to the potential connectivity of the site and their journey times to local destinations/facilities.

2.2.8 An extract of this analysis is provided below, with the full plans included at Appendix B and Appendix C respectively.



Northern site: cycle time analysis extract (5km)



Southern site: cycle time analysis extract (5km)

2.2.9 As is demonstrated, a range of local services and facilities are located within recommended cycle distances.

2.3 Local Facilities and Services

- 2.3.1 Manual for Streets (paragraph 4.4.1) states that ‘walkable neighbourhoods’ are typically characterised by having a range of facilities within 10 minutes (up to 800m) walking distance of residential areas which residents may access comfortably on foot.
- 2.3.2 Paragraph 2.2 of TA91/05 Provision for Non-Motorised Users states that 2 miles is ‘a distance that could easily be walked by the majority of people’. Paragraph 2.3 also continues by stating that ‘Walking is used to access a wide variety of destinations including educational facilities, shops, and places of work, normally within a range of up to 2 miles’ (3.2km).
- 2.3.3 In relation to shorter trips in particular, the CIHT publication Planning for Walking (section 2.1) states that across Britain about ‘80% of journeys shorter than 1 mile (1.6km) are made wholly on foot’.
- 2.3.4 As it is located on the periphery of the town of Trowbridge, the site is within recommended walking distance to a range of services and facilities.
- 2.3.5 With regard to cycling, TA91/05 goes on to state (in paragraph 2.11) that ‘Cycling is used for accessing a variety of different destinations, including educational facilities shops and places of work, up to a range of around 5 miles. Cycling is also undertaken as a leisure activity, often over much longer distances.’ At paragraph 2.9, TA91/05 states that 5 miles (8km) is a distance ‘that could easily be cycled by the majority of people’.
- 2.3.6 This is consistent with the statement in LTN1/20 Cycle Infrastructure Design (in paragraph 2.2.2) that ‘Two out of every three personal trips are less than five miles in length – an achievable distance to cycle for most people’.
- 2.3.7 Table 2.1 provides a summary of the local facilities and amenities within the vicinity of the site, and a local services and facilities plan (reference: 10711-HYD-XX-XX-DR-TP-0601) is included at Appendix A.
- 2.3.8 For the purpose of this exercise the site has been divided into the respective northern and southern parcels and distances have been measured from the centre point of each site, though in practice a significant proportion of housing will be closer to facilities and amenities than the figures given.

Table 2.1: Key Local Facilities and Amenities

	Distance (m)		Walking Time (min) (80 metres per minute)		Cycling Time (min) (320 metres per minute)	
	North	South	North	South	North	South
Local Public Transport						
Farleigh Avenue Bus Stops	570	900	7	11	2	3
St Johns Crescent Bus Stops	1,200	400	5	15	4	1
Hungerford Avenue Bus Stops	900	1,000	11	12	3	3
Kingswood Chase Bus Stop	1,300	500	16	6	4	2
Trowbridge Rail Station	1,900	2,000	24	25	6	7
Local Shops/Supermarkets						
One Stop	1,300	1,000	16	12	4	3
Manor Road Stores	950	500	12	6	3	2

Brook Road Local Centre; Tesco Express, chemist and takeaway	1,250	1,600	16	20	4	5
Tesco Express	2,200	1,100	27	14	7	4
Asda	2,000	2,000	25	25	7	7
Aldi	2,500	2,200	31	27	8	7
The Gateway Shopping Centre	2,000	1,900	25	23	7	6
Town Centre	2,000	1,900	25	23	7	6
Education						
YMCA Green Shoots Nursery	1,300	1,000	16	12	4	3
The John of Gaunt School	1,300	1,300	16	16	4	4
Studley Green Primary School	1,300	1,000	16	12	4	3
Wiltshire College	1,900	1,200	23	15	7	4
The Mead Primary School	2,500	1,250	31	15	8	4
Walwayne Court Primary School	1,200	1,600	15	20	4	5
Upper Studley Pre-School	1,900	1,200	23	15	7	4
See Saw Nursery	1,600	1,600	20	20	5	5
Healthcare						
Widbrook Medical Practice	1,100	1,100	13	13	3	3
BUPA Dentalcare	1,800	1,800	22	22	6	6
Mortimer St Dental Practice	2,500	2,500	31	31	8	8
Trowbridge Community Hospital	2,700	2,800	34	35	9	9
Community Use / Leisure						
Studley Green Community Centre	800	900	10	11	2	3
Southwick Country Park	1,800	800	23	10	6	3
Trowbridge Sports Centre	2,100	1,600	26	20	7	5
Employment						
Trowbridge Town Centre	2,000	2,000	25	25	7	7
County Hall and Civic Buildings	2,400	2,400	30	30	8	8
Riverway Industrial Estate	2,200	2,400	28	30	7	8
White Horse Business Park	4,000	3,300	50	41	13	10

*-Providing for Journeys on Foot (CIHT, 2000)

**- Department for Transport, Local Transport Note 2/08

2.3.9 There are a number of services and amenities within acceptable walking and cycling distances of the site. These are accessible via a mix of pedestrian footways and on road cycle facilities. The close proximity of these uses will encourage walking and cycling for potential residents. The location of the

site on the edge of the existing settlement of Trowbridge allows the site to take advantage of the existing, well established residential connections. This will reduce the reliance on the private car and encourage sustainable, active modes of transport.

2.4 Public Transport

- 2.4.1 Farleigh Avenue bus stop is located approximately 650m east of the two sites' main vehicular access points and is adjacent to the northern parcel's proposed Brook Road secondary access. It currently consists of a bus stop flag and no additional infrastructure. It is served by bus services 65 and 65a.
- 2.4.2 Kingswood Chase bus stop is located in close proximity to the southern parcel, near to the existing PRoW that crosses over Lambrok Stream and provides pedestrian access to the southern site. This stop also currently consists of a bus stop flag and no additional infrastructure. It is served by bus services 60 and 65a.
- 2.4.3 Bus service 60 provides an hourly connection to Trowbridge town centre (16 minute travel time) between 0846 and 1646. This bus service only operates during weekdays. Bus Service 65A provides a similar service to service 60 on a Saturday.
- 2.4.4 Hungerford Avenue bus stops are located just 800m east of the site's vehicular access points. Again, these stops consist of bus stop flags and no additional infrastructure. These stops are served by routes 65, 65A, 94, 98 and X47.
- 2.4.5 A summary of the local bus services is provided at Table 2.2.

Table 2.2: Summary of Local Bus Services

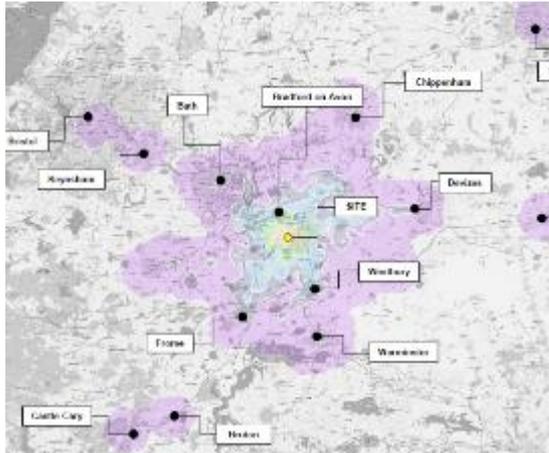
Bus Stop	Service	Route	Weekday First/Last Bus	Weekday Frequency	Weekend Frequency
Farleigh Avenue	65	Trowbridge Town Hall - Broadmead Estate	09:13/14:13	6 Services	-
	65a	Trowbridge Town Hall - Broadmead Estate	-	-	6 Services (Saturday Only)
Kingswood Chase	60	Trowbridge Town Hall - Studley Green via Wiltshire Drive	08:37/17:10	9 Services	-
	65a	Trowbridge Town Hall - Broadmead Estate	-	-	6 Services (Saturday Only)
Hungerford Avenue West Bound	65	Trowbridge Town Hall - Broadmead Estate	09:13/14:13	6 Services	-
	65a	Trowbridge Town Hall - Broadmead Estate	-	-	6 Services (Saturday Only)
	94	Trowbridge - Bath City Centre	11:11/15:16	3 Services	-
Hungerford Avenue East Bound	94	Bath City Centre - Trowbridge	08:50/12:59	3 Services	-
	X47	Frome - Trowbridge	08:19	1 Service	-

Rail

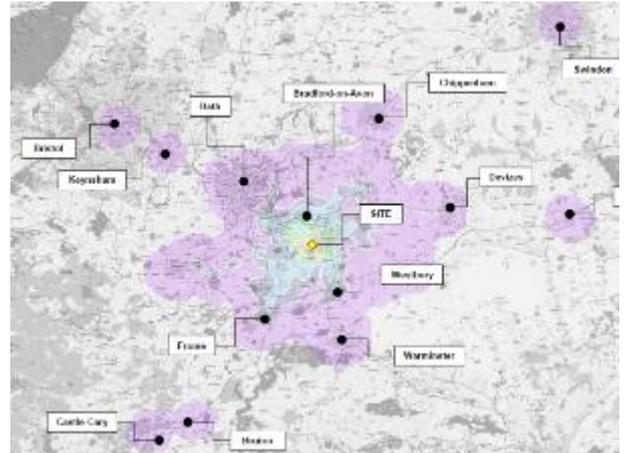
- 2.4.6 Trowbridge railway station is located 1.3km to the east of the site. The railway station offers frequent Great Western Railway (GWR) services to a range of commuting destinations including Bristol, Swindon, Gloucester and Chippenham.

Public transport journey time analysis isochrone plans

- 2.4.7 An analysis of public transport journey times (bus and rail) has been undertaken using TRACC Basemap software. This provides an illustrative output in isochrone form as to the potential connectivity of the site and their journey times to local destinations/facilities.
- 2.4.8 An extract of this analysis is provided below, with the full plans included at Appendix B and Appendix C respectively.



Northern site: public transport journey time analysis extract (60 minutes)



Southern site: public transport journey time analysis extract (60 minutes)

- 2.4.9 As is demonstrated, a range of key destinations are located within 60 minutes of the site by public transport, including Bristol, Bath, Chippenham and Swindon.

3. VEHICULAR ACCESS

3.1 Overview

3.1.1 Vehicular access to both the northern and southern parcels of land can be achieved in a number of locations, as both sites have a significant highway frontage. Primarily, vehicular access options are from the A366 for both sites, and additionally Westwood Road for the northern parcel.

3.2 Northern Parcel

3.2.1 The concept masterplan prepared by the Environmental Dimension Partnership (EDP) provides details of the locations in which vehicular access could be taken for the northern parcel of land, as displayed at Figure 3.1.



Figure 3.1: EDP Concept Masterplan (Northern Parcel)

3.2.2 Vehicular access is achievable and could be taken from Westwood Road to the north of the site as well as along the A366 at the south-east corner of the site. There is also the option to provide a further vehicular access along Brook Road at the south-eastern corner of the site. Internal roads within the site could connect these three vehicular access points.

3.2.3 It is assumed that the A366 vehicular access point would likely be the most utilised access among those travelling to and from the site due to the wider connectivity of the A366 as opposed to Westwood Road. This includes connections directly to Trowbridge town centre and Trowbridge railway station to the east as well as the B3109, A36 and the A362 to the west.

3.2.4 A fourth vehicular access point could be achieved within the south-west corner of the site where there are two extant gated access points to the field.

- 3.2.5 Provision of multiple access points is beneficial in that it would provide permeability and allow residents/visitors to travel along desire lines. In addition, alternative access options are beneficial in an emergency event.
- 3.2.6 An access onto the A366 is likely to take the form of a ghost island right turn priority junction. This junction arrangement would be dependent on traffic flows along the A366. A signalised junction could be considered if high two-way flows on the A366 cause significant queues to arise from a priority junction arrangement.

3.3 Southern Parcel

- 3.3.1 The southern parcel and the potential vehicular access options are displayed below at Figure 3.2.



Figure 3.2: Indicative Site Location and Vehicular Access Options

- 3.3.2 An access at either of the locations displayed at Figure 3.2 would likely take the form of a ghost island right turn priority junction. Again, this would be dependent upon two-way flows on the A366 as these could potentially impact on inbound and outbound movements to and from the development. If two-way flows are considered too high on the A366 to allow for these movements without causing significant queues, then a signalised junction may have to be considered instead. Providing an access in both locations would aid permeability.
 - 3.3.3 Access A is beneficial in that the stretch of road upon which it is situated has a straight alignment. Therefore, it is likely to be able to comfortably offer adequate visibility splays of 215m in either direction.
- ### 3.4 Other Access Considerations
- 3.4.1 To allow for access to the northern and southern parcels along the same stretch of the A366, it would likely be required that the 40mph speed limit which commences to the east of the site is extended to include this stretch of the road adjacent to the site access points. This would allow for suitable visibility splays at the site access points and reduce vehicle speeds past the site frontage.

3.4.2 The location of all of these potential access points provides a direct beneficial connection with one of the key arterial routes into Trowbridge.

4. CONCLUSION

4.1.1 This Technical Note concludes that the sites are considered to be accessible and sustainable. They are located within appropriate walking/cycling distance or public transport journey time of a range of local services and facilities within Trowbridge and beyond.

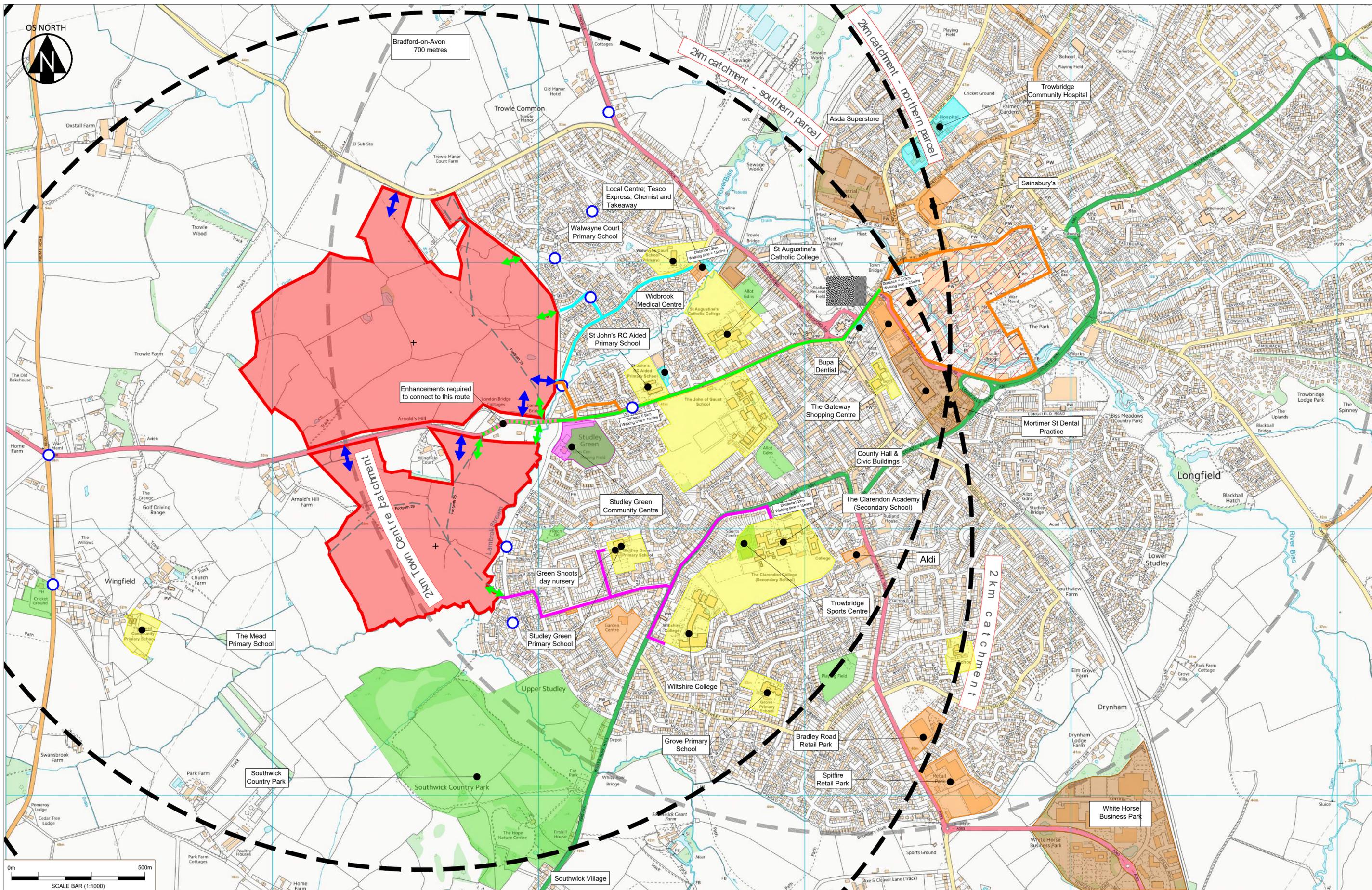
4.1.2 The sites are greenfields currently, with the desire line for neighbouring residents being predominantly to the east. As such, there is limited pedestrian infrastructure serving the sites. However, upgrades have been identified to connect the sites to existing infrastructure.

4.1.3 A range of vehicle access options exists to serve the respective sites, with both sites being able to achieve access via the A366 and the northern parcel having additional highway frontage onto Westwood Road and Brook Road. Further investigation is needed in terms of highway boundary information, and designs progressed, but no in-principle constraints have been identified.

4.1.4 In summary the sites can be accessed by sustainable means including walking, cycling and public transport. It is demonstrated that the sites can be connected to key local facilities and amenities within the surrounding area via an established network of walking and cycling routes.

Appendix A Services and facilities plan

OS NORTH



Key

	Site Boundary		Retail		Railway Station
	Community Use		Health		Local bus stops
	Education		Leisure / recreation		Approximate Location for Vehicular Access Option
	Employment		Town Centre		Potential pedestrian and cycle connections

Key Walking Routes (distances shown taken from centre of site)

	Route 1: Educational uses from southern parcel
	Route 2: Town Centre and associated uses from both parcels
	Route 2: Section requires additional footways to provide connection
	Route 3: Brook Road facilities from northern parcel
	Route 4 - Northern Parcel Secondary Access (Brook Rd)

NOTES

1. Plan is for information purposes only.
2. Plan has been based on latest masterplan information (Ref: EDP/2022/08).
3. Walking times are based on an 80 metres per minute pace.
4. Distances are indicative only, calculated using google maps and are taken from a location within the centre of the site.

NOTES (CONTINUED)

NOTES (CONTINUED)

NOTES (CONTINUED)

REVISIONS (CONTINUED)

REVISIONS

Rev	Date	Description	By	Old App
PO1	01/03/2021	First Issue	GP	RM

REVISIONS

REVISIONS

REVISIONS

Hydrock

CLIENT
Barratt Homes Bristol / Vistry

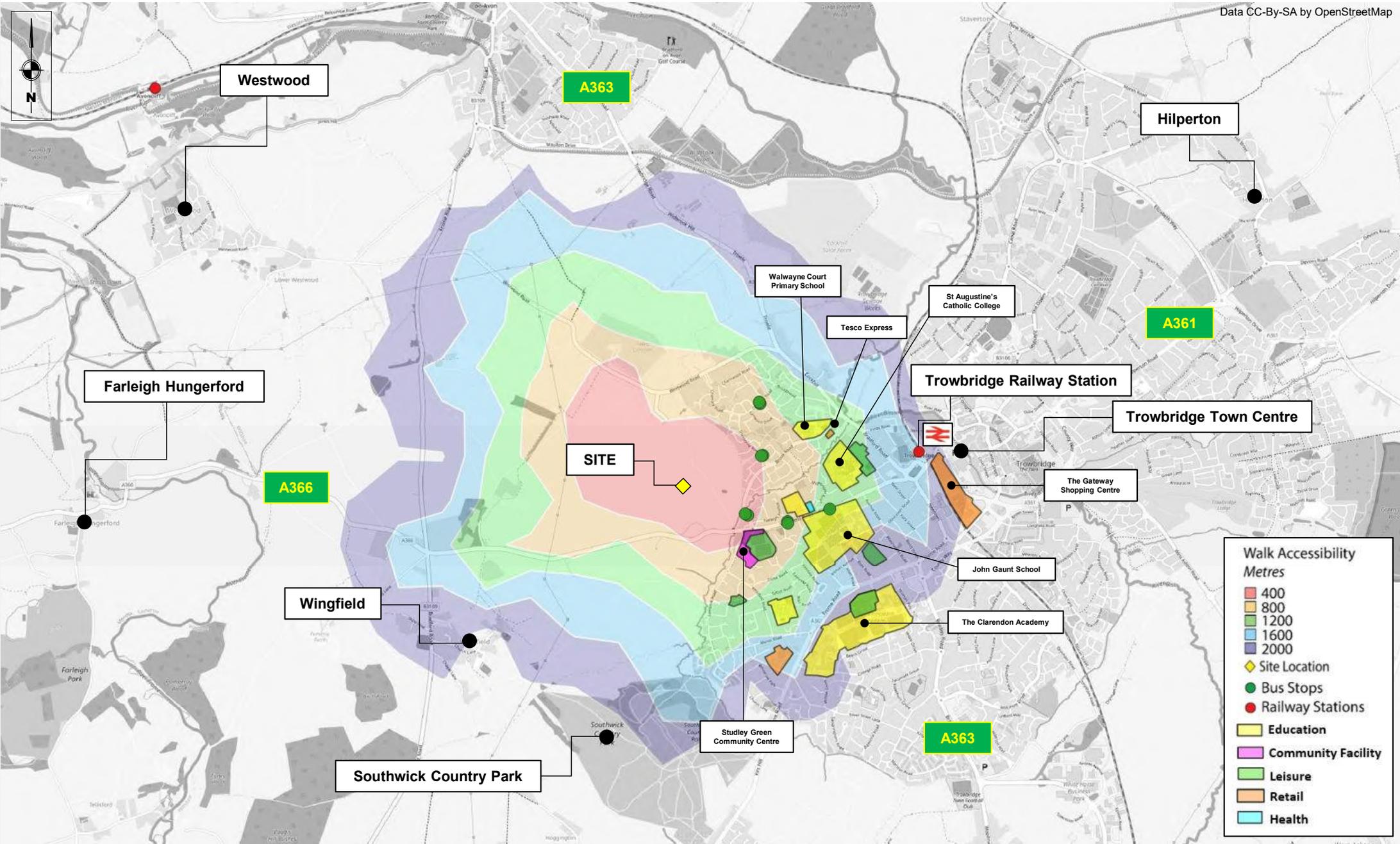
PROJECT
Arnold's Hill Farm Trowbridge

OVER COURT BARRS
OVER LANE
ALMOROSBURY
BRISTOL
BS31 4GF
T: +44 (0) 1454 610333
E: info@hydrock.com

Existing Local Facilities and Services Plan

HYDROCK PROJECT NO: C-10711-C	SCALE @ A2 1:1000	STATUS S2
FOR INFORMATION DRAWING NO: 10711-HYD-XX-XX-DR-TP-0601	PROJECT DESCRIPTION Arnold's Hill Farm Trowbridge	REVISION P01

Appendix B Northern site journey time analysis plans (TRACC)



Project Title
**Arnolds Farm, Trowbridge
 (Vistry Northern Parcel)**

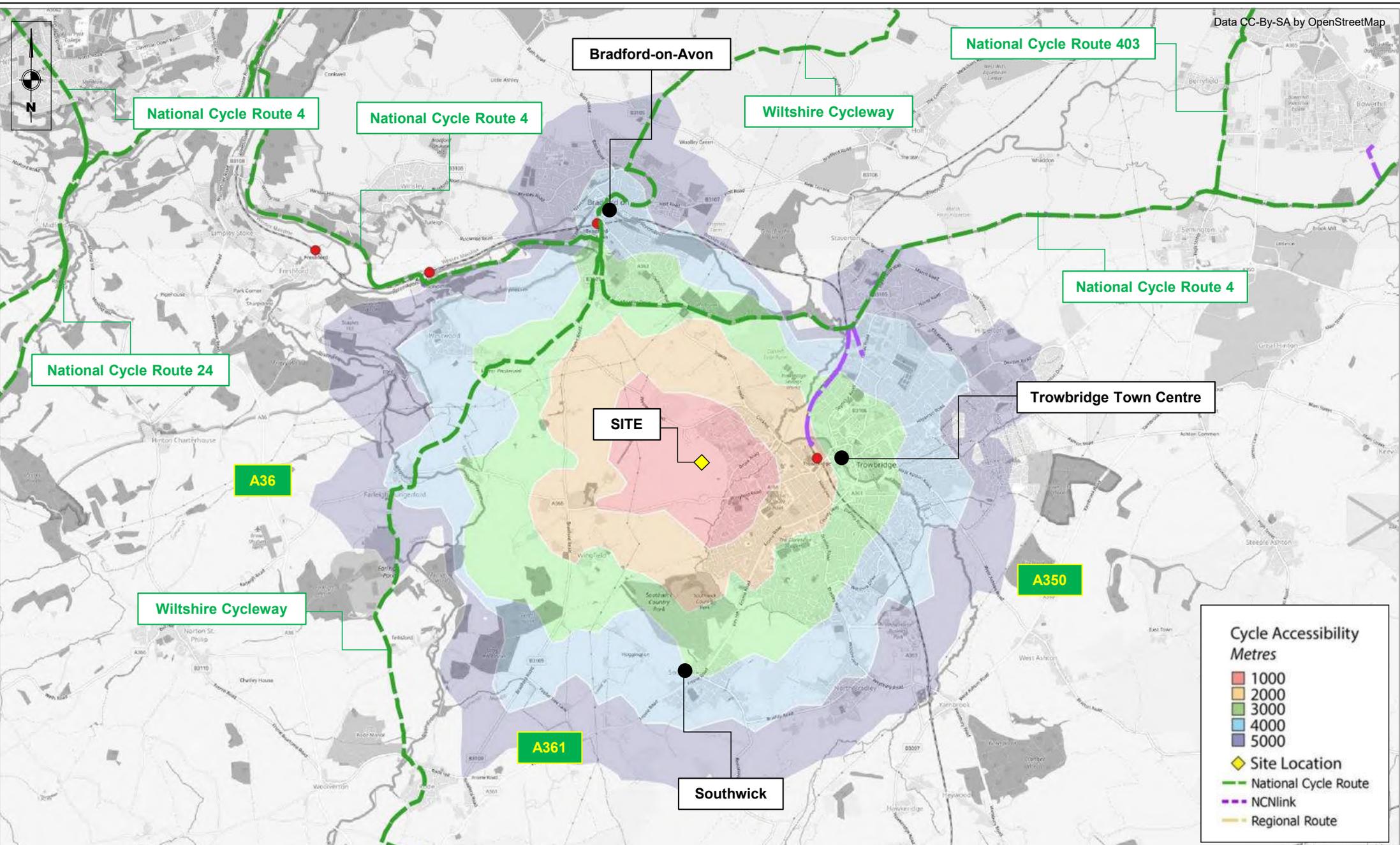
Drawing Title
**Accessibility: 2km Walking
 Catchment**

Job Number	10711	By	SG
Date	26.02.2021	Checked	CR
Scale	NTS	Status	-

Rev	Description	Date	By
P01	2km Walking Catchment	26/02/21	SG
-	-	-	-
-	-	-	-
-	-	-	-

Drawing No.
0001

Figure
1



Project Title
 Arnolds Farm, Trowbridge
 (Vistry Northern Parcel)

Drawing Title
 Accessibility: 5km Cycling
 Catchment

Job Number
 10711

Date
 26.02.2021

Scale
 NTS

By
 SG

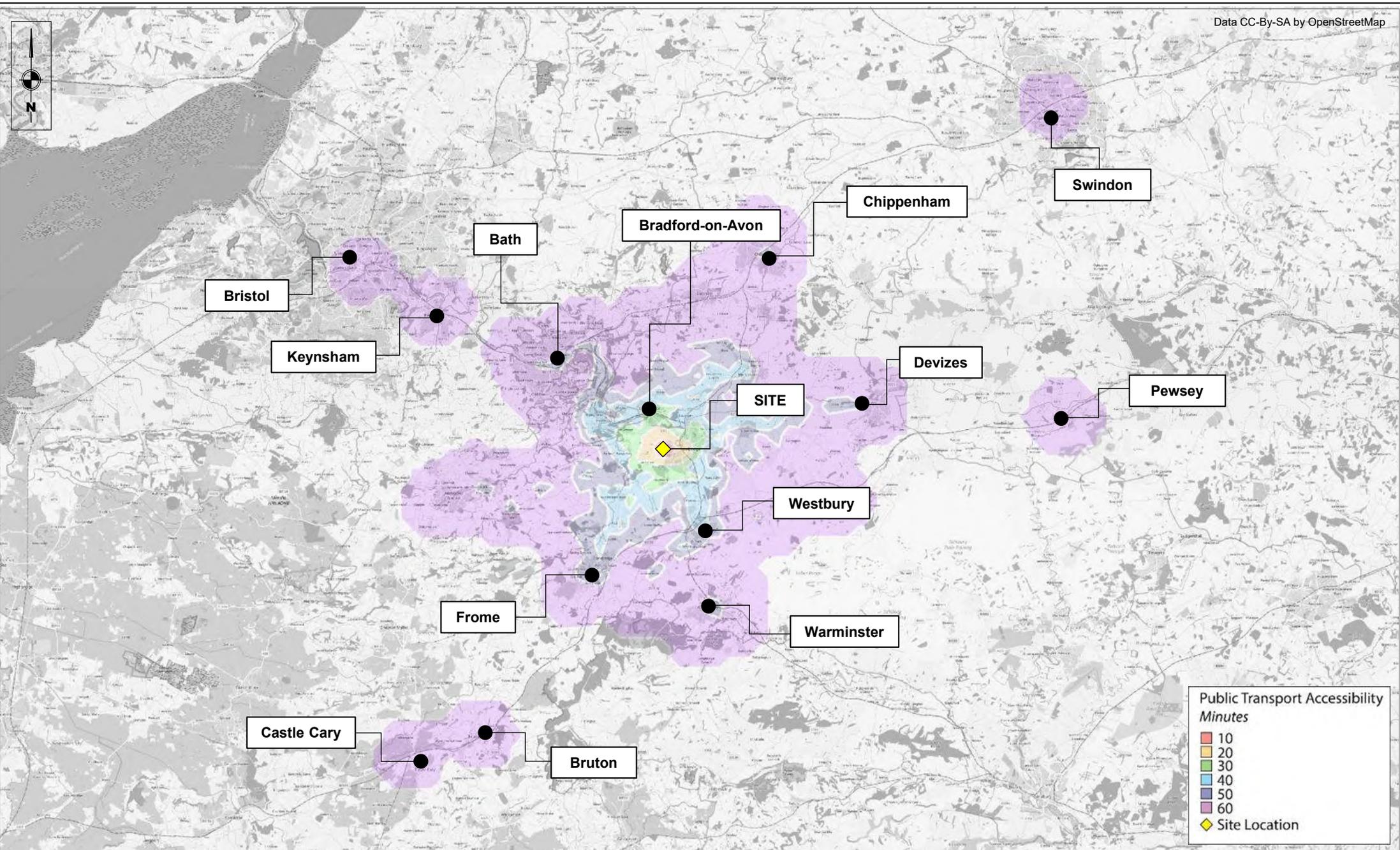
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Rev	Description	Date	By
P01	5km Cycling Catchment	26/02/21	SG
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-	-	-	-
-	-	-	-

Drawing No.
 0002

Figure
 2



Public Transport Accessibility Minutes

- 10
- 20
- 30
- 40
- 50
- 60
- ◆ Site Location



Project Title
 Arnolds Farm, Trowbridge
 (Vistry Northern Parcel)

Drawing Title
 Accessibility: 60minute Public
 Transport Catchment

Job Number
 10711

Date
 26.02.2021

Scale
 NTS

By
 SG

Checked
 CR

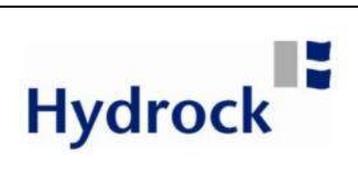
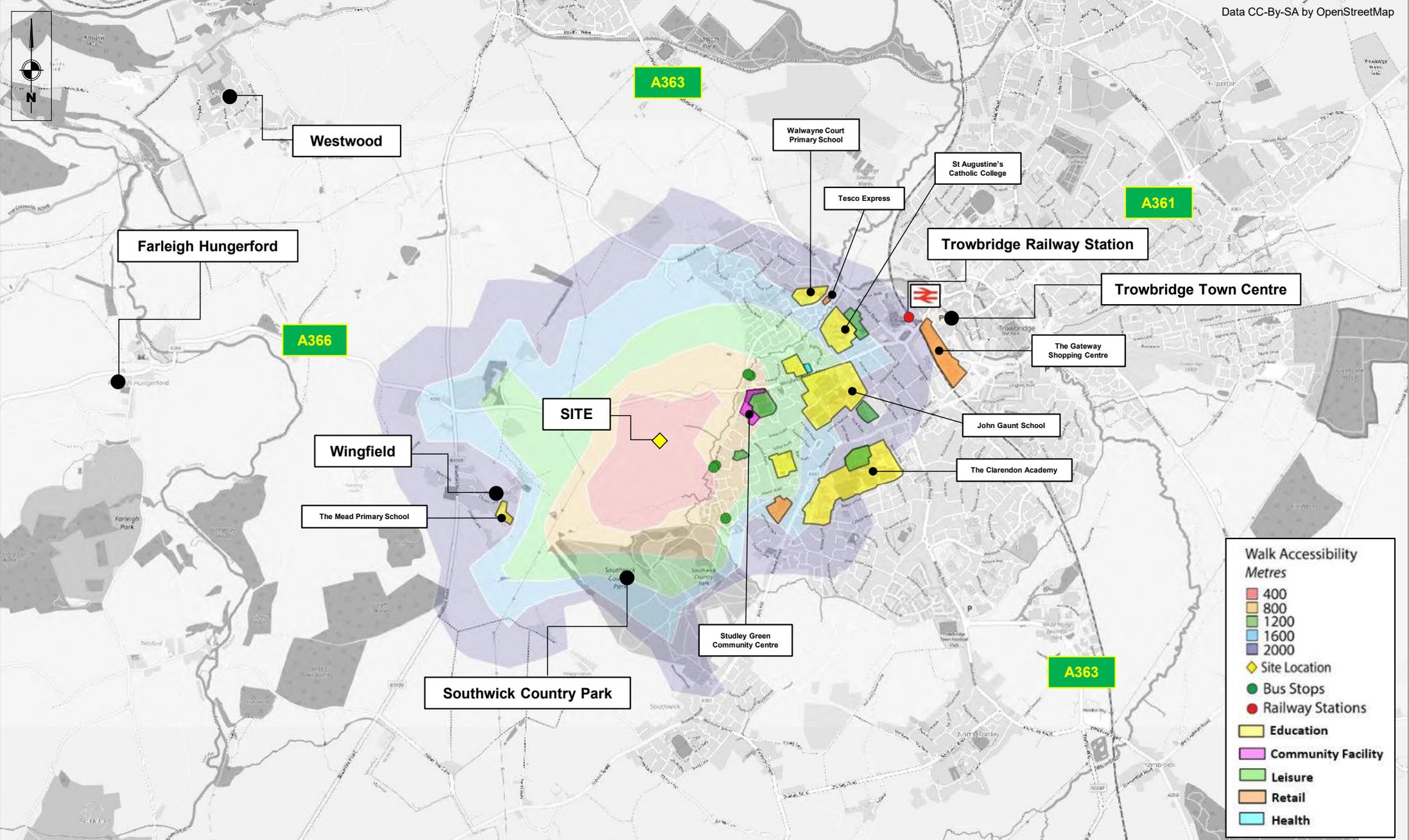
Status
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Rev	Description	Date	By
P01	Public Transport Catchment	26/02/21	SG
-	-	-	-
-	-	-	-
-	-	-	-

Drawing No.
 0003

Figure
 3

Appendix C Southern site journey time analysis plans (TRACC)



Project Title
**Arnolds Farm, Trowbridge
 (Barratts Southern Parcel)**

Drawing Title
**Accessibility: 2km Walking
 Catchment**

Job Number
10711

Date
26.02.2021

Scale
NTS

By
SG

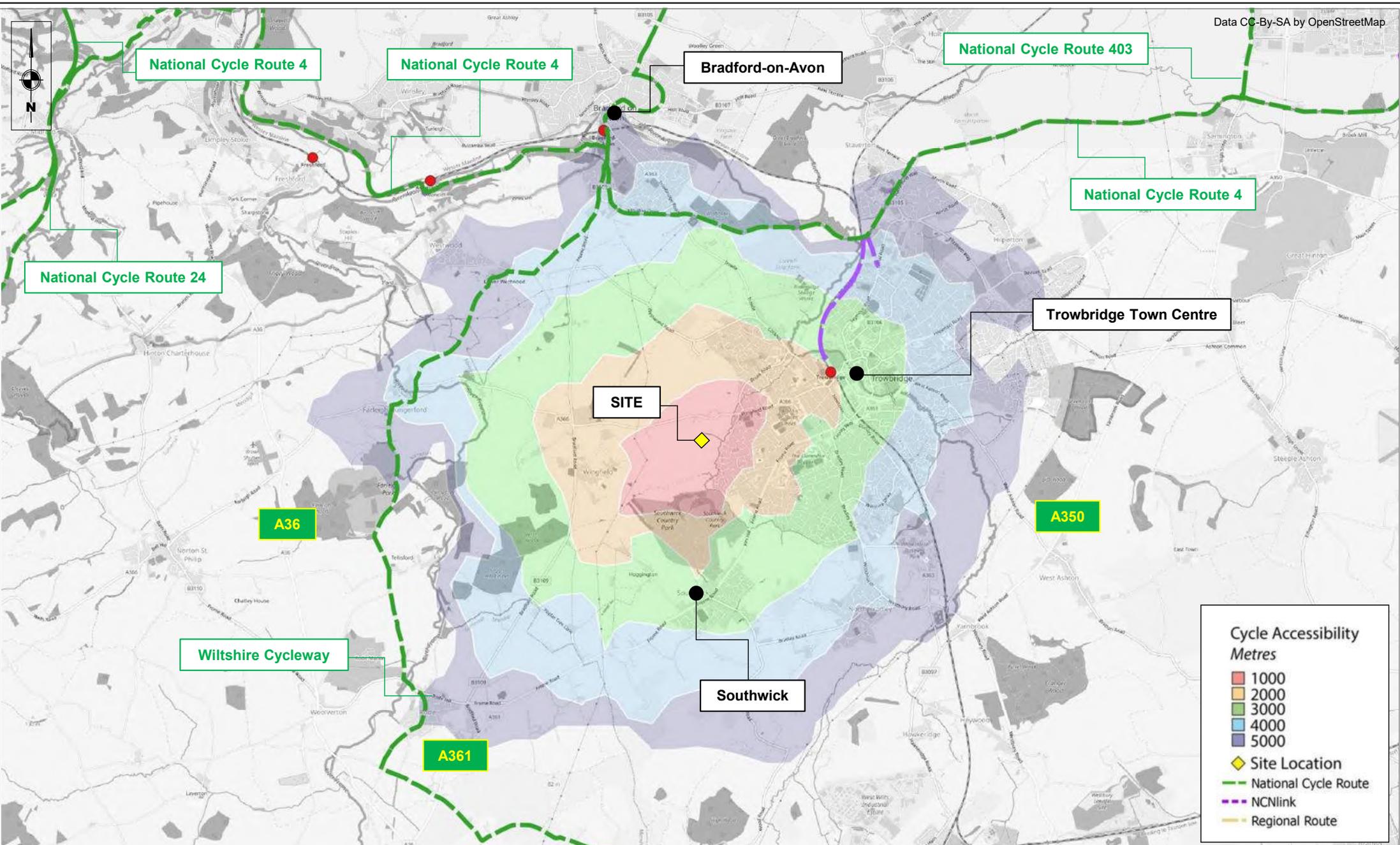
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Status
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Rev	Description	Date	By
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-	-	-	-
-	-	-	-

Drawing No.
0004

Figure
4



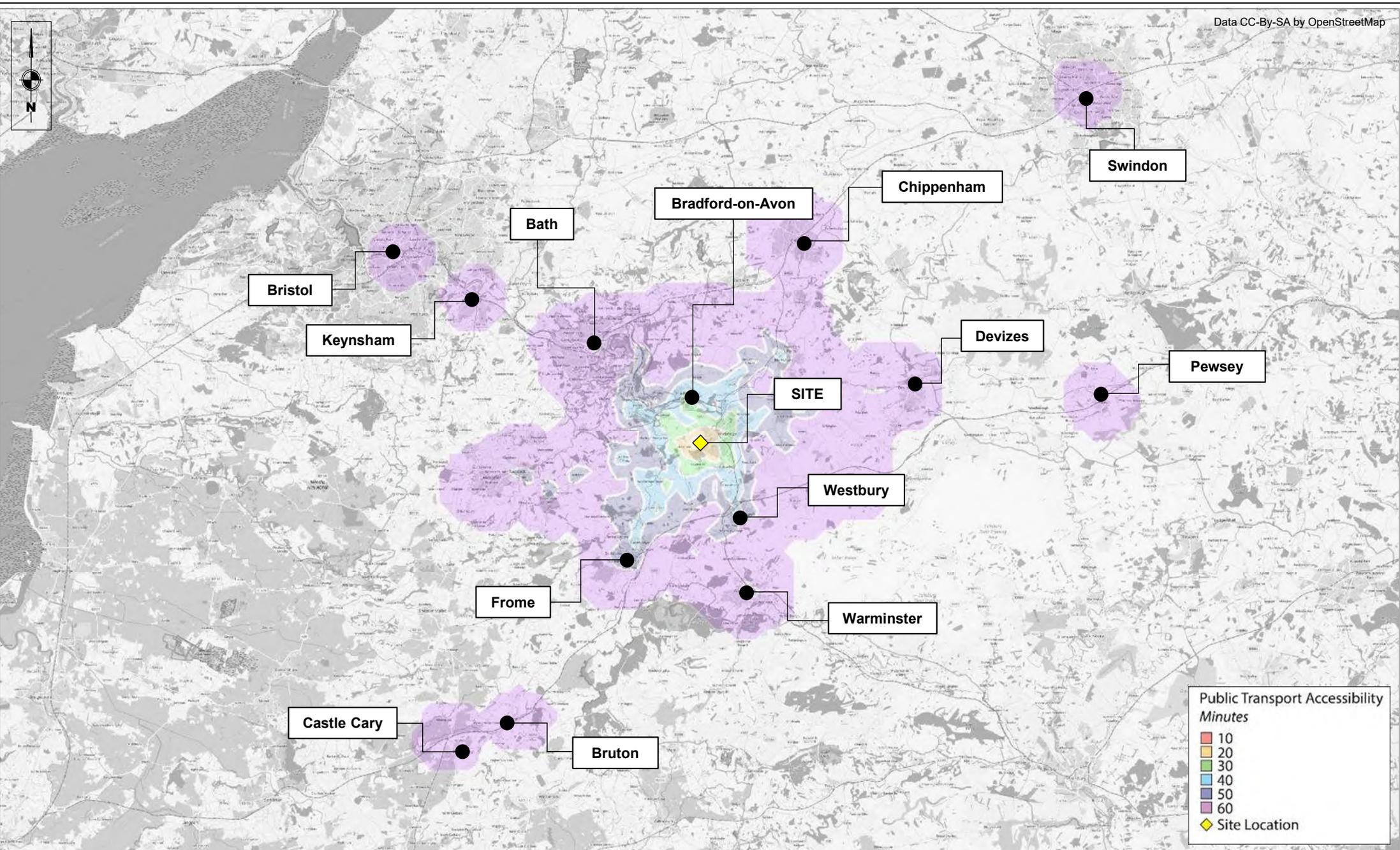
Project Title	Arnolds Farm, Trowbridge (Barratts Southern Parcel)
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Drawing Title	Accessibility: 5km Cycling Catchment
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Job Number	10711	By	SG
Date	26.02.2021	Checked	CR
Scale	NTS	Status	-

Rev	Description	Date	By
P01	5km Cycling Catchment	26/02/21	SG
-	-	-	-
-	-	-	-
-	-	-	-

Drawing No.	0005
Figure	5



Public Transport Accessibility Minutes

- 10
- 20
- 30
- 40
- 50
- 60
- ◆ Site Location



Project Title
 Arnolds Farm, Trowbridge
 (Barratts Southern Parcel)

Drawing Title
 Accessibility: 60minute Public
 Transport Catchment

Job Number
 10711

Date
 26.02.2021

Scale
 NTS

By
 SG

Checked
 CR

Status
 -

Rev	Description	Date	By
P01	Public Transport Catchment	26/02/21	SG
-	-	-	-
-	-	-	-
-	-	-	-

Drawing No.
 0006

Figure
 6



Appendix 3 – Preliminary Landscape and Visual Appraisal and Green Belt Assessment



**Land West of
Trowbridge**

**Preliminary
Landscape and
Visual Appraisal
and Green Belt
Assessment**

Prepared by:
**The Environmental
Dimension
Partnership Ltd**

On behalf of:
**Vistry Group and
Barratt Homes**

March 2021
Report Reference
edp2822_r002a

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Section 2	Findings of Data Trawl	3
Section 3	Landscape Character.....	11
Section 4	Visual Matters.....	19
Section 5	Mitigation and Developable Area	27
Section 6	Green Belt Assessment	29

Appendices

- Appendix EDP 1** Green Belt Assessment Methodology and Criteria
- Appendix EDP 2** Green Belt Assessment
- Appendix EDP 3** Concept Masterplan

Plans

- Plan EDP 1** Site Location and Environmental Planning Context
(edp2822_d009a 08 March 2021 GY/TR)
- Plan EDP 2** Landscape, Visual and Ecological Analysis
(edp2822_d010a 08 March 2021 GY/TR)

This version is intended for electronic viewing only

	Report Ref: edp2822_r002			
	Author	Formatted	Peer Review	Proofed by/Date
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002a	TR	-	CJM	JM 080321

Section 1 Introduction

- 1.1 The Environmental Dimension Partnership (EDP) Ltd have been appointed by Vistry Group and Barratt Homes (Vistry and Barratt) to prepare a preliminary Landscape and Visual Appraisal and Green Belt Review to inform concept masterplanning for potential residential development at Land West of Trowbridge ('the site').
- 1.2 The site location and boundary are shown on **Plan EDP 1** ('Site Location and Environmental Planning Context') with an aerial photograph at **Image EDP 1.1** below. The site abuts the western edge of Trowbridge, Wiltshire and comprises 'Land North of Westwood Road', ('Vistry land'), and 'Arnolds Hill Farm, Trowbridge' south of Westwood Road ('Barratt land').
- 1.3 The main aims of the study are to review the site in respect of its location within the Green Belt (GB) and to inform an early opinion on the potential capacity and design considerations of the site in terms of landscape and visual matters. This work is to inform next steps towards potential residential development of the site.
- 1.4 The study advises on the site's landscape and visual constraints and opportunities through the provision of **Plan EDP 2** ('Landscape and Visual Analysis'). This has informed the 'Concept Masterplan' (**Appendix EDP 3**), which illustrates the potential site capacity and design considerations should the site be progressed.
- 1.5 The key issues relating to landscape and visual and GB matters, and the conclusions drawn at this stage, are outlined in the relevant sections which follow.



Image EDP 1.1: Aerial photograph showing the site and context

Information Sources

Desk Study

- 1.6 EDP's landscape and visual study has included preliminary reviews of aerial photographs, web searches, Wiltshire Council (WC) publications and landscape character assessments. EDP has also obtained, where possible, information about relevant landscape and other designations such as Areas of Outstanding Natural Beauty (AONB), conservation areas (CAs), and registered parks and gardens (RPG).
- 1.7 In addition, a preliminary review of the planning policy context for the site has been undertaken, including the Wiltshire Core Strategy Development Plan Document (2015) and, where relevant, saved policies from the previous District Local Plan (West Wiltshire District Plan 1st Alteration – Adopted June 2004).

Field Assessment

- 1.8 A preliminary field assessment of local site circumstances was undertaken in order to corroborate the findings of the desk study with the current condition of the site. Field assessment was undertaken by a qualified landscape architect on 26 June 2015, 26 June and 06 September 2017, and 26 February 2020, from publicly accessible locations only.

Section 2 Findings of Data Trawl

- 2.1 The findings of EDP's data trawl of relevant environmental and planning designations are illustrated on **Plan EDP 1** and summarised in this section.

National Designations and Policy

- 2.2 The site does not contain or fall within any designated landscape. The Cotswold Area of Outstanding Natural Beauty (AONB) falls over 2km to the north-west, where it wraps around the northern edge of Bradford -on-Avon. However, field assessment has found that there is no apparent intervisibility between the site and the AONB and it is not considered further. In addition, the site lies within the Western Wiltshire Green Belt, which is protected by Section 13 of the National Planning Policy Framework (NPPF) 2019¹ and Planning Practice Guidance – Green Belt (22 July 2019)². Green Belt is, primarily, a planning matter rather than one related to the protection of landscape. However, it does relate to aspects of landscape character such as openness.

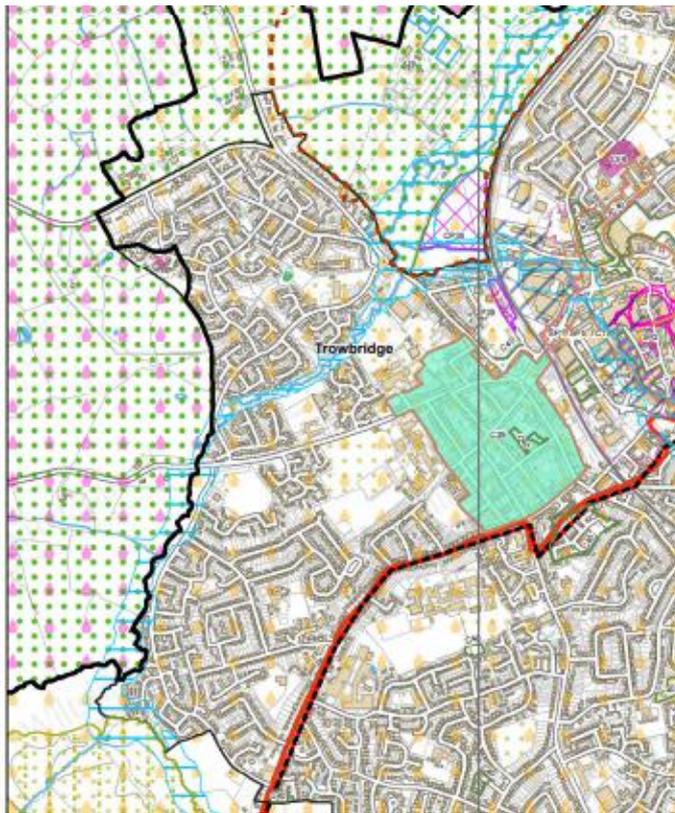
Local Designations and Policy

- 2.3 Relevant documents of the statutory development plan for Wiltshire Unitary Authority comprise the Wiltshire Core Strategy (2015) incorporating saved policies from West Wiltshire District Local Plan³.
- 2.4 An extract of the Core Strategy Policy Map: Insert Map 9: Trowbridge is included at **Image EDP 2.1**. This extract shows relevant policies over the proposed development site and include Green Belt, and Policy CP67 'Flood Risk Zone 2 & 3'. There are no landscape designations identified on the site. However, there are several general policies of relevance to this study as reviewed below.

¹ https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment_data/file/810197/NPPF_Feb_2019_revised.pdf - accessed 02 March 2021

² <https://www.gov.uk/guidance/green-belt> - accessed 02 March 2021

³ <https://www.wiltshire.gov.uk/media/372/Wiltshire-Core-Strategy-adopted-2015/pdf/Wcs.pdf?m=637099399373530000> - accessed 02 March 2021



Legend

- | | |
|---|---|
| Wiltshire Boundary | T4 New Distributor Roads (WWLP) |
| Community Area Boundary | T5 New Link Road (WWLP) |
| CP1 Settlement Framework (WCS) | TC2 Traffic Manage and Pedestrian Priority (WWLP) |
| CP1 Small Village (WCS) | U5 Sewage Treatment Works Buffer Zones (WWLP) |
| H8b, H8c, H11 Residential Allocation (WWLP) | CR2 Country Parks (WWLR DPD) |
| CP2, H4 Mixed Use Allocation (WCS & WWLP) | High Quality and/or High Value Sites (WWLR DPD) |
| E1a Employment Allocation (WWLP) | Low Value Sites (WWLR DPD) |
| CP28 Trowbridge Central Area of Regeneration (WCS) | Railway |
| CP30 Trowbridge Low Carbon Renewable Energy Network (WCS) | Primary Route Network |
| CP35 Principal Employment Area (WCS) | Local Lorry Route |
| CP67 Flood Risk Zone 2 or 3 (WCS) | Strategic Lorry Route |
| C39 Environmental Enhancements (WWLP) | Grade 1 Agricultural Land |
| C40 Tree Planting (WWLP) | Special Area of Conservation or Special Protection Area |
| C41 Areas of Opportunity (WWLP) | Site of Special Scientific Interest |
| CF8, S2, SP2, LE2 Community Facilities (WWLP) | County Wildlife Site |
| SP1, SP5, TC1 Commercial Area Boundary (WWLP) | Parks and Gardens |
| SP4 Primary Retail Frontage (WWLP) | Conservation Area |
| SP6 Local Shopping in Towns and Villages (WWLP) | Green Belt |
| 30% Affordable Housing Zone | 40% Affordable Housing Zone |

Image EDP 2.1: Core Strategy Policy Map: Insert Pap 9: Trowbridge extract

2.5 Saved policies from West Wiltshire District Local Plan of interest here include:

- **Saved Policy C3** ‘Special Landscape Areas’: *“Continue to save. Will be subject to a forthcoming review.”* This policy is not relevant as the site does not fall within, or in close proximity to, any Special Landscape Areas (SLAs);
- **Saved Policy C39** ‘Environmental Enhancement’ relates to the requirement for environmental enhancements in the ‘Newtown’ part of Trowbridge (and other parts of wider Wiltshire), and is therefore not relevant to this site;
- **Saved Policy C40** ‘Tree Planting’ seeks to protect trees with visual amenity value, those subject to Tree Preservation Orders and looks to enhance the town through planting native species characteristic of the local area in certain parts of the town;
- **Saved Policy GB1** ‘Western Wiltshire Green Belt’ is *“No longer relevant as it is covered by the NPPF”*; and
- **Saved Policy GB3** ‘Safeguarded Land Bradford on Avon’ is *“No longer relevant as assessment of housing requirement beyond 2011 has now been undertaken.”*

2.6 Wiltshire Core Strategy (2015) ‘Strategies’ and ‘Core Policies’ of relevance to this study include:

- The ‘Strategy for the Trowbridge Area’ explains what the Spatial Strategy, which is set out in Core Policies 1 and 2, means for the individual Community Areas of Wiltshire, with key elements in landscape terms set out below:

“It is recognised that the villages surrounding Trowbridge, particularly Hilperton, Southwick North Bradley and West Ashton, have separate and distinct identities as villages. Open countryside should be maintained to protect the character and identity of these villages as separate communities. The local communities may wish to consider this matter in more detail in any future community-led neighbourhood planning”; and

“all development in Trowbridge should be sensitive to constraints, such as the local County Wildlife Sites, SSSIs, Ancient Woodland, the Western Wiltshire Greenbelt and areas at risk of flooding.”;

- **Core Policy 50** ‘Biodiversity and geodiversity’ aims to protect features of nature conservation and geological value as part of the design rationale. There is an expectation that such features shall be retained, buffered, and managed favourably in order to maintain their ecological value, connectivity and functionality in the long-term;
- **Core Policy 51** ‘Landscape’ seeks to protect, conserve and enhance Wiltshire’s distinctive landscape character through reference to the European Landscape Convention, as set out below (underlining for emphasis added):

“The European Landscape Convention promotes landscape protection, management and planning, and applies to all landscapes, towns and villages, as well as open countryside; the coast and inland areas; and ordinary or even degraded landscapes, as well as those that are afforded protection. Development on the edges of towns and villages will be broadly controlled in line with Core Policy 3 (Delivery Strategy). However the principal pressure on the landscape arising from new development is erosion of the separate identity, character, visual and functional amenity of settlements and their setting, and impacts on the open countryside. Another challenge is to allow for appropriate development while having full regard to the conservation and enhancement objectives of the most highly valued landscapes including the Areas of Outstanding Natural Beauty (AONBs), New Forest National Park (NFNP) and the Stonehenge and Avebury World Heritage Site (WHS).”

Core Policy 51 also states that *“Work will be undertaken with these LCAs and the AONB Management Plans to establish a Landscape Strategy for Wiltshire early 2015”*. Discussion with the Local Authority Planning department confirms this document is a ‘work in progress’ and is not available currently.

Relevant wording of the full policy is provided below:

“Development should protect, conserve and where possible enhance landscape character and must not have a harmful impact upon landscape character, while any negative impacts must be mitigated as far as possible through sensitive design and landscape measures. Proposals should be informed by and sympathetic to the distinctive character areas identified in the relevant Landscape Character Assessment(s) and any other relevant assessments and studies. In particular, proposals will need to demonstrate that the following aspects of landscape character have been conserved and where possible enhanced through sensitive design, landscape mitigation and enhancement measures:

- i. The locally distinctive pattern and species composition of natural features such as trees, hedgerows, woodland, field boundaries, watercourses and waterbodies;*
- ii. The locally distinctive character of settlements and their landscape settings;*
- iii. The separate identity of settlements and the transition between man-made and natural landscapes at the urban fringe;*
- iv. Visually sensitive skylines, soils, geological and topographical features;*
- v. Landscape features of cultural, historic and heritage value;*
- vi. Important views and visual amenity;*
- vii. Tranquillity and the need to protect against intrusion from light pollution, noise, and motion;*

- viii. *Landscape functions including places to live, work, relax and recreate; and*
- ix. *Special qualities of Areas of Outstanding Natural Beauty (AONBs) and the New Forest National Park, where great weight will be afforded to conserving and enhancing landscapes and scenic beauty.”;*
- **Core Policy 52** ‘Green Infrastructure’ seeks to protect and enhance the green infrastructure (GI) network in Wiltshire, through the provision of the Wiltshire Green Infrastructure Strategy, “*which will define Wiltshire’s existing green infrastructure network, and provide the long term vision, objectives, policy framework, and delivery plan for the enhancement of the network.*”

The policy wording is included below, with key issues relevant to the proposed development underlined:

“Development shall make provision for the retention and enhancement of Wiltshire’s green infrastructure network, and shall ensure that suitable links to the network are provided and maintained. Where development is permitted developers will be required to:

- i. *retain and enhance existing on site green infrastructure;*
- ii. *make provision for accessible open spaces in accordance with the requirements of the adopted Wiltshire Open Space Standards;*
- iii. *put measures in place to ensure appropriate long-term management of any green infrastructure directly related to the development;*
- iv. *provide appropriate contributions towards the delivery of the Wiltshire Green Infrastructure Strategy; and*
- v. *identify and provide opportunities to enhance and improve linkages between the natural and historic landscapes of Wiltshire.*

If damage or loss of existing green infrastructure is unavoidable, the creation of new or replacement green infrastructure equal to or above its current value and quality, that maintains the integrity and functionality of the green infrastructure network, will be required.

Proposals for major development should be accompanied by an audit of the existing green infrastructure within and around the site and a statement demonstrating how this will be retained and enhanced through the development process.

Development will not adversely affect the integrity and value of the green infrastructure network, prejudice the delivery of the Wiltshire Green Infrastructure Strategy, or provide inadequate green infrastructure mitigation.

Green infrastructure projects and initiatives that contribute to the delivery of a high quality and highly valued multi-functional green infrastructure network in accordance with the Wiltshire Green Infrastructure Strategy will be supported.

Contributions (financial or other) to support such projects and initiatives will be required where appropriate from developers.”;

- **Core Policy 57:** ‘Ensuring high quality design and place shaping’ seeks to ensure that the layout and design of new developments is based on a thorough understanding of the site itself and its wider context, and seeks to maximise the benefits of the site’s characteristics; and
- **Core Policy 58** ‘Ensuring the conservation of the historic environment’ aims to protect, conserve and where possible enhance the historic environment including designated heritage assets and their settings and non-designated heritage assets, which contribute to a sense of local character and identity.

Heritage Matters

- 2.7 Heritage assets can influence the visual character of the landscape and enrich its historic value. This report considers heritage features only insofar as they are components of the wider contemporary landscape – not in terms of their significance and value as heritage assets, which is a matter for a heritage consultant.
- 2.8 As illustrated by **Plan EDP 1**, there are no scheduled monuments, registered parks and gardens, registered battlefields or world heritage sites on, or within 2km of, the site. However, the following designated heritage assets fall within 2km of the site:
- 326 listed buildings, primarily within the historic centre of Trowbridge and within Wingfield, including the Grade II* listed church, but also including buildings at Trowle Farm and Arnold’s Hill Farm, which lie between Wingfield and the site boundary; and
 - Trowbridge Conservation Area within the historic centre of Trowbridge.
- 2.9 Within the wider study area, there are also conservation areas across the centre of Bradford on Avon and across Lower Westwood at the eastern end of the village of Westwood. The closest points of both of these conservation areas fall some 2km from the site.

Ecology Matters

- 2.10 Ecology assets can influence the visual character of the landscape and enrich the value of its fabric. This report considers ecology features only insofar as they are components of the wider contemporary landscape – not in terms of their significance and value as ecology assets, which is a matter for an ecology consultant.

- 2.11 The site is not covered by, or adjacent to, any statutory or non-statutory designations for nature conservation.
- 2.12 The majority of the site comprises agriculturally improved, species-poor grassland, and arable land of limited intrinsic ecological value. Habitats of ecological value present on site relate predominantly to the Lambrok Stream, ponds, mature trees present within and adjacent to the site, and the hedgerow network.

Arboricultural Matters

- 2.13 Consistent with the current agricultural land use, there are a number of mature trees across the site primarily associated with the field boundaries and the stream although there are a few individual trees within the fields.
- 2.14 No Tree Preservation Orders (TPO) trees were identified on site from the WC online mapping service⁴.

Public Access and Rights of Way

- 2.15 A review of the definitive map reveals the following public rights of way across the site and context as illustrated on **Plans EDP 1** and **2**.

⁴<http://www.realitygeo.com/explorer.aspx?cfg=wiltspl> – accessed 02 March 2021

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Section 3 Landscape Character

Review of the Published Landscape Character Assessment

- 3.1 The Landscape Character Assessment (LCA) for this area of Wiltshire comprises the West Wiltshire Landscape Character Assessment (2007)⁵. The site falls within Landscape Type E, the 'Rolling Clay Lowland' and, within this, Landscape Area E1: 'Wingfield Rolling Clay Lowland'. The key characteristics, inherent landscape sensitivities, key landscape changes and management strategy and objectives of the landscape area are as follows, with underlining added for emphasis of matters relevant to the site and context:

Key Characteristics

- *"Gently rolling farmland based on clay with a mixture of arable and pasture;*
- *Largely rural character with extensive views;*
- *Distinct pattern of medium sized mostly irregular fields enclosed by mainly intact hedgerows with mature trees;*
- *Small settlements in the form of the village of Wingfield and several scattered farmsteads;*
- *Strong sense of tranquillity away from busy roads;*
- *Pylons as a dominant vertical element."*

Inherent Landscape Sensitivities

- *"Peaceful, rural nature of the area;*
- *The extensive views;*
- *The landscape setting and scale of the village of Wingfield;*
- *The remaining traditional field pattern with the hedgerow boundaries."*

Key Landscape Changes

- *"New developments in and around Wingfield could threaten the small scale of the village;*

⁵http://pages.wiltshire.gov.uk/west_wiltshire_landscape_character_assessment_march_2007_-_final_report.pdf - accessed 02 March 2021

- *Increasing visual intrusion and noise pollution associated with the busy roads;*
- *Potential further decline in traditional management techniques within woodland areas;*
- *Agricultural intensification could result in loss of the traditional field pattern with the network of hedges and hedgerow trees.”*

Management Strategy and Objectives

“The strategy is to maintain the rural, open character of the area with its mosaic of fields and hedgerows, farms and footpaths. Specific management objectives are to:

- *Maintain the open character of the area by resisting any development that would have adverse effects on the extensive views;*
- *Respect the small-scale village character of Wingfield by ensuring that any new development is in line with the vernacular nature of the existing buildings;*
- *Conserve the traditional field pattern by promoting new planting to repair gaps in the hedges and by encouraging ecological farming.”*

- 3.2 The visual characteristics are described as follows, with underlining added where particularly relevant to the site:

“The area has a generally rural character with a mixture of pasture and arable farmland. The B3109 which connects Bradford-on-Avon and Frome, and the A366 Trowbridge to Radstock road cut across the area, meeting in the village of Wingfield. Despite this junction of two busy roads there is a fairly strong sense of tranquillity in Wingfield and surroundings. The settlement pattern further consists of a scattering of farmsteads and manors, connected by a network of footpaths and rural roads. The medium to large sized, irregular fields, are typically bounded by hedgerows with mature trees. The condition of the hedgerows varies, being gappy in places and intact in others. Views are panoramic throughout the area with the chalk downland being visible looking south. The pylons, which are plentiful, together with some large-scale industrial buildings on the outskirts of Trowbridge – such as the sewage works – detract slightly from the rural character of the area.”

- 3.3 The site is consistent with the majority of the key characteristic of the LA, namely gently rolling farmland down to a mixture of arable and pasture and with a distinct pattern of medium sized, mostly irregular, fields enclosed by mainly intact hedgerows with mature trees, and with pylons as a dominant vertical element. Across the landscape, there are small settlements including the village of Wingfield and several scattered farmsteads.

- 3.4 However, this is a description of a relatively broad area and, unsurprisingly, does not capture matters that are of specific relevance to the character of the site and immediate context. Whilst falling within the rural area beyond the settlement boundary, the site’s rural

nature and tranquillity is diminished by: the definite urban influence across the eastern site area where land abuts, and slopes towards, the neighbouring residential areas which therefore provides the major contextual influence on its character and tranquillity here; the roads to the north (Westwood Road) and through the centre of the site (Wingfield Road (A366)); the deterioration and loss of hedgerows across the site; the over-head cables crossing the site; and the pylons and mast immediately to the west, and crossing the north-western site area, which detract from the rural character of the site's outward facing slopes and tops.

On-site Character Assessment

- 3.5 The site comprises agricultural fields, or parts thereof, north and south of the Wingfield Road (A366) at the western edge of Trowbridge. The site abuts the settlement edge of Trowbridge to the east, albeit being set back beyond the Lambrok Stream to the south, and agricultural land to the west. Wingfield Road (A366), and adjacent private dwellings to the north and south, are excluded from the site.
- 3.6 To the north, the site boundary is formed by Westwood Road and in part, by private dwellings and their curtilage, with agricultural land beyond. To the south, the site boundary is formed by the Lambrok Stream, which marks the parish boundary, with Southwick Country Park to the south separated from the site by a narrow strip of agricultural land used for horsiculture.
- 3.7 The topography of the site reflects the gently rolling nature of the host Landscape Area E1: 'Wingfield Rolling Clay Lowland'. Broadly, the site land is located on the watershed between the Wid Brook and the River Frome and tributaries, to the north and west, and the Lambrok Stream, which forms the south-eastern and southern site boundaries. As illustrated on **Plan EDP 2**, the north-western area of the site falls across a broad, apparently flat, ridge, from which the land falls away across the north-western corner of the site. A shoulder protrudes south from the broad ridge to the east of Arnold's Hill Farm, falling gently and then rising to two distinct tops to the north and south the Wingfield Road (A366). These comprise Arnold's Hill (c.55m above Ordnance Datum (aOD), to the north, and an unnamed top marked by a mast (c.60m aOD), to the south. From these tops, the site land falls east, towards the settlement, and south-east, towards the country park, which rise up the gently sloping facing slopes.



Image EDP 3.1: View east towards the settlement from southern hill top



Image EDP 3.2: View west from southern hill-top across the agricultural landscape with pylons

- 3.8 In addition to the Lambrok Stream, along the south-eastern and southern boundaries (see **Image EDP 3.3**), there is a small stream running east from Arnold's Hill Farm. There are some six ponds across the northern site area, some of which were dry at the time of the walkover survey.



Image EDP 3.3: Lambrok stream at the eastern sit boundary south of Wingfield Road (A366)

- 3.9 The site generally comprises medium to large fields of improved pasture or arable land enclosed by a mixture of mature hedgerows and cut hedges and occasional fences (see **Image EDP 3.4**). There is a semi-mature tree belt along a section of the ridge, mature trees scattered along the field boundaries and occasionally within fields, and a few small copses, primarily surrounding the ponds across the northern site area. There is evidence of hedgerow removal, with short lengths of remnant field boundaries and tree lines. The remaining hedges are generally in decline, which detracts from the character of the area.



Image EDP 3.4: View across the southern site area showing a variety of field boundaries and remnants.

- 3.10 The urban area is a prominent feature to the east. To the north, the settlement edge abutting the site is marked by an ad-hoc mixtures of fencing, trees and hedgerows, which provides a stark, unsympathetic and visually permeable edge to the town, as illustrated at **Image EDP 3.5** below.



Image EDP 3.5: The settlement edge to the north of Wingfield Road (A366) where it is marked by an ad-hoc selection of boundaries

- 3.11 To the south, the urban edge is set back beyond the Lambrok Stream which is lined by vegetation to the east. This provides some softening of the settlement edge here, although the settlement is still very much apparent as illustrated at **Image EDP 3.6** below.



Image EDP 3.6: The settlement edge to the south of Wingfield Road (A366) where it is set back beyond the stream corridor

- 3.12 There are several public rights of way (PRoW) running throughout the site (see **Plan EDP 1**), and linking to the wider agricultural and settlement landscapes abutting the site.
- 3.13 The site is broadly representative of the landscape type within which it sits, although as mentioned above, there are some key divergences – in particular the extent to which the urban area influences the eastern site area. For this reason, there is a reduced sensitivity to development in this area. This is only furthered by the overhead cable crossing eastern site area and the loss and degradation of field boundaries and the pattern and scale that they provide.
- 3.14 The western site area falls further from the settlement edge and has a western aspect so that it has limited visual connectivity with it. For these reasons, this western site area is more tranquil. However, this tranquillity is still tempered by views to pylons, to the west and

crossing the north-western site area, large industrial farm sheds, and the adjacent busy Wingfield Road (A366), see **Image EDP 3.7**.



Image EDP 3.7: Views from the site across the western site context including to pylons and large industrial style farm sheds that detract from the character of the landscape

- 3.15 In summary, the site is consistent with the majority of the key characteristic of the host Landscape Area E1: 'Wingfield Rolling Clay Lowland', namely gently rolling farmland down to a mixture of arable and pasture and with a distinct pattern of medium sized, mostly irregular, fields enclosed by mainly intact hedgerows with mature trees, and with pylons as a dominant vertical element. Across the landscape, there are small settlements including the village of Wingfield and several scattered farmsteads.
- 3.16 However, the site's rural nature and tranquillity is diminished by: the definite urban influence across the eastern site area; the roads to the north (Westwood Road) and through the centre of the site (Wingfield Road (A366)); the deterioration and loss of hedgerows across the site; the overhead cables crossing the site; and the pylons and mast immediately to the west, and crossing the north-western site area, which detract from the rural character of the site's outward facing slopes and tops.
- 3.17 This study also finds that the topography of the site broadly defines different character areas within the site. The eastern slopes are oriented towards and lie adjacent to the settlement edge which rises away across the facing slopes. Further, these slopes are visually divorced from the wider agricultural landscape to the west. The eastern site area therefore has a peri-urban character. This character reduces across the tops and west-facing slopes where the primary visual influences are increasingly derived from the adjacent agricultural landscape.
- 3.18 The value of the landscape, in terms of its fabric and features, is moderate by virtue of the loss and decline of many field boundaries and the pattern that they provide. Such features, as advised through planning policy and general good practice, should be retained and enhanced in any future development proposal.

3.19 Based upon this evaluation, the following elements should be considered in response to the local landscape character evaluation:

- Protect the rural open character of the wider area by ensuring that proposed development does not have any adverse affects on key views and tranquillity through screening and integration of the development, using and enhancing existing topography and vegetation and creating locally characteristic natural areas to provide a semi-rural interface between the development and the rural context;
- Retain locations for long distance views to landmarks from within the development;
- Protect the landscape setting of Wingfield by minimising intervisibility through informing the extent of the proposed development here, and the use of existing topography and existing, enhanced, vegetation for screening;
- Retain and strengthen the remaining traditional field boundary hedgerows and the pattern that they provide;
- Retain, protect and enhance other characteristic landscape elements including trees, ponds, and watercourses; and
- Ensure the PRoW that run through the site are considered, wherever possible, in terms of historic routes the linkage that they provide and their green, open, character and views.

Section 4 Visual Matters

- 4.1 Visibility to the site is more contained than might be expected for a site of this size and where there are views into the site area they are limited by the topography and vegetation within the site.
- 4.2 The eastern site area is visually contained by a combination of topography and vegetation, to the north and west, the settlement edge to the east, and by vegetation at the site boundary and across the country park c.250m to the south.
- 4.3 The more elevated nature and westerly aspect of the northern and western site areas means that they are more exposed in views from the wider rural landscape. However, the rolling nature of the topography of Landscape Type E: 'Rolling Clay Lowland' limits opportunities for elevated views, and consolidates the screening effect of topography and vegetation across the lowland, limiting substantive views to the site to within less than 1km of the site.
- 4.4 It should also be noted that there is limited potential for visibility to the site, including the more elevated northern and western site area, from more elevated locations to the west of the River Frome including open slopes around Bradford on Avon and Westwood, to the north and north-west, and at Farleigh Hungerford, to the west. This is due, in part, to distance, the limited elevation, and the screening effect of intervening vegetation and topography.
- 4.5 Principal potential visual receptors would be predominantly limited to:
- Users of the PRoW through the site (**Images EDP 4.1 to 4.6**);
 - Users of the PRoW running parallel to, and beyond, the western site boundary east of Wingfield, to the south, and north of Trowle Farm, to the north (**Images EDP 4.7a and 4.7b**);
 - Visitors to St Mary's Church at Wingfield (**Image EDP 4.8**);
 - Users of the Wingfield Road (A366) and Westwood Road where they run adjacent to, and some 100m or so beyond, the site (**Images EDP 4.9 and 4.10**); and
 - Residents at the western edge of Trowbridge and of the few properties adjacent to the northern boundary and off Wingfield Road (A366) (**Images EDP 4.11 and 4.12**).

PRoW Crossing the Site

- 4.6 **Images EDP 4.1** and **4.2** show the nature of parts of the PRoW crossing the site, which would obviously change as a result of the proposed development. It will be important, through the masterplanning of the site, that such rural links are preserved, and managed appropriately to ensure that some sense of rurality is maintained.



Image EDP 4.1: PRoW running south from Westwood Road



Image EDP 4.2 PRoW south of Wingfield Road (A366) with properties north of the road (off site) in the background

- 4.7 From the highest and most exposed parts of the site there are views over Trowbridge southwards towards the elevated chalk downland, noted as characteristic of the landscape area, as shown in **Image EDP 4.3**. It is important that some views to the downland are retained, notably from PRoW, due to their characteristic nature; their high quality; and the context of the users of the PRoW, who, will have a high sensitivity in landscape and visual terms.



Image EDP 4.3: Views towards elevated chalk downland, southwards for the north-eastern site area

- 4.8 From the more elevated east facing slopes and tops, notably at Arnold Hill and the hill to the south, there are also views across Trowbridge, to the east, that include the local landmarks provided by the spire of St James Church and the less obvious tower of the Holy Trinity Church (**Image EDP 4.4**). There are also views, notably from the north-western site area, to more elevated areas of Bradford on Avon, and high ground to the west (**Image EDP 4.5**), and glimpsed views to St Mary's Church protruding above the trees at the southern edge of Westwood, to the north-west (**Image EDP 4.6**).



Image EDP 4.4: View from Arnold Hill east across Trowbridge including the spire of St James Church and the less obvious tower of the Holy Trinity Church



Image EDP 4.5: View from the elevated north-western site area to areas of Bradford on Avon



Image EDP 4.6: Views from the elevated north-western site area to St Mary's Church protruding above the trees at the southern edge of Westwood

PRoW to the West of the Site and Visitors to St Mary's Church at Wingfield

- 4.9 **Images EDP 4.7** and **4.8** show that despite glimpsed views to the settlement edge of Trowbridge, to the south, the landscape between Wingfield and the site has a predominantly rural character that provides the landscape setting for Wingfield. To protect this character development would need to be screened along the southern section of the western boundary.



Image EDP 4.7a and b: Panorama from the PRoW between St Mary's Church and Arnold's Hill Farm to the western site boundary across the hill marked by the mast. Properties at the western edge of Trowbridge are apparent to the south



Image EDP 4.8: Views from St Mary's Church to the western site boundary across the hill marked by the mast. Properties at the western edge of Trowbridge are apparent to the south

Users of Westwood Road and Wingfield Road (A366)

- 4.10 There would be views to the site from the Westwood Road, and Wingfield Road (A366), where they run adjacent to, and some 100m or so beyond, the site, as illustrated by **Images EDP 4.9** and **4.10**.
- 4.11 **Image EDP 4.9** shows the rolling nature of the topography at the western edge of the site that predominantly screens views to Trowbridge and the eastern site area north and south of the road. The low visibility to the settlement edge means that this area has a rural character that would be sensitive to development.



Image EDP 4.9: Views from Wingfield Road (A366) west of Arnolds Hill Farm looking east. Properties at the western edge of Trowbridge are just apparent to the north

- 4.12 **Image EDP 4.10** illustrates the urbanising effect of suburban properties beyond the settlement edge of Trowbridge that reduces the sensitivity of the road here to sensitive development.



Image EDP 4.10: Views from Westwood Road west of properties beyond the western settlement edge illustrating that this section of road is already urbanised to some degree

Views from Residential Properties

- 4.13 Views towards the site from the residential/urban area to the east of the northern area are illustrated at **Image EDP 4.11** while those from the residential/urban area to the east of the southern area, are illustrated at **Image EDP 4.12**. **Image EDP 4.11** shows that there would be some open views into the site to the north, where open space and roads abut the open site boundary. There would also be views into the site from the rear and side of residential properties abutting the boundary although these would be limited, to some degree, by garden fencing and planting within the gardens. **Image EDP 4.12** shows that there would be more limited views into the site to the south due to vegetation along the stream although more properties here front onto the site. Care would clearly be required to ensure that the site adjacent to these existing residential areas is sensitive and well-considered.



Image EDP 4.11: Views from Brook Road at the edge of the residential area to the east of the northern site area



Image EDP 4.12: Views from Lambrok Road at the edge of the residential area to the east of the southern site area

- 4.14 On balance, although the site appears well-screened from many areas, there are a number of key visual issues to consider in the development of proposals for the site, in particular:
- Ensuring that the new settlement edge adjacent to the agricultural landscape is designed to protect the rural character of this landscape, notably across the landscape setting to Wingfield, and providing a positive contribution to the landscape west of Trowbridge, and the western gateway into the town, that improves on what exists. This is to be achieved through the use of existing natural topographical and vegetation features to provide a defensible, substantially screened new settlement edge that is sensitively designed, in terms of elevation, mitigation planting, set back/indentation, height, massing, orientation and materials and colour of development to ensure that it integrates with the adjacent rural landscape;
 - Ensuring that the new settlement limit does not extend along road corridors to an extent that it detracts from the character of these routes or is intrusive in the rural landscape to the west of the town;
 - Ensuring that the visual amenity of existing residential areas and roads to the east are considered in terms of, primarily, setback and orientation of development with mitigation planting where appropriate;
 - Ensuring that views towards the elevated chalk downland to the south, and the rural landscape to the west, are retained, from within proposed areas of public open space across the tops of Arnold's Hill, the hill top to the south, and/or the ridge to the north; and
 - Consider retention of visual connections to local landmarks across the site context including to St Mary's Church and church towers and steeples within Trowbridge.

Section 5

Mitigation and Developable Area

- 5.1 This preliminary assessment finds that the eastern site area is more visually contained and relates visually, and physically, to the settlement edge whilst the more elevated northern, western and southern site land would be more visible from the surrounding agricultural landscape. Further, this land has limited intervisibility and physical connectivity with the settlement edge. Any masterplanning exercise should take this into account with development primarily located across the lower ground of the eastern site area and existing elevated tops and vegetation used to limit visual impact to the north, west and south, and form the basis of further planting and open space to ensure that the development is well integrating into its rural context.
- 5.2 This latter point is perhaps more important given the Green Belt location of the site and potential that exists for the development to appear as a westerly 'spread' of the current settlement edge from some, albeit limited, locations. It may be that areas of public open space (or very low density development) are located in the more western and southerly parts of the development area with denser development to the east so as to take advantage of the existing urban influences on the eastern site area.
- 5.3 This is particularly important to the south-west and south of the site given the proximity of Wingfield, within the Green Belt, and the sensitivity of its landscape setting. Here consideration should be given to limiting intervisibility between the site and this landscape setting. This to be achieved by setting new development on the lower parts of the site, with a strong woodland belt along the lower, southern section of the western boundary, and along the southern boundary near the country park.
- 5.4 Appropriate mitigation to protect the visual amenity of existing residents, both at the settlement edge, and more dispersed, should be considered. This to be achieved through development setback and orientation, and mitigation planting where appropriate. Set-back along the eastern site boundary would also allow for incorporation of the existing stream corridor and flood zones 2 and 3 and new sustainable draining scheme features within a green corridor at the eastern development edge.
- 5.5 Consideration should also be given to a strategy to deal with the PRoW that run through the site. This in terms of retaining connectivity between the existing and proposed development and the wider rural landscape; retaining key views to the downland and other landmarks across the rural and settled site context; and retaining their existing green, open character through incorporation in green corridors wherever possible.
- 5.6 Other landscape and visual considerations for development of the site, with reference to specific mitigation, would include:
- Retention, wherever possible, and positive integration of the existing trees and hedgerows, watercourses, ponds, and PRoW to form the basis of the green infrastructure across the site;

- Retention of southerly views from elevated ground towards the elevated chalk downland to the south and the wider rural landscape to the west;
- Consideration of retention of visual connections to local landmarks across the site context including to St Mary's Church Wingfield, Westwood Church, and Bradford on Avon;
- Consideration of views from, and the character of, the wider road network, especially where they run adjacent to the site on the westerly approach and gateway to Trowbridge; and
- Provision of a multifunctional green infrastructure across the site that incorporates existing key features and PRow, and has the potential to accommodate proposed features including SuDS, that links across the site and into green corridors and open spaces within the settlement edge, to the east, and the wider GI, provided by hedgerows and watercourses, elsewhere. This could perhaps be designed to be incorporated into the emerging Wiltshire Green and Blue Infrastructure Strategy and to support the Nature Recovery Network through appropriate consultation and advice from the Local Planning Authority (LPA).

Section 6 Green Belt Assessment

Introduction and Context

- 6.1 The Green Belt (GB) Assessment tests whether bringing forward sustainable development on this site would allow the key purposes of the GB, in the context of the wider settlement of Trowbridge, to be maintained, or possibly even enhanced. The assessment considers the extent to which a continued sense of openness can be maintained within the tract of land between Trowbridge and settlements within the wider landscape to the west and north-west, particularly Bradford on Avon, Westwood, and Wingfield.
- 6.2 The NPPF requires demonstration that land contributes towards the two essential characteristics of openness and permanence, by meeting one or more of five purposes, or 'tests', of GB designation. These tests are set out at NPPF Paragraph 134 as follows:
1. *"To check the unrestricted sprawl of large built-up areas;*
 2. *To prevent neighbouring towns merging into one another;*
 3. *To assist in safeguarding the countryside from encroachment;*
 4. *To preserve the setting and special character of historic towns; and*
 5. *To assist in urban regeneration, by encouraging the recycling of derelict and other urban land."*
- 6.3 The purposes are set out in more detail in **Appendix EDP 1**.
- 6.4 It has been established by case law (Appeal Ref APP/P2935/A/14/3000634) that openness is defined by *"an absence of buildings or other forms of development"*. However, the case of Turner⁶ is important as it makes clear that a visual dimension should be included within any Green Belt Assessment.

Local Level Considerations

- 6.5 At a local level, GB policy is contained at West Wiltshire District Plan 1st Alteration – Adopted June 2004 Saved Policies GB1: 'Western Wiltshire Green Belt', and GB3: 'Safeguarded Land Bradford on Avon'. The Wiltshire Core Strategy (January 2015) states that:

⁶ John Turner v Secretary of State for Communities and Local Government and East Dorset District Council [2016] EWCA Civ 466

- Saved Policy GB1: ‘Western Wiltshire Green Belt’ is *“No longer relevant as it is covered by the NPPF, the purposes of which are considered above”*; and
- Saved Policy GB3 ‘Safeguarded Land Bradford on Avon’ is *“No longer relevant as assessment of housing requirement beyond 2011 has now been undertaken.”*

6.6 Wiltshire Council have not undertaken any sort of GB study or review to date; however, the Wiltshire Core Strategy Local Adopted Plan (2015) does list the purposes specific to the West Wiltshire Green Belt (WWGB). The Core Strategy states that the principal purpose of the GB is to *“check the expansion of towns in the area, principally Bristol and Bath, and to safeguard surrounding countryside”* (Paragraph 6.87) while its particular objectives are to:

- *“maintain the open character of undeveloped land adjacent to Bath, Trowbridge and Bradford on Avon*
- *prevent the coalescence of Bradford on Avon with Trowbridge or the villages to the east of Bath*
- *limit the spread of development along the A4 between Batheaston and Corsham*
- *protect the setting and historic character of Bradford on Avon.*

Applications for development within the Green Belt will be determined in accordance with national planning policy”.

6.7 In the absence of any more detailed GB assessments or reviews produced by, or on behalf of, the Council, this report undertakes a focussed exercise to understand the importance of the area of GB which contains the site. It does so, not based upon importance as measured by, for example, local people or the LPA, but in terms of the specific ‘purposes’ of the GB, as defined by the NPPF, and the principal purposes and objectives specific to WWGB as defined by the Core Strategy, as set out above.

Green Belt Assessment: Methodology

6.8 EDP have developed a methodology for Green Belt Assessment, which is based on landscape and visual assessment methodology with regard to the purposes of the GB, and our experience of GB reviews.

6.9 For each NPPF purpose, EDP has defined criteria that allows for an analysis to be undertaken, in landscape and visual terms, of the contribution the site makes to the open character of the GB in this location. The criteria relating to each purpose are set out in **Appendix EDP 1**.

6.10 The site is scored against the criteria listed for each purpose at **Appendix EDP 2**, with criteria scoring levels set out in **Table EDP 6.1** below.

Table EDP 6.1: GB Scoring level definitions.

Colour Code	Contribution to the Green Belt Purpose
	Limited contribution
	Moderate contribution
	Strong contribution

6.11 The grading of overall scores reflects the contribution the site makes towards meeting the purposes of the Green Belt. This ensures that, whilst the NPPF does not require all five purposes, or tests, to be met simultaneously, the extent to which a site contributes to the criterion of a specific purpose will better inform the decision for it to be removed from the GB or retained within it.

Green Belt Assessment: Findings

6.12 The GB assessment is undertaken at **Appendix EDP 2** with the findings summarised in **Table EDP 6.2** below.

Table EDP 6.2: Summary of Assessment provided at **Appendix EDP 2**

GB Purpose	Contribution to the Green Belt Purpose
Purpose 1: To check the unrestricted sprawl of large built-up areas	
Does the site form a contiguous open buffer between the existing settlement edge and the wider countryside?	Limited
Does the site have a defensible boundary which can prevent sprawl?	Limited
Purpose 2: To prevent neighbouring towns merging into one another	
Is the site well associated with the existing settlement edge?	Limited
Given the distance between the whole of the site and next nearest settlement edge, what is the effect of the perceived and actual intervisibility or potential for coalescence?	Limited
Purpose 3: To assist in safeguarding the countryside from encroachment	
To what extent does the site represent the key characteristics of the countryside?	Moderate
To what extent is the site urbanised, either by on-site or off-site features?	Moderate
Purpose 4: To preserve the setting and special character of historic towns	
What is the spatial and visual relationship between the site and the historic core of the nearest towns?	Limited

6.13 This assessment does not include consideration of the potential of the site to address all NPPF paragraphs relating to the GB. However, insofar as the considerations addressed here, the findings demonstrate that the site as a whole makes a moderate contribution to the GB. As would be expected for a large site of this nature, different parts of the site will vary in the contribution that they make to the GB, with the eastern site area contributing less than the western area due to its visual relationship to the settlement edge and relative visual enclosure. A summary discussion of the findings in relation to each of the purposes is provided below.

Purpose 1: To Check the Unrestricted Sprawl of Large Built-up Areas

- 6.14 This assessment considers how the site and its features contribute towards the openness of the GB and the potential to create a permanent boundary should it be taken out of the designation. The site comprises farmland that forms a small part of an expansive area of agricultural land forming a continuous buffer between Trowbridge and Bradford on Avon and Westwood, to the north and north-west, and a more limited area between Trowbridge and Wingfield, to the west. The development area of the site forms a more limited part of the gap. Openness could be retained across the remaining, undeveloped, GB area.
- 6.15 As shown on the Concept Masterplan at **Appendix EDP 3**, the proposed development is delineated by clearly definable boundaries that follow an existing road, to the north, a vegetated stream corridor, to the south, the built edge of Trowbridge, to the east, and existing field boundary hedgerows, to the west. Should development be delivered in the manner indicated on the Concept Masterplan a defensible boundary would be created to contribute further to a definitive visual separation between Trowbridge and the countryside, and settlements beyond, notably the closest settlement of Wingfield to the south-west.
- 6.16 Intervisibility between the site and the wider agricultural landscape is limited by topography and vegetation at the site boundaries and beyond, so that its perceived contribution to openness is limited.
- 6.17 The current GB boundary at the western settlement edge of Trowbridge to the north of Wingfield Road (A366) has no apparent relationship to historic field boundaries or other landscape features, it provides an uncharacteristic pattern and an abrupt unsympathetic line in the landscape. To the south of Wingfield Road (A366) the settlement edge is marked by the vegetated stream corridor however the development edge here, as to the north, is defined by modern development that does little to reflect the historic settlement core in terms of building style or layout and contributes little to the sense of place at the settlement edge or beyond.
- 6.18 The site therefore provides the opportunity to reduce the current intervisibility between the settlement edge of Trowbridge and the agricultural landscape of the adjacent GB and create a more defensible and integrated settlement edge.

Purpose 2: To Prevent Neighbouring Towns Merging into One Another

- 6.19 The site is only associated with the settlement edge of Trowbridge. It is separated from, and not physically associated with, other settlements. Bradford on Avon falls some 1.4km to the north, Westwood some 2.3km north-west, and Wingfield some 1.2 km to the west.
- 6.20 Development of the site would not reduce the gap between Trowbridge and Bradford on Avon. It would reduce the gap between Trowbridge and Westwood by some 0.5km but a substantial gap of 1.8km would remain. It would reduce the gap between Trowbridge and Wingfield by some 0.6km but a 0.6 km gap would remain. As such, the site forms only a

limited part of the open buffer between Trowbridge and these settlements and the area proposed for development on the Concept Masterplan represents a smaller proportion still.

- 6.21 The biggest reduction in the gap will be between the site and Wingfield but careful set back of development and strategic planting buffers will mean that there will be negligible intervisibility between the settlements.
- 6.22 The visual relationship between Trowbridge and the more distant settlements of Bradford on Avon and Westwood will not be substantially changed by development upon the site as shown on the Concept Masterplan.
- 6.23 The site is very well associated with the existing settlement edge of Trowbridge, being directly adjacent to, and at grade with housing here. However, the existing settlement boundary north of the Wingfield Road (A366) generally comprises rear garden boundaries and agricultural fencing and contains potential access routes to the settlement edge.
- 6.24 It is therefore considered that development of the site would have a minimal effect on the physical and visual separation between Trowbridge and settlements across the GB. Indeed, development of the site would provide an opportunity to provide a stronger, more defensible settlement edge adjacent to the GB at this western edge of the town than exists currently.

Purpose 3: To Assist in Safeguarding the Countryside from Encroachment

- 6.25 As set out regarding Purpose 1, the site comprises a limited area of the GB between settlements and is visually well contained. This visual containment could be further enhanced with planting used in combination with the topography. For both these reasons, the site makes a limited contribution to openness between settlements.
- 6.26 In landscape character terms, much of the site, notably to the east, currently has an urbanised fringe character with agricultural land uses and urban influences from the adjacent, poorly defined, settlement edge to which it is orientated by topography and transport routes.
- 6.27 Intervisibility between the site and the settlement edge of Trowbridge, and crossing pylons, reduce the tranquillity, and urbanise the site, again reducing the sense of openness that it provides. Development of the site would contribute towards increasing the built form, and therefore reduce the sense of openness experienced in views across the site, where available. However, that sense of openness has already been eroded to some degree.
- 6.28 It is considered that development of the site would provide an opportunity to enhance characteristic landscape features across the site, as illustrated by **Appendix EDP 3**, and provide a strong, defensible settlement edge, so reducing the influences of the new settlement edge on the character of the adjacent agricultural land within the GB.

Purpose 4: To Preserve the Setting and Special Character of Historic Towns

- 6.29 As set out in **Appendix EDP 2**, the nearest conservation area is within Trowbridge c. 600m to the east of the site. Intervisibility with this conservation area is limited to views from the open, elevated, facing slopes of the site to the spire and tower of historic churches, and the surrounding roofscape, within the conservation area. Visibility back towards the site is limited by the generally close-knit nature of the settlement which provides limited opportunities for views beyond adjacent buildings.
- 6.30 Intervisibility with other historic settlements protected by conservation areas is limited to glimpsed, distant, views from the most elevated areas of the site to the more elevated facing slopes of Bradford on Avon, which predominantly fall outside the conservation area. Views back towards the site from Bradford on Avon are more limited due to intervening settlement and vegetation.

Purpose 5: To Assist in Urban Regeneration, by Encouraging the Recycling of Derelict and Other Urban Land

- 6.31 Purpose 5 considers also whether or not sites can be ‘recycled’ or redeveloped, such as brownfield land within the GB. The amount of land within urban areas that could either be developed or regenerated is a planning matter that should already have been considered as part of a wider planning process, i.e. at the point of defining GB boundaries.
- 6.32 The assessment of the site at a local level against this purpose would not enable a distinction between GB areas and, as such, Purpose 5 has been excluded from this assessment.
- 6.33 However, as demonstrated above, development can occur in this location without compromising the essential functions of the GB at this western edge of Trowbridge, namely preventing merging of settlements, encroachment, and unrestricted sprawl.

Core Strategy Stated Principal Purposes of the GB

- 6.34 With reference to the Core Strategy, relevant stated principal purposes of the GB are set out below together with a summary of where they have been assessed (our emphasis):
- *“maintain the open character of undeveloped land adjacent to Bath, Trowbridge and Bradford on Avon”* – addressed above in relation to NPFF purposes;
 - *“prevent the coalescence of Bradford on Avon with Trowbridge or the villages to the east of Bath”* - addressed above in relation to NPFF purposes;
 - *“limit the spread of development along the A4 between Batheaston and Corsham”* – not relevant; and

- “protect the setting and historic character of Bradford on Avon” – addressed above in relation to NPPF purposes.

Conclusion of Green Belt Review

- 6.35 The GB assessment concludes that development can occur in this location without compromising the NPPF essential functions of the GB at this western edge of Trowbridge: preventing merging of settlements, encroachment, and unrestricted sprawl; or the Core Strategy relevant stated principal purposes of the GB.
- 6.36 This is due, primarily, to the relatively limited proportion of the existing gap between settlements that the site represents; the limited intervisibility between the site and closest settlements across the GB; and the comparatively effective defensible edge that the site would provide. The Concept Masterplan has built on this baseline to further limit the potential for compromising the functions of the GB by focussing development in the eastern area, with a sensitive approach to western area through siting of development and delivery of public open space. This further reduces the proportion of the GB represented by development, and utilising existing landform and characteristic features to provide a defensible physical boundary and further limit potential intervisibility, notably to Wingfield to the south-west of the site.
- 6.37 It is considered that the site could reasonably be removed from the GB and developed in accordance with the principles of the Concept Masterplan (**Appendix EDP 3**) without harm to the integrity of the GB overall and with potential benefits in terms of creation of a defensible GB boundary.

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Appendix EDP 1

Green Belt Assessment Methodology and Criteria

A1.1 For each NPPF purpose, EDP has defined criteria that allows for a more comprehensive analysis to be undertaken, in landscape and visual terms, of the contribution the site makes to the open character of the Green Belt in this location. The criteria for each purpose is described in more detail below.

Purpose 1: To Check the Unrestricted Sprawl of Large Built-up Areas

A1.2 This is a test that considers the site’s location in relation to defined built-up areas, particularly whether the site creates a clear, recognisable distinction between large built up areas (as defined within adopted policy) and the perceived open countryside.

A1.3 Assessment criteria considers whether any built form is contained within the site or if the site is able to prohibit further development. Commonly this is ribbon development but may also be piecemeal development in isolated areas or along settlement edges. A site may have already been compromised by some form of development, in which case it is relevant to consider the extent to which that development has eroded the sense of open character, this being whether or not there is a sense that the site is enclosed by either man-made or landscape features.

A1.4 Sprawl may also be discouraged by defensible boundaries that are either natural (e.g. topography, woodland, water course) or man-made features (e.g. as a road, railway line, or settlement edge). These may be within the site or share a boundary with it. Sites that do not contain defensible boundaries contribute towards greater openness.

A1.5 **Table EDP A1.1** provides EDP’s assessment criteria for Purpose 1.

Table EDP A1.1: Purpose 1 – To check the unrestricted sprawl of large built-up areas

Purpose 1 Criteria	Application of Criteria to Site
<ul style="list-style-type: none"> • Creates a clear, recognisable distinction between urban fringe and open countryside 	<p>Is the site perceived as forming a contiguous undeveloped buffer between the existing settlement edge and the wider countryside (higher to lower contribution a-c)?</p> <ul style="list-style-type: none"> a. Yes, the site has an open character, being free of development and associated influences with limited tree cover, strongly contributing to an open character of the Green Belt; b. There is an absence of development within the site but it is overlooked by adjacent/nearby development/-wooded/treed areas; and c. No, the site contains development and/or tree cover such that it does not clearly define a perceptible distinction between the settlement edge and the open countryside.

Purpose 1 Criteria	Application of Criteria to Site
<ul style="list-style-type: none"> • Are there any defensible boundaries? 	<p>Does the site have a defensible boundary which can prevent the sprawl of a large built up area (higher to lower contribution a-c)?</p> <p>a. The site does not have a defensible boundary and therefore open character is greater;</p> <p>b. The site has a defensible boundary/boundaries, which would need additional reinforcement; and</p> <p>c. The site has a defensible boundary/boundaries, which do not require additional reinforcement.</p>

Purpose 2: To Prevent Neighbouring Towns Merging into One Another

A1.6 The wording of the NPPF refers to ‘towns’, but in the context of this assessment study area, the GB affects a considerably smaller geographical scale, in which it is more relevant to consider the perceived merging of neighbouring settlement edges as well as distinct settlement areas that might be defined as towns. In essence, the purpose seeks to avoid coalescence of built form. This can be perceived in either plan view or ‘on the ground’ by intervening natural or man-made features.

A1.7 The interpretation of ‘merging’, in terms of geographic distances, differs according to the study area. Whilst a review of distinct towns might need to account for distances over several kilometres, when considering gaps between smaller settlements, as perceived in local views, the range can be much smaller. It is of note that susceptibility to ‘merging’ depends on the extent of open character between two settlements, and each situation needs to be reviewed in relation to the local landscape and visual context.

A1.8 **Table EDP A1.2** provides EDP’s assessment criteria for Purpose 2.

Table EDP A1.2: Purpose 2 – To check the unrestricted sprawl of large built-up areas

Purpose 2 Criteria	Application of Criteria to Site
<ul style="list-style-type: none"> • Perceptually, is the site well associated with the existing settlement edge? 	<p>Perceptually, is the site well associated with the existing settlement edge (higher to lower contribution a-c)?</p> <p>a. The site is perceived as being isolated from the settlement boundary and appears divorced from it;</p> <p>b. The site abuts one settlement boundary but is not divorced from it; and</p> <p>c. The site abuts two or more settlement boundaries and is perceived as part of an indent.</p>
<ul style="list-style-type: none"> • Prevent loss or noticeable reduction in perceived distance between towns/settlement edges; this may also be affected by agricultural land use or topography: a larger distance or more prominent topographical change would be better capable of 	<p>Given the distance between the whole of the site and next nearest settlement edge, what is the effect of the perceived and actual intervisibility on potential for coalescence (higher to lower contribution a-c)?</p> <p>a. Immediate and clear intervisibility with next nearest settlement edge;</p> <p>b. Partial visual association with next nearest settlement edges; and</p>

Purpose 2 Criteria	Application of Criteria to Site
<p>accommodating change than a narrow gap.</p> <ul style="list-style-type: none"> The gaps may contain different elements, be it natural (e.g. topography, woodland, agricultural land or large open spaces) or man-made features, which prevent perceived merging. 	<p>c. Limited or no visual association with next nearest settlement edges.</p>

Purpose 3: To Assist in Safeguarding the Countryside from Encroachment

- A1.9 In terms of Green Belt, the ‘countryside’ is the landscape outside of the current development limits, and which is generally defined by key characteristics such as hedgerow networks, varying field patterns, presence/absence of woodland, downland character, topographical features or open space, etc. Countryside is likely to be perceived as undeveloped land that is typically rural and often managed for agriculture or forestry, or simply kept as an open natural or semi-natural landscape. It may, however, contain man-made features such as historic landmarks or isolated properties, or even larger areas of settlement.
- A1.10 This assessment is based on the key landscape characteristics of the site and its surroundings, as well as the site’s visual context. Sites that are highly representative of the key landscape characteristics, and exhibit them in good condition, make a stronger contribution towards safeguarding the countryside than land that is less representative of the landscape character area or contains features that are in poorer condition. This allows a relative and qualitative ‘value’ element to be applied to landscapes.
- A1.11 The matter of perceived ‘encroachment’ requires a judgement that considers whether or not built form (such as residential development and/or related urbanising features such as street lighting, road signs, road infrastructure, etc.) is found in the site or affects it, and also the degree to which it has preserved the key characteristics or severed them from the wider countryside. A site that has limited or no urbanising influences has a stronger role in safeguarding countryside.
- A1.12 Finally, encroachment can also be prohibited by the presence or absence of particular natural or man-made features that separate existing settlement edges from the wider countryside. Typically, it is large man-made features such as dual carriageways, or motorways; natural features might include woodland, large water bodies, such as lakes and rivers or deep, steeply sloped valleys. Such features may border a site or be contained wholly or partially within it.
- A1.13 However, natural features in particular, including woodland, rivers or ridgelines, may suffer a loss of their integrity as prominent features within the landscape if development is progressed upon, or near, them. These features should therefore be safeguarded.

A1.14 **Table EDP A1.3** provides EDP’s assessment criteria for Purpose 3.

Table EDP A1.3: Purpose 3 – To Assist in Safeguarding the Countryside from Encroachment

Purpose 3 Criteria	Application of Criteria to Site
The countryside comprises ‘key characteristics’ which define the landscape and the way it is perceived, both visually and physically.	To what extent does the site represent the key characteristics of the countryside (higher to lower contribution a-c)? a. The site is strongly representative of the key characteristics and clearly connects with off-site key characteristics; b. The site comprises some representative key characteristics but there are few connections with off-site characteristics; and c. The site comprises little or no key characteristics and there is limited or no connection with off-site characteristics.
Encroachment: features such as speed signage and street lighting affect the extent to which the countryside changes from rural to urban.	To what extent is the site urbanised, either by on-site or off-site features (higher to lower contribution a-c)? a. There are no urbanising features within the site or directly influencing it; b. There are several urbanising features affecting the site; and c. There are many urbanising features affecting the site, which reduces its representativeness of the countryside. The site is perceived as previously developed land.

Purpose 4: To Preserve the Setting and Special Character of Historic Towns

A1.15 The subject of setting and special character in the context of historic towns should be examined on a site by site basis, by specialist heritage consultants. However, the conservation area local heritage designation allows the assessment to acknowledge that historic cores exist.

A1.16 **Table EDP A1.4** provides EDP’s assessment criteria for Purpose 4.

Table EDP A1.4: Purpose 4 – To Preserve the Setting and Special Character of Historic Towns

Purpose 4 Criteria	Application of Criteria to Site
In the absence of professional judgement on setting and special character on a site-by-site basis by heritage consultants, the criteria considers the proximity of the site to a conservation area (CA) which relates to the historic character of a town.	What is the spatial and visual relationship between the site and the historic core of the nearest towns (higher to lower contribution a-c)? a. The site is partially or wholly within the historic character area of the town/conservation area; b. The site shares a boundary with or has Intervisibility with the historical character area/conservation area; and c. The site does not share a boundary with the town/-conservation area and/or there is no intervisibility with its historic core/conservation area.

Purpose 5: To Assist in Urban Regeneration, by Encouraging the Recycling of Derelict and Other Urban Land

- A1.17 Purpose 5 considers also whether or not sites can be 'recycled' or redeveloped, such as brownfield land within the Green Belt. The amount of land within urban areas that could either be developed or regenerated is a planning matter that should already have been considered as part of a wider planning process, i.e. at the point of defining Green Belt boundaries.
- A1.18 The assessment of the site at a local level against this purpose would not enable a distinction between Green Belt areas and, as such, Purpose 5 has been excluded from this assessment.

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Appendix EDP 2 Green Belt Assessment

Description of the Site

The site lies at the western edge of Trowbridge with Bradford on Avon to the north, Westwood to the north-west, and Wingfield to the west. A description of the landscape character of the site and context is set out at **Section 3** while matters relating to visual matters are set out at Section 4.

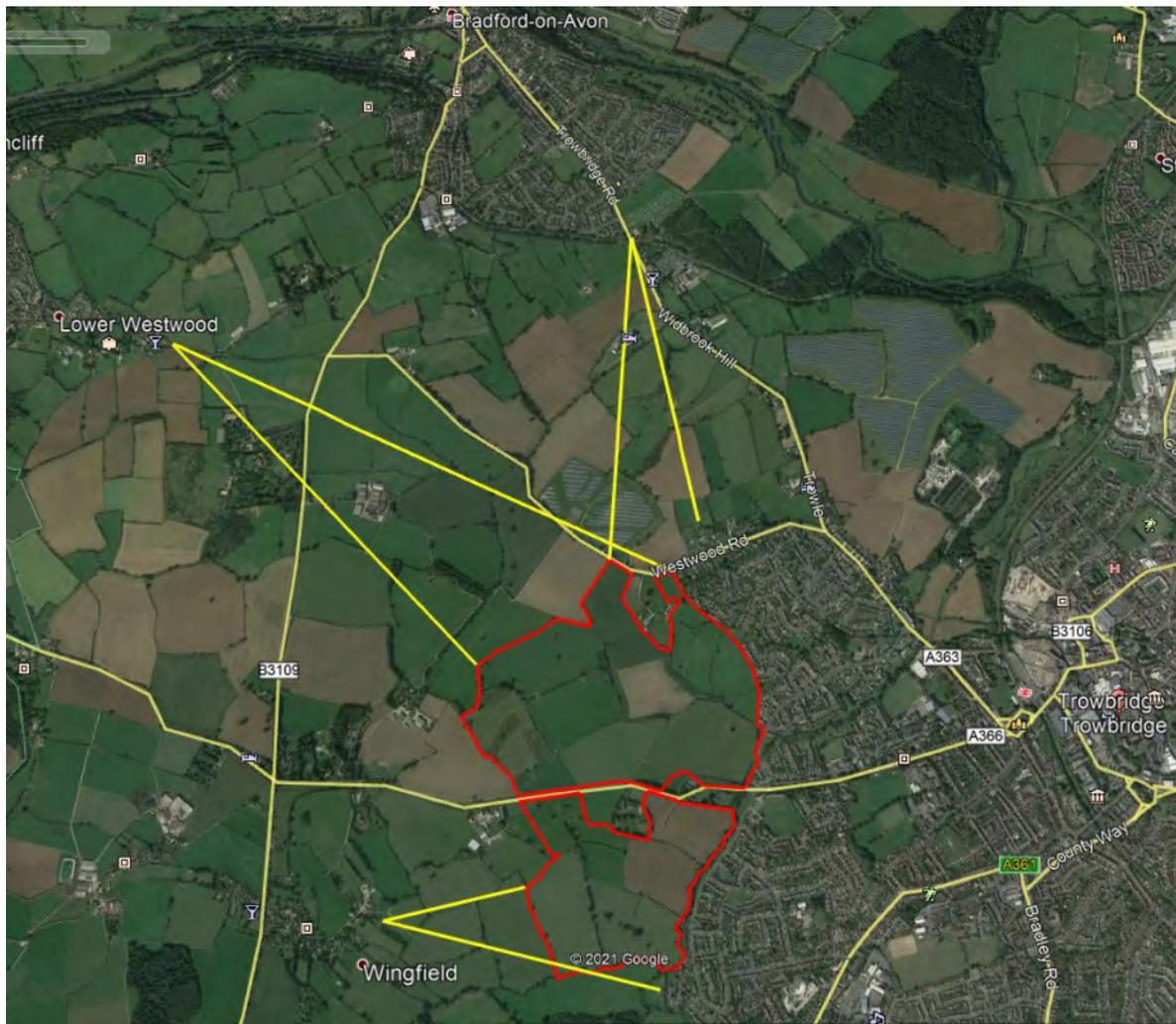


Image EDP A2.1: Aerial photograph showing locations of measured distances reported in **Table EDP A2.1** below.

Purpose 1: To Check the Unrestricted Sprawl of Large Built-up Areas		
Purpose 1 Criteria	Assessment	Score
<i>Creates a clear, recognisable distinction between urban fringe and open countryside</i>	The site is located at the western edge of the defined large built up area of Trowbridge. The site is fully within the Green Belt and contains no substantial built development. However, its boundary wraps around properties south of, and accessed from, Westwood Road, to the north, and around properties north and south of, and	Limited

Purpose 1: To Check the Unrestricted Sprawl of Large Built-up Areas

Purpose 1 Criteria	Assessment	Score
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	<p>accessed from, Wingfield Road (A366) cutting through the centre of the site. These properties extend the urban character along these road frontages.</p> <p>In addition, the site abuts, and its eastern area is overlooked by, the existing settlement edge of Trowbridge. The site abuts residential properties, agricultural land, and a solar farm to the north, open agricultural land to the west, and horsicultural land and the country park to the south.</p> <p>The nearest settlements beyond the GB comprise Bradford on Avon, some 1.4km to the north, Westwood, some 1.8km north-west, and Wingfield, some 560m to the west. Image EDP A2.1 above shows that these distances are from the site boundary, representing the worst case; distances from the development area proposed on the Concept Masterplans will be less.</p> <p>Set out below is a comparison of the distances between these settlements and the existing edge of Trowbridge, and between them and the site, at the nearest point. As noted above, this represents the worst case scenario, with larger distances between the development area indicated on the Concept Masterplan and settlements.</p> <p>Table EDP A2.1: Approximate distances to nearest settlements.</p> <table border="1" style="width: 100%; border-collapse: collapse; margin-bottom: 10px;"> <thead> <tr> <th style="width: 20%;"></th> <th style="width: 15%;">Distance to Trowbridge (km)</th> <th style="width: 15%;">Distance to site (km)</th> <th style="width: 50%;">Comparison</th> </tr> </thead> <tbody> <tr> <td>Bradford-on-Avon</td> <td style="text-align: center;">1.4</td> <td style="text-align: center;">1.4</td> <td>The site will not decrease the separation being at a very similar distance from Bradford on Avon to the existing settlement.</td> </tr> <tr> <td>Westwood</td> <td style="text-align: center;">2.3</td> <td style="text-align: center;">1.8</td> <td>The site will decrease the separation by some 0.5km.</td> </tr> <tr> <td>Wingfield</td> <td style="text-align: center;">1.2</td> <td style="text-align: center;">0.6</td> <td>The site will decrease the separation by some 0.6km.</td> </tr> </tbody> </table> <p>Development of the site would not reduce the gap between Trowbridge and Bradford on Avon. It would reduce the gap between Trowbridge and Westwood by some 0.5km but a substantial gap of 1.8km would remain. It would reduce the gap between Trowbridge and Wingfield by some 0.6km but a 0.6km gap would remain. As such, the site forms only a limited part of the open buffer between Trowbridge and these settlements and the</p>		Distance to Trowbridge (km)	Distance to site (km)	Comparison	Bradford-on-Avon	1.4	1.4	The site will not decrease the separation being at a very similar distance from Bradford on Avon to the existing settlement.	Westwood	2.3	1.8	The site will decrease the separation by some 0.5km.	Wingfield	1.2	0.6	The site will decrease the separation by some 0.6km.	
	Distance to Trowbridge (km)	Distance to site (km)	Comparison															
Bradford-on-Avon	1.4	1.4	The site will not decrease the separation being at a very similar distance from Bradford on Avon to the existing settlement.															
Westwood	2.3	1.8	The site will decrease the separation by some 0.5km.															
Wingfield	1.2	0.6	The site will decrease the separation by some 0.6km.															

Purpose 1: To Check the Unrestricted Sprawl of Large Built-up Areas

Purpose 1 Criteria	Assessment	Score
	<p>area proposed for development on the Concept Masterplan represents a smaller proportion still.</p> <p>The biggest reduction in the gap will be between the site and Wingfield, but careful set back of development and strategic planting buffers will mean that there will be negligible intervisibility between the settlements.</p>	



Image EDP A2.2: Northern site boundary (right of image)



Image EDP A2.3: Western site boundary of northern parcel (across centre of image)

Purpose 1: To Check the Unrestricted Sprawl of Large Built-up Areas

Purpose 1 Criteria	Assessment	Score
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Image EDP A2.4: Western site boundary of southern parcel



Image EDP A2.5: Southern site boundary

<p><i>Are there any defensible boundaries?</i></p>	<p>The site provides defensible boundaries: to the north – Westwood Road (Image EDP A2.2), which also generally provides a northern boundary for residential development at the existing settlement edge to the east; to the west – field boundary hedges and hedgerows (Images EDP A2.3 and A2.4); to the south – the Lambrok Stream and associated vegetation which marks the current parish boundary (Image A2.5). In addition, as the Concept Masterplan shows, topography and additional planting could provide a visual and physical boundary to the development that could be further reinforced with planting along existing field boundaries that would provide a defensible boundary while retaining their historic line and the pattern that they provide.</p> <p>Internal openness is limited by vegetation, field hedges and trees, and topography.</p>	<p>Limited</p>
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Purpose 2: To Prevent Neighbouring Towns Merging into One Another		
Purpose 2 Criteria	Assessment	Score
<i>Is the site well associated with the existing settlement edge?</i>	<p>The site is physically and visually very well associated with the existing settlement edge of Trowbridge, being directly adjacent to, and at grade with, housing east of Sherbourne Road to the north, and across the stream from housing east of Lambrok Road, to the south. The site is not divorced from this edge and there is potential for good physical and visual integration between it and the existing edge.</p> <p>It is clear from historic map analysis that the settlement areas at the western extent of Trowbridge, adjacent to the site, have extended significantly over the last 60 years to accommodate growth of the town. In addition, the presence of access roads that end at the western settlement edge indicate an intent to continue expansion to the west of Trowbridge. Further, to the north of the Wingfield Road (A366), there is a lack of a strong, defensible boundary at the settlement edge. For all of these reasons, the site is considered to be well associated with the existing settlement edge.</p> <p>As noted at Purpose 1 above, the site is physical separated from, and not physically associated with, other settlements within the GB.</p>	Limited
<i>What is the intervisibility with the next nearest settlement edge?</i>	<p>The visual relationship between Trowbridge and the settlements of Bradford on Avon, to the north and Westwood, to the north-west, will not be notably changed by development across the site due to the limited apparent intervisibility between these settlements and the site. This is primarily due to distance and the screening effect of intervening vegetation across this wide rolling valley at, and beyond, the site boundaries. While there is potential for some limited visibility to the more elevated site areas from elevated open facing slopes of Bradford on Avon, and from open land at the eastern extent of Westwood, this is limited and filtered by existing vegetation and could be mitigated further through planting at the site boundaries as illustrated by the Concept Masterplans. There is potential for greater intervisibility between the site and Wingfield but this can be mitigated through the location of open space across elevated slopes and tops and along the western site boundary of the southern site area together with sympathetic planting along existing filed boundaries, as illustrated by the Masterplan for this area.</p>	Limited

Purpose 3: To Assist in Safeguarding the Countryside from Encroachment		
Purpose 3 Criteria	Assessment	Score
<p><i>How representative is the site of the key characteristics of the countryside?</i></p>	<p>Documented landscape character is reviewed at Section 3 of this report. The West Wiltshire Landscape Character Assessment places the site within Landscape Type E, the 'Rolling Clay Lowland', and Landscape Area 'E1: Wingfield Rolling Clay Lowland'. The site is consistent with the majority of the key characteristic of the landscape area, namely gently rolling farmland down to a mixture of arable and pasture and with a distinct pattern of medium sized, mostly irregular, fields enclosed by mainly intact hedgerows with mature trees, and with pylons as a dominant vertical element. Across the landscape, there are small settlements including the village of Wingfield and several scattered farmsteads.</p> <p>The main characteristics of the site that differ from these key characteristics are in relation to tranquillity and rural character, notably across the eastern site area. These are both less across this area of the site than across the wider landscape area due to the proximity of the settlement edge and the site aspect, which means that its primary visual connections are with the settlement edge. This proximity and intervisibility diminish both the rural character and tranquillity of this site area in comparison to that of the wider area.</p> <p>However, this is a description of a relatively broad area and, unsurprisingly, does not capture matters that are of specific relevance to the character of the site and immediate context. Whilst falling within the rural area beyond the settlement boundary the site's rural nature and tranquillity is diminished by:</p> <ul style="list-style-type: none"> • The definite urban influence across the eastern site area where land abuts, and slopes towards, the neighbouring residential areas which therefore provides the major contextual influence on its character and tranquillity here; • The roads to the north (Westwood Road) and through the centre of the site (Wingfield Road (A366)); • The deterioration and loss of hedgerows across the site; • The overhead cables crossing the site; and • The pylons and mast immediately to the west, and crossing the north-western site area, which detract from the rural character of the site's outward facing slopes and tops. <p>The site has the potential, as illustrated by the Concept Masterplans, to contribute to the 'Management Strategy and Objectives' set out for the West Wiltshire Landscape Character Assessment Landscape Area 'E1: Wingfield Rolling Clay Lowland',</p>	<p>Moderate</p>

Purpose 3: To Assist in Safeguarding the Countryside from Encroachment		
Purpose 3 Criteria	Assessment	Score
	<p>notably with regard to field pattern and hedgerow boundaries, as set out below:</p> <p>Specific management objectives are to:</p> <ul style="list-style-type: none"> • <i>“Maintain the open character of the area by resisting any development that would have adverse effects on the extensive views”</i> – the Concept Masterplan shows how the proposed development could be designed to retain views from more elevated areas of the site; • <i>“Respect the small-scale village character of Wingfield by ensuring that any new development is in line with the vernacular nature of the existing buildings”</i> – the site is some 570m distant, and would be substantially screened from, the village so would not offend this objective; and • <i>“Conserve the traditional field pattern by promoting new planting to repair gaps in the hedges and by encouraging ecological farming”</i> – the Concept Masterplan shows how the site could be developed while retaining and enhancing the field pattern at the site boundaries and, to some extent, within the site. 	
<i>What is the influence of urbanising features?</i>	<p>Whilst falling within the rural area beyond the settlement boundary, the site’s character is urbanised by the following considerations:</p> <ul style="list-style-type: none"> • The definite urban influence across the eastern site area where land abuts, and slopes towards, the neighbouring residential areas which therefore provides the major contextual influence on its character and tranquillity here; • The roads to the north (Westwood Road) and through the centre of the site (Wingfield Road (A366)); • The deterioration and loss of hedgerows across the site; • The overhead cables crossing the site; and • The pylons and mast immediately to the west, and crossing the north-western site area, which detract from the rural character of the site’s outward facing slopes and tops to the north and west of the site. 	Moderate

Purpose 4: To Preserve the Setting and Special Character of Historic Towns		
Application of Criteria	Assessment	Score
<i>Is there potential for intervisibility with an historic core?</i>	The nearest conservation area is within Trowbridge, c.600m to the east of the site. Intervisibility with this conservation area is limited to views from the open, elevated, facing slopes of the site to the spire and tower of historic churches, and the surrounding roofscape, within the conservation area. Visibility back towards the	Limited

Purpose 4: To Preserve the Setting and Special Character of Historic Towns		
Application of Criteria	Assessment	Score
	site is limited by the generally close-knit nature of the settlement which provides limited opportunities for views beyond adjacent buildings. Intervisibility with the conservation areas across the historic core of other settlements is limited with glimpsed, distant, views from the most elevated areas of the site to the more elevated facing slopes of Bradford on Avon. Views back towards the site from Bradford on Avon are more limited due to intervening settlement and vegetation.	

Appendix EDP 3
Concept Masterplan

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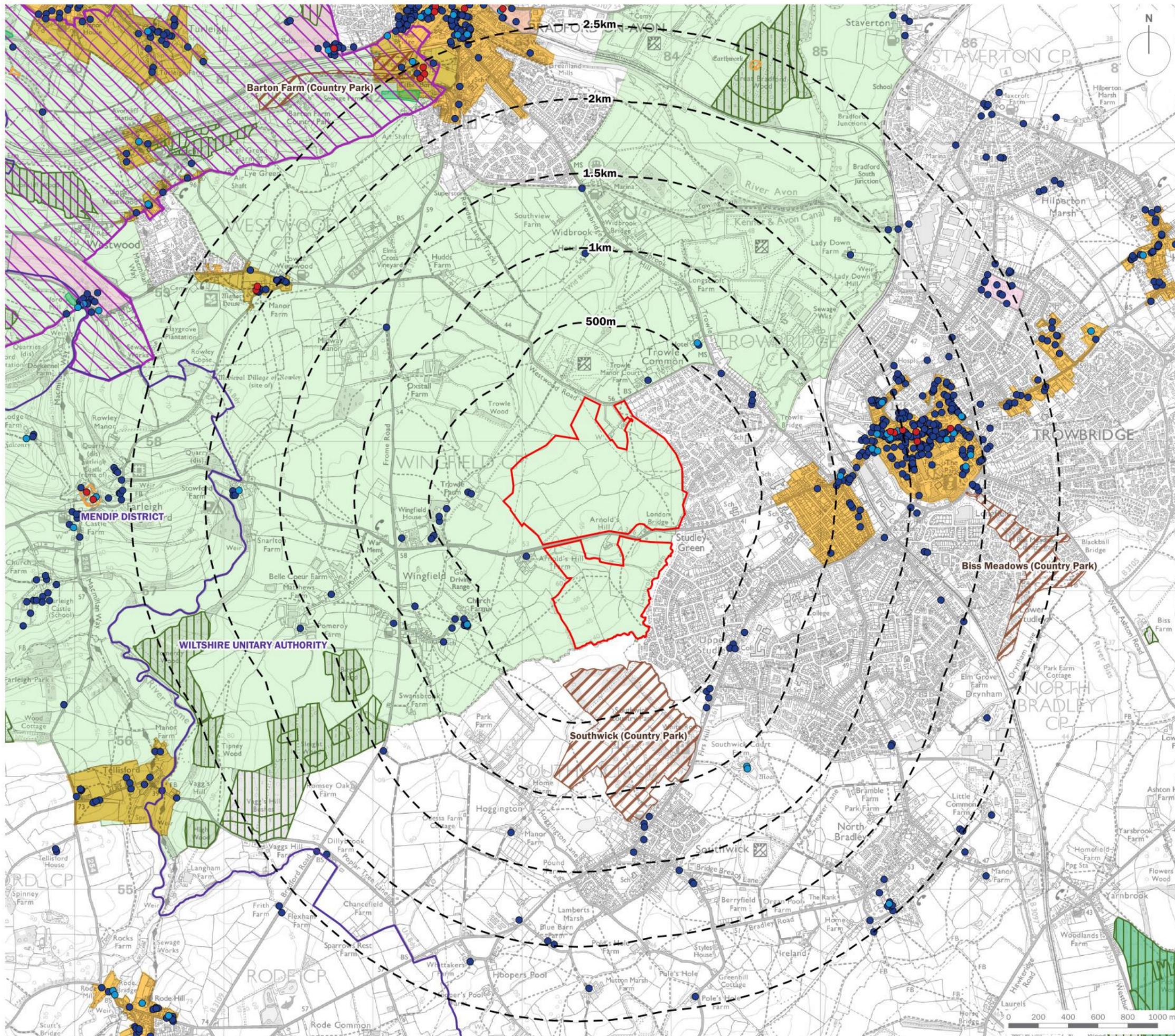
-  SITE BOUNDARY
-  PRIMARY VEHICULAR ACCESS
-  SECONDARY VEHICULAR ACCESS
-  PRIMARY ROUTE
-  SECONDARY ROUTE
-  FOOTPATH/CYCLEWAY
-  RETAINED EXISTING PROW
-  GREEN CORRIDOR
-  EXISTING HEDGEROW
-  POND
-  DEVELOPMENT BLOCK
-  COMMUNITY/RETAIL USE
-  EXISTING BUILDINGS
-  FEATURED SPACE
-  VILLAGE GREEN
-  PLAY AREA
-  SPORTS PITCH
-  OVERHEAD CABLES
-  WATERMAIN
-  FLOOD ZONE



Plans

- Plan EDP 1** Site Location and Environmental Planning Context
(edp2822_d009a 08 March 2021 GY/TR)
- Plan EDP 2** Landscape, Visual and Ecological Analysis
(edp2822_d010a 08 March 2021 GY/TR)

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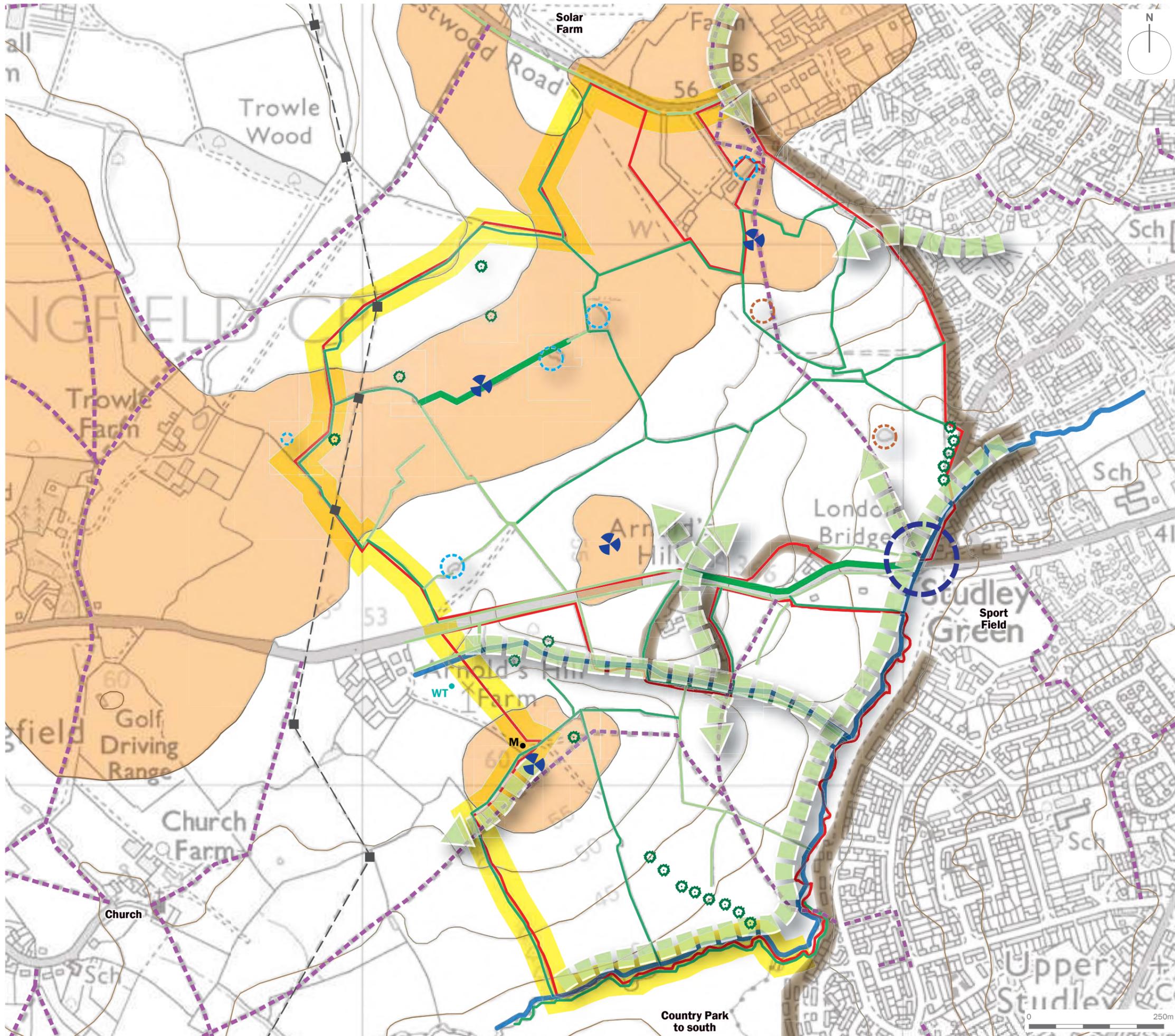
- Site Boundary
- Range Rings (at 500m intervals)
- Local Authority District Boundary
- Landscape**
- Western Wiltshire Green Belt
- Cotswolds Area of Outstanding Natural Beauty (AONB)
- Country Park
- Ecology**
- Ancient Woodland Inventory (AWI)
- Site of Special Scientific Interest (SSSI)
- Heritage**
- Scheduled Monument
- Grade I Listed Building
- Grade II* Listed Building
- Grade II Listed Building
- Registered Park and Garden
- Conservation Area

client
Vistry Group and Barratt Homes

project title
Land West of Trowbridge

drawing title
Plan EDP 1: Site Location and Environmental Planning Context

date **09 MARCH 2021** drawn by **GY**
drawing number **edp2822_d009a** checked **TR**
scale **1:25,000 @ A3** QA **RB**



-  Site Boundary
-  Visually sensitive edges - adjacent to countryside
-  Existing settlement edge with open and filtered views to site - visual considerations
-  Semi-native woodland - priority for retention
-  Trees beyond field boundaries (approximate locations) - priority for retention
-  Native hedgerows and site boundaries - priority for retention
-  Native cut hedges - retain where possible
-  Highest land (over 55m aOD)
-  Contours at 5m intervals
-  Opportunities for views out of site
-  Opportunities for green corridor connections
-  Ponds with potential for great crested newts - provide an appropriate buffer and incorporate into green corridors
-  Dry ponds with potential for enhancement
-  Streams - provide appropriate buffer and enhancements and incorporate within green corridor
-  Public rights of way - retain and incorporate within green corridors wherever possible
-  Mast
-  Pylons (over-head cable on site not shown)
-  Current gateway into Trowbridge visually uninspiring
-  Wind Turbine

client
Vistry Group and Barratt Homes

project title
Land West of Trowbridge

drawing title
Plan EDP 2: Landscape and Visual Analysis

date	09 MARCH 2021	drawn by	GY
drawing number	edp2822_d010a	checked	TR
scale	Refer to scale bar @ A3 QA		RB



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**URBAN
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Appendix 4 – Concept Plan



- SITE BOUNDARY
- PRIMARY VEHICULAR ACCESS
- SECONDARY VEHICULAR ACCESS
- PRIMARY ROUTE
- SECONDARY ROUTE
- FOOTPATH/CYCLEWAY
- RETAINED EXISTING PROW
- GREEN CORRIDOR
- EXISTING HEDGEROW
- POND
- DEVELOPMENT BLOCK
- COMMUNITY/RETAIL USE
- EXISTING BUILDINGS
- FEATURED SPACE
- VILLAGE GREEN
- PLAY AREA
- SPORTS PITCH
- OVERHEAD CABLES
- WATERMAIN
- FLOOD ZONE



CLIMATE147



Date: 08.03.2021

To Whom it May Concern,

National Farmers Union response: 2021 Wiltshire Council Local Plan Review Consultation

The South West National Farmers Union (NFU) welcomes the opportunity to comment on the Wiltshire Council Local Plan Review. The South West NFU represents approximately 9,000 Farmers and Growers across the South West region and over 47,000 nationally – more than 800 of our members farm here in Wiltshire. The NFU, and its members, recognise the importance of the Local Plan and our response is as attached and below for your consideration.

Please find the following documents attached:

- 1. Emerging Spatial Strategy Consultation Form NFU Comments**
- 2. Empowering Rural Communities Consultation Form NFU Comments**
- 3. Addressing Climate Change and Biodiversity Net Gain NFU Comments**

As you will be aware the farming community continues to face formidable challenges with increasing – and changing - regulation, volatile markets, and fluctuating farming returns. In response to these challenges farmers have had to consider the resources available to them and look at new ways of developing their businesses so that they can grow, remain competitive and compliant. This might include the need for modern agricultural buildings either to meet regulations, or to change the use of existing buildings in order to respond to changing market demand for example.

Our members in Wiltshire are no exception and given that around 70% of the land area here is farmed the County Local Plan must actively support farming businesses in our area. Our vision for the county is:

Wiltshire hosts a sustainable rural community that is underpinned by an innovative rural economy. Its thriving farming and food industry is profitable and supports viable livelihoods, underpins sustainable and healthier communities and enhances the environmental assets that are vital to our counties prosperity.

For the farming community to achieve this vision Wiltshire Council must ensure that its own policies support the industry by: strengthening our farming businesses to help them build profitability and respond to new opportunities; helping to create thriving localities that meet the needs of their communities, businesses, and environment; and enabling farm businesses to enhance and maintain their environmental assets.

We feel that it is essential the content of the Wiltshire Local Plan does not cause detriment to farm businesses or hinder their ability to modify, grow or diversify. Viable farm businesses underpin the local economy and food production output in addition to providing the best opportunities for maintenance and enhancement of Wiltshire's natural capital – which in turn have a positive impact on the populations health and wellbeing. Additionally, and equally as important, it is vital that planning rules do not restrict high standard housing provision on farm which is essential for succession planning and securing quality staff. We ask that the Local Plan supports and enables farms to build new housing where required in rural Wiltshire.

In order to maintain viable agricultural businesses in Wiltshire, the Council should seek to:

1. Enable the next generation to take on management of farms and to support this through the provision of affordable housing to allow succession.

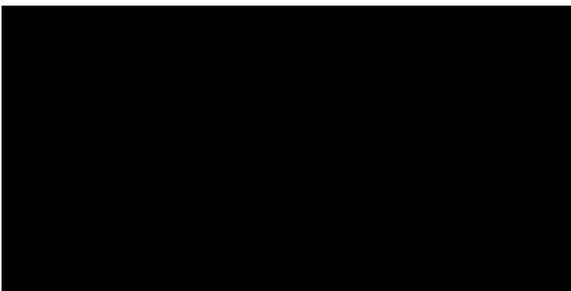
2. Encourage the development of farming enterprises that can meet the challenges of food security through modernising and becoming more efficient, and that remain compliant with current domestic (or international) rules and regulations.
3. Allow diversification of farm enterprises to meet new opportunities such as, for example, business units or tourism.
4. Support the development of appropriate renewable energy generation which meets the needs of the businesses and/or local community – in turn supporting county wide renewable energy ambitions.

To help guide any work we have developed some principles which we believe will help the Wiltshire Local Plan Review to shape activity in the county. These are:

- Food security is a crucial issue for now and the future and any actions at a county level must ensure that we do not compromise our ability to feed ourselves as a nation.
- The Council should support farm businesses in their efforts to increase farm productivity and decrease impact on the environment – enabling them to also maintain and enhance our counties natural asset base.
- Sustainable development in rural areas can only be achieved through the integration of environmental, social and economic objectives.
- Sustainable and viable farming businesses will support the wider community, and Local Plan outcomes should seek to underpin sustainable growth in the rural economy as a whole.
- Local Plan outcomes should meet the needs of a diverse rural population; ensure equality of opportunity; and encourage links between rural areas and urban centres.
- Not one system of farming is the 'answer', and all types should be supported for maximum benefit to society and the environment.
- And finally: farmers and landowners should always be consulted and listened to with regard to development within the local area.

Thank you for offering the opportunity for the NFU to respond to this consultation on behalf of the Wiltshire agricultural industry, we hope these comments are useful to the review.

Yours sincerely,



Main office: 01392 440 700 / south.west@nfu.org.uk / NFU Agriculture House, Pynes Hill, Rydon Lane, Exeter, EX2 5ST

CLIMATE150

Our Ref: 07C000572



9 March 2021

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

Via email: spatialplanningpolicy@wiltshire.gov.uk

Dear Sir or Madam

**Representations to Wiltshire Local Plan Review consultation – 13 January to 9 March 2021
On behalf of Eagle One Limited**

We write on behalf of our client, Eagle One Limited ('Eagle One'), to make representations to the Wiltshire Local Plan Review consultation.

Eagle One has freehold and long leasehold land interests in Emery Gate Shopping Centre, Chippenham. The shopping centre is located within Chippenham town centre, to the northeast of High Street. The shopping centre is popular with a range of shops and services including a Tesco Metro at its eastern end. However, the Centre is now suffering vacancies as part of the severe downturn in demand for Town Centre retail. The Tesco Metro is a single storey commercial building that sits on a raised deck above car parking. Emery Gate car park is publicly operated by Wiltshire Council and provides pay and display parking. There are two levels to this parking and Tesco is currently built above the sub-surface car park level. Surface level public car parking is provided to the south of the building.

Eagle One is working hard to retain Tesco within their premises at Emery Gate, however there is uncertainty surrounding Tesco's future tenancy and therefore a potential re-configuration of the shopping centre needs to be considered and the site future proofed. If Tesco decides to vacate the shopping centre during the Plan period, it will be important that planning policies are flexible enough to enable an alternative use in the absence of retail demand as soon as possible. This will not only support and retain footfall in the remainder of the shopping centre but a new proposal also provides a unique opportunity to create a positive place-based design response and enhancement to the surrounding conservation area.

Plans are now therefore being developed to explore potential for alternative uses, including residential development, that could be accommodated through demolition and re-build of the existing Tesco store if the need arises.

Comments upon the Emerging Spatial Strategy consultation document

We make the following representations to relevant parts of the consultation in order that Wiltshire Council gives full consideration to addressing these issues as the draft Local Plan Review document emerges.

Introduction & Growth and Climate Change

Overall, we support the retention of the Core Strategy hierarchy of settlements and agree that Chippenham should be a primary focus for development. Similarly, the approach to focus new development in the County's main settlements to reduce carbon and tackle climate change is supported.

Delivering the spatial strategy

Page 5 of the document sets out how the Council intends to deliver the spatial strategy. This includes considering the impacts of COVID-19 on the economy as well as town centres. The consultation sets out that town centres remain largely vibrant but they need to evolve with the flexibility to adapt to changing retail habits. This should include policies that are flexible and responsive to market signals. We fully concur with this statement and consider that Emery Gate is one such example where a mixed-use town centre approach, including the introduction of residential uses, will need to be adopted to address changes in the retail market. Paragraphs 2.7 – 2.9 of the document sets out that challenges faced by retail floorspace in relation to online retailing and online services. This will inevitably involve adaptation of existing buildings and uses within the town centre.

The Local Plan Review should therefore recognise that policies need to enable a potential reduction and consolidation of retail floorspace in order to sustain the success and vibrancy of town centre locations. We would encourage the Council to ensure that the principles of this strategy are defined at a local level through the place making priorities for each area of Wiltshire.

Given the pace of change and the likely timeline of the Local Plan Review, we would encourage the Council to work with landlords and landowners in the immediate-term so that development of suitable alternative uses within town centres can be supported in advance of the adoption of the Local Plan Review. This is consistent with the National Planning Policy Framework (Paragraph 85), which promotes growth and diversification to ensure the long-term vitality and viability of town centres.

On this basis, we recommend that the Council, jointly with Town Council's where appropriate, publishes an interim position statement in relation to the application of retail and town centre policies for development management purposes prior to adoption of the Local Plan Review. This could provide a framework for a case by case approach to assess planning applications within town centres and ensure that the Council is agile enough to respond to opportunities where the market is changing quicker than the planning policy.

We welcome the use of 'place shaping priorities' to guide new development and agree that Town and Parish Councils, who have local knowledge and understanding of issues, are best placed to deliver local policies through a Neighbourhood Plan. Further comment is provided below in relation to the Planning for Chippenham consultation document.

Whilst we understand the approach to use Neighbourhood Plans to manage development within main settlements, we do not agree with the approach to brownfield development. We have concerns for the following reasons:

- The consultation document states that communities “*will be encouraged*” to prepare a neighbourhood plan. In areas where a Neighbourhood Plan is not progressed or is severely delayed, greenfield land allocated through the Local Plan Review will inevitably take priority over brownfield land.
- The NPPF (Paragraph 69) requires local planning authorities to identify land to accommodate at least 10% of its housing requirement on sites no larger than one hectare. This would include brownfield sites. This is not achieved through the proposed Local Plan Review spatial strategy. For example, Chippenham is a Principal Settlement and focus for development and growth, but the housing requirement is largely proposed to be delivered through large scale greenfield site allocations with only 2.5% of the requirement proposed to be delivered on smaller brownfield sites.
- Paragraph 118 of the NPPF sets out that “*strategic policies should set out a clear strategy for accommodating objectively assessed needs, in a way that makes as much use as possible of previously-developed or ‘brownfield’ land*”. A Neighbourhood Plan should not include strategic policies and the Local Plan Review must therefore promote an approach that prioritises the use of brownfield land. We urge the Council to be more ambitious in its approach to delivering new brownfield opportunities by identifying brownfield sites that can contribute to housing delivery.
- Proposed changes to the NPPF (published for consultation in February 2021) make changes to Paragraph 11 (a) to confirm that, for plan-making, the presumption in favour of sustainable development includes making effective use of land in urban areas. This is reinforced by Chapter 11, which supports the effective use of land and seeks for local planning authorities to take a proactive role in identifying and helping to bring forward land to meet development needs. We do not believe that the current spatial strategy goes far enough to encourage the effective use of land and recommend that the Local Plan Review sets out minimum density targets for town centre locations.

Formulating the spatial strategy

The consultation document sets out two ways of calculating housing need to provide a lower figure (Standard Method) and an upper figure (Local Housing Need Assessment). This demonstrates a housing need of between 17,410 – 20,400 new dwellings for the Chippenham Housing Market Area between 2016 – 2036. We have no comments on this approach, other than to support the growth forecasts for the town.

Emerging spatial strategy

The emerging spatial strategy proposes growth in line with the Core Strategy by identifying preferred sites for development (and to accommodate the majority of growth) at the three Principal Settlements.

The brownfield development target is taken from a ‘windfall’ allowance in the housing land supply. Appendix 1 to the consultation document proposes that brownfield target is updated every five years and as progress is made in identifying brownfield opportunities, the need for additional greenfield land to be released in the future will be moderated.

We question the soundness of this approach; a windfall site is categorised as any site that is not specifically identified in the development plan and may not necessarily be brownfield land. Furthermore, the target for brownfield development within settlements should be derived from the housing need for that location rather than looking back at windfall permissions. It is also unclear how development on greenfield land would be moderated where there are large site allocations. It would be unreasonable for the Council to inhibit delivery of housing on allocated sites where the only purpose of phasing would be to maintain priority for development on brownfield land.

We recommend that brownfield sites are allocated in the Local Plan Review to meet local housing needs, which would support sustainable patterns of development and prioritise the effective use of land within settlements. It is important that planning policies provide certainty for bringing forward proposals. Development allocations and an ambitious brownfield land target would provide such clarity to landowners and the community regarding the land uses that are acceptable on specific sites. The Tesco Metro at Emery Gate is one such site that would benefit from clear policy guidance so that a future redevelopment successfully supports the vitality of Chippenham town centre.

Emerging Spatial Strategy Recommendations

In summary our recommendations are as follows:

- The brownfield land target for settlements in the Emerging Spatial Strategy should more ambitious and deliver a good supply of small and medium sized sites for housing;
- The Local Plan Review should highlight brownfield opportunities with the Neighbourhood Plan delivering the allocation detail;
- The Local Plan Review should set minimum density targets for town centre locations to optimise housing delivery on brownfield land;
- The brownfield land target should be derived from housing need figures rather than past windfall delivery;
- The Tesco Metro at Emery Gate is a brownfield site that could support new housing development and this should be allocated within the Local Plan Review.

Comments upon the Planning for Chippenham consultation document

We respond below to questions within the consultation document relevant to the town centre and Emery Gate site.

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

Our comments in relation to the approach to brownfield land are set out above.

This section of the document refers to the local economy and identifies that Chippenham remains a healthy town centre. This sets out that there is a need to ensure that the High Street and the shopping centres at Emery Gate and Borough Parade continue to underpin the health of the centre. We agree that it is important to support the health of the centre, however, given the current challenges faced in retaining the Tesco Metro store within Emery Gate, we believe this will need a wider approach to envisage a wider mix of uses that can support the town centre function. This

includes increasing residential uses within the town centre to increase footfall and vitality. We are concerned that the current vision places an overreliance on retail uses and does not go far enough to positively re-imagine high streets and town centres.

As of 1st September 2020 new regulations made substantial changes to the 1987 use classes order, which sit alongside other recent changes to permitted development rights, forming part of the government's 'project speed' to support high street revival and allow greater flexibility to change uses in town centres in response to the impact of COVID-19. The changes demonstrate Central Government's clear intentions to provide a more flexible planning system where there is an appetite to equip our centres with the tools to recover from the impacts of COVID-19. This should be reflected in local planning policies and the approaches made to support the future vitality of town centres.

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

The consultation document sets out the place shaping priorities for Chippenham. The principles are supported and we agree that improving the resilience of the town centre is a key priority. We note that the priorities focus on 'retaining' and 'preserving' the town centre. Structural changes that have pushed consumers away from physical retail to online outlets had already started to impact town centres and high streets. The pandemic has accelerated these pressures. In this context, we believe that continuing with the status quo for town centres is not an option and radical re-imagining of how town centres operate and the mix of uses within them is required. Whilst the town centre is currently considered to be largely vibrant, this could rapidly change and planning policies need to offer sufficient forward thinking and flexibility to allow for existing buildings and spaces to be successfully adapted, including the potential to facilitate alternative uses.

This is set out within the Emerging Spatial Strategy (para 3.20), however, it is not reflected within the Chippenham priorities. Local authorities and planning policies have a critical role to play in promoting a clear long-term vision and strategy to bring together spatial planning, council services and local initiatives. Place shaping priority (ii) sets a passive role for the local authority and we consider that it should be stronger to include:

- Support for partnerships and collaboration between occupiers, landowners and the local authority;
- A clear town centre vision based on current evidence and likely future policy intervention;
- Positive policy wording to support the inevitable changes that will occur in the town centre and environs;

We would also encourage the introduction of residential development or mixed-use allocations into the town centre that would boost both the night and daytime economy. This type of development would support sustainable development and climate change objectives by being well located to benefit from sustainable modes of transport, optimising the use of public transport.

Comments upon the Addressing Climate Change and Biodiversity Net Gain Document

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

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

We welcome the publication of the Council's initial considerations for how the Local Plan can help to address the issue of Climate Change. In this regard, we would reiterate our comments above in relation to maximising the use of brownfield land in settlements to support growth within the County. This would have multiple benefits to encourage the effective use of land (in accordance with paragraph 118(a) of the NPPF), reduce the need to travel by private car and encourage the use of sustainable modes of transport.

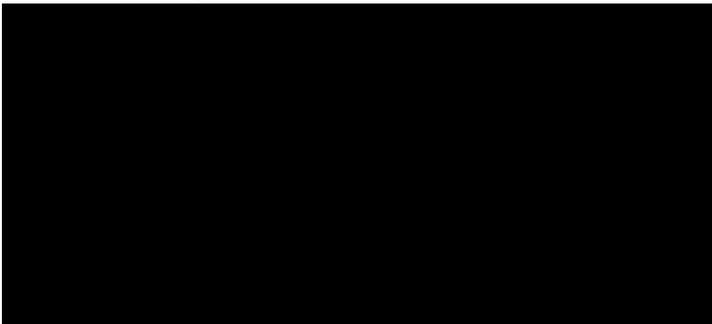
Without optimising the use of brownfield land, we question how the Council will be able to fully address the challenge of climate change within the plan period. For example, the location and scale of large development to the east of Chippenham does accommodate future growth. However, in the absence of a robust and proactive policy to also maximise brownfield development, this future growth will not make effective use of existing sustainable transport infrastructure such as the railway station and local bus services.

Conclusions

This representation has been prepared by Avison Young on behalf of Lone Eagle Retail Ltd in response to the current consultation on the Local Plan Review consultation. In summary, we generally support the approach of maintaining the spatial strategy set out within the Core Strategy where Principal Settlements are the focus for growth; however, we have concerns about the soundness of the approach to brownfield land targets. We also make suggestions in relation to the Chippenham place shaping priorities and it is recommended that these are strengthened to better support the future of Chippenham town centre.

I hope that the comments set out above will be duly considered and will assist in informing the next iterations of the Local Plan Review document. We would very much welcome the opportunity to discuss the Emery Gate site with the policy team and provide any clarifications as required. Please do not hesitate to contact me on 0117 988 5321 / charlotte.taylor-drake@avisonyoung.com should you wish to discuss.

Yours faithfully



For and on behalf of Avison Young (UK) Limited

Avison Young (UK) Limited registered in England and Wales number 6382509.
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CLIMATE151

[REDACTED]
Spatial Planning
Economic Development and Planning
Wiltshire Council
County Hall
Trowbridge
BA14 8JQ

[REDACTED]
9th March 2021

[REDACTED]
REPRESENTATIONS TO THE WILTSHIRE LOCAL PLAN REVIEW CONSULTATION (JANUARY – MARCH 2021)

We write on behalf of our Client, Gallagher Developments, in respect of their land interests at Land South of Pewsham, Chippenham ('the site' hereafter) for residential development. We welcome the opportunity to respond to the consultation to inform the preparation of the Wiltshire Local Plan Review.

We append a Site Boundary Plan (**Appendix 1**) illustrating our Client's land interests, which form part of the Preferred Development Site – Site 2 South Chippenham. We are promoting the site through the Local Plan Review to support the Plan's strategy and the Site 2 allocation as an appropriate location for growth to help meet the needs of Chippenham and the wider District in a sustainable manner. As we set out in these representations, we consider the location of our Client's site is particularly well suited to be delivered early in the Plan period, and our Client has a demonstrable track record in this respect. We also append a Land Use Plan (**Appendix 2**) illustrating our Client's land interests in the context of its relationship to the existing urban area and the wider Preferred Development Site. This is an initial concept plan setting out our thoughts on land uses and how they relate to some of the Council's current objectives. We will provide more detail around a potential layout and the site's relationship with the balance of the draft allocation and neighbouring draft allocation to the north (Site 1 East Chippenham) as part of a Vision Document, which we will submit in due course. This will be informed by the proposals for a potential distributor road, which we touch upon in this letter. We are responding separately to the Future Chippenham consultation on this road.

These representations set out a brief overview of our Client's land interests before providing commentary on the Emerging Spatial Strategy and supporting documents which inform the development of the policy.

To support these representations, we provide the following information:

- Site Boundary (Drwg No. 9601) – **Appendix 1**
- Land Use Plan (Drwg No. 9600) – **Appendix 2**

The Site

As shown on Appendix 1, the site adjoins the existing urban area and is immediately south of Pewsham Way, which provides a number of potential vehicular access points into the site. The site itself forms two parcels separated by an existing Public Right of Way which the Council envisages will connect the wider Preferred Development Site to Pewsham to the north. Pedestrian and cycle connectivity between the site and the existing town and other proposed developments will be central to our Client's approach.

We have reviewed the consultation material, including Figure 6 (Concept Map) in the Planning for Chippenham document, which shows the proposed layout and land uses for Site 2 South Chippenham. This illustrative plan shows a potential distributor road in Chippenham. Whilst we are responding to the separate consultation, given the implications for the design and layout of this site and the wider allocation, we make reference to the distributor road here.

We would emphasise that our proposals are flexible in terms of the road's alignment and the masterplan can and will be amended as the design of the road progresses ahead of the new Local Plan. It is also worth highlighting at this stage that we have undertaken some initial highways work, which indicates that the delivery of this site would not be reliant on the new road. This is indicated in the Planning for Chippenham document at paragraph 38:

"It is highly likely, but not so certain, that a second road link from the A4 will also be needed as Chippenham continues to grow. This is a route south from the A4 to the A350. This is also shown on the concept plans for sites 2 and 3. The Council has made a successful bid to fund the road's construction, if these proposals go ahead. A new road is shown on the concept plan for site 1."

This of course relates to the Site 2 as a whole, which is for 2,415 dwellings. As shown on the Land Use Plan at Appendix 2, our current thinking is that the site can provide around 550 to 750 dwellings from two or three separate points of access from Pewsham Road. Our Vision Document will set out more detail on how this can be achieved, but on the basis of the work we have undertaken so far (including highways), we consider that early delivery of this quantum of development is achievable without the new distributor road.

We fully support the delivery of the road and we would protect a corridor for its delivery and provide an early financial contribution to facilitate this. This early delivery of housing in a sustainable location adjacent to the urban area will kick start the wider allocation and the Local Plan's objectives.

The site will propose a 2FE primary school and policy compliant public open space, with typology to be agreed with the Council. Key green and blue infrastructure corridors will be protected and enhanced, as will pedestrian and cycle routes e.g. the Avon Valley Walk linking east to west.

Emerging Spatial Strategy

Introduction

We support the principle of the various components of Local Plan Review consultation, however, we have certain comments on the Emerging Spatial Strategy (ESS) and supporting documents.

We support the hierarchy of settlements and welcome the primary focus on development to the Principal Settlements of Chippenham, Salisbury, and Trowbridge. In addition, we welcome the Council's growth ambitions and the acknowledgement that the minimum target is 40,840 dwellings in the Plan period. The ESS also acknowledges that the housing requirement figure may change once the Government has reviewed the Standard Method. We would support the Council's higher growth target of a minimum of 45,630 dwellings to provide flexibility of supply and to encourage economic growth.

Growth and Climate Change

We support the Council's intent to help address climate change by ensuring a sustainable pattern of development in appropriate locations. The site, as part of the wider South Chippenham Site, is well-placed to meet these objectives by virtue of its location on the edge of the settlement. This enables swift integration of the new development, reducing the need to travel, whilst making best use of existing infrastructure.

As part of the Vision Document, we will provide more detail regarding our site's contribution towards these goals – specifically in terms of heating, electricity generation/use/efficiency, sustainable transport and modal shift, and zero carbon design principles. As part of this strategy, we would provide innovative zero carbon heating concepts and initiatives. Gallagher Developments is committed to delivering innovative and viable solutions from day one to help Wiltshire Council achieves its zero carbon transition.

Delivery Principles

We support the Delivery Principles and the use of place shaping priorities to guide development, particularly around the strategic allocations. The aim to maximise brownfield land is welcomed, but there does not appear to be an evidence base document exploring the urban capacity and what contribution this could feasibly make to the overall housing target. If brownfield targets are used, this should be produced to ensure the Plan is robust and justified.

The Delivery Principles should make a clear distinction where needed between the strategic allocations and smaller allocations / windfall development.

Emerging Spatial Strategy

We welcome the Council's approach to directing the majority of growth to the County's three Principal Settlements, which continues the approach of the Wiltshire Core Strategy.

We also welcome the Council having assessed alternative development strategies through the Sustainability Appraisal. We will provide more detailed comments on the Sustainability Appraisal as the draft Plan progresses.

As above, the approach to brownfield targets may need some further evidence beyond relying just on historic windfall rates for each settlement. However, the recognition that the brownfield targets will be reviewed after 10 years is welcomed.

Chippenham Housing Market Area (HMA)

We agree with the Council's approach that three main settlements are capable of providing sufficient capacity to meet even the highest spectrum of development requirements. We also agree with the forecast that the housing pressure in the Chippenham HMA presents the largest additional housing need.

We note that the Council envisage the increase in carbon production and climate change in the Chippenham HMA due to the scale of development proposed. Development at Land South of Pewsham will be a sustainable urban extension which can incorporate measures to mitigate environmental effects and support linkages with the existing urban area. We will provide further detail around this through our Vision Document.

Planning for Chippenham

We set out the following answers to the consultation questions posed in the 'Planning for Chippenham' supporting document.

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

We support the scale of growth in Chippenham as a Principal Settlement. We would only support a brownfield target if it was supported by evidence around urban capacity and deliverability. Brownfield sites should be supported where they have a realistic prospect of contributing towards the housing target, but as identified above, the forecast need at Chippenham is significant and so sustainable sites such as Land South of Pewsham on the edge of urban areas should be the focus. As we will set out, our Client's site as part of this wider allocation and is capable of early delivery, which will help protect the Council against speculative development during the Plan period.

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

We support these priorities and consider Land South of Pewsham to contribute effectively given it adjoins Pewsham and will link well to the existing transport network, including footpaths, cycleways and public transport.

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

We support the Council's approach and the methodology in the Site Selection Report for Chippenham (January 2021). We agree that a high scale of growth for Chippenham is required and as such, urban extensions are a sustainable solution.

The wider Site 2 South Chippenham site straddles several SHELAA References as set out in the Site Selection Report for Chippenham (January 2021). Our Client's land interests primarily comprise Reference 809 – and South of Pewsham Way. As demonstrated in the Council's judgment, the site has no significant constraints, with good access to the A4. As set out above, we will provide technical information alongside a Vision Document to support this position.

As set out in the Formulating Alternative Development Strategies (ADS) Wiltshire Council Chippenham Housing Market Area (January 2021), Chippenham is one of the least constrained areas environmentally compared to other areas in the HMA. It also appears to be one of the best served settlements in terms of infrastructure, indicating its potential for higher growth.

The Wiltshire Local Plan Transport Review (January 2021) conveys the importance of the A350 corridor in the context of the County. On the case of Chippenham, new road connections will help to mitigate the impacts of additional development. Our proposals indicate this is achievable for our site. Analyses in the Transport Review establish the requirement for a new Southern Distributor Road (the spine road corridor) connecting the A4 to the A350. As noted above, the road is highly likely to be needed, but this is not certain yet. Further technical work will be carried out to establish this. Notwithstanding our initial work suggesting that a standalone development of around 750 dwellings could be delivered independently of this infrastructure on the site, we fully support the delivery of the distributor road and will ensure it is protected as part of any masterplan for the site.

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

We consider early delivery of the more accessible parts of the wider allocation Site 2 to be most important, because this will kick start the whole allocation and speed up the delivery of housing and other objectives. This will also support evidence around deliverability / developability, which will be key in supporting the allocation and Local Plan strategy / trajectory. Infrastructure will be very important for the allocations. Early delivery of a development which can provide all of its own requirements, whilst contributing to wider requirements (e.g. distributor road), should be supported through the policy's wording.

CP5. How can these concept plans be improved?

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

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

For ease of reference, we respond to questions CP5, CP6 and CP7 collectively. Our response relates to our Client's land interests, Land South of Pewsham, as illustrated in Appendices 1 and 2. We will provide more detailed comments around the allocation as part of the wider masterplanning exercise within our forthcoming Vision Document.

First, we query the rationale of the wooded area to the north of our site. We note there is a wooded area at present, which we will seek to protect and enhance. However the Concept Map appears to show a substantial increase in woodland which we think would be at the expense of utilising the existing King's Roundabout. This could provide a high quality, landscape-led first early phase of development to deliver the benefits we have identified above.

Second, as set out above, we have a view on the location and alignment of the potential distributor road, which we will set out in more detail as part of the separate consultation. In summary, we consider pushing the road further out the east of the site would be most appropriate from an urban design perspective. We have identified residential parcels from a number of access points which can provide linkages with this distributor road. We would welcome a further discussion on this as we prepare our Vision Document and as the design of the distributor road evolves. We will ensure our proposals are consistent with the Council's plans for the road.

Third, we are supportive of the green corridor and the benefits it will have for the wider Preferred Development Site. We agree that green and blue infrastructure and habitat connectivity will be fundamental to the success of sustainable growth in Chippenham and we will set out further detail as to how our site will link up with the existing and future development and the remaining countryside, and how we will achieve biodiversity net gain.

We have currently shown the potential for housing within the western parcel, alongside improvements to the Riverside Park and the Avon Valley Walk. This will be subject to further technical work and discussions with the Council, but we are supportive of the principle of some residential here as an early phase.

For the reasons we have set out, we consider the policy should provide some support for early delivery of the northern part of Site 2, subject to addressing certain criteria e.g. highways capacity, infrastructure provision etc.

Addressing Climate Change and Biodiversity Net Gain

We welcome and support the Council's commitment to addressing climate change through the development of five overarching themes. We note at Paragraph 5.4 that it is too early to in the Local Plan Review to define or outline specific policy wording.

Our Client's approach to this site will be underpinned by a strong focus on sustainability and this will be reflected in the Vision Document. We support the principle and content of the themes and make the following comments.

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

We support this policy in anticipation of the forthcoming Environment Bill.

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

We support good design principles to achieve sustainable development. Our comments on technical standards for homes are set out below.

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

B5. Would a move to support the delivery of zero carbon new development materially affect scheme viability?

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

We support the aim to achieve zero carbon swiftly, but we would encourage the Council to ensure that any deviation from Building Regulations (including the timing of Future Housing Standards) is properly tested, to ensure it is deliverable.

We would encourage the Plan to rely on national standards so that it does not become out of date as these evolve e.g. through Future Homes Standards. Gallagher is committed to delivering innovative solutions and this will be outlined in our future vision proposals.

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

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

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

We generally support the approach set out in Policy Theme 4, however we would caution against being too prescriptive, as this could become out of date compared to evolving national standards and emerging technology.

We support sustainable energy generation for the allocations where feasible, but consider that for Site 2, any standalone solar panels would be better located towards the periphery of the development so that the most accessible areas are more efficiently used for residential development to minimise unnecessary trips. Any requirement for on-plot measures should be tested through the viability study to ensure deliverability. We support the consideration of district heating networks as a key plank in the measures to achieve zero carbon.

B12. If we are to tackle issues associated with air quality would the measures set out above go far enough and be effective in improving air quality in Wiltshire? If not, what measures are we missing and how should they be framed in land-use planning policy?

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

Directing significant growth to sustainable urban extensions such as in Chippenham will be the most important step in helping to deliver these goals. Discussions with public transport operators should be undertaken to ensure a joined-up approach between public transport provision and the phasing of development. These improvements can be delivered via contributions and our Client is supportive of modal shift.

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

Early discussions with providers will need to take place to ensure the requirements of the Plan are deliverable.

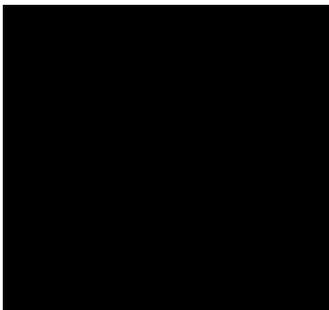
B15. If all new development is to be future proofed to promote zero carbon living in energy production and consumption terms, what impact would this have on the design and viability of schemes?

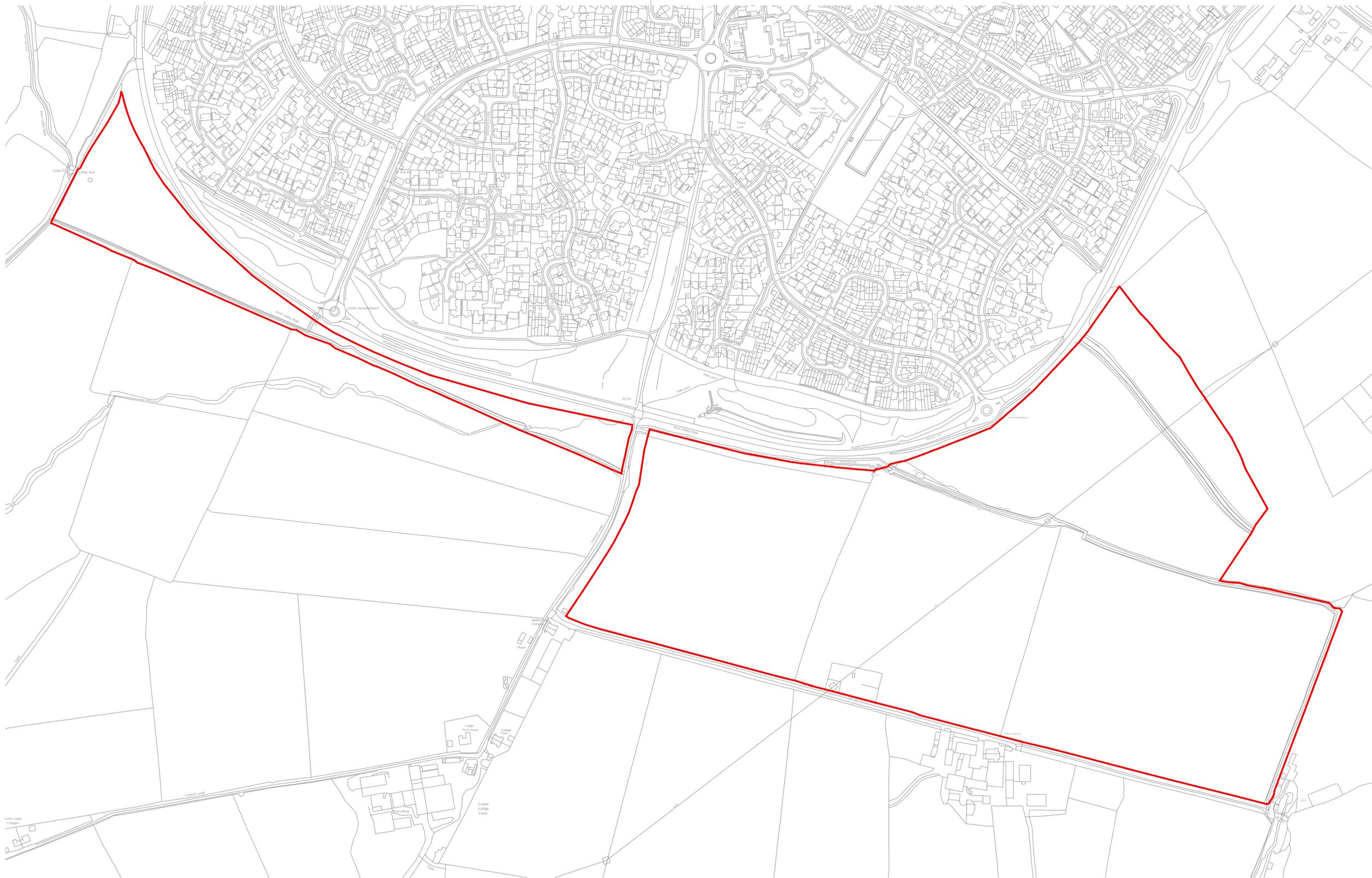
Any measures which are too prescriptive or which go above and beyond national standards may not be deliverable or may become out of date. The Plan must protect against this and be supported by robust evidence on viability. Development phases that would deliver beyond 2025 should retain flexibility in design to allow for the rapid emergence of innovative new technology and solutions.

In summary, we fully support the draft Plan's spatial strategy and proposed allocation south of Chippenham (Site 2). As we have set out, we consider our Client's site as part of this wider allocation presents an excellent opportunity to be delivered early within the Plan period. This will help to deliver sustainable growth and the Council's objectives, including housing and infrastructure such as the distributor road. We will be producing a more detailed Vision Document to set out how this can be achieved and we would welcome the opportunity to discuss this with you further.

We trust these representations are helpful to inform the next stage of the draft Local Plan. Should you require any clarifications of the points raised please do not hesitate to contact me.

Yours sincerely





LEGEND

Site Boundary 38.29Ha



Project
Land South of Pewsham

Drawing Title
Site Boundary

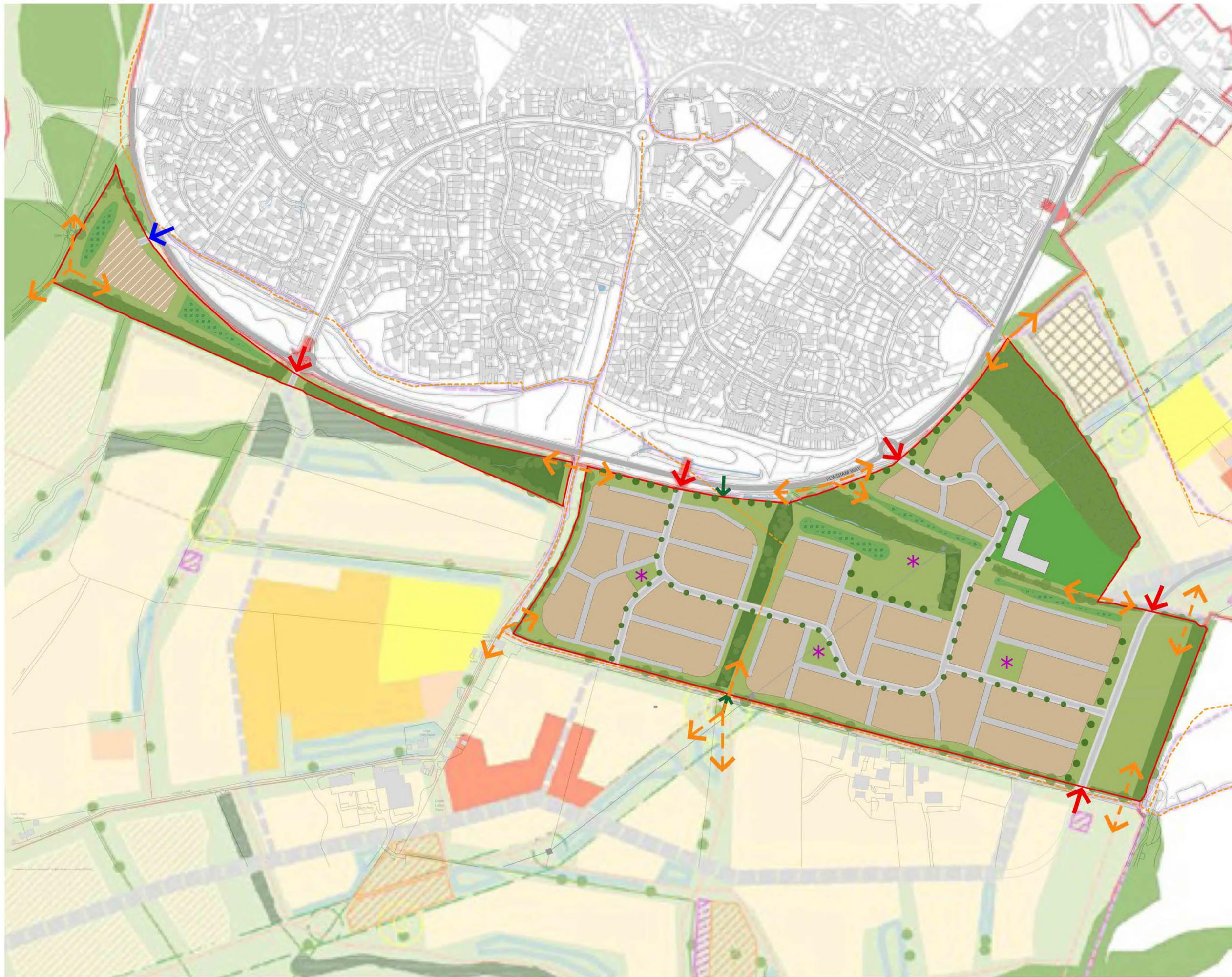
Date	Scale	Drawn by	Check by
22/02/21	1:2500@A1	KT	AT
Project No	Drawing No	Revision	
1300	9601	-	

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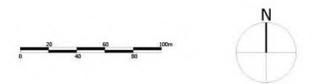


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-  Site Boundary
-  Vehicular, Pedestrian and Cycle Access Point
-  Potential Additional Access
-  Pedestrian Access Point
-  Pedestrian and Cycle Connection Opportunities
-  Existing PROW
-  Residential
-  Potential additional residential
-  Potential Primary School
-  Public Open Space
-  Strategic planting
-  Potential locations for play
-  SuDS Basin (Indicative Location)
-  Infrastructure
-  Overhead power cables (to be removed)

NOTE:
Wider masterplan land uses are consistent with Figure 6 Concept Map for Site 2 and 3 of the Draft Wiltshire Local Plan (Jan 2021)



Project
Land South of Pewsham

Drawing Title
Concept Masterplan

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04.03.21	1:2500@A1	KT	AT
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32651	9400	-	

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CLIMATE152

[REDACTED]

Wiltshire Council
by Email

[REDACTED]

8 March 2021

Dear [REDACTED]

WILTSHIRE LOCAL PLAN CONSULTATION

Due to the number of papers associated with the development of the Local Plan for Wiltshire, I have been unable to find the time to scrutinise them with any degree of certainty that I now know the details of what is in the plan. However, I have a number of questions. I apologise if answers are in the documents but you will appreciate that it is asking a lot of the general public to plough through such a huge amount of material. For future reference, perhaps the strategy could be presented as one document with appendices for each designated area, rather than repeating the large amount of each report devoted to exactly the same generalised information which currently takes up the majority of each report.

The Plan currently seems to be missing some basic needs on specific measures to meet climate change targets and to comply with other environmental and social obligations such as BAPs, National Pollinator Strategy, air quality and social inclusion rules. My questions come under three headings which I hope makes it easier to answer them.

1. Sustainability and Climate Change

While I understand that the plan is focussing on housing need, I cannot find any overall strategy for the Council to include important components of sustainable planning and climate change resilience, such as transport, education, employment, health and wellbeing. Please could you direct me to those components of the plans? Again, I apologise if the targets and operational methodologies are somewhere in the reports but I couldn't find them. If not, the plan does need to include a commitment to meet all these components with specific targets, as a matter of urgency.

1. Siting new development where (1) it is most needed (2) numbers are supportable (3) it reduces car use (4) it improves public transport usage (5) genuine sustainable settlement designs are provided (6) greenfield sites are avoided
2. A commitment to ensure all new developments are built to zero carbon standards (as was part of planning law for 2016 before the current government removed that obligation).
3. How will road schemes take into account realistic projections of future traffic volumes and ensure that local and national climate change policies, and longer- term changes in work patterns as a consequence of COVID-19, are properly measured and incorporated into the plan?
4. Create a planning framework that promotes renewable energy generation, including making specific provision for onshore wind generation (the lowest cost form of electricity generation), which is not currently mentioned anywhere in the Plan?
5. Encourage a significant shift away from private cars to public and active transport, investing in cycling and walking infrastructure and improving infrastructure for electric vehicles?

6. Protect and enhance the carbon absorption properties of the natural environment, including significant increases in tree and hedge planting, also helping to improve biodiversity, and SUDS schemes, mainly through permeable surfaces to reduce damaging run-off with all the negative outcomes for nature and people that brings?

7. Protecting the best and most versatile agricultural land, which helps sequester carbon and ensure local food production and future food security, as well as helping to restore dangerous declines in important invertebrate populations crucial to food production, including the Council's own County farms.

2. Neighbourhood Plans

As I understand it, there are Neighbourhood Plans currently being produced - with varying degrees of success in my own experience - by small towns and villages all over the county. Have the number of houses and types of development been taken into account? Has the obligation to be zero carbon been clearly communicated to those communities? In which case, where in the reports can I find this information? There are, where NPs are creative and well-done with proper consultation, many opportunities for increased sustainability and improved health and wellbeing, which can contribute to the overall strategy that needs to encompass a wider brief than just where to put houses. Can you tell me how the council plans to take advantage of these opportunities? If not, please ensure that they are included as a matter of urgency.

3. Public Sector Equality Duty

As I was unable to find reference to the PSED in the reports, I would appreciate if you could tell me how the consultation process complies with the requirements of the PSED? I cannot find where you have published your obligatory evidence. Can you tell me how you have identified the hard-to-reach groups in this consultation? Where are those data presented? Can you also tell me how those hard-to-reach groups have been consulted and where the evidence required by the Act shows that this has been carried out successfully?

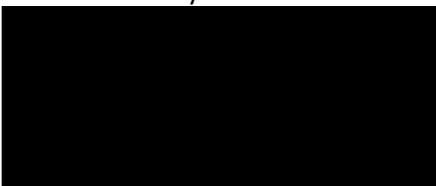
Conclusion

The current local plans seem to need a lot of work to encompass these basic needs for a sustainable future for Wiltshire and to follow the recommendations of the Climate Emergency Task Group.

But the Wiltshire Local Plan is a great opportunity for Wiltshire Council to introduce a policy framework that comprehensively addresses the urgent need for measurable reductions in carbon emissions, in line with the Council's democratic and legislative obligations. By ensuring the Plan includes the criteria listed above - and I'm sure there are creative minds among our LA officers and members who could make it happen - Wiltshire could become a leading exponent of the very best in sustainable frameworks for the future of our great, great grandchildren who will not thank us if we leave them with an exhausted planet that can no longer provide their food, shelter, water or the sound of the great bustard on Salisbury Plain.

I look forward to your comprehensive response to my questions and an assurance that all these components will be incorporated in future drafts of the Wiltshire Local Plan.

Yours sincerely



CLIMATE154

Addressing Climate Change and Biodiversity Net Gain through the Local Plan Consultation Response Form

Ref:

(For official use only)

The paper 'Addressing climate change and biodiversity net gain through the Local Plan - raising the ambition' outlines the challenge of climate change, describing how the preparation of the Wiltshire Local Plan can, in part, help address the issue.

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

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

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

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

This form has two sections:

Section One – Personal details

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

Section One – Personal details

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

	1. Personal details	2. Agent's details (if applicable) *
Title	Mr	
First name	[REDACTED]	
Last name		
Job title (where relevant)		
Organisation (where relevant)		
Address Line 1		
Address Line 2		
Address Line 3		
Address Line 4		

Postcode		
Telephone Number		
Email Address		

Section Two – Questions

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

Answer:

Evidence: [The scientific measurement evidence](#) clearly shows that we have made Zero progress to date in reducing the exponential rate of increase of every Climate Change measure. This is the fundamental evidence that National, County and Town Land Use Policies need to urgently and fundamentally change away from the goal of Economic Growth to a new goal of [Green Economic Growth](#). All economic sectors that emit should de-grow and only sectors that harvest and sequester should be targeted for growth.

Realistic: The reality is that here in Wiltshire the annual average temperature has increased by 1.69°C since 1960. The reality is that IF global carbon emissions get to Net Zero by 2050, global warming will only change from increasing exponentially to increasing linearly. The reality is that there is no choice but for the Local Plan to focus on Climate mitigation rather than Human Comfort and wealth.

Viable: We need to change what you mean by viable. When you say “Viable” here, you mean “financially viable”, which uses the construct of money to indicate the further accrual of wealth and comfort to individuals or society. The Climate and Environment do not care one jot about money. Wiltshire Council need to change their [value metric](#) for the measurement of viability away from money/wealth to planet/nature.

*Achievable: We have No Choice but to succeed in reversing existing carbon emission trends and then achieving significant Carbon Sequestration. We could lead the way as a county, if only the leaders believed in the pro-green rhetoric they consistently Act **against**. We could show other counties how to do it if every member of WC rowed in the same direction and make a national difference ... if we chose to.*

Our Political Leadership is focussed on Economic Growth and wealth creation. That policy turns the resources of the planet into money using the work of the population. I do not think it is reasonable to assume that the Local Plan will make any difference at all to the aspirations and methods of these Leaders. The evidence is clear: at the national level, ministers over-rule climate/ecological arguments on anything they choose to e.g. HS2, Stonehenge A303, Coal Mines etc etc and our own cabinet leaders take no notice of climate/ecological arguments if they pose a challenge to economic growth e.g. supporting incineration, using glycoposphates, supporting A350 enhancement, planning huge housing estates.

It is not reasonable to assume that the Local Plan will change the core values of these people to give consideration to our dying Nature, Climate and Oceans.

Consultation Question A2:

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

Answer:

*The most immediate practical 1st step is to stop **all** planning to create things that emit huge amounts of Carbon in their making, until we have control of all Global Climate Indicators. That includes all new construction, all new incineration and all new roads. As a stop-gap we need to repair, reuse, re-cycle everything from countryside lanes to buildings to plastic. Let's accept the weather is broken and utilise what we've got.*

The most practical 2nd step is to change every instance of "Economic Growth" in the County, Town & Parish Policy Libraries to "Green Economic Growth" where 'Green' is specifically and professionally defined to include all things that enhance Climate, Ocean and Ecology and to exclude all things that degrade Climate, Ocean or Ecology

*However, that won't be achievable until our leaders show some courage and some leadership on Climate Change. The only way to make the above achievable is to **Tell The Truth** about how bad the climate and ecological crises are to the population of Wiltshire in order that the politicians have the backing of the population to do what's necessary, which includes fighting anti-climate and anti-ecological National Policy. Covid-19 proves that when the population understand a problem, 90% will act accordingly to save our skins.*

*Learning, Talking, Planning are all fine, but to make a difference requires Action. So the agenda of each and every local government meeting should have Climate & Ecological Emergency as the first agenda item and an Actions List should be addressed which contains actions, dates and named action owners. The leaders need to **Act Now** on the Emergency by deploying all resources, intellect, policy, business, managers and workers in order to address the myriad Climate and Ecological problems in a managed, funded and prioritised way.*

*Finally, for the politically difficult or ethical difficult decisions, a **Citizens Assembly** should be regularly used so that decisions which would manifestly be made for the leadership's personal gain, career enhancement, party-political beliefs etc are taken out of the hands of their hands and decided on by an informed cross-section of the population and implemented by the leadership.*

The concept of a Civil Servant actually serving the people of the community for the benefit of the community should be reinstated. The current practice of gorging at the trough of business must be stopped.

**Consultation Question A3:
How should these actions be delivered and measured?**

*Delivery: The most effective delivery method that I have come across in my professional career for getting things done is the [Agile Methodology](#). Measured against this methodology for failing fast, identifying and prioritising tasks, using expert-led knowledge and many, many more metrics, pretty much every single Local Government meeting I've been to pales into inefficient insignificance. The key is breaking down huge complex Tasks into small **Actions** in order to Get Things Done, whilst reacting in parallel to real-world interrupts ...of which there will be many and varied soon, caused by extreme weather and food pressure.*

Measurement: Continual measurement, quality, performance and progress metrics are an essential and inbuilt part of the methodology which are fully embraced through all tasks by the entire team from top to bottom.

It's what you use to design, build, equip, run, refurbish and repurpose an entire Nuclear Strike Submarine ... on time and whilst making a profit. The number and complexity of the Climate and Ecological solutions required are many times greater than even this complex piece of military equipment.

But, it will require everyone to change and to work towards a common goal with a common purpose and a common belief. Unfortunately, this is not how National Government, Local Government, Town Councils, Parish Councils, even a PCC are traditionally set up.

*This would require courageous Leadership on the Climate Crisis and the Ecological Crisis rather than political leadership. There is no evidence of **courageous climate leadership** being present at National or County or Town level.*

Consultation Question B1:

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

Please explain your answer

Answer: No chance.

In this section about successfully tackling flood risk, there is an inherent implication that the countryside land is 'developed' into roads and buildings designed maintain or increase human comfort and ensure that humans have enough clean water to continue with our well-fed and plentiful lives.

Despite [the scientific measurement evidence](#) clearly showing that we have made Zero progress to date in reducing the exponential rate of increase of every Climate Change measure, this Local Plan section talks almost exclusively about making climate & ecological problems worse by building over our Natural Capital, commonly known as "The Countryside"... and then you're worrying about how nature might react to this further devastation.

Even without building any more, there is a huge risk of flooding and a huge risk of water management becoming unsustainable. Within the next 40 years, both of these things are not so much "high risk" as "inevitable". This [Global CO₂ graph](#) determines the trajectory of this [Global Temperature Graph](#) and there is a 40 year lag between the CO₂ trajectory changing and the Temperature trajectory changing – that's physics.

Global human behaviour (a religion of GDP growth, incessant War, endless Fossil Fuel extraction, Political deadlock etc etc) is not going to change anytime soon – it will require a huge home catastrophe to make that happen, so until then, our countryside is the only weapon we have to enhance our environment, particularly so in this discussion of flooding and water management.

*The Countryside is **NOT AN ASSEST WAITING FOR DEVELOPMENT**, it is degraded and abused Nature, which our society gives so little value to that we are oblivious to the peril our Values are about to bring us. By radically changing farming methods and changing away from concrete, steel and excavation we must restore natural water defences to protect existing buildings, roads and communities and NOT build more.*

We need to completely rethink our flood and water policies to make them integrate into a loved, cherished and valued countryside that is ecologically and climatically enhanced, not for the benefit of human comfort, but for the benefit of all other lifeforms and their environment. Our human built environment should be seen to benefit as a side-effect of intelligent restoration and husbandry of Nature, which like it or not, is our Natural Environment.

Within our existing urban areas we need to think about retrofitting rainwater harvesting, 100% PV installation, unsealing soil by replacing hard pavement surfaces with porous ones, shaming car-worship to make front gardens re-appear, grow ivy up every possible wall in the urban deserts we call housing estates, put plant troughs along every possible double yellow line, convert car parks into allotments and turn multi-story carparks into body-to-soil structures. If you're smiling, hold your thoughts right there, remember them. Reflect on them again in 15 years time.

Leadership needs to stop thinking about build, build, build and start thinking about a Future. [This CPRE document](#) is a good place to start thinking about what this actually means for our Rural County's Local Policy.

Every single bullet point of Policy Theme1 on Page 15 relates to New Build. You people need to open your eyes to what's going on in our world, rather than only thinking about economy, efficiency and wealth.

Consultation Question B2:

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

Please explain your answer

Answer: *Of course not. Most of the measures are “going” in completely the wrong direction.*

Of course not. Most of the measures are “going” in completely the wrong direction.

How can you enhance Natural Capital by digging it up (killing entire underground eco-systems), dumping the natural capital (soil) into landfill to toxify it forever with modern human waste, then pouring concrete all over everywhere for house and road foundations (excavation).

*If you sample the soil beneath the surface of the farmland, hedge land, woodland and wetland anywhere in Wiltshire you will see that it contains significant amounts of inorganic carbon and significant amounts of organic carbon – much of which is **ALIVE**. This is called Natural Capital. By “Place Shaping” (converting this countryside) to a new built environment, our existing Natural Capital emits huge amounts of CO₂ when inorganic Carbon is reduced by Oxygen on contact with air, it emits huge amounts of NH₄ (Methane) when the dead organic matter is exposed to rot and KILLS all the live organic matter that exists by smashing the 3-D space in which it lives (soil) to pieces. We can’t see it, so we feel we can destroy it but in reality we don’t need only to care about it, we need to care for it.*

The evidence is there, this is what Humanity does globally: we breathe, we breed, we build. The evidence is irrefutable, exponentially increasing Methane emissions, exponentially decreasing Oxygen levels. Can you see it yet?

I don’t know how strongly enough to say this: Natural Capital is there already – it needs a big helping hand to repair the damage we have already done. By destroying it, building on it and then saying we’ve done “net biodiversity gain” is a total lie; it’s utter rubbish. It is delusional. Our Nature based solution is Nature – we don’t need to destroy it and remake it, we need to help it and yes, that is NOT putting humans or economic growth first, that I accept.

Nothing written in this document mentions countryside, farming, woodland, wetland, rivers, pools, ponds wildlife, insects, pollinators, bugs, creepy crawlies, fauna or flora. The document title is “Addressing Climate change and Biodiversity” – how can it be that none of these things (and a myriad more) are even mentioned?

Perhaps when Civil Servants and Politicians use the word “Addressing” here, the plan is to actually destroy in totality, so that it’s inconvenience to “Development” and economic growth is avoided for ever.

Consultation Question B3:

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

Please explain your answer

Answer: *No, not by miles.*

No, not by miles.

The only places to build should be places that have existing buildings which cannot be made to run carbon-zero operationally and where the sealed soil underneath them is dead already or not present.

*In that case, a full LCA carbon assessment should be made to compare best-effort repair / leaving it until 2050 to demolish and rebuild. Rebuilding should always create a net-carbon-positive new building with **all** emissions amortised out to 2050 – that's counting everything from demolition fuel to fitted carpets, as well as finished operational emissions (including the emissions of the living residents themselves).*

On top of that, building design should be modular by design to allow recycle/reuse/re-configuration after 2050 and into the future, to plan for zero waste at the End of Life.

Again, each bullet point talks only about new development – new building on countryside. The reality is that we have made Zero progress to date in reducing the exponential rate of increase of every Climate Change measure.

*Local Government across the country and Governments across the world is just like **you**; using last-century economics and increasing human comfort to form yet more “new” policy without changing anything.*

*Think about it, if they're all like you (and to be fair, your thinking is advanced, compared to most) but think about it, if this is the best you can do, when and why will anything get better? Who is going to be the change if you here, educated, aware, democratic, comfortable - in the 1st world - won't change ... ??
[Answer:] it's not going to happen.*

I accept that Wiltshire Council going against National Policy will require a battle. However, total commitment to fighting against climate change is required if humanity is going to win this struggle and a public battle between county and government will give a public stage and a national spotlight to Telling The Truth about how bad the climate and ecological crises are and how some current law and some government policy are completely wrong – they are simply making things worse.

We need Non-Violent Direct Action at County level by the Political leaders to effect National change. That's extremely uncomfortable, which is why our leaders need to show Leadership and Courage.

Consultation Question B4:

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

Please explain your answer

Answer: Yes, absolutely

Yes, absolutely.

*Again, Covid shows us how it is done. We can carry on with business as usual and all catch the virus with global catastrophic consequences (to mankind) or we can **Stop, lock-down**, come up with an alternative focus, re-organise, re-think and re-plan for an all-encompassing solution which might get us to a new end-goal. In reality that requires a fundamental System-Change.*

*We can get to a position where all new development is carbon-neutral (net-Positive, actually) right now, and definitely by 2023 by **halting all new development** which is not part of the fight to fix the climate and the ecology until the scientific global climate measurements indicate that humanity has control of the climate and the environment. Only then, perhaps, we might be in a position to choose to trash our "Natural Capital" some more.*

For instance, a [big-wind turbine](#) is a building that requires all the emissions associated with construction but the renewable energy harvested quickly pays for the LCA carbon emitted. We have no choice but to harvest energy, so we do the best we can, we compromise on Human Comfort and focus on climate repair.

Unless we take a fundamentally different approach, we will not be able to make all new development zero carbon, no. This is because business interests are embedded throughout national, local and town government – following the names of councillors through Companies House shows that the system is riddled with business interests for the purpose of development and economic wealth creation. Business is concerned with its bottom line profit. Business profit is distributed to the few and kept away from the population in order that it continues to work. The Offshore finance system provides a full set of financial instruments to convey totally secret distribution with complete anonymity to those who 'do business'. If you find any of that incredible, educate yourself.

Society currently values money, not climate, not the ecology; economic growth is Wiltshire Council's core policy. It boils down to a battle between the Planet and Money and this county is driven by money at all levels.

*Cabinet have confirmed that there is no policy to request, suggest or force any developer to do a fair and reasonable Carbon Budget which considers sequestration lost and carbon emitted when an existing piece of countryside (that is both above ground **and** below ground) is converted to a finished furnished building, pavement and road. If the politicians are not even willing to count the real set of emissions from construction – let alone force themselves or developers to compensate for them financially with offsets – why will developers do anything other than not care? Actually, no need for a question there: the developers will continue to not care.*

*Cabinet have confirmed that there is no policy to request, suggest or force any developer to do a fair and reasonable Ecological Budget which considers habitat lost and lifeforms destroyed when an existing piece of countryside (that is both above ground **and** below ground) is converted to a finished furnished building, pavement and road. If the politicians are not even willing to count the real set of deaths from construction – let alone force themselves or developers to compensate for them financially with [I'm not sure what] – why will developers do anything other than not care? Actually, no need for a question there: the developers will continue to not care.*

Consultation Question B5:

Would a move to support the delivery of zero carbon new development materially affect scheme viability?

Please explain your answer

Answer: Yes, it could, if leadership enforced it, but No, it won't if leadership continues to choose not to.

Yes, it could, if leadership enforced it, but No, it won't if leadership continues to choose not to.

If, for example, we took the [657 hectares](#) of countryside that the proposed Chippenham Urban Expansion will convert into housing estate, industrial estate, roads, pavements and utilities and we estimated the inorganic and organic carbon content of the lifeforms in the soil to be 28% by volume, then carbon emissions would be around 6.5 million tonnes from the countryside conversion alone: i.e. just site preparation and soil excavation.

If we took that 6.5 million tonnes of CO₂ and forced the developer to pay the Traded CO₂ spot price ([as defined by HMG in DBEIS 2019b](#)) as £28^[2019], then the development profit would shrink by £182 million. Of course, that figure is designed to be used by industrial emitters such as incinerator plants to offset the costs of Carbon Capture, so this type of climate- and ecology- wrecking 'development' would rationally attract the Non-Traded Carbon emissions price of £69^[2019] per tonne of CO₂, effecting a payment from the developer for carbon emissions of £448,500,000. Given that the developers [apparently] cannot build a £75 million road without public finance to make the scheme viable, £182m or – realistically - £448m would make the scheme unviable.

In the context of the Climate crisis and the Ecological crisis, this is exactly the correct outcome. It is little wonder therefore that the Politicians and Businessmen refuse to estimate the real Carbon and Ecological costs of this scheme.

If a realistic financial value is placed on emissions and destruction for all of the other housing estate and road schemes being planned across Wiltshire, the outcome would be the same – none of the schemes would be viable, which is exactly the correct outcome. Unfortunately, society does not yet value Carbon emissions or Ecological destruction enough to do anything about it. Money is still more important.

Alternatively, developers could 'offset' the carbon generated from the countryside destruction. For instance, if a state of the art solar farm, such as that proposed by [EdenRenewables at Leigh Delamere](#) were constructed in Wiltshire to harvest enough renewable energy to draw down the emitted 6.5 million tonnes of CO₂ from the atmosphere using state of the art [Direct Air Capture](#) plant, there would be no Net Carbon Emissions from site preparation and excavation. In this case, given it takes 1824kWh of electricity to capture one tonne of CO₂, a 60GWh/annum solar farm such as Leigh Delamere would take 198 years to generate the required electricity to draw down the emissions. So again, clearly a Net Zero new development policy would materially affect scheme viability, which is exactly the correct outcome

Consultation Question B6:

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

For example, should we rely on current Building Regulations, or the Government's proposed 'New Homes Standards' (or any successor scheme, such as that promoted through the Planning White Paper) to achieve an uplift in the performance of new buildings?

Answer: The council should enforce methods that always mitigate Climate and Ecological crises

The council should enforce methods that always mitigate the Climate and Ecological crises

Conceptually, it's quite simple. Every development scheme, from the massive Cabinet-sponsored estates, down to an individual's house extension should provide a realistic and fair Carbon Budget and a realistic and fair Ecological budget.

For any scheme to be endorsed and for any planning permission to be subsequently granted, the budgets must show net Carbon sequestration and net Biodiversity Gain to 2050, where separate budget lines account for every single stage of construction (or demolition) and for operation after completion and fitting.

*The Council should stop funding planning of all types and focus finance and manpower instead on validating the budgets delivered by each developer. From this point on, it could lead the way nationally in constructing a realistic Carbon and Ecological materials, methods and costs database. The database should allow fair estimation of **Everything** involved in construction. Said database should be freely available to any developer to assist with their budgeting and supported by the council with expert guidance on best practice and updated as and when external R&D improves cost or mitigation figures.*

Only through Carbon and Ecological Budgeting can both Developer and the Customer become truly aware of exactly what is the real cost to the Atmosphere/Ocean of Carbon emissions and of the real cost to the Ecology/Environment of the soft, fluffy sounding term "place shaping" and messy retrofitting. Nothing in this world comes for free.

The Carbon and Ecological budget can be balanced by designing in the required ecological and emissions performance of the target building, set to a level which will demonstrably over-compensate for the costs through it's useful life. In the process of executing this type of budgeting, understanding of the Climate & Ecological crises by all parties will be naturally enhanced as will building design, Town and City planning.

Where a building cannot balance the true cost of both budgets, the building should not proceed.

Consultation Question B7:

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

Please explain your answer

Answer: The Council should support the retrofitting and modernisation of existing buildings to achieve higher performance and reduce carbon emissions strenuously and with complete conviction.

At the start of every utterance from the cabinet member responsible for net zero of late, I've heard the phrase "... in all honesty, we're not going to make the county net zero by 2030". Well, with that attitude and his power, he's right and with the cancer of cabinet members who don't believe that climate change will affect their privileged comfortable life much in evidence, we need the leader of Wiltshire Council to take a long hard look at his capabilities and either step up, or step down. At any time in my professional career had I stated that I could not achieve the task I was responsible for just 20% of the way into it, I would have been sacked. No ifs, no ands, no buts, sacked – and with very good reason. This public behaviour is totally unacceptable – even for a wannabe politician.

Let me state again: We Have No Choice but to do this work: [Look at the data](#), extrapolate it, educate yourself, observe humanity, feel the grief, then for goodness sake, Act!

*As I said above, the most important thing is to **Tell the Truth** to the population about how serious the crisis is. Publicise the problem, publicise the facts, publicise the retrofit and modernisation methods that can be applied to a building, publicise how life choices can reduce emissions both with and without spending money, ... there's so much the council can do through education and believing in achieving a goal of full retrofit and modernisation of all existing buildings by 2030. Yet again, Covid shows it can be done with leadership, education and conviction; we had no virus models, no vaccine and no vaccination programme just one year ago, and now we're 30% there in the UK & well positioned to help the world.*

*When did I see an email talking about climate change from WC or CTC ? You have full email lists!
When did I see Leaders giving informed webinars on climate change? You have YouTube channels!
When did I see leaflets outlining the consequences of inaction in my Ward? You have full postal lists!
Where are the case studies for the set of typical Wiltshire houses & retrofit? You have a massive web site!
Where are the mandatory CEE agenda items in each Local Government meeting? You have the power!
Where are the public Action Progress boards in each ward and the award ceremonies? You can do this!*

Is it possible for a person to deploy PV on someone else's roof? No. That requires the equivalent of a Local Government ABTA scheme to cover any/all conveyancing issues at the time of sale.

Is it possible to deploy micro wind turbine power in an urban environment? No. That requires an MCS approved turbine system <3.8m² swept area and there are none on the market.

Is there a list of companies provided by Local Government to execute the work required through Green Homes Grant ? No ... or is Local Government training any significant number of unemployed people to do the work ? No.

Has the council spent millions to build over the countryside? Yes. Are it's key power players delivering economic growth by building over the countryside [yes!] or working to mitigate Climate change and Ecological destruction full time [if only] ??

The Council needs to determine what it actually Values. If core values are still the old-age Political ones, say so, drop the greenwash and continue to get rich. If core values concern the future of the population through Civil service, then get serious on addressing climate Change and biodiversity.

There is a 5-strong team addressing Carbon reduction. That's 5 workers out of 5000 workers in total. The Ratio speaks volumes about this Local Government's core values and levels of hypocrisy when it comes to this Local Plan Policy.

Consultation Question B8:

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

Answer: No, the measures outlined do not go far enough.

Fundamentally, what's missing in this document is a statement of how much harvested energy is required, this year and each year forward to

- a. *Provide all electrical and heating power for Wiltshire's requirements*
- b. *Sequesterate and store CO₂ from the atmosphere, equivalent to the amount that Wiltshire emits.*

Without those numbers – as cabinet well know – we can all continue to live in a haze of slight concern and avoid feelings of guilt or feel any real need to do anything. Politicians sell voter Comfort to get elected and avoid voter Discomfort at all times. Unfortunately, to mitigate climate change, life needs to get significantly less comfortable for all, especially us high-consuming, first world types.

So, as an example, let's look at Chippenham's energy consumption figures for 2018 from the [CSE](#): 310,000MWh. EdenRenewables' 220 Acre PV farm generates 60,000MWh annually. So Chippenham needs >1100 acres of PV farming (which is temporary, improves bio-diversity & wildlife). Instead, WC plans to sell and build over Chippenham's county farms for profit. Rather than focussing on a building strategy, WC right now should focus on a Renewable Energy Strategy for every settlement in Wiltshire. By allying harvesting to storage, Wiltshire Council could become a national leader in generation/storage if it chose to do so.

Let's take another example using Chippenham's energy usage. A 10-minute play on [GlobalWindAtlas](#) is enough to persuade anybody that Wiltshire has some of the best wind resource in the world and it's right over our heads. A few days of learning & researching shows that above Chippenham Station car park, an IEC Class3 turbine with a 150m hub height will achieve a 50% CF. Not as good as the North Sea site for sure, but it's sited at point-of-use, accessible by road and rail and not miles away in the deep sea ... which counts for a lot. Just seven [Halide-X 12MW](#) turbines at 42% CF could provide 310,000MWh annually.

But you have to change the maximum turbine tip height Policy and educate the public about what will happen if we don't achieve Carbon Neutral by 2030. Rather than build over Chippenham's county farms for profit, why not site 7x turbines there, amongst PV farms? There's a High Voltage power line running right through and the pylons are 200m apart. Why not work with SSEN across the county farms to upgrade the HV line to more efficient copper cables, move it to a ground-routed system, install a sub-station to feed the grid and the town from the turbines, do some [DAC sequestration](#), generate some hydrogen, make some synthetic fuel, [recycle all waste plastic](#) types and remove the pylons to help with the view?

Don't be taken in by HMG Rhetoric: look at the reality of [Grid Carbon Intensity](#) in our Southern Region – when the sun doesn't shine, we're powered by CCS Gas. Read the [BEIS Energy Policy](#) which is to empty the UKCS of Oil & Gas before 2050. See [Dukes](#) and understand that we don't count the 'biofuel' CO₂ emissions of our biggest power station – Drax – or any other biofuel plant. We don't count the CO₂ from Incinerators, yet we push EVs ... why? ... because Grid electricity is a massive market for Gas. We must recognise that our National Politicians do not intend to change on account of the climate, they are driven by money.

So, for Wiltshire to “decarbonise Energy Production, Consumption and Emissions”, you, Wiltshire Council, are missing an entire team and your aspirations for Energy Harvesting and Green Economic Growth are orders of magnitude too low. Alongside the Carbon reduction team, WC require an Energy Harvesting Team. Both teams need the full, A-Political backing and full-time support of each and every cabinet member and the leader of the council. Our WC 'leaders' need to assess what they value – is it money or is it a future?

When it comes to renewable energy harvesting, the choice for the population of Wiltshire really is between a view and a future. Our leaders can continue to live doggedly in the past or they can work hard to be heroes for a future.

Consultation Question B9:

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

Please explain your answer

Answer: It should encourage all technologies to provide green energy in Wiltshire.

Not only should Wiltshire Council encourage all technologies through Policy and active facilitation and capture of grant monies, it should get active and help in the deployment of renewable energy harvesting of its own accord, with its own budget and strive to become best-in-class experts and achieve on time on budget delivery. That's called Green Economic Growth and it does not have to be left to the Private Sector.

*The problem with the Climate is absolutely massive. The CO₂ problem is **so** big in fact, it's Planetary in size. The only things humanity has to fix the existing climate problem are Harvested Energy and Ingenuity. In the UK, we are highly educated and world class in R&D, design and engineering. Consider the challenges faced by other more disadvantaged countries, such as, say, India. Are they going to be able to engineer sufficient sequestration in time? No. So that means – if we want to avoid climate tipping points – we have to do what is required, no matter how economically fair that seems.*

Again, is there any idea amongst the politicians as to how big the problem is globally? Consider the 43 billion tonnes of CO₂ humanity emits annually into the atmosphere. What do we have to engineer to draw down that amount of pollution every year and then de-insulate our atmosphere so the planet stops relentlessly warming up?

Well, if we use DAC Sequestration technology we would need over 3000 Hinkley-C type Nuclear power stations or 1.2 million Offshore wind turbines, or 1.2 million square kilometres of PV to generate that power, and that's just to do the CO₂ draw down. Nothing to do with running our economy or keeping us comfortable, warm and fed, that's just to extract the CO₂ we emit. And remember, for every tonne sequestered from the air, a free tonne is adsorbed by the ocean, so to lower the ppm of the atmosphere, twice as much effort is required. On top of that, it takes energy to actually do something with 43 billion tonnes of CO₂ drawn down. Be worried, be very worried.

However, we have vast renewable energy resources in our country. We have vast engineering capabilities. We have vast influence around the world over huge areas of land and business from previous pillage. Why not make Wiltshire a power house to focus national use of all of our resources? The wealth in Wiltshire is immense, we just need to enlighten the wealthy about how urgently they need to put their money to work for something other than their own comfort.

So don't ask should we support all technologies – get out there and deploy them with maximum commitment and maximum effort.

Consultation Question B10:

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

Please explain your answer

Answer: definitely yes

It is imperative for the Wiltshire population to see, at least annually, the amount of energy we have consumed and the amount of harvested energy we have generated. The key in Agile methodology is to fail fast and learn fast. By sharing the magnitude of the failure with the population on a regular basis and by regularly explaining the consequences of continued failure, the population will engage.

Yet again, the Covid shows us that this is a very useful technique to change mass population behaviour. By publishing the daily case rate, the hospitalisation rate and the death rate, the population engaged with the Covid problem and behaviour changed to address the problem.

I expect that the CSE can provide energy consumption figures for Wiltshire alongside renewable energy generation figures for Wiltshire to get Wiltshire Council started on collating and presenting this data itself. The Scatter methodology can provide true CO₂ emissions figures (as in: figures that include international travel and goods from abroad) for the county and figures exist for the energy required for CO₂ sequestration, both DAC and CCS. Figures can then be generated regularly and published (e.g. on BBC Points West, as are the Covid Cases per 100,000 currently, per Local authority).

Figures should show the delta between year-to-date "Human Comfort" generation/use and between the energy required to sequester year-to-date CO₂ emissions and the energy used to sequester CO₂.

These figures will be truly awful and that just might be enough to generate full public support for the Climate Emergency state which the entire country needs to be in, to make the required progress.

Consultation Question B11:

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

Please explain your answer

Answer: All steps possible – we are in an Emergency, this stuff isn't "optional"

*This is a favourite point of diversion from a particular cabinet minister. I'm sure I've heard him say that this type of house accounts for 6% of the housing stock in Wiltshire and then phili-buster on and on and on about how really hard it is to make those houses carbon neutral. So, let's set those aside in this discussion and address the 94% of buildings that **are** fully suitable for retro-fit.*

During the period of retrofit of the 94%, extra time can be taken to determine as gentle and complementary an approach to retrofitting the 6% as possible.

*The key first step in retrofit is insulation. It is 100% better **not** to use energy for space heating at all, rather than to burn Gas to heat it. The EPC system and the Green Grants system should therefore continue and be actively supported and pushed by this council. Insulation is key – loft, wall, double glazed windows, window and door seals. Rather than spending £ millions planning roads and housing estates WC should retrain the personnel to execute free thermal imaging surveys on EVERY building, such as those offered by the [Cheese project](#). Such a survey, allied to an EPC certificate will give every householder and business owner a very good idea of what's wrong, thermally, and what to fix first, through insulation.*

Next, let's exclude biomass pellets from this discussion. The generation of biomass pellets is NOT sustainable as can be clearly seen in [this exposé](#). Again, we see how this Government's policy of deliberately not counting CO₂ emissions protects big business and allows UK companies to act just like Bolsonaro in Brazil, just for profit.

I've previously discussed micro-wind generation which is completely blocked by MCS certification/red tape. MCS is a Government Charity (whatever that is!) and allows HMG to wax lyrical about the benefits of wind power whilst disallowing it onshore where it's needed, to protect the O&G market.

That leaves ASHP, GSHP and PV.

Start with Business: The most cost-effective/efficient roof spaces to retro-fit with PV or to install ASHP or GSHP are the large business and farm buildings. These consumers use vast amounts of energy, many of them 24/7. Have I ever heard WC discuss shaming our supermarkets or commercial landlords into fitting PV on their roof space and car-parks? Never. These are the super-users, they have the money, the tax breaks, the space and their own maintenance engineers, so get on and target them in earnest ...HMG just put up £Billions for Business investment WC should stand up and publically shame them for total inaction – another job those WC housing estate and road planners could be doing.

For any house that can fit PV, PV should be fitted. We now have 460W panels, so East/West roofs are as suitable as South roofs. A 4kW^{pk} system should cost well under £5K fully fitted with a £ payback period under 10 years and a CO₂ payback period of < 2 years. There are millions of unemployed currently who should have been trained to install these – what total HMG ineptitude to pay millions to do nothing during furlough – utter incompetence. Furthermore, the Policy to limit generation to 3.9kWh per household needs to be fixed. Yes, that may require some investment but the limit is essentially Gas market protectionism.

WC needs to implement a well-published policy, whereby Business and Home rates attract an extra annual escalating payment, if no renewable energy is installed at a property. This payment should be multiplied by a significant factor if the insulation improvements shown by EPC/Cheese are not implemented. The furore that would be generated via this policy should be used as a platform to the public and business communities to get the message out that there is a Climate Crisis, that everybody needs to Act and that Wiltshire Council are taking the lead in making that happen.

Finally, there is no problem with retro-fitting conservation buildings. Attic insulation – no problem. Windows – 3/6/3 Argon DGU in 17mm-rebated wooden frames/doors – no problem. Superfoil 6mm and 22mm insulated plasterboard for all internal walls – no problem. 18mm retro-fit UFH heating – no problem. GSHP or ASHP in their [usually] larger-than-modern gardens – no problem. It's all totally do-able.

Consultation Question B12:

If we are to tackle issues associated with air quality would the measures set out above go far enough and be effective in improving air quality in Wiltshire? If not, what measures are we missing and how should they be framed in land-use planning policy?

Please explain your answer

Answer:

[This graph](#) shows Human Population since 1800AD. The root cause of the climate crisis and of the ecological crisis is that there are too many humans on this planet.

The clearest explanation of what our global human population has done and is continuing to do to Nature and to our Planet is given in [this short](#) but clinically precise YouTube clip.

Even though we have the science, the facts & figures and the Advocates to speak out against the destruction of our natural capital and have been doing so for over forty years, our political leaders and media channels are not listening and are resolutely and manifestly not Acting on either crisis.

This entire Local Plan process is the perfect example – it is ridden through with a single purpose, which is to Build, Build, Build in order to drive economic growth. That's not a plan for where humanity stands right now – it's a plan that makes everything worse.

Democratic Political leaders could never have a discussion about reducing the size of the global population. Political leaders could never publically discuss the self-bestowed primacy of humans. Religious leaders could never countenance discussing an alternative to Man having dominion over the entire animal kingdom (and women) .. and these people are our leaders, with huge vested interests. They would rather go to war than discuss these subjects. But this is exactly the type of hard, ethical discussion that a Citizens Assembly could and should handle and generate policy that governments enact.

So how do you control the numbers in an exponentially growing population, particularly in a democratic first world society where we all demand rights to consume as much of anything and everything as we can afford?

What is the vaccination Mother Nature could apply to fairly control her Virus before it kills her – Air Pollution maybe ?

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

Please explain your answer

Answer: Anything and everything; change WC core strategy of endless road building and get radical alongside climate and ecological education for the population

Anything and everything; change WC core strategy of endless road building and get radical alongside climate and ecological education for the population

The first problem is the mentality of WC leadership. Their core strategy for decades has been to build roads in the belief that it drives Economic Growth. Infrastructure is huge cost, high employment (though not for Wiltshire people) and huge wealth diversion - via third party companies – from the public purse to the business leaders. The core aim is to turn the A350 into a road similar to the A34 from Poole to the M4.

In order to populate the new roads with vehicles, WC need to generate vast amounts of commuter traffic and route it directly onto the A350. This is the purpose of the distributor roads around Chippenham and Melksham – the more traffic, the better the case for trashing more countryside (for profit) with a bigger A350. The more houses that feed the distributor roads via a cancer of housing estate roads over the countryside, the better for our cabinet members' road building strategy.

So the 1st policy step in any plan that benefits Local People is to remove the road and wealth-loving personnel from positions of Local Government power. Unfortunately the system, as well as the mind-set of the leaders is from the last century and it is unfit to tackle the Climate and Ecological Crises.

Most of us, the Wiltshire population, derive massive human comfort from our cars. Walk around the housing estates and look – some households practically deify them, conferring entire house frontage and internal house space to displaying them and publically caressing them, not to mention working all hours to service the credit costs and maintenance costs they bring. Politicians know that to take away Human Comfort associated with our beloved cars will get them voted out. They do not have the courage or the balls to do the right thing on transport and they never will.

*So the 2nd policy step that is required is to hand over this entire problem to a Citizens Assembly and force the Politicians to enact the policy decisions that come out of a citizens assembly – and be held accountable if they are not implemented. There are hundreds of ideas, both carrot and stick, to fix this problem, but the population first needs to be educated on **why** we need to abandon our cars and what Climate change, food scarcity, mass migration and extreme weather will do to our society if we don't.*

Finally, on EVs in Wiltshire. I'll say it again, if the sun's not shining, our electricity in Wiltshire is generated by Gas. We have next to no wind. In fact, because we are not yet a 100% renewables grid, all year round, when we demand an extra kWh from the grid, we burn 3kWh's worth of Gas to generate it – see Dukes 2019 flow chart ([Page 2 of this document](#)). The reality is that if you charge your EV from the grid, here in Wiltshire, your EV system uses more CO₂ per mile than a modern diesel car.

*Not a popular thing to point out, but that's the current **reality**. So a huge opportunity for WC to publicise this information, run all county chargers from PV, Hydro or GSHP (yes, [it is possible](#)) and promote every household getting renewable energy harvesting installed ASAP.*

*Finally, the real message that we will need to digest as a society is **DON'T USE YOUR CAR** unless it's to work against the Climate or Ecological crises. The greenest, lowest carbon footprint car is the one that's never used.*

Consultation Question B14:

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

Please explain your answer

Answer:

Having been on a number of DNO stakeholder workshops and followed through with discussions on how to address this particular issue, the reality is that HMG Policy controls DNO investment in its own Grid Network via the Regulator OfGEM. OfGEM is the [Government's regulator](#) for both Gas and Electricity markets, er, yes, both ... at the same time, Gas and electricity.

The Government's policy is to subsidise Oil & Gas (from the public purse) to ensure that it completely empties the UK's Oil and Gas Continental Shelf reserves before 2050 – this is the current [BEIS Energy Policy](#). The Oil and Gas industries are the most profitable businesses that have ever existed throughout human history and they control the UK HMG Energy Policy and to a large extent, the UK Climate Change R&D budget of £8-£12Bn.

By sequestering Offshore Wind through HMG's Climate Change R&D budget, O&G gets the public to pay the industry to "green up" its flaring and gas-powered extraction equipment with harvested North Sea wind power. Harvested Power that will not be directed to the UK consumer.

By sequestering [CCUS](#) through HMG's Climate Change R&D budget O&G gets the public to pay the industry to draw-down CO₂, which it then pumps into 'unviable' oil and gas wells to extract previously inaccessible O&G using the banner of "carbon capture and underground storage" and also to ensure maximum yield from ongoing wells.

OfGEM limits the % of consumer revenue that the UK Grid DNOs are allowed to invest in their section of the UK Grid. It does this precisely to prevent the DNOs from improving the grid too much, too fast. This includes preventing the DNOs from leveraging their customer revenue to get the £Billion of loans required to do the work from available sources such as the European Green Bank. HMG, controlled by O&G, has no intention of removing the electricity generation market for Gas until it has burned through the UKCS reserves.

If you [review the price](#) difference between Gas and Electricity per kWh from our Electricity/Gas suppliers, you'll see electricity is around 7x more expensive than Gas. HMG Policy as set by O&G business is to add the cost of renewables to the electricity price, in order to preserve the Gas market. The Queen owns all rights to extraction of anything above and below the UK land area and 200miles out to sea. The only rule the Crown currently places on the licensees who extract Oil and Gas from the Sovereign estate is that they exact maximum economic benefit from extracting the reserves. No rules on Climate Change or Ecological damage.

In this particular case, where HMG and the Crown are controlled by the entire O&G business, backed by huge past wealth and immense future wealth, Wiltshire Council will be totally ineffective. So, much better to spend time and resource insulating Housing and Business buildings than fighting pure, unadulterated, planet-killing power.

Consultation Question B15:

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

Please explain your answer

Answer:

I think I answers that fairly fully in the responses above, particularly in question A2.

We need to stop all new construction on countryside immediately. All brownfield or urban regeneration construction should only proceed if it's LCA generates positive Carbon and Ecological outcomes before 2050. This was fully discussed in question B4

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

This paper is entitled "Addressing Climate Change and Biodiversity Net Gain" and I was expecting to find a Plan for the huge Wiltshire Budget that addressed climate change and biodiversity net gain. I have found absolutely nothing of the sort.

*This is a document that discusses **construction** and very nearly only construction and attempts to greenwash over the massive carbon emissions and the massive environmental destruction that the construction industry creates daily.*

I am disgusted that the developers, in collusion with our political 'leaders' can only think about building housing estates and roads, when the climate is broken and nature is becoming increasingly extinct.

I am extremely disappointed that the council officers who moderated the meetings and these documents are professionally propagating the plan to destroy vast swathes of Wiltshire. You do have a choice, you know.

You people should be utterly ashamed of yourselves and I hope your offspring have already told you exactly why.

But it's not too late (I hope). You could educate yourselves thoroughly on the causes and up-coming effects of both of these crises – there are plenty of links above to get you started. There are [county-level methods](#) already in existence that will allow you all to immediately start to do the right thing professionally, as a councillor or an officer.

Perhaps the most important thing is to research and read, then decide for yourself when the Planet will reach its first [Climate Tipping Point](#). Remember, Humanity has made absolutely [no progress](#) at all on mitigating climate change to date – and you're working for people who are planning to make it worse.

My worst-case scenario is a 0.5C rise through the next 15 years, triggering 500,000,000 people to migrate North due to food shortages caused by droughts and floods. Wiltshire has already seen a 1.69°C rise since 1960 which has indeed caused crop yield issues here in Wiltshire. Already, the weather isn't like it used to be. As a minimum, a good Plan has to detail Actions that avoid a worst case scenario. This plan does not.

When you feel an overwhelming grief at some point in your learning, you've learnt enough about what's already happened. You then have the task of working out how best you personally can use the talents you have to make a big difference, whilst minimising your own household carbon footprint and maximising you household ecological assistance.

Good Luck, the work needed is not easy and it's not comfortable.

Future notification

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

YES: NO:

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CLIMATE156



Wiltshire Climate Alliance

**Response to the Wiltshire Local Plan Review (2016 - 2036)
Consultation**

9th March 2021

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About the Wiltshire Climate Alliance

Wiltshire Climate Alliance (WCA) is an umbrella organisation for different groups to come together to campaign for action on climate change. WCA consists of a wide variety of groups and individuals whose common characteristic is that they care about the challenges of climate change and the impact of human activity on the environment. WCA has been engaging with Wiltshire Council as a critical friend in relation to the implementation of its Climate Emergency declaration in which it seeks to make the county of Wiltshire (excluding Swindon Borough) carbon neutral by 2030. WCA regards the Local Plan will have a key role in achieving this.

1. INTRODUCTION

Following the [Special report on the impacts of global warming of 1.5 °C](#) issued by the Intergovernmental Panel on Climate Change (IPCC) in October 2018, the urgency of the climate crisis has been brought into sharp focus, with public protests, school strikes and councils declaring climate emergencies across the UK. The UK Committee on Climate Change reassessed their recommendations and the Government committed to net zero by 2050 and a 68% reduction in emissions (on a 1990 baseline) by 2030. [Wiltshire Council also declared a climate emergency](#) in February 2019 and committed to seeking to make the county (less the Borough of Swindon) carbon neutral by 2030.

Two and a half years since the IPCC report and over 2 years since Wiltshire Council acknowledged the emergency, relatively little has been done outside of the Council's own organisational/ operational boundary, as reported in our [Second Anniversary of the Climate Emergency](#) report. In the report we pointed out that "achieving the radical greenhouse gas emissions reductions required to meet net zero in 2030, or even the 68% reduction in the [6th Carbon Budget](#), will require all the plans developed by the Council to work in an integrated way. In particular, the Local Plan, the Local Transport Plan and the future Climate Change Strategy/ Carbon Reduction Plan." We had particular concerns over the lack of any formalised baseline of current emissions that the carbon budget that Wiltshire can work within, and any targets or milestones by which progress and success can be measured and scrutinized. We also expressed concern about the lack of a joined-up approach, for example:

- continuing to apply for grants for road building at scale but only investing in active travel when government grants or developer contributions allow; or
- continuing to build houses that do not meet net zero carbon standards through its Stone Circle housing company;
- or proposing housing developments on its own farms that are important carbon sinks, vital for future food supply and which could be used to generate renewable energy.

Many of the concerns expressed relate to spatial and transport planning, which is one Wiltshire Council's biggest risks but also one of its biggest opportunities to influence carbon emissions and channel investment into greenhouse gas reduction.

We are informed by the National Planning Policy Framework (NPPF) that there is a presumption in favour of sustainable development but it is worth reminding ourselves what the definition of sustainable development actually is, namely 'Development that meets the needs of the present without compromising the ability of future generations to meet their own needs' (World Commission on Environment and Development, 1987).

The NPPF itself reiterates that economic, social and environmental objectives need to be pursued in mutually supportive ways, including protecting and enhancing our natural, built and historic environment; including making effective use of land, helping to improve biodiversity, using natural resources prudently, minimising waste and pollution, and mitigating and adapting to climate change, including moving to a low carbon economy. Yet past local plans have repeatedly traded the environment against aspirations for economic growth that have often failed to materialise and come with severe consequences for our wellbeing and that of future generations, reflected by the climate and ecological emergency we are all now facing. This needs to change.

In our response to this consultation, we have been guided by many sources of information, including from organisations such as the Royal Town Planning Institute, the Town and Country Planning Association, the UK Green Building Council, the Centre for Sustainable Energy and Client Earth, in particular its [letter of 2nd September 2019](#) to Wiltshire Council's

Cabinet Member for Spatial Planning, in which it highlighted the Council's key legal and policy responsibilities for reducing carbon under the Local Plan. It laid out how it could meet these by:

- Setting a local carbon target framework based on a comprehensive assessment of carbon reduction potential in relation to carbon reduction targets;
- Demonstrating proposed planning policies' consistency with this local target framework; and
- monitoring performance on at least an annual basis using relevant indicators.

Like Client Earth, we think this is a sensible way of proceeding. Therefore, in addition to commenting on various section of the Local Plan proposals and answering consultation questions, we have included a Climate Report Card, based on the Client Earth recommendations, which we intend to develop further and use to assess the Local Plan proposals, including this and the radically revised version of the Plan we hope will follow.

2. EMERGING SPATIAL STRATEGY

Any form of development will have significant amounts of embodied carbon, as well as carbon emissions resulting from its construction, in addition to the operational emissions during the lifetime of the development, if not constructed to zero carbon standards.

Development that has limited local employment (as is the case for Wiltshire) and creates greater car dependency will also lead to substantial additional carbon emissions. This is even more so if that development is focused on greenfield sites rather than brownfield.

Therefore, even the planning for a minimum number of houses needed to avoid speculative development being granted permission by the Secretary of State, will generate substantial quantities of emissions and the Spatial Strategy should focus on allocating the minimum number.

At 45,630, the proposed housing target for Wiltshire is far too high and is 5,000 higher than even the out-dated “standard method” prescribes. At 40,840, the “standard method” projections (including the imputed 36% uplift that increases it from 29,940 to 40,840) is also too high, as it is based on Office for National Statistics (ONS) housing demand projections for 2014, when the national population was growing much faster than it currently is or is predicted to, rather than more recent 2018 or 2016 projections, which would result in a 24% lower baseline figure of 22,750 houses.

In addition to this the birth rate in the UK has declined and the impact of leaving the EU has reduced immigration, leading to an increasing risk of over-supply, as has happened in countries such as Japan and Spain, when their populations declined¹.

In attempting to justify selecting the significantly (12%) higher number of houses over the lower one, the spatial strategy asserts that ‘there are no adverse effects of such significance that would prevent the higher figure being progressed.’ Whether carbon emission form part of what is considered to be significant (or not) is unclear. The footnote says that mitigation measures would sufficiently reduce any adverse effects, without any evidence to support such a sweeping statement. This begs numerous and fundamental questions about the basis on which an additional 5,000 houses could be judged not to have significant adverse impacts and what mitigation measures could negate those adverse impacts that are believed would result, all of which is simply left hanging (2.24).

For Wiltshire, these inflated housing targets bear little relation to local housing need (i.e. are far in excess and in the wrong locations) and or local employment opportunities, which are severely limited, the net result being in-migration of people who depend on cars to commute back out of the county for their employment (which is unsustainable).

However, they do have significant adverse consequences for climate change and the natural environment, which could be avoided with lower numbers and a more sustainable approach to site selection.

The adverse impacts of the existing proposals include:

- Destruction of agricultural meadows, arable farmland and woodland that currently act as carbon sinks - which would both release vast quantities of greenhouse gases and remove their future carbon sequestration potential;
- Construction of roads, railway, river and canal bridges, and concrete fly-overs (some a long as 0.5km across the River Avon floodplain) - which damage the climate as a result of their vast quantities of embodied carbon, as well as emissions associated with the transport and operations associated with their construction;

¹ <https://www.independent.co.uk/news/uk/politics/covid-uk-immigrants-job-loss-b1787785.html>

- Locking in vehicle exhaust emissions for years, even decades to come - as a result of proposing development in places where people would depend upon their cars to commute to their place of employment (e.g. two thirds of workers in Chippenham already commute to other towns for employment and none of the allocated employment sites in the existing Plan (2006-26) have been built out);
- Lack of commitment to net zero carbon development policies - which are already possible to achieve and allowable under current legislation, and without which new development will need to be retrofitted and an even greater quantity of renewable energy will need to be generated to offset these avoidable emissions;
- Lack of commitment to designating sites for renewable energy generation, such as council owned farmland and County farms, which would make a significant contribution to carbon reduction and have the added benefit of protecting valuable agricultural land and food supply for the future;
- Lack of commitment to a tree canopy target and to planting trees on Council owned land, which would sequester carbon and contribute significantly towards the UK's and Wiltshire net zero targets;
- Destruction of natural capital, wildlife habitats and existing and future biodiversity - including proposals to build on areas containing endangered species. Much of this natural capital is irreplaceable, the loss of which cannot be mitigated;
- Destruction of high-quality agricultural land - including some of the best and most versatile which we know will be increasingly important in terms of both national food security and local food production. The Local Plan proposals include developing on Council owned land, which could otherwise be used for renewable energy generation (e.g. solar farms) and tree planting, in line with Wiltshire Council's 2030 net zero target. The proposed Plan would also include permanent loss of County farms, set up to provide employment opportunities for the next generation of farmers;
- Exacerbation and undermining of local communities' resilience to climate change impacts – for example by building adjacent to flood plains that are likely in future to extend some of the proposed development zones putting lives and properties at risk.

It is stated in the Spatial Strategy document that “addressing climate change is already a Local Plan objective.” that “a sustainable pattern of development and how growth is distributed appropriately continues to be an important means to help address climate change” and that “carbon reduction is already an integral theme of the Local Plan.” Also that “mitigation is related to dramatically reducing the amount of carbon released in Wiltshire,” which is “largely related to emissions from cars and the energy used to heat and power homes and businesses. And that the Plan aims to “reduce the need to travel, and travel by the private car in particular, by providing jobs, facilities and services locally.”

The current proposals seem to be in direct contradiction with all these aspirations and set to generate huge positive net emissions, which there seems to have been no attempt to measure, wiping out (many times over) any reductions Wiltshire Council is making in its own operations. If carbon reduction was an integral theme, there would be specific, measurable targets and milestones within the Plan, setting out how the Plan will help get Wiltshire to net zero by 2030. As it is, there seem to be no carbon reduction targets of any kind.

The box entitled ‘Climate change outcomes’ (page 4) claims that focusing development in the County's main settlements would reduce carbon emissions, yet the spatial strategy does not explain how this reduction would be achieved. Neither is there any evidence of how these ‘aspirations’ have actually influenced the strategy or connects with what is being proposed. Taking Chippenham as an example, making use of existing infrastructure (a

claimed carbon reduction measure) is not part of the strategy. In fact, sites that would make use of the A350 and existing national grid and utility services infrastructure have been discounted in favour of massively carbon intensive new infrastructure for sites to the East and South. The need to travel and dependency on cars would be increased given the limited local employment opportunities and lack of employers moving in as a result of the last Plan, and the opportunities for renewable energy constrained by existing and proposed new development (i.e. instead of renewable energy generation on the Council owned land that has been put forward for building on). All of which substantially increases rather than reducing carbon emissions.

The document also speaks of “maximising development that re-uses previously developed land and limits the loss of countryside wherever possible remains a priority,” yet excludes brownfield development from the target numbers and says almost nothing about how reusing previously developed land (brownfield sites) for housing would be maximised. A far more proactive approach is needed here rather than putting that burden on local communities and Neighbourhood Plans, who in the main are volunteers with limited time to commit or gather the detailed knowledge required to navigate the complex bureaucracy involved in their creation (2.11, 2.12).

Local employment should be a key element of any sustainable development/ sustainable Local Plan in order to avoid creating isolated and disconnected (with their own communities) commuter towns. The spatial strategy states that ‘There is already a large supply of land available to meet business needs across the County’, indicating that the Council’s approach to allocating employment land is clearly having no impact on addressing this key aspect. This needs to be addressed before bringing in tens of thousands of additional houses with no local employment opportunities. There seems to be no logic in allocating additional land for business use, which also seems to be the same quantity regardless of the number of additional houses (2.18).

If the strategy aims to encourage a change from car travel to more sustainable modes, it needs a focus on concentrating housing and workplace growth in places where no additional roads would be required, where it would be quick and easy for people to access their work and shopping needs on foot, by bicycle or with a short trip on public transport. To propose that the scale and pattern of growth will require more roads, shows that the strategy does not support the modal shift to sustainable transport (3.23).

The assessment of the impact of Covid is welcome, particularly in relation to the future of our town centres, the rise of the home worker, and the need for much better walking and cycling infrastructure to support the re-localisation of work and shopping. However, the Local Plan needs to work symbiotically with the Local Transport Plan to deliver the desired and required walking and cycling infrastructure and this should certainly be prioritised over the building of new roads, which will hamper decarbonisation by creating more polluting journeys in private cars, rather than encouraging modal shift to public transport and the more health beneficial walking and cycling options (2.5 - 2.8).

It is also concerning to see the assertion that a focus of the planning framework is to support economic recovery from the impacts of Covid-19, and that planning controls somehow need to be less prescriptive. This could be a disaster in terms of achieving net zero targets and addressing a far greater crisis than covid. This should be reworked to specify that any flexibility in planning controls must serve the goal of transitioning to a net zero society and economy, and demonstrate how it supports the radical emissions reduction targets that also need to be set out in this strategy (3.20).

The document also cites the Town and Country Planning Association’s and Royal Town Planning Institute’s position on plan making and development management supporting a transition to a low-carbon future, and empowering local communities to “shape places to

help secure radical cuts in greenhouse gas emissions,” whilst the spatial strategy would impose housing (on ‘preferred sites’) that would drive up emissions and completely over-ride local community efforts to cut carbon, including those in Neighbourhood Plans.

The emerging spatial strategy has been informed by an interim sustainability appraisal (SA) but this does not appear to fully consider the most pressing factor in terms of sustainable development - the embodied and operation carbon associated with the various options considered, loss of carbon sinks and the transport emissions that would be locked in as a result of the spatial strategy. This seems to be a fundamental omission that removes any remaining credibility. The SA should be a tool for assessing how the spatial strategy will contribute to the radical carbon emissions reductions that will be required to achieve the national and Wiltshire net zero targets or where these are absolutely unavoidable, how they would be neutralised. Throw away statement such as ‘mitigation measures could sufficiently reduce any likely significant adverse effects of the strategy’ (3.77), (3.94) are no substitute for proper analysis. The SA should be making it clear that there are significant adverse impacts associated with all the options set out in the spatial strategy, and providing evidence of how any unavoidable impacts could be successfully mitigated.

The spatial strategy speaks about helping, ‘deliver the climate change outcomes sought’ (3.71 - 3.73), (3.90) but makes no attempt to define them, merely alluding to a net zero target. The means by which net zero will be achieved needs to be set out in the strategy, which seems not to contain any robust proposals to radically reduce emissions or how this will be effected. The spatial strategy as it stands will actually increase carbon emissions and undermine Wiltshire’s ability to reach the net zero target. Whilst alluding to desirable outcomes such as a shift away from private car use and greater settlement self-containment, the strategy fails to elaborate on such crucial observations or set out how the modal shift and self-containment needed will be realised (3.91).

The spatial strategy has been formulated around high level judgements about long term growth, which has become its key determining factor. However, the appropriateness and reasonableness of those judgements needs to be scrutinised, and the strategy adjusted accordingly, if we are to have any chance of producing a Local Plan that is fit for the future. Much is changing in the world and one of the biggest drivers of that change is the climate and ecological emergency. Mitigating future impacts from global heating and adapting to the adverse changes that are already locked in by the failure to address the issue in a timely fashion, mean that the world now has to embark on a programme of radical emissions reductions. Planning for growth is meaningless unless there is certainty that such planning incorporates the mechanisms to deliver those radical carbon reductions. This is completely missing from the strategy, which urgently needs to be reworked to set out exactly how it would work to achieve the necessary emissions reductions (3.2).

If the spatial strategy is to give proper weight to climate change and the environment, it will need to:

- significantly reduce the excessive (and unnecessary) housing numbers in line with ONS predicted growth statistics, which would immediately reduce the pressure on the environment and allow for much lower emissions, and even the possibility of net zero emissions;
- prioritise urban regeneration and brownfield site development as part of this approach;
- include brownfield development as part of the housing numbers, as oppose to treating it as a windfall and thereby deprioritising regeneration and adding to the greenfield target);
- avoid designating sites where future residents would be dependent on out-commuting long distances for employment;

- develop a properly thought-out employment led, rather than housing led, strategy;
- avoid developing greenfield sites that result in loss of carbon sinks and require substantial carbon intensive infrastructure to develop;
- avoid developing greenfield sites that will be important for future flood alleviation and require expensive Sustainable Urban Drainage schemes to mitigate flood risk;
- deploy ‘net zero carbon development’ and proactive ‘renewable energy generation’ policies as soon as possible (rather than waiting for the Government to require it);
- invest in Council owned farms and County farms for national food security and future local food production;
- invest in Council owned farms and County farms for renewable energy generation and tree planting on the less productive land.

The spatial strategy currently runs counter to all the above.

The document also states the spatial strategy “has its most direct relationships with Neighbourhood Plans for main settlements – since they are the focus for growth,” which is clearly not the case, since Chippenham’s Neighbourhood Plan Steering Group (representing one of the main settlements) has never supported the scale or location of the proposed development and Chippenham Town Council has rejected the Local Plan entirely.

Bradford on Avon Town Council’s response documents that the Local Plan “does not recognise or take appropriate account of our Neighbourhood Plan. It is, at best, a ‘business as usual’ plan, intended simply to mark time to 2036,” Describing it as “not so much a Plan, as an allocation of houses in unsuitable places. It lacks vision for the future of our communities and our county.”

3. SUSTAINABILITY APPRAISAL

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)

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 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 makes 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 there 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

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.

4. ADDRESSING CLIMATE CHANGE AND BIODIVERSITY NET GAIN

The paper points out that “in February 2019 Wiltshire Council acknowledged a climate emergency and agreed to seek to make the county of Wiltshire carbon neutral by 2030” and that “mitigation is related to dramatically reducing the amount of carbon released in Wiltshire,” which is “largely related to emissions from cars and the energy used to heat and power homes and businesses.” It also points to the need to “shape places to help secure radical cuts in greenhouse gas emissions, for example through efficient building design and changes to the way we travel,” and “actively support and help to drive the delivery of renewable and low-carbon energy generation and grid infrastructure.”

This is commendable, in as far as it goes. There are however two key issues with Wiltshire Council’s approach:

1. It misses any proper consideration of climate change and biodiversity in relation housing numbers and potential locations; and
2. It fails to propose a strategy and policies that would deliver what it acknowledges is needed.

With regards the former; the numbers of houses and their locations will determine more than anything else whether or not the Plan is sustainable. Adding 5,000 more houses to an inflated housing target based on an out of date (2014) multiplier, which is now acknowledged to be an over-estimate of population growth, is particularly detrimental for a rural county like Wiltshire, where employment opportunities are limited and employment growth constrained, and the vast proportion of migrants into the county will need to commute long distances. It puts pressure on Wiltshire Council’s planners to find yet more and larger greenfield sites, removing carbon sinks, requiring additional infrastructure and locking in more transport emissions for years to come.

The inflated housing figures also make it harder for Wiltshire Council to meet its 5 year housing land supply (which it is already failing to meet under the current Plan), further undermining Neighbourhood Plans and allowing speculative planning applications to be granted permission, potentially adding further emissions through uncontrolled development.

Simply cutting back on the excessive and ultimately, undeliverable target would immediately result in a reduction in emissions and a greater proportion of development on brownfield sites and those already close to existing infrastructure, and closer to existing centres of population. But a much greater reduction in the housing target would be needed to make the Plan sustainable and compliant with the stated aim of “dramatically reducing the amount of carbon released in Wiltshire.” Housing numbers need to be reduced to a point that allows people to live near where they work, make fewer journeys by car and preserves existing natural capital and carbon sinks. The net result: fewer roads, fewer bridges and floodplain fly-overs, fewer SUDs and flood alleviation measures, shorter grid connections, fewer carbon emissions. More green fields would be left intact for carbon capture and food production, and there would be substantially less transport emissions, currently the biggest source of greenhouse gas emissions in the county.

After reducing unnecessarily high housing targets and locating development more sustainably so as to reduce the need for carbon intensive infrastructure and car dependency, the way to “shape places to help secure radical cuts in greenhouse gas emissions” through “efficient building design and changes to the way we travel” and “actively support and help to drive the delivery of renewable and low-carbon energy generation and grid infrastructure” should be through net zero carbon development policies and policies that promote investment in renewable energy generation. Net zero development entails high energy

efficiency standards, with on-building/ on-site renewable energy generation to cover operational energy consumption during the lifetime of the development, any remaining carbon emissions being offset through a renewable energy generation offset scheme (reference the Wiltshire Council Climate Emergency Task Group Report (Part 2) on planning).

Adopted plans such as the London Plan already have such policies in place and many LPAs are including them in their emerging Local Plans, in anticipation of the inevitable changes to the planning system to bring it in line with the Climate Change Act and national carbon reduction targets (net zero by 2050 and a 68% reduction on a 1990 baseline by 2030). Planning legislation already allows for such policies and the Government has reiterated that the soon to be introduced Future Homes standard on energy efficient buildings will be a floor not a ceiling as far as Council's ambitions to achieve net zero development are concerned. In other words, nothing is preventing LPAs from setting net zero development policies. The excuse that viability wouldn't allow this carries little weight anymore, given that viability needs to be assessed at the site allocation stage and developers will be clear about the costs of developing particular sites at a sufficiently early stage. Given that such policies will eventually be the norm across all LPAs, costs will in any case rapidly reduce as carbon neutral development becomes the norm, as it will have to be.

In order to further reduce emissions and environmental damage, a policy should also be introduced for sustainable construction to ensure embedded emissions and those resulting from transport and operations during construction are minimised, and high sustainability standards achieved.

Both net zero development and sustainable construction policies are already being included in some emerging Neighbourhood Plans, such as Chippenham's, which seem to be further advanced than Wiltshire Council's Local Plan in this respect.

The paper also acknowledges that the Local Plan should "actively support and help to drive the delivery of renewable and low-carbon energy generation" yet in the Spatial Strategy proposes to lay concrete and tarmac over Wiltshire Council's (i.e. publicly owned) farms and County farms, wasting a prime opportunity to achieve this stated objective. Not only would renewable energy generation actually help the Council and Wiltshire's residents, cut carbon (as oppose to increasing emissions as currently proposed) but, being a temporary land use, it would preserve valuable carbon sinks, natural capital and high quality agricultural land, which this Plan has designated for destruction. For example, studies have already been submitted and presented to the Climate Emergency Task Group that demonstrate the viability of ground mounted solar energy generation (solar farms) on the Wiltshire Council farms to the East and South of Chippenham (destined to be sold to developers under the current version of the proposed Plan).

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

Yes, it is reasonable to expect the Local Plan to deliver carbon reduction outcomes in line with the national net zero target, with sustainable housing numbers in the right locations, backed up by policies that require net zero carbon development and sustainable construction and promote investment in renewable energy generation. In fact, it is a requirement of planning legislation and the NPPF that local plans are aligned with the Climate Change Act and the Government's [net zero carbon by 2050](#), and [68% reduction \(on a 1990 emissions baseline\) by 2030](#), national target. This is a clear legal duty under [Section 19 of the 2004 Planning and Compulsory Purchase Act](#), as amended by the 2008 Planning Act, requiring that, taken as whole, Local Plan policy contributes to the mitigation of, and adaptation to,

climate change. In other words, Wiltshire's Local Plan not only has to "deliver outcomes that significantly reverse existing carbon emission trends before 2030" but needs to (as a minimum) align (and demonstrate this alignment) with these national targets.

In doing so, it will need to plan for genuinely sustainable development that is located so as to preserve carbon sinks, avoid climate damaging infrastructure and remove, rather than increase, reliance on commuting and private car dependency. It will also need to introduce net zero carbon development policies, to ensure there are no emissions and potentially negative emissions, associated with all new spatial development, which will have the added benefit of removing the need for costly retrofit in years to come. Wiltshire Council would do well to be guided by the [letter it received from Client Earth](#) in 2019 and the [Climate Emergency Task Group's recommendations](#) endorsed by Wiltshire Council's Environmental Select Committee In January 2021.

There is plenty of evidence for the viability of Local Plan net zero carbon or 'carbon neutral' development policies in other Local Authority plans that have adopted or are in the final stages of adopting such policies, including in reports such as [The Cost of Carbon reduction in New Buildings](#) (CSE, 2018). Moreover, determining the viability of Local Plan policies on strategic sites at an early stage (as set out in the 2018 revisions to the NPPF) will ensure any cost implications are incorporated into early land purchase decisions. Planning Practice Guidance sets out useful sources of evidence such as national data on local greenhouse gas emissions and provides sources of evidence of how future patterns of spatial development can be designed to maximise carbon reduction potential by, for example, reducing the need to travel.

The requirement to deliver genuinely sustainable development through Local Plans will ramp up significantly in coming years and there is already evidence of the need for major infrastructure planning decisions to take account of the UK's legally binding obligations in relation to proposed expansion of airports (Heathrow and Bristol) and more recently England's road network, which has been called into question following the revelation of documents showing the transport secretary, [Grant Shapps](#), overrode official advice to review Government policy on environmental grounds. The signs are that the Government is beginning to prepare to put its policy and public spending proposals through a net zero filter, which is exactly what Wiltshire Council needs to do in relation to the Local Plan.

With regards other aspects of 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 Interim Sustainability Appraisal (Section 5.2.5) simply 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 there is a significant amount of Grade 2 and 3A (the Best and Most Versatile) land. Similarly, there is no consideration of farmland (or its use for local food production, tree planting or renewable energy generation) as an alternative or any value placed on the loss of such. Neither is its value considered in terms 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".

Well managed farmland with community connections also has the capacity to contribute positively to achieving carbon reduction targets as well as "healthy and inclusive communities," but this seems to be neither recognised nor evaluated. The lack of attention to

the current and future benefits of farming and the costs of its loss is further exemplified in the Empowering Rural Communities document, in which the words “farm” and “farming” are completely absent. This lack of attention to the value and negative impact of potential farmland loss is a serious weakness in the land use policies which underpin the site selection process and conclusions. Moreover this is contrary to the expectations of para 170 of the NPPF which states that “Planning policies and decisions should contribute to and enhance the natural and local environment by...(b) recognising the intrinsic character and beauty of the countryside and the wider benefits from natural capital and ecosystem services including the economic and other benefits of the best and most versatile agricultural land, and of trees and woodland.”

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 of the site selections put forward in the Spatial Strategy.

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

Despite warm words in its Local Plan climate change paper, and its [Climate Emergency declaration](#) in which the Council committed to seek to decarbonise the county, Wiltshire Council’s current Local Plan proposals would substantially increase the county’s carbon emissions and lock in emissions for years to come (i.e. precisely the opposite). To deliver outcomes that significantly reverse existing carbon emission trends, the planners need to radically change their approach to reduce car dependency and ensure future development does not increase, and ultimately reduces carbon emissions (e.g. through renewable energy generation and carbon sequestration).

Taking Chippenham as an example, this would mean an employment led plan that radically reduced the need for additional commuting. It would mean abandoning a spatial strategy that simply encourages relocation from other settlements along the M4 corridor, and further embeds dependency on commuting. It would mean reducing housing numbers to genuinely meet local needs, and certainly not further exceeding current levels of growth (which are already based on in-migration). In Chippenham, for example, growth is predicted at 250-300 people per annum by the Office for National Statistics (ONS), which equates to 2,500 houses (at most), rather than the 9,225 currently being proposed, for the 20 year period to 2036. However, given that none of the 26ha of employment land current Plan Period (2006-2026) has yet been built on, it would be better to hold back on further housing development until employment sites are built upon and local employment opportunities are available. This would also have the advantage of not requiring an extensive distributor road with extended river crossings (up to 0.5km long each) across a flood plain, and bridges over the Wilts-Berks canal, all of which would have a massive associated carbon footprint. Neither would there be the need for extensive destruction of land that acts as a carbon sink, which would release huge quantities of carbon and remove the potential to capture carbon in future.

Appropriate and sustainable housing numbers supported by investment in attracting suitable employers, bringing skilled jobs into the area, would have effect of reducing commuting and private car dependency. More innovative approaches to public transport, including rail (e.g. new stations at Devizes, Corsham and potentially Hullavington) would help reduce the need for remaining necessary longer journeys by road. Genuinely sustainable transport policies, promoting investment in active travel and electric vehicle charging infrastructure, would help reduce emissions from shorter journeys in and around the local area. Net zero carbon development policies, and related policies to promote local renewable energy generation, of

the type being put forward by the Chippenham Neighbourhood Plan, would mean no additional emissions for the development itself.

A3: How should these actions be delivered and measured?

They should be delivered through local employment-led development and net zero carbon development/ sustainable construction/ renewable energy promotion/ sustainable transport policies such as the ones highlighted above and [recommended by the Climate Emergency Task Group](#). These should be measured in terms of their net carbon emissions over time and adjusted accordingly in line with Government's and Wiltshire Council's carbon reduction targets.

The Local Plan itself should establish its carbon reduction potential and targets for net zero carbon development ([as recommended by Client Earth](#)), including preventing emissions being generated as a result of:

- destruction of natural capital and removal of carbon sinks;
- construction of carbon intensive infrastructure (including embedded emissions in materials such as concrete and asphalt);
- additional transport mileage as a result of car dependency and commuting;
- operational emissions resulting from new housing and business/ industrial premises;

and avoiding emissions as a result of:

- local employment led development;
- highest possible standards of building insulation (for domestic and commercial);
- integrated and stand-alone renewable energy generation;
- innovative and progressive farming methods;
- investment in infrastructure to support active travel (for short journeys) and public transport;
- investment in infrastructure to support the transition to ultra-low emission vehicles.

The carbon emissions associated with proposed housing numbers in proposed locations should be calculated up front so as to properly inform the Plan and allow for the proper comparison of potential sites [at the outset](#). No sites should be designated as 'preferred' until such time as the climate change implications (including estimated tonnes of carbon emissions) have been calculated.

A means of monitoring the implementation of the Plan policies that drive the carbon reduction should be established alongside the Plan.

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

As stated in the Interim Sustainability Appraisal report, flood risk will be exacerbated by climate change and whilst flood risk may be mitigatable for some sites, building on these sites can increase the risk of flooding elsewhere. It is therefore better to avoid building on low-lying land adjacent to existing flood plains (e.g. to the East of Chippenham) in order to reduce the risk of future downstream flooding (e.g. of Chippenham and other communities such as Melksham, Bradford-on-Avon and Bath).

In addition, the UK Climate Impact Projections have revealed that climate change impacts are manifesting more rapidly than anticipated, and areas adjacent to current undevelopable flood zones, could well become part of those zones in future. It would be unwise to rely on expensive Sustainable Urban Drainage Scheme (SUDS) solutions to mitigate flood risk that

is avoidable in the spatial strategy in the first place. In addition to the substantial cost and space requirement, claims that all new development would include SUDS to achieve a 'greenfield runoff rate plus 20%' seem unrealistically optimistic, and lack evidence. 20% may also turn out to be an insufficient margin to compensate for future climate change scenarios and the likely more intensive rainfall events that are the cause of rapid river level rises and associated downstream flooding.

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

The question is based on a false premise, since natural capital would not be enhanced by any of the proposed development, and would be spectacularly damaged in many of the spatial strategy's proposed site locations, including wiping out some huge areas such as the Avon and Marden valley to the East and South of Chippenham. Any measures to incorporate 'nature' within the proposed urban conurbations would be tokenistic relative to the scale of the loss of natural capital caused.

It is also far from clear what Wiltshire Council's Blue and Green Infrastructure Strategy is, or the nature-based solutions mentioned under Policy Theme 2 would actually comprise of, apart from aspirational statements about benefiting carbon sequestration, air quality improvements, passive cooling, health and wellbeing and biodiversity enhancement, which are precisely what the proposed spatial strategy would destroy.

The question seems disingenuous in that successfully enhancing natural capital requires that it isn't destroyed in the first place. Hence, lower, more sustainably located housing numbers would help avoid building on valuable habitats and carbon sinks, such as the Avon and Marden valley and land surrounding Bradford on Avon. High quality pasture land and river valleys are finite and irreplaceable, and need to be protected and enhanced in their current state.

In terms of how to limit the destruction of natural capital that the spatial strategy would destroy; a starting point would be to estimate the value of natural capital that would be lost on the proposed sites so as to be transparent about the damage to the climate and environment that would result if the current Plan proposals were implemented. This would support the case for lower numbers of houses, less hard infrastructure intensive development and selection of sites on which the destruction can be limited.

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

No. The adoption of policies that require net zero carbon development in line with the UK Green Building Council (UKGBC) approach, and as other LPAs are including in their plans, and the promotion of renewable energy generation (e.g. on Council land and County farms) will be essential. However, these are necessary but not sufficient and their benefits would be wiped out completely by an unsustainable spatial strategy that substantially increased emissions by:

- release of huge quantities of carbon through the excavation of rich organic soils;
- removal of carbon sinks that would otherwise continue to lock in and further sequester carbon in future;
- construction of carbon intensive infrastructure (including embedded emissions in materials such as concrete and asphalt);
- additional transport emissions as a result of new commuter extensions.

In other words, planning for net zero requires both sustainable housing numbers, a sustainable spatial strategy and sustainable (net zero development and renewable energy generation) policies, to have any chance of meeting the Government and Wiltshire's net zero targets.

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

It is possible to have a net zero carbon development policy that would ensure net zero operational emissions for all the allocated sites in the Local Plan, as is already the case for some adopted Local Plans and other LPAs are doing in their emerging plans. This should be backed up by strong sustainable (low carbon) construction and renewable energy generation policies. These policies will not, however, prevent the destruction of carbon sinks or require the lost sequestration is compensated. Neither will they prevent the transport emissions that results from poor spatial planning and place shaping, the negative effects of which could wipe out the positive effects of such policies.

With regards achieving net zero carbon new development; by undertaking viability assessments on strategic sites as part of the revised Plan, as is now required, the viability of proposed development will be clear from the outset and developers will price in any additional costs into their land deals. Once a clear net zero development policy has been set, the additional costs of carbon neutral development will fall rapidly, as this becomes the standard method of building and developing sites. Government net zero carbon targets require this to happen as soon as possible and a net zero development planning policy needs to be put in place as soon as possible, given that Core Policy 41 is defunct and the badly insulated houses being given permission at present will all need to be retrofitted in future.

However, as stated above, a net zero carbon development policy is necessary but not sufficient to achieve a carbon neutral or carbon negative Local Plan. Such a Plan also requires that development is only allowed in locations that do not significantly undermine the Government's (and Wiltshire Council's) carbon reduction (net zero) targets. Hence, the spatial strategy itself needs to support net carbon neutrality, focused on providing housing where there is employment (i.e. to be 'employment led'), avoiding the destruction of natural capital and carbon sinks, avoiding climate damaging, carbon intensive infrastructure (and locations that require this) and removing rather than increasing dependency on private cars to get around.

The current proposals would unnecessarily destroy natural capital/ carbon sinks and increase transport emissions through commuting, whilst bearing no relation to local employment or local housing need, which would be better achieved through urban regeneration/ brownfield sites. The latter would be provide affordable housing (e.g. apartments), reduce the need for cars and help rejuvenate the town centres of principle settlements and large market towns that are in danger of being doughnuted (i.e. having suburbs supported by in-migration and out-commuting, that are disconnected from town centres, with separate shops and services, leading to further deterioration of town centres, vacant shops, and unused town centre facilities).

B5: Would a move to support the delivery of zero carbon new development materially affect scheme viability?

Determining the viability of Local Plan policies on strategic sites at an early stage (as set out in the 2018 revisions to the NPPF) will ensure any cost implications are incorporated into early land purchase decisions. There is considerable evidence for the viability net zero

carbon development policies in Local Plans (please refer to the [Centre for Sustainable Energy](#) for examples and background papers). The need for net zero carbon development is set to increase in future, as the Government requires planning decisions to prioritise climate change considerations. Viability will become a secondary issue as policy and legislative requirements ramp up. Once net zero carbon development policies become more mainstream, additional cost will no longer be material. Developers claims that they can't afford to develop sites to net zero should be taken with a pinch of salt. It is no longer a choice in any case.

Overall, Wiltshire Council needs to worry less about viability, accept the inevitable changes that are coming and focus on:

- developing a carbon neutral spatial strategy;
- putting a robust net zero carbon development policy in place;
- actively promoting renewable energy development, including on its own farms (and using these for food production/ tree planting and renewable energy generation rather than selling for short-term financial gain);
- putting policies in place to promote the transition to ultra-low emission vehicles (waking up to the fact that electric vehicles as will be the norm by the end of the Plan period).

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

The improvement in Part L of the Building Regulations being introduced as part of the Future Homes Standard is necessary but not sufficient in achieving net zero carbon development. The Government has indicated that it will not restrict local authorities from exceeding this standard, which several leading local authorities are already doing through their local plan policies. This includes Plans that have already gone through Examination and been adopted, such as the London Plan.

In addition to decarbonising its spatial strategy, the Council needs to put in place a policy that requires all development be net zero-carbon, in line with the UK [Green Building Council's Net Zero Carbon Buildings Framework Definition](#). This would require all development to achieve an annual operational net zero carbon emissions balance by:

- prioritising energy efficiency through the building fabric;
- reducing the remaining energy demand through on-site renewable energy and heat (e.g., rooftop solar PV and/ or air or ground source heat pumps); and
- compensating for the residual carbon emissions via a [carbon offset fund](#), into which developers are required to pay a value agreed at the application stage, to deliver carbon savings which would not otherwise have been made (ensuring additionality).

The Building Research Establishment's [BREEAM](#) offers a range of sustainability assessment methods and standards for [masterplanning](#) projects, [infrastructure](#) and [buildings](#) from [new construction](#) to [in-use](#) and [refurbishment](#), which can be used in guidance to supplement an overarching net zero development policy in relation to individual (particularly commercial) buildings.

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

This could be done via a policy to support the retrofit of insulation (including double glazing) and renewable energy generation devices (e.g. solar panels and ground source heat pumps) in conservation areas and listed buildings, subject to other relevant local planning

requirements, although this would make a small difference in terms of overall impact. It is unclear what the Local Plan could do, if anything, to promote the retrofit of existing buildings, which needs to be a priority for Wiltshire Council to address, and would make a substantial difference in terms of reducing carbon emissions.

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

The key element that is missing (in so far as it isn't even raised or has any questions on) is the overarching proposed housing numbers and spatial strategy. Other Local Plan policies could be regarded as sticking plasters for a strategy that imposes an out-dated model of immigration, car dependency and the destruction of natural capital, carbon sinks and productive farm land, all of which are critical to reaching net zero and preventing devastating climate change. It has already been established that the proposed excessive housing numbers bear no relation to local housing need or can be supported by local employment, which would allow people to not have to commute. In other words, the entire Plan is based on an unsustainable approach that sets itself up to fail in terms of carbon reduction and the Government's and Wiltshire's net zero targets.

The question that needs to be asked of Wiltshire Council (rather than Wiltshire Council asking of its residents) is "How will this proposed Plan cut carbon emissions in line with the national targets, as it is required to do under planning legislation that refers to LPAs obligations under the Climate Change Act?" (i.e. at least 68% reduction on a 1990 baseline by 2030). This does not seem to even feature in the preparation of this Plan yet is the fundamental question it should be addressing. The consultation documents have not even produced any estimate of the carbon implications of the Plan, let alone calculated how the housing numbers proposed and spatial strategy being promoted would contribute to reducing overall emissions.

Once the Plan has begun to address the fundamental issues above, it almost goes without saying that its Local Plan policies need to ensure emissions from any development that takes place are neutral or negative.

Planning policies should require that:

- all development (housing and commercial) is required to meet net zero carbon standards in line with the UKGBC approach (i.e. energy efficiency, on-site renewable energy and heat generation and carbon offset through off-site renewable energy generation for any remaining operational emissions) as soon as possible;
- promote renewable energy generation, such as solar and wind on suitable sites, identifying Wiltshire Council land (including sites within farms/ County Farms) to contribute (e.g. through Local Plan Development Orders) and working closely with Neighbourhood Plans in identifying other locally preferred, suitable sites;
- sustainable (low carbon) construction, including embedded carbon in materials such as concrete, aggregates, plasterboard and tarmac, procurement of products and services involved in construction and the transport and on-site activities associated with the construction itself;
- Planning policies should stop any further installation of natural gas for heating and cooking ahead of it being completely [phased out in new homes from 2025](#) and support the transition to renewable heat such as air and ground source heat pumps;

- require the installation of EV charging infrastructure in anticipation of the [cessation of petrol and diesel vehicle sales from 2032](#) and the transition to EVs over the course of the Plan period;
- set water efficiency standards to help reduce emissions from energy used in pumping.

The carbon emissions associated with the emerging Spatial Strategy should be calculated in advance, including the emissions associated with different site options, to enable a transparent planning process and informed decisions to be made about housing numbers and potential development site locations.

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

It should allow for all technologies but take account of their effectiveness, efficiency and any potential environmental and social impacts. This would allow for future innovation and adaptable approaches, which could help a faster transition to net zero. Working with communities, including for example community energy organisations, will be an important aspect, helping to ensure renewable energy generation is suitably located and recycling benefits directly back into the local economy/ community.

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

Yes. Local Authorities have a key role in ensuring the UK meets its climate change targets. Section 18(1A) of the updated NPPF requires the planning system supports the transition to a low carbon economy and in particular *“should help shape places that contribute to radical reductions in greenhouse gas emissions”* and that *“Plans should take a proactive approach to mitigating and adapting to Climate Change... in line with the objectives of the Climate Change Act.”*

The Local Plan should therefore set a net zero target based on an assessment of its carbon reduction potential and develop policies consistent with this target. The generation of renewable energy will be critical in achieving this target, alongside a genuinely sustainable Spatial Strategy and carbon neutral development policies. Separate interim targets could be set for the generation of renewable energy during the Plan period, consistent with the overall net zero target.

These would need to be ambitious and regularly reviewed, since early investment/ front end loading will be critical given the amount of time it takes to develop proposals and the planning application process. In other words, the net zero target will be much more achievable if emissions reductions begin early and the large scale investments needed are delivered in the early part of the Plan period.

Measuring progress will also be important and will require a baseline and means of updating. This should be relatively easy in relation to any significant ‘ground mounted’ renewable energy generation sites. Whilst more challenging to keep track of domestic and commercial renewable energy and heat generation, there are an increasing number of more sophisticated tools that can be used, such as the [community-scale carbon footprint tool](#) developed by the Centre for Sustainable Energy and Exeter University.

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

Existing policy already allows for retrofitting and adapting existing buildings to accommodate ultra-low carbon or zero carbon forms of energy generation. This includes in conservation areas and listed buildings, providing they are sympathetic to their setting and significance but enhancements could be made to the latter. The main imperative for Wiltshire Council is to promote retrofit of existing buildings throughout the county, which is beyond the scope of the Local Plan to influence as far as we are aware. The Local Plan priority should be on sustainable housing numbers in sustainable locations that don't destroy carbon sinks and promote commuting, backed up with net zero carbon development, sustainable construction and renewable energy policies, including LDOs for suitable Wiltshire Council farms, such as the ones in Chippenham.

B12: If we are to tackle issues associated with air quality would the measures set out above go far enough and be effective in improving air quality in Wiltshire? If not, what measures are we missing and how should they be framed in land-use planning policy?

The paper states that "the Council considers that increasing the level of self-containment within Wiltshire's settlements offers the best solution for tackling unsustainable, carbon-based travel patterns." It further states that "to achieve this goal, the Local Plan will likely need to set out policies for reducing travel and the use of private carbon fuelled vehicles." Despite this, its spatial strategy promotes large urban commuter extensions, requiring climate damaging infrastructure and locking in tailpipe emissions and pollution, as a result of increased commuting and localised travel for many years to come.

A more organic growth/ local employment-led development approach, with supporting policies, would prevent large scale commuting and associated air pollution. Sustainable (active and battery enhanced) travel options within sites would reduce the need to use cars for local journeys. Employment development should promote high skilled jobs in order to minimise out-commuting and allow people to live near their place of work, thus reducing air pollution associated with a daily commute. This is particularly acute in towns like Chippenham and Melksham where thousands of vehicles drive through all parts of the town to the A350 and up to the M4 and onwards to their places of employment, contributing substantially to air pollution at peak periods, which also coincide with children walking to school and breathing in the NO_x gases and particulates.

The currently proposed excessive housing numbers and spatial strategy would simply add to this air pollution and damage to young people's health, as well as creating even more air pollution in town centres, as a result of all the additional vehicles associated with the urban extensions. Taking Chippenham as an example, the 7,500+ houses and associated suburbs to be built in open countryside, resulting from the HIF funded road bid dictating the spatial strategy, would generate potentially 15,000 more cars and vans, the vast majority of which would drive into Chippenham or Calne to access shops and services, creating even more air pollution and the need for Air Quality Management Areas (AQMAs) in both settlements. We already see this pattern in the most recently built estates at Cepen Park North and Cepen Park South, with no reliable regular bus services to offer any alternative, and few people cycling into town. The air pollution caused would run counter to Wiltshire Council's own Air Quality Strategy and hugely undermine all the efforts taken to improve air quality thus far.

Policies to control the use of wood burning stoves/ heating in densely built-up areas are needed to reduce non-vehicular air pollution, which seems to be a growing problem in residential areas in Wiltshire, affecting young people's health and future disease (asthma, lung and heart related) exacerbation in particular.

If Wiltshire Council is serious about addressing air quality, it needs to completely reassess its approach to housing expansion and come up with a Plan that reduces tailpipe emissions (and tyre and brake pad pollution) not increases them. The Council also needs to include a comprehensive strategy for cycling, walking and public transport to mitigate existing air quality issues and mitigate remaining additional air pollution that would result.

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

An employment led spatial strategy would significantly reduce the amount of commuting and dependency on private cars. Policies that promote ultra-low carbon public transport and active/ battery enhanced active travel will then reduce the need for local car travel/ dependency. This will require policies that create dedicated, fast and safe cycle routes of the type common in other European countries, and a few parts of the UK. Policies should also promote integrated public transport that improves reliability and increases usage, and further reduces car dependency. Policies also need to promote the installation of on-street EV charging infrastructure to enable those who don't have off-street parking to charge their EVs.

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

More local renewable energy generation and policies which support this will help overcome this challenge. Wiltshire should be more proactive in terms of working out how the distributor grid should work effectively. Distribution Network Operators (currently transitioning to being Distribution System Operators, with wider responsibilities for the distributed grid) are keen to work with Local Authorities in developing their local networks to meet a net zero carbon future. Government money is available for investing in this grid infrastructure and Wiltshire Council needs to work with the DNOs/ DSOs to ensure Wiltshire gets the grid investment needed to achieve net zero for our county. The main focus should be on upgrading grid capacity and infrastructure in the right places to enable renewable energy generation, EV charging and any other investments needed to help deliver net zero via the electricity distribution network.

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

Much of this has already been covered. Wiltshire Council needs to bite the bullet and:

At a strategic spatial planning level:

- Reduce housing numbers to a sustainable level that will allow net zero emissions to be achieved;
- Develop a genuinely sustainable spatial strategy that does not promote and is not dependent on commuting;
- Reduce housing numbers to allow for more organic growth that will not cause the substantial harm associated with the current proposed strategy;

- Take an employment led approach (not a housing led one that works against achieving net zero targets);
- Measure the carbon emissions associated with the proposed spatial strategy options and prioritise minimising current and future emissions;
- Develop a framework for aligning the Local Plan with the Government's and Wiltshire's carbon reduction targets;
- Place proper value on natural capital and account for it in the Plan; and

At a policy development level:

- Develop and implement net zero carbon development policies and low carbon, sustainable construction policies;
- Develop and implement supportive renewable energy development policies, including policies that identify and enable renewable energy generation within council farms;
- Develop and implement supportive EV infrastructure policies;
- Work closely with the DNO/ DSO in developing the necessary distributed grid to enable net zero to be reached as quickly as possible;
- Develop and implement supportive integrated public transport and active/ battery assisted travel infrastructure development policies to discourage car use for short journeys.

The current proposals work in the opposite direction, particularly in terms the higher-level strategy, which seem to be driven by road building and a focus on commuter housing. With forward thinking policies of the type described above, design will take care of itself (the skills, knowledge and technology are already out there) and viability will quickly catch up. The key message is to be clear about the overarching objectives (net zero) and get the fundamentals right (i.e. do not plan for unnecessary, unsustainable and potentially undeliverable numbers of houses in order to create large commuter extensions that lock in transport emissions, destroy valuable farmland/ wildlife habitats/ carbon sinks, and take a lead from other LPAs on introducing net zero carbon development and effective renewable energy policies). The rest will follow.

Ecological and Biodiversity Impacts Supplement

This supplement pertains to damaging ecological and biodiversity impacts for the 'preferred sites' for Chippenham and is submitted to illustrate adverse impacts on valuable wildlife habitats and biodiversity that may occur on sites across the county (there being absence of any detailed evidence to show otherwise).

i. Great Crested Newts

Development of sites 1 and 2 would impact a population of great crested newts, the main areas of concern being:

Habitat Availability - a search of ordinance survey maps encompassing the widest proposed route through to the built environment of Chippenham was undertaken to take account of each of the proposed route and surrounding development. In this search area there are a total of 24 recorded ponds each of which have the potential to provide opportunities for breeding great crested newts. These ponds are largely clustered at the east of the search area where there are three confirmed records of great crested newts. The distribution of these ponds in addition to the confirmed populations in the immediate vicinity gives rise to the serious risk of directly harming newts and/or degrading their habitat quality in contravention of The Conservation of Habitats and Species (amended) (EU Exit) Regulations 2019. All three of the proposed routes are close enough to the identified ponds

to have potential impacts on newts should they be present. Insufficient data exists to conclude no impacts in this respect. To the west of this search area, an EPS Licence for great crested newts has been granted, indicating that a further or continued extant metapopulation is present at the western extent of the proposed road, further highlighting the risk to this species.

On top of the main search area an additional 2km in all directions was searched. This returned a further 76 ponds. The presence of these ponds and abundance of surrounding greenspace indicates wider suitability for this protected species in and around Chippenham. Confirmed records of great crested newts additionally exist to the south, south west and south east outside of the search area.

In short, the proposed development and associated roads would cause direct habitat loss and habitat degradation for this species in the long term, with short term impacts including disturbance, injury and death during works in the construction phase.

Habitat Connectivity and Quality - Great crested newts disperse over land to travel between breeding ponds of the wider metapopulation. This requires connected habitats to allow safe and successful dispersal. In its current state the search area and surrounding habitats are well connected via grasslands, hedgerows, and woodlands. This allows free movement of individuals between ponds in existing populations.

By developing a significant road and housing development where newts are present, a new and potentially harmful barrier to dispersal is introduced into the environment. Mortality of amphibians associated with large infrastructure is widely documented, including fast- and slow-moving roads alike, such as those proposed around Chippenham. Records of great crested newts are present to both the north and south of each of the proposed road routes, therefore each route presents a significant barrier to dispersal between northern and southern sub-populations, essentially isolating the northern subpopulation of great crested newts by encircling them in a limited expanse of greenspace. This, in combination with the proposed increase in residential developments (direct habitat loss and short term harm) will put substantial and significant strain on a protected species by limiting gene flow through the population, reducing breeding success and reducing quality of and availability of foraging and breeding habitats.

In addition to the above the remaining ponds to the north of the road will likely be subjected to degradation in quality through polluted road and surface water run-off. An increase in nitrogen content would also be anticipated (i.e. reduction in water quality) due to increased human activity in the area due to the increase in residential developments, and reduced availability of permeable ground. These factors combined have significant potential to alter the character of the ponds, including flora and fauna associated with them. This will reduce the potential value of the ponds by influencing the existing faunal and floral communities and subsequently reduces the breeding success of newts. This could ultimately result in the local extinction of great crested newts to the north of the proposed roads.

Translocation – whilst a translocation of great crested newts is offered as an option to mitigate for the harm expected from one of the road routes (though in reality would be required regardless which route was adopted), it should be stressed that a translocation has the potential to spread diseases and pervasive plants associated with pond life e.g. chytridiomycosis, duck weed, *Elodia* sp. Etc. and should only be used as a last resort, even if practically possible in these circumstances.

Significantly more information is required to assess the actual impact the development proposals would have on great crested newts. A population assessment should be

undertaken to determine the anticipated impacts associated with all three routes. It is naïve and negligent to assume absence of newts in either case when there is significant potential for harm associated with these proposals.

ii. Bats

Of particular concern regarding these proposals is the potential they have to impact common and rare bat species, to which no consideration has been given. All species of bat are protected under The Conservation of Habitats and Species (amendment) (EU exit) Regulations 2019, which provides protected status to the bats themselves, their roosting sites and their foraging and commuting habitats.

Foraging Habitat - the western extent of the proposed road sits between 4-5km to the east of Bath and Bradford upon Avon Special Area of Conservation (SAC) which has direct habitat connectivity to Chippenham via a network of hedgerows, woodlands and a vegetated railway line. This SAC is a statutory designated site identified as being of international importance for bats. It is known to support up to 15% of the UK population of greater horseshoe bats during the swarming and hibernation seasons, with other rare species recorded including Bechstein's bats, lesser horseshoe bats and barbastelle. At least one maternity roost of greater horseshoe bat is known to be present within the SAC with more likely to be present indicating of year-round use of the site. These roosts are of high conservation significance and are frequently recorded within the SAC and its surrounding environment. The NPPF indicates that applications should be refused where impacts are anticipated on SAC's and their ecological receptors, which these proposals will likely do (Section 15 paragraphs 175 and 176).

Conservation of greater horseshoe bats is of particular concern with these proposals given their 90% decline in their native UK range over 100 years. Distance travelled from the roost is key in this case, with greater horseshoe bats known to travel 4-5km for foraging purposes. Given this, and the proximity of Chippenham to this SAC, there is a very high chance that farmland around Chippenham will be of value to foraging greater horseshoe bats. Ideal foraging habitat is cited as being a mosaic habitat of cattle grazed fields with pockets of woodland, which is typical of the wider Chippenham area and will be directly lost to the proposed roads and associated residential development. When considering the additional pressure of increasing volume of residential development in addition to the road itself and associated traffic on what is currently highly suitable foraging habitats there is likely to be a significant adverse impact on this species. Proposals for the various schemes indicate that up to 800 hectares of quality foraging habitat will be put at risk as a result, for which no mitigation has been proposed. This is in contravention of The Conservation of Habitats and Species (amendment) (EU Exit) Regulations 2019, which affords protected status to the bats themselves as well as their roosts and foraging and commuting habitats.

It should also be noted that bats will be using the search area for foraging purposes from much nearer roosting sites. For example, immediately north of the search area at the southern extent of Chippenham a granted EPS licence for a works around a lesser horseshoe roost is known. Individuals and colonies of bats in these areas will rely heavily on the immediate surrounding countryside for sustenance and greater consideration must be given to this.

Habitat Connectivity - the majority of summer roosts of greater horseshoe bats are located within 20km of the winter hibernaculum therefore it is a fair assumption that commuting bats will be using the railway corridors, river and brook corridors, cycle path corridor, hedgerows, woodlands and tree lines to commute between the winter hibernacula and the summer roosts. Similarly, Bechstein's bats have a catchment area of approximately 20-30km for their

swarming sites indicating the potential importance of the commuting corridors on their breeding success. Disrupting these flight paths will be highly detrimental to the widespread success of these species over a far wider area than just Chippenham, with consequences likely to be felt over a much wider zone of influence. Such disruption comprises the direct impact of habitat removal and/or degradation due to pollution etc., but also the major potential impact of artificial lighting due to encroachment of development and roads further and further into the countryside (over habitats noted as particularly important for the conservation of greater horseshoe bats).

All species of bat are nocturnal however greater and lesser horseshoe bats are noted as being particularly light averse, therefore increased artificial lighting anticipated as a consequence of the development proposals will reduce the value of their existing commuting corridors and foraging territories. Even low levels of lighting will deter these species, and strategic lighting strategies are not capable of fully mitigating for the increased lighting associated with the new residential areas and street lighting on the expected scale of these proposals (e.g. increasing sky-glow and conspicuous points of origin). This puts these light averse species at a competitive disadvantage to more light tolerant species in a region of the UK considered to be the stronghold for the remaining population of greater and lesser horseshoe bats.

It should be stressed that the commuting and foraging habitats of these species are protected under the same legislation as the roosting sites and cannot be dismissed given the highly damaging consequences on rare species. The NPPF (Section 15 paragraph 180) indicates that developments should be suitable for their locations, specifying that light pollution for nature conservation must be considered. In this case this policy is of particular importance given well documented detrimental impact of artificial lighting on these highly rare species near an SAC designated for these same species.

The potential impacts outlined here detail the concerns relating specifically to greater horseshoe bats and Bechstein's bats, however the same issues will be experienced by all species of bat known in the locality of which there are many – a data search with Swindon and Wiltshire Biological Record Centre will show more detailed information, including many uncommon and extremely rare species, which are known to be present in roosts of high conservation status.

iii. Birds

The impact of the proposed roads and associated development on birds must also be considered, with the loss of habitats expected to be detrimental to populations of resident and migratory species alike including IUCN red and amber listed species. Agricultural land such as that anticipated to be cleared provides essential resources for winter visitors such as fieldfare and redwing, and summer migrants such as lapwing, which are all known to be present in the area. It can also form a foraging resource for raptors including barn owl, little owl, kestrel and buzzard as some examples. Riverine species will likewise be impacted, with little egret, kingfisher and grey herons known in the area.

The detrimental impact of roads and traffic on birds is well documented, with many species sensitive to the disturbance associated with them often as a result of increased noise and vibrations. In many species this results in reduced foraging success, reduced nest success and reduced population density, with the impact felt more heavily by shy and less common species. Similarly, the installation of the aqueducts will require a significant quantity of work over a prolonged period at the bank of the river. Various water fowl will likely be affected by such works by deterring breeding attempts in the area and destruction of suitable foraging and nesting habitats.

Mortality of birds on the road upon completion will also be expected. Young barn owls in particular are vulnerable to traffic as they migrate away from their nests, though all local species will be at increased risk. Protected species will be put under pressure as a consequence.

Further information needs to be provided to determine the extent to which avian communities can be expected to be impacted by the road proposals given the diverse use of habitats employed by each species. Moreover, the cumulative impacts of the road and residential schemes that are proposed must be considered in tandem to fully account for the overall impacts that will be felt. Breeding bird surveys and winter bird surveys should be carried out, however to date no information has been provided. This should be carried out in sufficient time to inform site selection.

iv. Hazel Dormice

Hazel dormouse have potential to be disproportionately affected by these proposals. Records of hazel dormice in the area are slim, however a granted EPS licence from 2014 for hazel dormouse located to the south west of Chippenham demonstrates that they are in the area, therefore must be fully accounted for in any development proposals. Dormice are primarily an arboreal species which rely heavily on having a continuous network of interconnected branches to survive and as such are typically found in hedgerows and well connected mature woodlands with a diverse species composition to provide year-round opportunities and a well-structured understorey. Due to their arboreal nature their dispersal capability is heavily reliant upon the connectivity in their environment, particularly in large infrastructure projects where a large number of hedgerows and tree lines can be expected to be perforated.

Much in the same way that great crested newts will be impacted, any hazel dormice on the Chippenham side of the proposed road will be isolated from the wider environment. This will limit gene flow through the population, reduce opportunities within the wider landscape and fragment habitats which are currently well interconnected. Mitigation for this species is not straightforward and can be very costly due to the highly specific habitat requirements for supporting a population as outlined briefly above. Hazel dormice are protected under The Conservation of Habitats and Species (Amendment) (EU Exit) Regulations 2019, providing protected status to the dormice and their habitat, which must be protected in line with this legislation.

The status of hazel dormouse should be properly established to accurately determine the impact this road could have on any local populations, particularly given their reliance on unbroken networks of woodland and hedgerows.

Terrestrial Habitats - the implementation of a new road will invariably contribute to both air pollution and nitrogen deposition into the soil in areas currently free from such pressures, including Bencroft Hill Meadows SSSI, which is an unimproved neutral lowland meadow which supports highly sensitive botanical communities which are vulnerable to nitrogen deposition. Increased soil nitrogen puts these rare communities of plant at a competitive disadvantage compared with common ruderal species known to outcompete rarer plants under nitrogen rich conditions such as common nettle. Unimproved lowland meadows are a particularly rare habitat type in the UK given the extensive agricultural history of the country and are included as a Priority Habitat under the Natural Environment and Rural Communities Act (2006). Measures must be taken to ensure that valuable habitats such as this SSSI, but also vulnerable woodlands and watercourses are fully accounted for in this scheme.

It should also be noted that sites like Bencroft Hill Meadows SSSI and other such local wildlife sites will be subject to a much greater visitor pressure as a result of a net gain in

households in areas currently comprising greenfield land which could easily result in soil compaction and trampling, which many of the rarer species recorded in the area are unable to recover from.

Losses in biodiversity will be incurred through direct habitat loss to facilitate any roads including significant grassland cover and hedgerow losses. Given the wide-reaching impact this will have, this scheme will not be capable of delivering no net losses in biodiversity without significant investment into improving surrounding habitats, which would be difficult to achieve with the added complication of residential suburbs being included. Biodiversity net gain would be significantly more difficult to achieve as a result. The DEFRA Metric 2.0 should be used to measurably demonstrate the impact these proposals would have, and where net losses are predicted consent should not be given.

The fragmentation and loss of the habitats which will be anticipated to be cleared if the proposed schemes go ahead has the potential to be directly detrimental to numerous species and contravenes guidance set out in NPPF Section 15 Paragraphs 170, 171 & 175.

v. Rivers and watercourses

There is the potential that development proposals will impact upon the River Avon and smaller waterbodies in the area. Polluted runoff from the proposed road will be unavoidable, with fuel, oil and particulates at some stage making their way through to the watercourses through entering groundwater or via surface water runoff. This type of pollution is widely documented to have a damaging effect on water quality and subsequently the flora and fauna associated with the rivers.

There will be an inevitable increase in total surface run off as a consequence of increased sealed surfaces associated with the road and residential developments. Whilst the road proposals indicate that clear span-type aqueducts will be used to avoid impacting the flood plain, no mention is made of how the increased runoff would affect the river character (i.e. increased water speed and/or levels, water acidity etc.), and how this might subsequently impact resident wildlife. For example, otters are known to use the Chippenham stretch of the River Avon and are protected under The Conservation of Habitats and Species (Amendment) (EU Exit) Regulations 2019. Further records exist in nearby areas including Corsham, and an otter roadkill was identified in Chippenham Town Centre, therefore their presence is widely documented in the area. The potential change of river character, disturbance from extensive and prolonged works and residents, in addition to an increased potential for fatalities on the roads over the long term will increase pressure on another protected species which has again been left unmentioned in the proposals.

The river Marden is also likely to be impacted by the work proposals. Significant work has been put into restoring the river Marden for the benefit of biodiversity, including targeted methods for improving habitats for brown trout which are known to be threatened. A publicly available survey report from 2015 indicated that's the river Marden was failing with respect to its target condition by having exceeded its target level of pollutants. Remedial works may since have been undertaken, however by increasing human activity in the region between Chippenham and Calne existing measures are likely to become insufficient, and would serve only to increase the pollution levels (including phosphates) in the river. This threatens all users of the rivers and reduces its suitability for brown trout and other such fauna. No monitoring or mitigation has been proposed for this, nor any commitment to its prevention been indicated.

More consideration must also be given to wider aquatic fauna including other species of fish, white clawed crayfish (if present) and the many aquatic invertebrates which support the river system and the wider riverine food web.

5. TRANSPORT REVIEW

Introduction

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...”*. 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.”*

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”*.

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 re-drafting, but in any case.

- 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.

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-row-paper-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

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

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):

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 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...*

*•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.

➤ **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 particular 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*

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](#).
- 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

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.

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 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)² 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)³ 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 LFRMS⁴

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 18,000⁵ 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, Exeter

³ 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: 06/07/2018

⁵ This figure is in conflict with that given at 2.3.1 of 20,000

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.

7. CLIMATE REPORT CARD ON THE WILTSHIRE LOCAL PLAN REVIEW

Introduction

On 2nd September 2019 the environmental law charity, [Client Earth](#) wrote to Wiltshire Council inviting them to, 'put your area on a credible path to achieving net zero emissions by setting robust carbon reduction targets and integrating them throughout your Local Plan.' Client Earth further emphasised that this is a legal requirement and that taking action in this way would bring, 'substantial benefits and opportunities to your communities.' The letter went on to outline the relevant environmental and planning legislation that require Local Plans to, 'contribute proactively to meeting national and international climate commitments.'

Wiltshire Council is undertaking a consultation to inform the preparation of the Wiltshire Local Plan Review from Wednesday 13th January to Tuesday 9th March 2021, and is seeking representations. This 'Report Card' constitutes one such representation and has been prepared by the Sustainable Development Topic Group of [Wiltshire Climate Alliance](#) (WCA). WCA is an umbrella organisation for Wiltshire based groups to come together to campaign for action on climate change.

Purpose of the Report Card

The Report Card that follows in this document uses the criteria identified by Client Earth to assess to what extent the Local Plan contributes proactively to meeting local, national and international climate commitments. Set out below are the criteria against which the Local Plan is assessed, derived from key elements of relevant planning and environmental legislation, and local targets:

CRITERION 1: To what extent does this section of the Local Plan contribute to radical reductions in greenhouse gas emissions?

- ▶ Section 19(1A) of the Planning and Compulsory Purchase Act 2004 (PCPA) requires that a local authority's development plan documents must, '(taken as a whole) include policies designed to secure that the development and use of land in the local planning authority's area contribute to the mitigation of, and adaptation to, climate change.' It is only by setting local carbon reduction targets by reference to wider national and international targets - and demonstrating proposed policies' consistency with local targets - that it is possible to establish and track an area's contribution to the mitigation of climate change (and for policies to be 'designed to secure' that local land use and development mitigates climate change). In this sense, section 19(1A) makes emissions reduction a central organising principle of plan-making.
- ▶ The updated National Planning Policy Framework (NPPF) maintains the requirement that, 'the planning system should support the transition to a low carbon future in a changing climate.' In particular: '[i]t should help to: shape places in ways that contribute to radical reductions in greenhouse gas emissions ... Plans should take a proactive approach to mitigating and adapting to climate change ... [i]n line with the objectives and provisions of the Climate Change Act 2008.
- ▶ The Government emphasises the importance of local planning policy in delivering compliance with the UK's carbon budgets in its Clean Growth Strategy, 'Local areas are best placed to drive emission reductions through their unique position of managing policy on land, buildings, water, waste and transport. They can embed low carbon measures in strategic plans across areas such as health and social care, transport and housing.'

CRITERION 2: To what extent does this section of the Local Plan exhibit a robust evaluation of future emissions? Does it consider different emission sources? Has sustainability appraisal been used to test different spatial options on emissions?

- ▶ The national Planning Practice Guidance (PPG) refers to addressing climate change as, ‘one of the core land use planning principles’ that should, ‘underpin both plan-making and decision-taking.’ The PPG also refers to the need for local planning authorities to undertake a, ‘robust evaluation of future emissions’, including consideration of, ‘different emission sources, likely trends taking into account requirements set in national legislation, and a range of development scenarios.’ It also states that, ‘sustainability appraisal should be used to test different spatial options in plans on emissions.’

CRITERION 3: To what extent has this section of the Local Plan been assessed for consistency with all relevant climate objectives and targets?

- ▶ The Environmental Assessment of Plans and Programmes Regulations 2004 (which implement the Strategic Environmental Assessment (SEA) Directive) require that a development plan document’s cumulative climate impacts are assessed and taken into account. Among other things, this includes assessing the consistency of proposed policies with all relevant climate objectives and targets.

CRITERION 4: Where relevant, to what extent has Wiltshire Council cooperated with other local planning authorities in planning measures to address climate change mitigation, where there are cross border impacts?

- ▶ Under section 33A of the PCPA, local planning authorities are under a duty to cooperate with other local planning authorities in preparing Local Plans where strategic matters - such as, ‘planning measures to address climate change mitigation’ - have impacts across administrative boundaries.

CRITERION 5: Does this section of the Local Plan include emissions reduction targets and indicators that support local and national commitments? Does this section of the Local Plan set out how these indicators and targets will be monitored annually?

- ▶ Monitoring obligations require local planning authorities to report on an annual basis against any targets or indicators included in Local Plans. Local Plan policies should be designed to secure emissions reductions that are at least consistent with the UK’s national and international commitments (currently 68% reduction by 2030 and net zero by 2050). Additionally, Wiltshire Council has acknowledged the climate emergency and seeks to make the county of Wiltshire carbon neutral by 2030, and has stated that carbon reduction will be a key theme in the council’s recovery from COVID-19.

	1: RADICAL REDUCTIONS IN GHGs?	2: EVALUATION OF FUTURE EMISSIONS/ SUSTAINABILITY APPRAISAL?	3: CONSISTENT WITH CLIMATE OBJECTIVES AND TARGETS?	4: COOPERATION WITH NEIGHBOURING AUTHORITIES?	5: EMISSIONS REDUCTION TARGETS TO SUPPORT COMMIT-MENTS? ANNUAL MONITORING?
EMERGING SPATIAL STRATEGY	<p>The strategy states that carbon reduction is 'already an integral theme of the Local Plan'. This is not borne out by the strategy, where there is no mention of GHG emissions reduction targets, or a strategic/ policy approach to achieve them.</p>	<p>The strategy references the interim sustainability appraisal (SA) and states that the emerging spatial strategy has been informed by this process. However, if there are evaluations of future emissions in the SA, these are not mentioned in the strategy. The elements of the SA that are referenced within the strategy only talk about the assessment of the alternative development strategies considered, rather than looking in detail at emissions. The strategy acknowledges that further SA will be needed but does not specify that this will look at GHG emissions reduction measures. It may also then be too late to radically change the spatial strategy, which is what is needed.</p>	<p>Whilst the strategy mentions the Wiltshire Council acknowledgement of the Climate Emergency, there is no baseline carbon impact, carbon reduction framework or specific reduction targets set out within the strategy that map the pathway to achieve the climate objectives.</p> <p>Without these, it is impossible to know the Local Plan's likely impact, assess the options within it and develop a Plan that will contribute to national and Wiltshire carbon reduction goals.</p>	<p>The strategy states that the Council works closely with Swindon Borough Council in relation to the Swindon HMA. There are no mentions of specific planning measures to address climate change mitigation, just a vague reference to a reduction in the need to travel (which the spatial strategy for Wiltshire fails to achieve) if both authorities meet their own housing targets.</p>	<p>The strategy contains no information on emissions reduction targets to support either national targets (as articulated in the 6th Carbon Budget) or Wiltshire Council's net zero by 2030 commitments. There is a Climate Change Outcomes section for each HMA within the strategy, however these currently fail to set out how the climate change outcomes sought would be delivered.</p>

	1: RADICAL REDUCTIONS IN GHGs?	2: EVALUATION OF FUTURE EMISSIONS/ SUSTAINABILITY APPRAISAL?	3: CONSISTENT WITH CLIMATE OBJECTIVES AND TARGETS?	4: COOPERATION WITH NEIGHBOURING AUTHORITIES?	5: EMISSIONS REDUCTION TARGETS TO SUPPORT COMMIT-MENTS? ANNUAL MONITORING?
EMPOWERING RURAL COMMUNITIES	There is no mention of climate change, emissions reduction targets or the net zero commitment anywhere in this section of the Local Plan.	There is no mention of climate change, emissions reduction targets or the net zero commitment anywhere in this section of the Local Plan.	There is no mention of climate change, emissions reduction targets or the net zero commitment anywhere in this section of the Local Plan.	There is no mention of climate change, emissions reduction targets or the net zero commitment anywhere in this section of the Local Plan.	There is no mention of climate change, emissions reduction targets or the net zero commitment anywhere in this section of the Local Plan.
ADDRESSING CLIMATE CHANGE AND BIODIVERSITY NET GAIN	This section of the Local Plan correctly identifies, using the reference to the response to Covid-19, that urgent action to tackle emergencies is possible. It also acknowledges that it is important not to lose sight of plans to tackle the ongoing threat of climate change. It states that the Council is preparing strategies aimed at delivering synergistic step-changes towards tackling climate change. It notes that dramatically reducing the amount of carbon released in Wiltshire needs to focus on emissions from cars and the energy used to heat and power homes and	This section correctly identifies that policies in recent decades have 'potentially' not gone far enough to adapt to and mitigate the acknowledged effects of climate change. In reality, there is no 'potentially' here. Key policy decisions, such as the jettisoning of the proposed zero carbon homes regulations due to enter force in 2016, by the Conservative Government, illustrate the point, and the problems this has caused Local Authorities when trying to do the right thing in terms of sustainable design and construction are acknowledged in this	The section emphasises that climate change adaptation and mitigation strategies must be woven into a number of planning policy areas and act as a 'golden thread' through the Local Plan. This is not yet evident. There is no specific linkage through the plan and its discussion of new homes, with mitigation or adaptation strategies. This MUST be addressed if the Local Plan is to have a positive rather than a negative impact on emissions reductions and the achievement of net zero targets. Section 4 notes that assessment is now required to understand the extent to which	The section indicates that cooperation with neighbouring authorities is being considered, and could be important in supporting efforts to decarbonise at a strategic scale. However, it does not indicate that any such cooperation has actually started yet.	The section sets out in broad terms the areas that need addressing in order to achieve net zero (section 3), however, these measures have not translated across to the other parts of the plan - there is an almost complete disconnect between the climate change section and the rest of the Local Plan. The section appears to indicate that Wiltshire has not yet identified a carbon baseline. It acknowledges that this is the necessary first step for a carbon budget for the county to be set, against which progress can be measured.

	1: RADICAL REDUCTIONS IN GHGs?	2: EVALUATION OF FUTURE EMISSIONS/ SUSTAINABILITY APPRAISAL?	3: CONSISTENT WITH CLIMATE OBJECTIVES AND TARGETS?	4: COOPERATION WITH NEIGHBOURING AUTHORITIES?	5: EMISSIONS REDUCTION TARGETS TO SUPPORT COMMIT-MENTS? ANNUAL MONITORING?
	<p>businesses. Considering we are in a climate and ecological emergency, it is very disappointing that any meaningful action on achieving radical GHG emissions reductions is being pushed back until after a more detailed policy response to climate change is developed, following this consultation on the Local Plan.</p> <p>Decarbonisation targets have not yet been set because a carbon baseline and budget have not yet been calculated.</p> <p>It is encouraging to see that this section acknowledges some of the key issues that must be factored into any decision-making about the location and form of any new development, e.g. the need for big changes to travel patterns to significantly reduce carbon</p>	<p>section of the plan. We argue that this does not preclude the Council from insisting on future development conforming to standards that are in line with their emissions reduction targets.</p> <p>The problems are identified - tackling unsustainable travel patterns/modes and decarbonising existing and future building stock. It also understands the important role of the Local Plan in influencing the achievement of these goals by shaping the pattern and form of future development, supporting the delivery of renewable energy schemes, encouraging investment in the green economy and influencing the shift to sustainable modes of transport. However, this has not yet translated across to the rest of the Local Plan, which in its current form works against the radical</p>	<p>current policies contribute to tackling climate change, and where the gaps are. It states that this assessment will support the scope for updating policy, developing new policies or whether a whole new climate change objective is required. This is an URGENT piece of work, and would seem to be fundamental to the decision-making about any future development, and whether or how it can proceed.</p> <p>This section also illuminates the challenge of being behind the curve when it comes to the inevitable changes in the energy market, noting that developments could be potentially unviable as the existing infrastructure may well be incapable of meeting projected demand. This is an alarm call from within the Local Plan documentation</p>		<p>It is disappointing that despite acknowledging we are in a climate emergency, 2 whole years on from then, the Council still hasn't even established a carbon baseline.</p> <p>This section of the plan (section 4) acknowledges that an adequate monitoring framework will be important to ensure effectiveness of policy, and that the current issue of a lack of a carbon baseline and time-series data on sector emissions is hampering efforts at understanding the scale of the challenge. This MUST be addressed as a matter of urgency, before any decisions are made that will make the task even harder to achieve.</p>

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	<p>emissions. And that this section highlights that sustainable development means increasing self-containment within settlements, aligning job creation with housing, reducing the need to travel, supporting modal shift and using greener vehicle technology.</p> <p>However, the spatial strategy fails to address all the aims and objectives alluded to in the Climate Change and Biodiversity section and seems set to work in the opposite direction.</p>	<p>decarbonisation necessary to achieve the targets.</p> <p>Section 4 also acknowledges that current policies potentially do not incorporate the opportunities to enhance green/blue infrastructure and biodiversity, and that the co-benefits of GBI in terms of carbon sequestration, air quality improvements, passive cooling, health and wellbeing and biodiversity enhancement need to be explored. Again, a clear translation of these ambitions does not yet appear in other parts of the Local Plan, and this omission must be addressed.</p>	<p>itself, the implications of which need to be urgently addressed prior to any new developments being approved. This supports the absolute need for any new developments to be constructed so as to minimise energy demand and maximise energy efficiency and on-site renewable generation.</p>		

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<p>SUPPORTING DOCUMENTS (INCLUDING SUSTAINABILITY APPRAISAL AND HABITATS REGULATIONS ASSESSMENT)</p>	<p>We 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, our 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</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> <p>In the light of the net zero target, GHG emissions should be highlighted as a key sustainability issue and priority for</p>	<p>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</p>		<p>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. We 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</p>

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	the climate and ecological emergency.	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.	<p>carbon neutrality by 2030.</p> <p>Whatever the methodology, it is not apparent that climate change impacts have featured to any meaningful degree in the Interim SA.</p> <p>Furthermore, we are 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.</p>		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. We 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'.

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					<p>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.</p> <p>Carbon reduction targets and monitoring of progress towards them, do not feature in the SA.</p>
AMESBURY	<p>The NPPF indicates that the planning system should help to shape places in ways that contribute to radical reductions in greenhouse gas emissions. The Place Shaping Priorities section of this plan only references climate change and carbon reduction as priorities that apply equally everywhere. There is no</p>	<p>There is no robust evaluation of future emissions or consideration of emissions sources in this section of the plan. Sustainability Appraisal is yet to be conducted for this town, however the absence of a mention of the proposed developments potential to increase GHG emissions is considered</p>	<p>There is no assessment of the consistency of this section of the plan with local or national climate objectives or targets.</p>		<p>This section of the plan contains no information on emissions reduction targets to support either the 6th Carbon Budget or local 2030 commitments. Neither is there any information about how emissions reduction measures will be monitored.</p>

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	subsequent mention about how the plan might contribute to these priorities. This must be addressed to set out how radical GHG emissions reductions will be achieved.	to be an omission (in the Strategic Context section).			
BRADFORD ON AVON	The NPPF indicates that the planning system should help to shape places in ways that contribute to radical reductions in greenhouse gas emissions. The Place Shaping Priorities section of this plan only references climate change and carbon reduction as priorities that apply equally everywhere. There is no subsequent mention about how the plan might contribute to these priorities. This must be addressed to set out how radical GHG emissions reductions will be achieved.	There is no robust evaluation of future emissions or consideration of emissions sources in this section of the plan. Sustainability Appraisal is yet to be conducted for this town, however the absence of a mention of the proposed developments potential to increase GHG emissions is considered to be an omission (in the Strategic Context section).	There is no assessment of the consistency of this section of the plan with local or national climate objectives or targets.		This section of the plan contains no information on emissions reduction targets to support either the 6th Carbon Budget or local 2030 commitments. Neither is there any information about how emissions reduction measures will be monitored.

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CALNE	The NPPF indicates that the planning system should help to shape places in ways that contribute to radical reductions in greenhouse gas emissions. The Place Shaping Priorities section of this plan only references climate change and carbon reduction as priorities that apply equally everywhere. There is no subsequent mention about how the plan might contribute to these priorities, apart from the statement that impacts of any development need to be minimised to help meet the Calne Town Council Climate and Environmental Emergency Pledge. This must be addressed to set out how radical GHG emissions reductions will be achieved.	Sustainability Appraisal is yet to be conducted for this town, however the absence of a mention of the proposed developments potential to increase GHG emissions is considered to be an omission (in the Strategic Context section).	There is no assessment of the consistency of this section of the plan with local or national climate objectives or targets.		This section of the plan contains no information on emissions reduction targets to support either the 6th Carbon Budget or local 2030 commitments. Neither is there any information about how emissions reduction measures will be monitored.
CORSHAM	The NPPF indicates that the planning system should help to shape	There is no robust evaluation of future emissions or	There is no assessment of the consistency of this section of the plan with		This section of the plan contains no information on emissions reduction

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	places in ways that contribute to radical reductions in greenhouse gas emissions. The Place Shaping Priorities section of this plan only references climate change and carbon reduction as priorities that apply equally everywhere. There is no subsequent mention about how the plan might contribute to these priorities. This must be addressed to set out how radical GHG emissions reductions will be achieved.	consideration of emissions sources in this section of the plan. Sustainability Appraisal is yet to be conducted for this town, however the absence of a mention of the proposed developments potential to increase GHG emissions is considered to be an omission (in the Strategic Context section).	local or national climate objectives or targets.		targets to support either the 6th Carbon Budget or local 2030 commitments. Neither is there any information about how emissions reduction measures will be monitored.
CHIPPENHAM	No reference to Wiltshire Climate Strategy or any specific Net Zero targets on WC LP- Planning for Chippenham document. The Emerging Spatial Strategy proposes radical increase in carbon emissions, rather than reduction by: i.) removing carbon sinks (huge areas of farmland including 3 County Farms); ii.)	Development sites identified through 'sustainability appraisal framework' according to social, economic and environmental criteria and seems to be heavily weighted towards aspirational, unevidenced economic benefits, over-riding climate and environmental damage.	There is no assessment of the consistency of this section of the plan with local or national climate objectives or targets.	Mentions only that "Chippenham, one of many vibrant market towns, is located with the Swindon and Wiltshire Local Enterprise Partnership (LEP) Growth Zone."	This section of the plan contains no information on emissions reduction targets to support either the 6th Carbon Budget or local 2030 commitments. Neither is there any information about how emissions reduction measures will be monitored. Developments of this size and scale (i.e 2 sites

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	<p>constructing unnecessary roads and concrete flyovers on the River Avon floodplain, with huge quantities of embedded carbon; iii.) locking in car dependency and massive quantities of tailpipe emissions by creating a commuter suburb the size of Calne, with no prospect of local employment for those who relocate there.</p> <p>A highly subjective methodology is employed to dismiss any alternative spatial strategy involving other sites around the town that would not require a distributor road and large-scale infrastructure to cross the flood plain.</p> <p>Brownfield sites (which would cut carbon) are not included in the housing numbers yet these could provide relatively high density, affordable homes and remove the</p>	<p>28 moderate (significant) adverse effects across 7 sites of Chippenham in LPR Interim SA Appendix.</p> <p>No specific baselines or targets detail, but asserts that planning at scale provides better opportunities to moderate additional carbon emissions. Fails to account for the loss of carbon sinks and transport emissions that will be locked in by such large scale commuter extensions on green field sites. Moreover, since these 'preferred sites' are majority Council owned land, they could be secured for renewable energy generation (solar farms in particular), regenerative farming and reforestation, which would more than compensate for any claimed advantages deriving from the scale of the site (those it is not clear what these would</p>			<p>that would take 20% of Wiltshire's total housing) would raise the county's emissions substantially, including the significant carbon intensive construction emission and long term transport emissions resulting from commuting.</p> <p>Reduction targets and means of how net zero would be achieved are essential.</p>

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	<p>need for yet more car dependency, removing the need for more roads and greenfield development.</p> <p>The SA selection criteria are biased in favour of matching the required outcome for the HIF bid, climate change mitigation and adaptation into a single criterion and discounting against speculative economic benefits, for which is no evidence is presented. There is even a 'place shaping' priority that favours building near the River Avon (which builds in a preference for environmental damage).</p> <p>Place Shaping Priorities references priority to address "climate change and achieve carbon reduction" but include no specific baselines or targets.</p> <p>Priorities include: iii) improving access to the River Avon valley</p>	<p>be). As usual, this seems to be an attempt to justify 'preferred sites' to meet the HIF bid road scheme above all else and future carbon emission are simply overlooked.</p> <p>Perversely, it is also stated that these sites secures large areas of land that help the town adapt to flood risks and heatwaves and provides land to enhance biodiversity and protect habitat, when developing these sites destroys wildlife habitats and biodiversity and increases downstream flood risk.</p> <p>Opportunities for renewable energy are being explored by Chippenham Town Council's Neighbourhood Plan and include renewable energy generation on (Wiltshire Council owned) Hardens Farm, which solar developers have</p>			

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	through Chippenham as important green infrastructure corridor for the town. Rather than scoring positively as a reason for selecting an area to build on, this should score negatively as a critical area to protect and avoid developing within, not only but also for climate change mitigation and adaptation reasons.	undertaken to studies to demonstrate is viable (this farm being one of those destined for destruction).			
DEVIZES	The NPPF indicates that the planning system should help to shape places in ways that contribute to radical reductions in greenhouse gas emissions. The Place Shaping Priorities section of this plan only references climate change and carbon reduction as priorities that apply equally everywhere. There is no subsequent mention about how the plan might contribute to these priorities. This must be	There is no robust evaluation of future emissions or consideration of emissions sources in this section of the plan. Sustainability Appraisal is yet to be conducted for this town, however the absence of a mention of the proposed developments potential to increase GHG emissions is considered to be an omission (in the Strategic Context section).	There is no assessment of the consistency of this section of the plan with local or national climate objectives or targets.		This section of the plan contains no information on emissions reduction targets to support either the 6th Carbon Budget or local 2030 commitments. Neither is there any information about how emissions reduction measures will be monitored.

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	addressed to set out how radical GHG emissions reductions will be achieved.				
MALMESBURY	The NPPF indicates that the planning system should help to shape places in ways that contribute to radical reductions in greenhouse gas emissions. The Place Shaping Priorities section of this plan only references climate change and carbon reduction as priorities that apply equally everywhere. There is no subsequent mention about how the plan might contribute to these priorities. This must be addressed to set out how radical GHG emissions reductions will be achieved.	There is no robust evaluation of future emissions or consideration of emissions sources in this section of the plan. Sustainability Appraisal is yet to be conducted for this town, however the absence of a mention of the proposed developments potential to increase GHG emissions is considered to be an omission (in the Strategic Context section).	There is no assessment of the consistency of this section of the plan with local or national climate objectives or targets.		This section of the plan contains no information on emissions reduction targets to support either the 6th Carbon Budget or local 2030 commitments. Neither is there any information about how emissions reduction measures will be monitored.
MARLBOROUGH	The NPPF indicates that the planning system should help to shape places in ways that contribute to radical	There is no robust evaluation of future emissions or consideration of emissions sources in this	There is no assessment of the consistency of this section of the plan with		This section of the plan contains no information on emissions reduction targets to support either the 6th Carbon Budget or

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	reductions in greenhouse gas emissions. The Place Shaping Priorities section of this plan only references climate change and carbon reduction as priorities that apply equally everywhere. There is no subsequent mention about how the plan might contribute to these priorities. This must be addressed to set out how radical GHG emissions reductions will be achieved.	section of the plan. Sustainability Appraisal is yet to be conducted for this town, however the absence of a mention of the proposed developments potential to increase GHG emissions is considered to be an omission (in the Strategic Context section).	local or national climate objectives or targets.		local 2030 commitments. Neither is there any information about how emissions reduction measures will be monitored.
MELKSHAM	The NPPF indicates that the planning system should help to shape places in ways that contribute to radical reductions in greenhouse gas emissions. The Place Shaping Priorities section of this plan only references climate change and carbon reduction as priorities that apply equally everywhere. There is no subsequent mention	There is no robust evaluation of future emissions or consideration of emissions sources in this section of the plan. Sustainability Appraisal is yet to be conducted for this town, however the absence of a mention of the proposed developments potential to increase GHG emissions is considered to be an omission (in the	There is no assessment of the consistency of this section of the plan with local or national climate objectives or targets.		This section of the plan contains no information on emissions reduction targets to support either the 6th Carbon Budget or local 2030 commitments. Neither is there any information about how emissions reduction measures will be monitored.

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	about how the plan might contribute to these priorities. This must be addressed to set out how radical GHG emissions reductions will be achieved.	Strategic Context section).			
ROYAL WOOTTON BASSETT	The NPPF indicates that the planning system should help to shape places in ways that contribute to radical reductions in greenhouse gas emissions. The Place Shaping Priorities section of this plan only references climate change and carbon reduction as priorities that apply equally everywhere. There is no subsequent mention about how the plan might contribute to these priorities. This must be addressed to set out how radical GHG emissions reductions will be achieved.	There is no robust evaluation of future emissions or consideration of emissions sources in this section of the plan. Sustainability Appraisal is yet to be conducted for this town, however the absence of a mention of the proposed developments potential to increase GHG emissions is considered to be an omission (in the Strategic Context section).	There is no assessment of the consistency of this section of the plan with local or national climate objectives or targets.		This section of the plan contains no information on emissions reduction targets to support either the 6th Carbon Budget or local 2030 commitments. Neither is there any information about how emissions reduction measures will be monitored.
SALISBURY	The NPPF indicates that the planning system	There is no robust evaluation of future	There is no assessment of the consistency of this	No mention of the potential impact which	This section of the plan contains no information

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	<p>should help to shape places in ways that contribute to radical reductions in greenhouse gas emissions. The Place Shaping Priorities section of this plan references climate change and carbon reduction as priorities that apply equally everywhere. The Salisbury plan conspicuously does not feature priorities around mitigation of, or adaptation to, climate change. The plan alludes to opportunities to moderate additional carbon emissions, but currently there is no mention about how the plan might contribute to radical emissions reductions. This must be addressed to set out how radical GHG emissions reductions will be achieved.</p>	<p>emissions or consideration of emissions sources in this section of the plan. Sustainability Appraisal assesses that climate impacts of the selected sites is only of minor adverse effect, for which mitigation is easily achievable. It is hard to see how this conclusion is arrived at in the absence of robust data about the loss of carbon sinks, the embodied carbon associated with site development or the ongoing operational carbon that would be generated by the developments. The references to sustainable construction and opportunities for on site renewable energy generation are not quantified, so it is impossible to assess whether the carbon impacts would be mitigated.</p>	<p>section of the plan with local or national climate objectives or targets.</p>	<p>further development, particularly south of Salisbury, might have in terms of traffic and recreational pressures on the New Forest. Parts of South Wiltshire in the Salisbury HMA come under the New Forest National Park Authority for planning purposes.</p>	<p>on emissions reduction targets to support either the 6th Carbon Budget or local 2030 commitments. Neither is there any information about how emissions reduction measures will be monitored.</p>

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TIDWORTH AND LUDGERSHALL	The NPPF indicates that the planning system should help to shape places in ways that contribute to radical reductions in greenhouse gas emissions. The Place Shaping Priorities section of this plan only references climate change and carbon reduction as priorities that apply equally everywhere. There is no subsequent mention about how the plan might contribute to these priorities. This must be addressed to set out how radical GHG emissions reductions will be achieved.	There is no robust evaluation of future emissions or consideration of emissions sources in this section of the plan. Sustainability Appraisal is yet to be conducted for this town, however the absence of a mention of the proposed developments potential to increase GHG emissions is considered to be an omission (in the Strategic Context section).	There is no assessment of the consistency of this section of the plan with local or national climate objectives or targets.		This section of the plan contains no information on emissions reduction targets to support either the 6th Carbon Budget or local 2030 commitments. Neither is there any information about how emissions reduction measures will be monitored.
TROWBRIDGE	The NPPF indicates that the planning system should help to shape places in ways that contribute to radical reductions in greenhouse gas emissions. The Place Shaping Priorities section of this plan references climate	There is no robust evaluation of future emissions or consideration of emissions sources in this section of the plan. Sustainability Appraisal assesses that climate impacts of the selected sites is only of minor	There is no assessment of the consistency of this section of the plan with local or national climate objectives or targets.		This section of the plan contains no information on emissions reduction targets to support either the 6th Carbon Budget or local 2030 commitments. Neither is there any information about how emissions reduction

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	change and carbon reduction as priorities that apply equally everywhere. The Trowbridge plan additionally includes priorities around self-containment to reduce the need to travel, and improving the range of transport modes to reduce reliance on private cars. Currently there is no mention about how the plan might contribute to radical emissions reductions. This must be addressed to set out how radical GHG emissions reductions will be achieved.	adverse effect, for which mitigation is easily achievable. It is hard to see how this conclusion is arrived at in the absence of robust data about the loss of carbon sinks, the embodied carbon associated with site development or the ongoing operational carbon that would be generated by the development. The references to sustainable construction and opportunities for on site renewable energy generation are not quantified, so it is impossible to assess whether the carbon impacts would be mitigated.			measures will be monitored.
WARMINSTER	The NPPF indicates that the planning system should help to shape places in ways that contribute to radical reductions in greenhouse gas emissions. The Place Shaping Priorities	There is no robust evaluation of future emissions or consideration of emissions sources in this section of the plan. Sustainability Appraisal is yet to be conducted for	There is no assessment of the consistency of this section of the plan with local or national climate objectives or targets.		This section of the plan contains no information on emissions reduction targets to support either the 6th Carbon Budget or local 2030 commitments. Neither is there any information about how

	1: RADICAL REDUCTIONS IN GHGs?	2: EVALUATION OF FUTURE EMISSIONS/ SUSTAINABILITY APPRAISAL?	3: CONSISTENT WITH CLIMATE OBJECTIVES AND TARGETS?	4: COOPERATION WITH NEIGHBOURING AUTHORITIES?	5: EMISSIONS REDUCTION TARGETS TO SUPPORT COMMIT-MENTS? ANNUAL MONITORING?
	<p>section of this plan references climate change and carbon reduction as priorities that apply equally everywhere. The Warminster plan additionally mentions that the Neighbourhood Plan will be able to consider locally specific policies for climate change. Currently there is no mention about how the plan might contribute to these priorities or policies. This must be addressed to set out how radical GHG emissions reductions will be achieved.</p>	<p>this town, however the absence of a mention of the proposed developments potential to increase GHG emissions is considered to be an omission (in the Strategic Context section).</p>			<p>emissions reduction measures will be monitored.</p>
WESTBURY	<p>The NPPF indicates that the planning system should help to shape places in ways that contribute to radical reductions in greenhouse gas emissions. The Place Shaping Priorities section of this plan only references climate change and carbon</p>	<p>There is no robust evaluation of future emissions or consideration of emissions sources in this section of the plan. Sustainability Appraisal is yet to be conducted for this town, however the absence of a mention of the proposed</p>	<p>There is no assessment of the consistency of this section of the plan with local or national climate objectives or targets.</p>		<p>This section of the plan contains no information on emissions reduction targets to support either the 6th Carbon Budget or local 2030 commitments. Neither is there any information about how emissions reduction measures will be monitored.</p>

	1: RADICAL REDUCTIONS IN GHGs?	2: EVALUATION OF FUTURE EMISSIONS/ SUSTAINABILITY APPRAISAL?	3: CONSISTENT WITH CLIMATE OBJECTIVES AND TARGETS?	4: COOPERATION WITH NEIGHBOURING AUTHORITIES?	5: EMISSIONS REDUCTION TARGETS TO SUPPORT COMMIT-MENTS? ANNUAL MONITORING?
	reduction as priorities that apply equally everywhere. There is no subsequent mention about how the plan might contribute to these priorities. This must be addressed to set out how radical GHG emissions reductions will be achieved.	developments potential to increase GHG emissions is considered to be an omission (in the Strategic Context section).			

Findings

This response by Wiltshire Climate Alliance to the Local Plan review analyses the documents that make up the plan with a focus on its ability to positively influence the achievement of the net zero by 2030 target (whilst also considering the 6th Carbon Budget target of a 68% reduction in emissions by 2030). The key findings from this analysis are set out in the below bullet points:

- The assertion in the Emerging Spatial Strategy that ‘carbon reduction is already an integral theme of the Local Plan’ is disingenuous. There is almost no evidence in the Plan documents that point to carbon reduction being important, let alone an integral factor in the determination of housing numbers or the assessment of where housing could be located within the county. There are no carbon reduction targets set out in the plan that give any confidence that the net zero target is being taken at all seriously in this process.
- The assessment criteria in the Sustainability Appraisal provide insufficient weight to the impacts of global heating and no meaningful strategies are proposed that would mitigate the adverse impacts of the embodied carbon or operational carbon associated with the proposed new developments, or indeed the very negative impacts of the destruction of carbon sinks and biodiversity that would result from the predominantly greenfield development that the Local Plan is recommending.
- The Climate Change and Biodiversity Net Gain section of the Local Plan is well written and correctly identifies many of the issues around the threat climate change poses. Particularly it identifies the need for robust, forward thinking policies to adapt to and mitigate the effects of climate change. Unfortunately, the spatial strategy bears no relation to this (and presumably was formulated before it) and the rest of the Local Plan, such that it is, does not contain any such policies.

- The Climate Change and Biodiversity Net Gain section highlights the need for all the Council's plans to work synergistically towards achieving the net zero goal. There is insufficient evidence in the current suite of Local Plan documents that indicate that this is yet happening.

Conclusions

The Council asserts that the Local Plan Review 'will play a key role in helping to deliver not only the Council's carbon reduction aspiration, but also achieving compliance with legislation and national planning policy expectations regarding climate change' (Emerging Spatial Strategy, 2.3). If these aspirations and expectations are to be realised, the next iteration of the Plan must explicitly set out the carbon implications (both embodied, operational and consequential, including associated land use and transport emissions) of proposed new development. It must also set carbon reduction targets that provide a route to achieving the net zero goal, to enable proper scrutiny of the plan, and the extent to which it contributes to the necessary emissions reductions. Those targets must be accompanied by realistic and deliverable policies that work synergistically across the whole of the Council's planning responsibilities.

Prepared by Sustainable Development Topic Group, Wiltshire Climate Alliance, March 2021.

8. ACCESS AND INCLUSION

Content of the Local Plan

Environmental Sustainability is integral to community health and wellbeing. Therefore, public health, access and inclusion should be at the heart of any planning proposals. There is no mention in any of the key consultation documents of health and wellbeing, equality, access or inclusion.

The Public Sector Equality Duty of the Equality Act 2010, places a duty on public authorities to consider or think about how their policies or decisions affect people who are protected under the Equality Act, notably in this case, people who are older, disabled, or of a different ethnicity. With an ageing population, this Public Sector Duty should mean that access and inclusion should be embedded in all planning decisions, and consultation strategies. It is apparent that this is not the case in this Local Plan Review.

The following comments are made:

- **Housing Location:** Housing allocation on greenfield edge-of-town sites is inappropriate for people with no, or limited access to a car. Brownfield in-town sites within a 10-minute walking distance of existing essential shops and services would offer the level of access required. These should be prioritised in the Local Plan.
- **Housing Type:** Traditional two-storey developer housing for private ownership is inappropriate for many people with mobility impairments, or older people needing a small low-maintenance home. For reasons of health, accessibility, affordability and Climate Change, the Local Plan must presume that the majority of homes will be small dwellings. The highest possible energy efficiency standards, within the context of net zero carbon development policies should be mandatory.
- **Housing Tenure:** The Local Plan appears to presume a predominance of home purchase whereas there is a documented shortage of Social rented accommodation. The Local Plan should focus on and prioritise housing provision in the social rented sector, so that the most vulnerable in society can remain living close to established support networks
- **Other issues:**

In addition to concerns we have about housing allocation, we also highlight our concerns about the absence of any consideration in the Local Plan with regards to health and wellbeing. Older, disabled and more vulnerable people will be negatively impacted by:

- Increased air pollution arising from additional roads and vehicles;
- Increased social isolation arising from dwellings sited further away from centrally-based shops and services and cost/infrequency of public transport;
- Decrease in quality of life, emotional and physical wellbeing, if local green spaces are replaced by housing developments (there being a strong evidence base associating nature and positive health/recovery outcomes).

Consultation Process

In addition to grievances regarding the content of the Local Plan, we have serious concerns about the consultation process itself. Our view is that the consultation has not been inclusively conducted and that *indirect discrimination* has taken place. Indirect discrimination, outlawed under the Equality Act 2010, is where organisational practices and policies that apply to everyone, put some people with a protected characteristic at an unfair disadvantage.

We have evidence from multiple sources: surveys, emails and spoken reports from local people all over Wiltshire – that the consultation has excluded vast numbers of people – notably those who are older, with sensory or cognitive impairments, or simply without IT/internet access. It has also excluded people from ethnic minorities for whom English is their second language.

Summarised feedback:

- a. **Lack of prior information:** As the consultation was conducted during a global pandemic and national lockdown, only a very small proportion of the population knew about the consultation, and these were people who:

- a) had internet access;
- b) were already actively engaged in local community affairs.

The Government's Planning Practice Guidance (PPG), paragraph 078 requires "alternative or creative approaches" to inform or engage with people who are not online. There is no evidence of these having been undertaken, and the vast majority of those who were aware were informed about the consultation by their own personal contacts (usually online).

- b. **Lack of face-to-face explanation; inaccessibility of Webinar presentation:** A single, 45-minute online presentation was offered for each town. No alternative times were offered for people who were unavailable to make their town's particular time-slot. People without internet access were excluded from these sessions. Many could not access the presentation due to technical issues at the Wiltshire Council end. The language used during the presentations was reported to be 'too technical' for many listeners to understand. The presentation slides can now be viewed online, but the spoken presentation itself cannot. The slides on their own do not convey the information people need to understand the Council's rationale for its proposals.
- c. **Disjointedness of the Wiltshire-wide consultation:** The consultation has been designed to elicit responses from local residents, with a focus on each area separately. Naturally when looking at the list of towns people are inclined to click on their own town's documentation. Every document is complex, and with a minimum of two town-focused papers to read and understand, people have not looked at the plans associated with neighbouring towns. We understand that many small villages (and their parish councils) have not felt the Local Plan necessarily applied to them, as the wider picture, including impacts on transport and traffic has not be clearly presented.
- d. **Complexity of the paperwork:** To understand the rationale behind the Local Plan proposals, it is suggested that 5 fairly complex consultation documents be read, totalling 155 pages of information. In addition to these there are at least 12 technical supporting documents. None of these is straightforward for a layperson to read: there are no 'easy read' versions. It is clear from many of the comments submitted to us (75% of survey respondents in addition to emailed reports), that people were perplexed

by the documentation and language and found they were not straightforward in conveying the essential information they needed to know to make an informed response.

- e. **Inappropriate and inadequate timing:** This consultation we argue, is poorly timed. Legal advice from David Manley QC and Piers Riley-Smith of Kings Chambers makes this point: *“The planning system is facing unprecedented challenges during the Covid-19 pandemic. It is of course important that, where they can be made, compromises are reached which allows for the continued operation of the planning regime. However, those compromises cannot be made at the price of public participation.”* [2]

Furthermore, the Gunning principles (coined by Stephen Sedley QC, and cited by the Local Government Association) [3] state that a consultation is only legitimate if there is sufficient information to give ‘intelligent consideration’ ; i.e. the information must be readily available and accessible; and there is adequate time for consideration and response; i.e. there must be sufficient opportunity for consultees to participate in the consultation, and the timeframe must be flexible to allow consultees to respond.

It is apparent from emailed reports, survey responses and verbal interactions with members of the public that given the lack of information and complexity of documentation, and the unavailability of face-to-face meetings, public participation has been sacrificed for expediency and pressure by Government to continue the process. No additional time has been allowed, to facilitate access by people who are not online, who need clear face-to-face interaction (e.g. people with hearing impairments who need to lip-read), or people who simply require more time to absorb and understand the documentation. We argue that this lack of flexibility and unwillingness by the council to extend the consultation period or reasonably postpone the process, is discriminatory and represents a clear breach of the spirit of the PPG, the Gunning Principles, and importantly, the Public Sector Equality Duty.

Conclusion

It is clear from the lack of any reference to public health, access, equality and inclusion in any of the consultation documents, that Wiltshire Council regards these issues as unrelated to environment and planning. The housing allocation sites as set out in the documents bear little relation to what older people, people with disabling conditions, and people on low incomes actually need.

With regards to the process itself, the council would argue that it is meeting its obligations to consult the public in accordance with the regulations set out in the Town and Country Planning (Local Planning) (England) Regulations 2012, the Planning Practice Guidance (updated July 2020 in light of the Covid-19 pandemic), and its own Statement of Community Involvement – Temporary Arrangements (July 2020). The council may also argue that access and inclusion are embedded in its decision-making with regards to formulating local plans.

However, unsolicited comments and anecdotal reports from councillors and members of the public and responses to our survey, strongly indicate that this is not the case. Our response concludes that not only is Wiltshire Council failing in its public duty as outlined in the Equality Act 2010, to include more vulnerable members of society in its planning decisions, it is also failing to ask them for their opinions.

Note: A longer version of this response, including supporting appendices, has been sent to Wiltshire Council separately.

9. OVERALL CONCLUSIONS AND RECOMMENDATIONS

At a time of climate and ecological emergency, the Local Plan and associated Local Transport Plan have the potential to do significant damage to the climate and environment and at the same time represent an opportunity for Wiltshire Council to begin to deliver on its commitment to seeing to make Wiltshire carbon neutral by 2030 and support the national targets under the Climate Change Act, as it has a responsibility to do.

As they stand, Wiltshire Council's Local Plan proposals would do enormous damage to our climate and environment and would set Wiltshire back years on its journey to net zero, cancelling out progress achieved on its operational carbon reduction many times over.

Despite recognition of the kind of action that is required in the supporting document on Climate Change, the spatial strategy seems to not to have incorporated any of it and appears to have been developed on a political judgement about long term growth without considering the negative consequences that its approach will bring. Mitigating future impacts of global heating and adapting to the adverse changes that are already locked as a result of previous inaction means the world (including Wiltshire) has to embark on a programme of radical emissions reductions, and spatial and transport planning are no exception.

Adverse impacts of the existing spatial strategy/ Local Plan proposals include:

- Destruction of carbon sinks (farmland and woodland);
- Emissions for the construction of (unnecessary) roads, bridges, and fly-overs;
- Driving up and locking in transport emissions as a result large out-of-town commuter suburbs in towns like Chippenham;
- Lack of commitment to net zero carbon development policies - which are already legal/ viable and likely to be mandatory in future;
- Lack of commitment to designating sites for renewable energy generation, such as council owned farmland and County farms;
- Lack of commitment to a tree canopy target and planting trees on Council owned land;
- Destruction of natural capital, wildlife habitats and existing and future biodiversity (included endanger species);
- Destruction of high-quality farmland - including some of the best and most versatile- which could support local food production and national food security;
- Destruction of County farms, set up to provide employment opportunities for the next generation of farmers;
- Exacerbation of future flood risk from large urban developments in the river catchments, threatening not only local communities but also out of county areas;
- Undermining of local communities' resilience to climate change impacts by building adjacent to (expanding) flood plains.

All of which is driven by excessive housing numbers and a lack of proper consideration of the climate and environment. The SA barely considers carbon emissions, conflating mitigation and adaptation into a single (one of 11 and sometimes 12) assessment criteria, trading off adverse impacts against aspirational economic benefits, and dismissing environmental impacts as mitigatable, without offering any further information on how. There are no measurable carbon reduction targets or milestones within the Plan, or even any commentary on how the Plan will help get Wiltshire to net zero by 2030.

It seems clear that the housing target for Wiltshire is too high and needs to be reduced. The site selection process needs to be repeated with these lower numbers and a set of criteria that prioritise local housing and employment needs alongside a carbon reduction strategy, rather than the current in-migration based, housing led and environmentally destructive one that has been put forward.

In this regard, we recommend the Local Plan follows the advice given by Client Earth in its [letter](#) to Wiltshire Council of Sept. 2019, including:

- Setting a local carbon target framework based on a comprehensive assessment of carbon reduction potential in relation to carbon reduction targets;
- Demonstrating proposed planning policies' consistency with this local target framework; and
- Monitoring performance on at least an annual basis using relevant indicators.

In taking a completely new approach, the revised Spatial Strategy and Local Plan policies should aim to prevent:

- Destruction of natural capital and carbon sinks;
- Operational emissions resulting from new housing and business/ industrial premises;
- Construction of carbon intensive infrastructure (including embedded emissions in materials such as concrete and asphalt);
- Additional transport mileage that would result from creating car dependency and reliance on commuting.

They should also aim to avoid additional emissions/ reduce the county's emissions by focusing on:

- Reduced housing numbers in sustainable locations (well connected to existing settlements and making optimal use of existing infrastructure);
- Local employment led (not housing led) development;
- Net zero development policies, including highest standards of building insulation (domestic and commercial);
- Promotion of investment in renewable energy generation (including on its own farms);
- Promotion of innovative and progressive farming methods;
- Investment in infrastructure to support active travel (for short journeys) and public transport (modal shift); and
- Investment in infrastructure to support the transition to ultra-low emission vehicles.

The carbon emissions associated with proposed housing numbers in proposed locations should be calculated up front so as to properly inform the Plan and allow for the proper comparison of potential sites at the outset. No sites should be designated as 'preferred' until such time as the climate change implications (including estimated net carbon emissions) have been calculated. The impact of the proposed development in helping Wiltshire attain net zero should be one of the key decision criteria.

Wiltshire Council also needs to be cognisant of the fact that flood risk to the whole county of Wiltshire will increase significantly over the coming 15 years and needs to ensure its evidence is up to date and sufficient headroom for climate change is built in.

Finally, we would endorse the recommendations of the Global Warming and Climate Emergency Task Group in its [Report of the Global Warming & Climate Emergency Task Group \(Part Two\)](#), which would support such a revised approach.

CLIMATE157

Response to Wiltshire Council's Local Plan Review Consultation (2016 - 2036)

1. Housing numbers proposed for Wiltshire are too high

Wiltshire's housing numbers are based on 2014 housing projections, when the national population was growing much faster than currently. If either the 2016 or 2018 projection were used this would result in a 24% lower baseline. They are also based on a workplace affordability uplift (of 36%) which has been applied inappropriately, since a significant proportion of the working population work for organisations outside Wiltshire. Wiltshire Council has also added another 4,790 houses based on an out of date economic trends forecast. It is my understanding that Ministry of Defence housing (several thousand) and brownfield sites within existing urban areas (also significant numbers) are not included in the housing figures, making the total even higher. As a rural county, with valuable farmland and wildlife habitat, and a lack of local employment opportunity for all the in-migration the houses will lead to, these numbers will put enormous strain on our towns, villages and natural environment, with few benefits and huge downsides (congestion, pollution, loss of amenity) for Wiltshire residents. The inflated housing figures also make it harder for Wiltshire Council to meet its 5 year housing land supply (which it is already failing to meet under the current Plan), further undermining Neighbourhood Plans and allowing speculative planning applications to be granted permission. They also undermine existing Neighbourhood Plans and the work local communities have done to protect natural capital and allocate housing away from environmentally valuable areas such as the Avon and Marden valley.

Wiltshire Council should therefore:

- Abandon the notion of adding an additional 5,000 houses;
- Push back on MHCLG to get the 40,840 number reduced;
- Focus on maximising the number of brownfield sites within the target;
- Consider the housing needs of rural settlements or small towns in the post covid world in which they will benefit from affordable housing, primary schools, surgeries, local shops and community amenities to remain viable.

2. Housing Targets in Chippenham are too high

Far too many houses have been allocated to Chippenham. The numbers are double previous targets and way above what had previously been discussed with members of the Town Council and Chippenham Neighbourhood Plan. The previous Chippenham Site Allocations Plan (CSAP) to 2026 identified sites at Rawlings Green and to the South West of Chippenham for 2,050 houses. Building work has not started on any of these, so to start allocating even more land for development is premature and risky. Growth at Chippenham is constrained by the particularly beautiful and biodiverse countryside around the Avon and Marden river valleys, which is highly valued by the residents of Chippenham and the surrounding villages. The proposal to build a £75m distributor road to the South and East of Chippenham with 7,500 houses (5,100 by 2036) and associated commercial land is equivalent to adding a town the size of Calne. Two thirds of Chippenham's workers commute (many considerable distances along the M4) to their place of work. None of the 26ha of employment land designated in the current CSAP has attracted any employers and several employers have moved out of the town or contracted/ pulled back on expanding in recent years. Building huge suburban extensions will increase the number of commuters, increase congestion (15,000 more cars), drive up carbon emissions, whilst damaging Chippenham's market town heritage and the Avon and Marden valleys upon which people place so much value.

Wiltshire Council should therefore:

- Reduce Chippenham share of houses to no more than the previous Local Plan which would leave a residual number of houses to be built of 1,370 which could more sustainably be accommodated on a combination of brownfield sites and other smaller sites, without needing destroy the Avon and Marden valley.

3. Chippenham Site 1 Should not be a Selected for Development

There would be huge environmental and Climate Change impacts from Wiltshire Council selecting Site 1, including destruction of two river valleys, hundreds of acres of productive farmland (some of the best and most versatile in the country) substantial loss of natural capital, destruction of wildlife habitats (including endanger species) and an unacceptable impact on the climate. It is clear that the site was pre-selected to support the Council's HIF bid for a £75m road (not mentioned here), which it disingenuously 'sold' to the public as a 'relief road' and which the public and all the surrounding town and parish councils have now rejected. Such is the determination for predetermination of this site that even the interim SA has also suggested that the environmental impact of destroying prime wildlife habitat and high quality farmland, bordered by two river valleys, requiring carbon intensive infrastructure (railway bridge, two extended floodplain river crossings, canal bridges and miles of road within metres of the river Marden, is less than developing alternative sites on poorer land, away from rivers and already close to existing infrastructure such as the A350 and the electricity grid. The site selection process ('place shaping priority') even has 'proximity to the River Avon corridor' as a reason for selecting for development rather than avoiding. protecting.

Wiltshire Council should therefore:

- Withdraw its proposals for Site 1 and reappraise all potential sites around Chippenham under the new lower housing target, including brownfield urban regeneration;
- Introduce long term protection status for the River Avon and Marden valley to the East of Chippenham and invest in enhancing its wildlife and positively developing Wiltshire Council's farms for sustainable food production, renewable energy generation and reforestation.

4. 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 unevicenced) economic benefits, which then justify writing off vast swathes of countryside and high-grade agricultural land. There is no explanation as to the wight 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 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 eoc/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 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".

5. The Plan does not address the Climate and Ecological Emergency

Wiltshire Council's current Local Plan proposals would substantially increase the county's carbon emissions and lock in emissions for years to come. The Local Plan documents point out that "in February 2019 Wiltshire Council acknowledged a climate emergency and agreed to seek to make the county of Wiltshire carbon neutral by 2030" and that "mitigation is related to dramatically reducing the amount of carbon released in Wiltshire," which is "largely related to emissions from cars and the energy used to heat and power homes and businesses." It is also acknowledged that there is a need to "shape places to help secure radical cuts in greenhouse gas emissions, for example through efficient building design and changes to the way we travel," and "actively support and help to drive the delivery of renewable and low-carbon energy generation and grid infrastructure." Yet these proposals fail to consider climate change and biodiversity in relation housing numbers and locations and fail to propose a strategy and policies that would deliver what is acknowledged is needed. Simply cutting back on the excessive and ultimately, undeliverable target would immediately result in a reduction in emissions and a greater proportion of development on brownfield sites and those close to existing infrastructure, closer to existing centres of population. But a much greater reduction in the housing target would be needed to make the Plan sustainable and compliant with the stated aim of "dramatically reducing the amount of carbon released in Wiltshire."

After reducing the housing targets and locating development more sustainably so as to reduce the need for carbon intensive infrastructure and car dependency, the way to "shape places to help secure radical cuts in greenhouse gas emissions" should be through net zero carbon development policies and policies that promote investment in renewable energy generation. Net zero development entails high energy efficiency standards, with on-building/ on-site renewable energy generation to cover operational energy consumption during the lifetime of the development, any remaining carbon emissions being offset through a renewable energy generation offset scheme (reference the Wiltshire Council Climate Emergency Task Group Report (Part 2) on planning). Adopted plans such as the London Plan already have such policies in place and many local planning authorities (LPAs) are including them in their emerging Local Plans, in anticipation of the inevitable changes to the planning system to bring it in line with the Climate Change Act and national carbon reduction targets (net zero by 2050 and a 68% reduction on a 1990 baseline by 2030). Planning legislation already allows for such policies and the Government has reiterated that the soon to be introduced Future Homes standard on energy efficient buildings will be a floor not a ceiling as far as Council's ambitions to achieve net zero development are concerned. The excuse that viability wouldn't allow this carries little weight, given that viability needs to be assessed at the site allocation stage and developers will be clear about the costs of developing particular sites at a sufficiently early stage. Given that such policies will eventually be the norm across all LPAs, costs will in any case rapidly reduce as carbon neutral development becomes the norm, as it will have to be.

The question that needs to be asked of Wiltshire Council (rather than Wiltshire Council asking of its residents) is "How will this proposed Plan cut carbon emissions in line with the national targets, as it is required to do under planning legislation that refers to LPAs obligations under the Climate Change Act?" (i.e., at least 68% reduction on a 1990 baseline by 2030). This does not seem to even feature in the preparation of this Plan yet is the fundamental question it should be addressing. The consultation documents have not even produced any estimate of the carbon implications of the Plan, let alone calculated how the housing numbers proposed and spatial strategy being promoted would contribute to reducing overall emissions.

Finally, the approach to biodiversity is based on a fundamental misunderstanding that natural habitat destruction can be compensated by marginal improvements to nature elsewhere. The question misses the point completely in that successfully enhancing natural capital requires it isn't destroyed in the first place. Hence the need to avoid building on valuable habitats and carbon sinks, such as the land to the East of Chippenham. High quality pasture land and river valleys are finite and irreplaceable, and need to be protected and enhanced in their current state. In describing biodiversity offsetting and net gain as "[licence to trash nature](#)," environmental charity Friends of the Earth point

out that nature is declining in the UK, natural ecosystems are under stress and many parts of the UK are becoming biodiversity deserts. Their view is that biodiversity net gain should be a last resort, used only when every avenue to avoid environmental harm has been exhausted.

In terms of habitat destruction and biodiversity loss, no material consideration seems to have been given to the natural capital/ biodiversity impacts of developing Chippenham's sites 1 and 2, and there is only one question that refers to this in the Climate Change and Biodiversity Net Gain section. Questions asked of Wiltshire Council officers in the consultation webinars and at the Chippenham Area Board indicate that these impacts have not been considered in any depth and that this would be done at a later stage (by which time it will be harder to take account of what's discovered, properly consider alternatives and progress the kind of radically different Plan that is needed). Given the unique nature of the Avon and Maren valley and the loss of valuable habitats and biodiversity that would occur if these proposals were to go ahead, we have added our comments on habitat destruction and biodiversity loss under question B2.

Losses in biodiversity will be incurred through direct habitat loss to facilitate any roads including significant grassland cover and hedgerow losses. Given the wide-reaching impact this will have, this scheme will not be capable of delivering no net losses in biodiversity without significant investment into improving surrounding habitats, which would be difficult to achieve with the added complication of residential suburbs being included. The fragmentation and loss of the habitats which will be anticipated to be cleared if the proposed schemes go ahead has the potential to be directly detrimental to numerous species and contravenes guidance set out in NPPF (Section 15 Paras 170, 171 and 175). The Local Plan should also seek to maximise the value of existing farmland in terms of carbon capture, particularly its own farms where it has direct influence over the land and the way in which it is managed. It should plan for a future which encourages progressive agroecological and regenerative methods that promote carbon sequestration and storage

In addition, the UK Climate Impact Projections have revealed that climate change impacts are manifesting more rapidly than anticipated, and areas adjacent to current undevelopable flood zones, could well become part of those zones in future. It would be unwise to rely on expensive Sustainable Urban Drainage scheme (SUDS) solutions to mitigate flood risk that is avoidable in the first place. In addition to the substantial cost and space requirement, claims that all new development would include SUDS to achieve a 'greenfield runoff rate plus 20%' seem unrealistically optimistic, and lack evidence. 20% may also turn out to be an insufficient margin to compensate for future climate change scenarios and the likely more intensive rainfall events that are the cause of rapid river level rises and associated downstream flooding.

Wiltshire Council therefore needs to:

- develop a genuinely sustainable spatial strategy that is not dependent on commuting;
- reduce housing numbers to allow for more organic growth that will not cause the substantial harm associated with the current proposed strategy;
- take an employment (rather than a housing led) approach;
- measure the carbon emissions associated with its spatial strategy options and prioritise minimising current and future emissions;
- develop a framework for aligning the Local Plan with the Government's and Wiltshire's carbon reduction targets;
- place proper value on natural capital and account for it in the Plan;
- develop and implement net zero carbon development policies and low carbon, sustainable construction policies;
- develop and implement supportive renewable energy development policies;
- develop and implement supportive EV infrastructure policies;
- develop and implement supportive integrated public transport and active/ battery assisted travel infrastructure development policies.

The proposals as they stand would destroy nearly 1,500 acres of farmland and valuable wildlife habitat. The carbon footprint of destroying prime countryside to create this massive development that would then generate even more transport emissions has not even been calculated but there is no doubt that it will take Wiltshire Council's carbon reduction target in completely the opposite direction. Does Wiltshire Council really want to be responsible for such a legacy?

6. The Distributor Road has been firmly rejected by all Local Councils

Wiltshire Council have used a grant of £75m from Homes England to propose a distributor road to enclose huge development areas. The public were not consulted. The general public have been confused, believing headlines about a 'relief road' that would alleviate traffic, when in fact this would be a low speed distributor road that brings 7,500 and potentially 15,000+ additional vehicles into and around the town. Fortunately our town and parish councillors have seen through the HIF bid proposals and rejected the road entirely following a consultation that tried to gather consent for one or more of the e route options (before housing numbers and locations had even been consulted upon). Chippenham Town Council, Calne Town Council and Bremhill Parish Council have all passed resolutions opposing any distributor road at all. Chippenham Town Council also firmly rejected the Local Plan proposals for Chippenham unanimously voting to inform Wiltshire Council that their case for Chippenham housing numbers and locations has not been adequately made, and is not accepted for the following reasons:

1. The housing target allocated to Chippenham is much too high (at 9,225 and equivalent to 20% of the total number for Wiltshire), bears no relation to Chippenham's actual housing needs and is predicated on substantial numbers of people relocating here, in order to commute back out, causing more congestion and significant damage to the climate.
2. The proposals to develop large suburbs to the East (Site 1) and South (Site 2) would have a severe adverse impact on the town and cause unacceptable damage to the local environment through the destruction of high-quality farmland and wildlife habitat in the Avon and Marden Valley.
3. The Chippenham housing numbers and their location should not be dictated by a grant application for a road, which did not undergo any public consultation, and which serves to predetermine the spatial strategy.
4. Wiltshire Council needs to develop an alternative spatial strategy, which is employment led, "appropriate in scale" and "environmentally sustainable" as stated in the Vision for the Chippenham Neighbourhood Plan.

See: [Chippenham Town Council say no to proposed new housing in Wiltshire Council's Local Plan Review Consultation • Chippenham Town Council](#)

7. Existing Residents are ignored

Existing residents, who should be at the top of the list of stakeholders, are hardly mentioned at all within these proposals. All the benefits and new infrastructure talked about is in new housing areas, not existing ones. Local people who are key stakeholders in Chippenham's future and are simply ignored by this Plan. Neighbourhood Plans such as Bremhill's (which will have its designated green buffer obliterated by these proposals) and Chippenham, whose Vision is for "employment-led development" that is "appropriate in scale" and "environmentally sustainable" are treated with disdain.

These plans destroy local amenity and the local environment for the residents of Pewsham, London Road and Monkton Park, destined to become inner urban wards within new suburbs. Residents in Stanley move from being a hamlet in open countryside to being sliced through with a distributor road. This means no access to countryside, loss of natural capital, traffic congestion, air pollution and possible future decline and deprivation of their neighbourhoods. There is coalescence with surrounding villages such as Langley Burrell and Tytherton Lucas, destroying their place in the environment. Do the opinions of and the impacts upon the people who live here count for so little? Is that what localism has now become?

Chippenham Town Council, the key representative body for the people of Chippenham, has rejected the Local Plan. Both Chippenham and Calne Town Councils have rejected the road. Residents speaking at Chippenham Town Council's Planning, Environment and Transport Committee meeting on 18th February 2021 and at two Extraordinary Town Council meetings (one on the Local Plan on 25th February, the other on the HIF Bid road proposals on 4th March) all spoke against both the Plan and the Road for the full half hour of public question time on all three occasions. Residents through their councillors in neighbouring Bremhill Parish and Calne Town also opposed this plan in its entirety. No residents have been asked what they want their town to look like in the future. A petition against the distributor road has already attracted around 5,500 signatures and growing. What does it take to get Wiltshire Council to listen to its residents?

9th March 2021

CLIMATE158

**WILTSHIRE LOCAL PLAN CONSULTATION
COTSWOLDS CONSERVATION BOARD COMMENTS
9 MARCH 2021**



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EMERGING SPATIAL STRATEGY (COTSWOLDS CONSERVATION BOARD COMMENTS)

Introduction

Paragraph 1.1 and Footnote 1

Paragraph 1.1 states that ‘forecasts predict Wiltshire will need between 40,840 and 45,630 new homes over the plan period of 2016 to 2036’. Footnote 1 clarifies that 40,840 homes is the minimum required by Government using its current standard method.

We acknowledge that the government’s ‘standard method’ is the starting point for identifying housing need in a local authority area. However, we are very concerned about the potential conflation of ‘housing need’ and ‘housing requirement’. Paragraph 1.1 (and, to some degree, the rest of the consultation document) creates the impression that the housing need figure identified through the standard method has to be accommodated regardless of any other considerations. This should not be the case.

The Government has recently provided useful clarification on this issue:¹

- *Within the current planning system the standard method does not present a ‘target’ in plan-making, but instead provides a starting point for determining the level of need for the area, and it is only after consideration of this, alongside what constraints areas face, such as the Green Belt, and the land that is actually available for development, that the decision on how many homes should be planned for is made. It does not override other planning policies, including the protections set out in Paragraph 11b of the NPPF or our strong protections for the Green Belt. It is for local authorities to determine precisely how many homes to plan for and where those homes most appropriately located. In doing this they should take into account their local circumstances and constraints.*
- *We heard suggestions in the consultation that in some places the numbers produced by the standard method pose a risk to protected landscapes and Green Belt. We should be clear that meeting housing need is never a reason to cause unacceptable harm to such places.*

This clarification reflects the Government’s guidance on Housing and Economic Land Availability Assessment.² For example, this guidance allows for the fact that consideration of constraints, such as Green Belt and AONBs, may mean that the housing requirement figure is less than the identified housing need figure:

¹ [Government response to the local housing need proposals in “Changes to the current planning system” - GOV.UK \(www.gov.uk\)](http://www.gov.uk/government/consultations/changes-to-the-current-planning-system)

² [Housing and economic land availability assessment - GOV.UK \(www.gov.uk\)](http://www.gov.uk/government/consultations/housing-and-economic-land-availability-assessment)

- Paragraph 025: *If there is clear evidence that strategic policies cannot meet the needs of the area, factoring in the constraints, it will be important to establish how needs might be met in adjoining areas through the process of preparing statements of common ground, and in accordance with the duty to cooperate. If following this, needs cannot be met then the plan-making authority will have to demonstrate the reasons why as part of the plan examination.*

It is also important to note Planning Practice Guidance for development in AONBs, which states that:³

- The NPPF's policies for protecting these areas may mean that it is not possible to meet objectively assessed needs for development in full through the plan-making process.
- AONBS are unlikely to be suitable areas for accommodating unmet needs from adjoining (non-designated) areas.

These considerations are particularly important in a local authority area like Wiltshire, where approximately 44% of the area is located in AONBs⁴, with an additional substantial area being located within the setting of these AONBs. They are also important considerations with regards to the large area of Green Belt that extends from Trowbridge and Corsham (i.e. the Western Wiltshire Green Belt).

Before assuming that the housing provision in Wiltshire will match (or exceed) the housing need figure identified through the standard method, Wiltshire Council should first identify whether this housing need figure is actually achievable, taking into account relevant constraints.

Growth and Climate Change

The Cotswolds Conservation Board acknowledges the climate change emergency and the need to mitigate and adapt to climate change. The need to address climate change is reflected in the Cotswolds AONB Management Plan 2018-2023⁵ and in the Board's Climate Change Strategy⁶.

In principle, the Cotswolds Conservation Board supports the aim to focus growth on the main settlements as a means of helping to address climate change (for the reasons outlined in the 'Climate Change outcomes' box on page 4 of the consultation document).

In principle, we also support growth in rural settlements to meet local needs, especially with regards to affordable housing and local services.

Please see our comments below, relating to 'Delivering the Spatial Strategy' for further relevant information.

Delivering the Spatial Strategy

In principle, the Cotswolds Conservation Board supports the 'Delivery Principles' outlined on page 6 of the consultation document.

³ [Natural environment - GOV.UK \(www.gov.uk\)](https://www.gov.uk). Paragraph 041.

⁴ There are three AONBs that overlap with Wiltshire – the Cotswolds National Landscape, Cranborne Chase AONB and North Wessex Downs AONB.

⁵ <https://www.cotswoldsaonb.org.uk/wp-content/uploads/2018/12/Management-Plan-2018-23.pdf>. Particularly Policies CC7 (Climate Change – Mitigation) and CC8 (Climate Change – Adaptation).

⁶ <https://www.cotswoldsaonb.org.uk/wp-content/uploads/2020/02/Climate-Change-Strategy-adopted-June-2012.pdf>

However, given that 44% of Wiltshire is located in AONBs (with a significant additional area being located within the setting of the AONBs), we recommend that the Delivery Principles should also set out delivery principles for development in the AONBs and their settings.

- Development in the AONBs and their settings should be compatible with and, ideally, make a positive contribution to conserving and enhancing the natural beauty of the AONBs.
- Development in the AONBs, particularly housing, should be based on robust evidence of needs arising within the AONBs.⁷

If these principles are not applied, this would undermine:

- the statutory purpose of designation;
- the principle that safeguarding Areas of Outstanding Natural Beauty (AONBs) is in the national interest;
- the aspirations and goals of the Government's 25 Year Environment Plan;⁸
- the proposals of the Government-commissioned Landscapes Review Final Report;⁹
- the vision, outcomes, ambitions and policies of the Cotswolds AONB Management Plan;¹⁰
- efforts to restore and enhance the natural beauty of the Cotswolds National Landscape;
- the Government's assertions that: (i) meeting housing need is never a clear reason to cause unacceptable harm to protected landscapes;¹¹ and (ii) our Areas of Outstanding Natural Beauty (AONBs) will be protected as the places, views and landscapes we cherish most and passed on to the next generation.¹²

National planning policy and guidance helps to address this issue by making it clear that:

- great weight should be given to conserving and enhancing landscape and scenic beauty in AONBs, which, together with National Parks and the Broads, have the highest status of protection in relation to these issues;¹³
- the scale and extent of development in AONBs should be limited;¹⁴
- planning permission should be refused for major development other than in exceptional circumstances and where it can be demonstrated that the development is in the public interest;¹⁵

⁷ This reflects Policy CE12 (Development Priorities and Evidence of Need) in the Cotswolds AONB Management Plan 2018-2023.

⁸ The Government's 25 Year Environment Plan ([link](#)) aspires for us to be the first generation to leave the environment in a better state than we found it. As part of this aspiration, it proposes to embed an 'environmental net gain' principle for development. In addition, it sets a goal that '*we will conserve and enhance the beauty of our natural environment ... by ... safeguarding and enhancing the beauty of our natural scenery and improving its environmental value while being sensitive to considerations of its heritage*'.

⁹ The 'Landscapes Review Final Report' ([link](#)) sets out 27 proposals relating to our protected landscapes, including stronger purposes in law for our 'national landscapes' (proposal 23) and for AONBs to be strengthened with new purposes, powers and resources (proposal 24).

¹⁰ Cotswolds Conservation Board (2018) *Cotswolds AONB Management Plan 2018-2023* ([link](#)).

¹¹ Government response to the local housing need proposals in 'Changes to the current planning system' – updated 16 December 2020 ([link](#)).

¹² Statement by the Secretary of State for Housing, Communities and Local Government, when launching the consultation on the Planning White Paper in August 2020 ([link](#)).

¹³ National Planning Policy Framework (NPPF) ([link](#)): paragraph 172.

¹⁴ NPPF ([link](#)): paragraph 172. See also Appendix 9 of the Cotswolds AONB Management Plan 2018-2023.

¹⁵ NPPF: paragraph 172 ([link](#)).

- policies for protecting AONBs may mean that it is not possible to meet objectively assessed needs for housing and other development in full;¹⁶
- AONBs are unlikely to be suitable areas for accommodating unmet needs arising from adjoining, non-designated areas.¹⁷

Formulating the Spatial Strategy

Paragraph 2.17, page 7 (Housing Need)

Please refer to our comment on paragraph 1.1 of the consultation document, relating to housing need.

Emerging Spatial Strategy

Brownfield Land

In principle, we support the priority given to re-developing brownfield land as this helps to reduce the extent to which greenfield land needs to be developed.

However, some brownfield sites have a high biodiversity value, particularly with regards to rare invertebrate species and the priority habitat ‘open mosaic habitat on previously developed land’. Care should be taken to ensure that this biodiversity resource is conserved and enhanced.

Care should also be taken with the redevelopment of decommissioned airfields in the AONBs and their settings. In the Cotswolds National Landscape, such airfields are one of the key features of Landscape Character Type (LCT) 9 (High Wold Dip Slope). Colerne Airfield is one such example. The Cotswolds AONB Landscape Strategy & Guidelines for LCT 9 states that:

- *In view of the brownfield status of decommissioned airfields, they are particularly susceptible to proposals for new large-scale development that has the potential to have a widespread impact on landscape character and visual amenity over large areas of the surrounding landscape. Such sites may offer some capacity for development, however, due to the established use of existing development, but nevertheless require careful site planning and mitigation.*¹⁸

Section 9.5 of that document provides guidelines on how to avoid and minimise adverse impacts associated with re-using decommissioned airfields, including for residential, industrial and solar farm uses. Any relevant allocations and / or development proposals should be compatible with these guidelines.¹⁹

Housing Market Areas

Development at settlements within the setting of AONBs

None of the principal settlements or market towns in are located in the three AONBs that overlap with Wiltshire. However, many of them are located within the setting of the AONBS (as outlined below, in relation to the Cotswolds National Landscape).

¹⁶ Planning Practice Guidance – Natural Environment: paragraph 41 ([link](#)).

¹⁷ Planning Practice Guidance – Natural Environment: paragraph 41 ([link](#)).

¹⁸ <https://www.cotswoldsaonb.org.uk/wp-content/uploads/2017/07/lct-9-high-wold-dip-slope-2016.pdf>

¹⁹ As specified in Policy CE10 of the Cotswolds AONB Management Plan 2018-2023 ([link](#)).

Guidance on development in the setting of AONBs is provided in:

- the Board’s Position Statement on ‘Development in the Setting of the Cotswolds AONB’;²⁰ and
- the Government’s Planning Practice Guidance on development in the setting of protected landscapes.²¹

In particular, when considering potential allocations or development proposals in the setting of the AONBs, it is important to consider potential impacts of the proposed development on the AONBs, including impacts on:

- views from and to the AONBs;²²
- the tranquillity of the AONBs – noise / increase in traffic levels (inc. significance of 10%+ increase in traffic levels);²³
- the dark skies of the AONBs – light pollution / introduction of lit elements into dark landscapes;²⁴
- the landscape character of land adjoining AONBs, where this landscape character is complementary to that of the AONB.

Relevant case law has clarified that great weight should be given to the impact of development outside an AONB on views from the AONB.²⁵ This great weight does not apply to impacts on views from outside an AONB looking towards the AONB. However, other factors, such as important views identified in a Neighbourhood Development Plan, might increase the weight given to such views.

The dark skies and tranquillity of the AONBs are also two of the AONB ‘special qualities’ (for the Cotswolds National Landscape, at least). Whilst important considerations in their own right, they are also an integral part of the landscape character of an area. As such, impacts on the dark skies and tranquillity of the AONBs should also be given great weight.

The main settlements in the setting of the Cotswolds National Landscape and important considerations relating to these settlements are outlined below:²⁶

- Chippenham Housing Market Area:
 - **Corsham:** The built environment of Corsham currently extends to within approximately 600m of the Cotswolds National Landscape boundary; the main road through Corsham (the A4) continue through the National Landscape towards Bath.
 - **Chippenham:** The built environment of Chippenham currently extends to within approximately 2.7km of the Cotswolds National Landscape boundary – this could potentially be an issue for any new large development proposals to the west of the

²⁰ <https://www.cotswoldsaonb.org.uk/wp-content/uploads/2017/08/setting-position-statement-2016-adopted-with-minor-changes-30616-1.pdf>

²¹ <https://www.gov.uk/guidance/natural-environment#landscape>. Paragraph 042.

²² See also Policy CE1 (Landscape) of the Cotswolds AONB Management Plan 2018-2023 which specifies that development proposals should ensure that views - including those into and out of the AONB – are conversed and enhanced.

²³ See also Policy CE4 (Tranquillity) of the Cotswolds AONB Management Plan 2018-2023 and the Board’s Tranquillity Position Statement ([link](#)).

²⁴ See also Policy CE5 (Dark Skies) of the Cotswolds AONB Management Plan 2018-2023 and the Board’s Dark Skies & Artificial Light Position Statement ([link](#)) and its appendices A ([link](#)), B ([link](#)) and C ([link](#)).

²⁵ Stroud District Council v Secretary of State for Communities and Local Government v Gladman Developments Limited [2015] EWHC 488 (Admin) ([link](#))

²⁶ Similar considerations will need to be taken into account with regards to settlements in the setting of the other two AONBs.

- A350; two of the main road in Chippenham (the A4 and the A420) continuing through the National Landscape towards Bath and Bristol, respectively.
- **Malmesbury:** The built environment of Malmesbury is directly adjacent to the Cotswolds National Landscape boundary; the statement in the Government's Planning Practice Guidance that AONBs '*are unlikely to be suitable areas for accommodating unmet needs from adjoining (non-designated) areas*' will be particularly relevant here.²⁷
 - Trowbridge Housing Market Area:
 - **Bradford on Avon:** The built environment of Bradford on Avon is directly adjacent to the Cotswolds National Landscape boundary; the statement in the Government's Planning Practice Guidance that AONBs '*are unlikely to be suitable areas for accommodating unmet needs from adjoining (non-designated) areas*' will be particularly relevant here.²⁸
 - **Trowbridge:** The built environment of Trowbridge currently extends to within approximately 2.4km of the Cotswolds National Landscape boundary – this could potentially be an issue for any new large development proposal to the north-west of Trowbridge.

²⁷ <https://www.gov.uk/guidance/natural-environment#landscape>. Paragraph 041.

²⁸ <https://www.gov.uk/guidance/natural-environment#landscape>. Paragraph 041.

EMPOWERING LOCAL COMMUNITIES (COTSWOLDS CONSERVATION BOARD COMMENTS)

Affordable Homes

Q. Do you agree there should be a target of 40% affordable homes on all new schemes of more than five dwellings in the rural area? What other approaches might there be?

The Cotswolds Conservation Board acknowledges that a target of 40% affordable homes is an improvement on the 30% target that is currently required in some parts of Wiltshire. However, in the AONBs, we would encourage Wiltshire Council to consider setting a target of 50% affordable homes.

We also acknowledge that the proposal to apply this target to all new schemes of more than five dwellings is more stringent than in some local authority areas. However, the National Planning Policy Framework (NPPF) allows for the provision of affordable housing for schemes of five units or fewer. In the AONBs, we would encourage Wiltshire Council to consider applying this target to schemes of two or more units.

Combining these two elements together, for housing developments in the AONBs we would encourage Wiltshire Council to consider setting a target of 50% affordable housing on all new schemes of two or more dwellings. This reflects best practice in development plans that relate to other protected landscapes, such as the Arnside & Silverdale AONB Development Plan Document (DPD).²⁹

The natural beauty of AONBs means that they are desirable places to live. This contributes to elevated house prices compared to surrounding non-designated areas. These elevated house prices mean that housing in the AONBs is even more out of the reach of those most in need of affordable housing.

This is particularly important given that many of the jobs that are essential to conserving and enhancing the natural beauty of AONBs – and to furthering the economic and social wellbeing of local communities within AONBs - are relatively low paid. These workers, especially young people, are being priced out of the housing market in the landscapes and communities that depend on them.

Having a higher percentage of affordable housing for all scales of development in AONBs also reflects Policy CE12 of the Cotswolds AONB Management Plan 2018-2023, which prioritises affordable housing. It also reflects the Government's 'vision' for national parks which specifies that '*the expectation is that new housing will be focussed on meeting affordable housing requirements*'.³⁰

Having a higher percentage of affordable housing, where this affordable housing primarily meets local needs, would also help to limit the scale and extent of development in the AONBs, as required in paragraph 127 of the NPPF.

²⁹ <https://www.lancaster.gov.uk/planning/planning-policy/arnside-and-silverdale-aonb-dpd>. Policy AS03 – Housing Provision.

³⁰ Defra (2010). *English National Parks and the Broads. UK Government Vision and Circular 2010* (link). N.B. Although this document relates to National Parks and the Broads – not AONBs – the Board takes the view that the extracted text is relevant to all protected landscapes. This is because National Parks and AONBs both have the highest status of protection in the NPPF. Also, the NPPF and PPG now explicitly state that the scale and extent of development in AONBs should be limited.

Rural Exception Sites and Community-Led Housing

Q. Do you agree with the approach set out in the suggested revised Core Policy 44? If not, why not? How could it be improved?

The Cotswolds Conservation Board supports the criteria specified for rural exception sites as these criteria reflects most of the principles that the Board advocates for such sites.

We are pleased to see that the policy sets a maximum of 25% market housing on rural exception sites. This should help to avoid the scenario that has arisen in other parts of the Cotswolds National Landscape where such sites have provided up to 49% market housing, which we consider to be completely inappropriate.

It would be helpful if the policy explicitly stated that the starting point, when considering such sites, should be 100% affordable. This would help to reinforce the primary purpose of such sites.

We are also pleased to see the criteria relating to the size of rural exception sites (i.e. 20 dwellings or fewer and no greater than 5% of the size of the settlement) – we consider this to be an appropriate interpretation of the requirement for such sites to be ‘small’.

It would be helpful if this requirement was expanded to state:

- (i) 20 dwellings or fewer and (ii) no greater than 5% of the size of the settlement or no greater than 5% of the number of dwellings in the settlement, whichever is less.

This will help to set a limit on the number of dwellings, in addition to the limit on the size of the scheme.

Housing Requirements for Neighbourhood Area Designations in the Rural Area

Q: What do you think to the housing requirements for Local Service Centres and Large Villages? Should requirements be higher or lower? If so which ones and why?

The Cotswolds Conservation Board considers that the four bullet points, which set out the way in which housing requirements for Local Service Centres and Large Villages, will be met are appropriate.

We also support the general presumption against housing proposals outside a settlement.

We acknowledge that some level of housing development may be appropriate in AONB settlements. However, we are concerned that the methodology for identifying housing provision in each settlement does not adequately address the specific circumstances of the individual location (such as landscape character and visual sensitivity). In addition, the 100m buffer that has been used does not adequately address issues such as views (both to and from settlements) that extend beyond this 100m buffer.

When considering potential site allocations for settlements in the AONBs and their settings, we recommend that a Landscape and Visual Sensitivity and Capacity Study should be undertaken, with sites / land parcels that are identified as having a high or medium-high sensitivity being ruled out.

For potential allocations for settlements within the AONBs, we recommend that:

- potential impacts on the factors³¹ that contribute to the natural beauty of the AONBs should be assessed;
- the allocations should be assessed to see if they constitute major development, in the context of paragraph 172 of the NPPF, particularly allocations of 10 or more dwellings - potential allocations that are considered to be major development should be ruled out.³²

Further advice on these recommendations is provided in the Board's draft Planning & Development Position Statement, which Wiltshire Council has been consulted on.

³¹ In addition to landscape quality and scenic quality, these factors also include tranquillity (including dark skies), natural heritage (including biodiversity) and cultural heritage (including historic environment).

³² Such allocations should only be considered if Wiltshire Council is satisfied that (i) there are exceptional circumstances, and (ii) it is demonstrated that, despite giving great weight to conserving the landscape and scenic beauty in the AONB, the development is in the public interest,

ADDRESSING CLIMATE CHANGE AND BIODIVERSITY NET GAIN (COTSWOLDS CONSERVATION BOARD COMMENTS)

Context

The Cotswolds Conservation Board acknowledges the climate change emergency and the need to mitigate and adapt to climate change. The need to address climate change is reflected in the Cotswolds AONB Management Plan 2018-2023³³ and in the Board's Climate Change Strategy³⁴.

Policy Theme 1 – Tackling Flood Risk and Promoting Sustainable Water Management

The Board supports the measures proposed to address this issue.

Policy Theme 2 – Enhancing Green/ Blue Infrastructure (GBI) and biodiversity

In principle, the Board supports the measures proposed to address this issue.

However, we do not consider that the proposed measures (or the document as a whole) goes far enough to address the ongoing, massive declines in biodiversity at a global, national and local level. Addressing biodiversity loss requires a comprehensive set of measures, of which delivering biodiversity net-gain is just one component.

One of the most important measures is for existing wildlife sites to be protected, in line with national policy and guidance, and for these sites to be brought into good condition through effective and appropriate management. In principle, development should not impact on international, national and, ideally, local nature conservation designations. The biodiversity net-gain mechanism should not be used in a way that allows for development to harm these designations.

A key omission from the consultation document is any reference to Local Nature Recovery Strategies (LNRS). LNRS will soon be one of the key mechanisms for helping to halt and reverse declines in biodiversity at the local level. Development should be required to make a positive contribution to LNRS.

Policy Theme 3 – Sustainable Design and Construction in the Built Environment

The Board supports measures to reduce greenhouse gas emissions from new development (and, retrospectively, from existing development).

The main focus should be on reducing greenhouse gas emissions at source, rather than relying on offset mechanisms such as off-site renewable energy schemes.

Within the AONBs and their settings, such measures should, ideally, be implemented in a way that is compatible with – and positively contributes to – the purpose of AONB designation. For example, such measures should be sensitive to the local distinctiveness of the built environment.

³³ <https://www.cotswoldsaonb.org.uk/wp-content/uploads/2018/12/Management-Plan-2018-23.pdf>. Particularly Policies CC7 (Climate Change – Mitigation) and CC8 (Climate Change – Adaptation).

³⁴ <https://www.cotswoldsaonb.org.uk/wp-content/uploads/2020/02/Climate-Change-Strategy-adopted-June-2012.pdf>

The Board's guidance for householders on energy efficiency and generation measures suitable for traditionally constructed buildings in the Cotswolds AONB is a good example of this approach.³⁵

Policy Theme 4 – Sustainable Energy Generation and Management

With regards to the Cotswolds National Landscape and its setting, the Board supports the use of small-scale forms of renewable energy that are compatible with the purpose of AONB designation. Further information on this issue is providing in the Board's Renewable Energy Position Statement.³⁶

We recommend that the Local Plan should identify 'suitable areas' for renewable and low-carbon energy, particularly wind and solar energy. Ideally, this should be implemented for the whole of the Wiltshire Council area, in order to obtain a strategic-level, spatial understanding of potential opportunities. These suitable areas can then potentially be refined at the Neighbourhood Development Plan stage.

We recommend that the process for identifying suitable areas should include:

- a Landscape and Visual Sensitivity and Capacity Study (LVSCS), which takes account of the high landscape value accorded to the AONB designation – land parcels / sites that are identified as having high or medium-high sensitivity should be ruled out;³⁷
- identifying key constraints and creating a buffer zone around these constraints.³⁸

Policy Theme 5 - Sustainable Transport and Air Quality

In principle, the Board supports measures that reduce the need to travel, reduce car use and encourage more sustainable modes of transport.

³⁵ <https://www.cotswoldsaonb.org.uk/wp-content/uploads/2019/08/Energy-Guide-June-2014.pdf>

³⁶ <https://www.cotswoldsaonb.org.uk/wp-content/uploads/2017/08/renewable-energy-ps-2014-final-apr2014.pdf>. This position statement will be reviewed in 2021, with the intention of the Board adopted an updated version in early 2022.

³⁷ Other than in exceptional circumstances and where it can be demonstrated that the development is in the public interest.

³⁸ Relevant constraints would include nature conservation designations, historic environment designations and public rights of way.

CLIMATE159A

Draft Wiltshire Local Plan Consultation 2021

Representation by Persimmon Homes (South Coast)

09/03/2021

INTRODUCTION

1. Persimmon Homes (South Coast) welcomes the opportunity to comment on the Regulation 18 Wiltshire Local Plan Review Consultation 2021. The South Coast office operates in the Southern part of Wiltshire (roughly the defined Salisbury Housing Market Area (HMA)). Persimmon Homes (Wessex) cover the remaining parts of Wiltshire and Swindon; the Wessex office may provide comments separately on the draft Plan.
2. Persimmon (South Coast) has a number of sites with the Salisbury Housing Market Area which it is promoting for residential development. The draft Local Plan has identified Downton Road Salisbury (Site 6), which is in Persimmon's Control, for an allocation of 275 dwellings. Persimmon's Fugglestone Red site is identified in the Plan as a committed site. The Company is of the view, however, that the employment element of the site, which does not yet have detailed consent, could be reconsidered for mixed use residential led development. Subject to the detailed comments on the policies elsewhere in these representations, the Company firmly supports the identification of the Persimmon sites in the Plan, and we look forward to positive working with the Council to deliver the sites going forward.
3. Persimmon also has interests in Salisbury Road, Downton site which has not been selected for allocation in the draft Plan. It is Persimmon view that this site should also be allocated in the emerging Plan. Persimmon Homes has produced Site Deliverability Statements for the Salisbury Road, Downton site (and the Downton Road, Salisbury site), which should be read alongside these representations. The Statements demonstrate that the both sites are sustainable and deliverable development opportunities that can be brought forward in the short term.

STURCTURE OF THE REPRESENTATIONS

4. The Local Plan consultation focusses on the distribution and level of growth across the Plan area and also sets out the Council proposal for addressing climate change and biodiversity net gain. The consultation comprise a number of separated reports, each focussing on a specific settlement area or area/topic. In light of the South Coast office's area of operation, these representations have been limited to commenting on the following reports:
 - Emerging Spatial Strategy (page 2)
 - Planning for Salisbury Report and the associated Salisbury Site Selection Report (page 5)
 - Empowering Rural Communities (page 10)
 - Addressing Climate Change and Biodiversity Net Gain (page 12)
5. Where relevant, commentary is also made in the evidence base documents that support these reports, including the Sustainability Appraisal and Habitats Regulations Assessment.

EMERGING SPATIAL STRATEGY

6. The Emerging Spatial Strategy report, sets out information relating to the proposed distribution of growth around the county across the plan period. This is expressed in terms of the amount of new homes and land for employment that each main settlement should accommodate.

Plan Period

7. The Wiltshire Local Development Scheme (LDS) states that the Local Plan is due to be adopted in 2023. The Council will be aware that the National Planning Policy Framework (NPPF) states that strategic policies should look ahead over a minimum of 15 years from adoption. On this basis the Council's Plan should run to at least 2038, not to 2036 as set out in the emerging Plan. The plan horizon should be extended by at least two years if it is to meet the requirements of the NPPF. As discussed below, this will have implications for the Local Plan housing requirement, and may necessitate uplifts to HMA housing need figures and those of individual settlements.

Housing Needs and Requirements

8. The Council's sets out two figures for housing need: a minimum figure of 40,840 (based on Standard Method) and higher figure of 45,630 (based on the Council's own Local Housing Need Assessment). This is equivalent to between 2,042 – 2,282 dpa new homes to be delivered each year of the plan period.
9. According to the Spatial Strategy report, the second, Council derived figure, applies long-term migration patterns and economic growth forecasts resulting in a higher housing need figure when compared with that of the Standard Method. Persimmon supports the Council approach of uplifting housing numbers to account for relevant factors, as this is supported by the Planning Practice Guidance. However, further adjustments may be needed to this figure as a result of Duty to Co-operate discussion and affordability considerations, for example. With regards to economic adjustments to the Standard Methodology, the Council's report makes reference to the Local Housing Need Assessment (2019) which sets out this evidence for this adjustments. However, it is not clear from document or the Spatial Strategy document how many dwellings have been added. The same is true for the economic growth adjustment which draws on the Swindon and Wiltshire Functional Economic Market Assessment (2016) evidence base, which is over 5 years old and will not account for recent changes in demand for employment floor space, new working practices (as a result of COVID 19, for example) and changes to planning context (i.e. revisions to the business use class order). The Spatial Strategy report should clearly set out the justification and evidence for the uplift that has been applied so this can be interrogated. Until such time as the Council has published this information, Persimmon must reserve comment on whether the housing uplift as proposed by the Council is appropriate.
10. Notwithstanding our comments on the appropriateness of the uplift, in light of the earlier comments made regarding the plan period, the housing requirement for Wiltshire County should be a range of at least between 44,924 and 50,194.

Employment Needs and Requirements

11. The Spatial Strategy makes reference to employment needs but we have been unable to work out from the evidence base where this need figure has been derived. A background paper setting out the employment evidence and approach to the distribution of employment needs across HMAs and individual settlements would be beneficial.

Housing Market Areas

12. Similar to the adopted Core Strategy, the Plan sets out four Housing Market Areas (HMAs) (i.e. Salisbury, Swindon, Chippenham and Trowbridge) which have informed the distribution of growth across the County. Retaining the four HMAs is supported as it represents a sensible means distributing growth across a large plan area, and for monitoring (including five year housing land supply). It is unclear from the Plan whether the Council intend to monitor housing delivery/supply at the HMA level or across the Wiltshire area as a whole. For reasons set out above, the former approach is supported.

Alternative Development Strategies

13. The Council has considered a number of development strategies for each of the HMA areas in order to determine the amount of growth that will be directed to each area and the settlements within these area. These options have been the subject of Sustainability Appraisal, which is necessary.

Settlement Hierarchy

14. As part of the Plan review, the Council has reviewed the settlement hierarchy. In terms of the Southern HMA, Salisbury continues to be identified as a 'Principal Settlement' and is described in the plan as the primary focus for development providing significant levels of jobs and homes. This identification of Salisbury as a tier 1 settlement is supported by Persimmon as this correctly recognises the City's sub-regional importance. It is also noted that Wilton will be considered in the new Plan as its own distinct settlement, separate from Salisbury. Similarly, Amesbury, Bulford and Durrington are also considered as separate settlements in the new Plan (as opposed to a single settlement). Planning for the strategic requirements of these towns separately is supported by Persimmon as this allows for the consideration of the individual growth needs of distinct settlements to be considered and for local housing needs to be better addressed.

Salisbury Housing Market Area

15. As set out in the Spatial Strategy report, the development strategy for the Salisbury HMA constitutes a roll forward of existing Core Strategy development strategy (SA Option A). The Report states that for SA Option, housing and employment land requirements are reduced by 11% and distributed pro-rata rolling forward the current development strategy. The Salisbury HMA: Formulating Alternative Development Strategies Report (January 2021) states that the 11% reduction is due to differences in overall housing requirement for the Salisbury HMA compared with current needs assessment, the housing requirement, set out in the Core Strategy. Given our comments above with regards to the appropriateness of higher housing target figure (i.e. does not include all possible uplifts), it is not possible to comment on whether this 11% reduction is appropriate. Allied to this is the fact that the Council is comparing the 'policy on' housing *requirement* figure in the Core Strategy with the 'policy-off' housing *needs* figure - the two figures are not directly comparable.

16. Notwithstanding this concern, the strategy selected by the Council which focusses growth on Salisbury (and to a lesser extent on Amesbury and Tidworth/Ludgershall) is broadly supported.

Brownfield Land and Targets

17. Appendix 1 of the Spatial Strategy report sets out proposals for the introduction of new policy to help ensure as many homes as possible are built using previously developed land within the urban areas of main settlements. Persimmon recognises the important role that previously developed land can play in delivering the growth ambitions of an area, and acknowledges provision set out in the NPPF's to use of land effectively. However, the NPPF also requires that sites proposed for allocation must be deliverable/developable. As is often the case, brownfield sites, can be subject to significant deliverability issues including existing uses, land assembly / ownership, contamination, viability and other issues that can often render brownfield sites undeliverable. The Council must ensure that its assessment of brownfield sites is robust and realistic so it does not place undue reliance on brownfield sites coming forward to meet requirements.
18. With regards to a specific target for brownfield land, this is not supported by Persimmon Homes nor by national planning policy. When introducing the NPPF, the Government decided not to carry forward the brownfield target that once formed part of Planning Policy Statement 3: Housing. In Permission view, the introduction of a brownfield target policy would be a retrograde step that does not reflect current national planning policy requirement.
19. Appendix 1 of the Report implies that the delivery of brownfield sites at a settlement should have a bearing on the amount of greenfield land that is released. If an area is not meeting its brownfield target, this should not be used as justification for restricting or slowing / phasing greenfield developments. This approach does not represent positive planning as is required by the NPPF, and cannot be supported by Persimmon. Should a particular settlement overprovide housing against its brownfield targets (or overall housing requirements for that matter), this should be viewed positively by the Council as a means of significantly boosting housing supply, and not be viewed as a means to frustrate development. The Council should also be aware that changing delivery phasing could have significant unforeseen contractual issues for some development sites.
20. Rather than setting brownfield policy targets, the Council has a number of other more appropriate tools at its disposal that it can draw upon to encourage brownfield sites to come forward including: identifying such land as specific allocations in the Development Plan, effective use of the brownfield registers and permission in principle processes and appropriate consideration of windfall allowances (which are often on brownfield development site) in supply assessments. The Council can also take proactive steps including working with developers through the planning application process to support challenging brownfield development proposals, which may include reconsidering development parameters (including development density).
21. Paragraph 6 and 26-29 of Appendix 1 states that brownfield targets will be the basis for housing requirements for designated neighbourhood plan areas at main settlements. The Council setting housing targets for neighbourhood plan areas is to be welcomed, as the

approach is supported in the NPPF. However, brownfield land availability should not be the only primary basis for determining for housing requirements. Whilst brownfield land availability is a helpful indicator of the quantum of housing that *could* be delivered, it does not allow for considerations of what *should* be delivered. To remedy this, the Council should have regard to Paragraph: 101 Reference ID: 41-101-20190509 of the Planning Practice Guidance that directs local planning authorities to consider other factors such as the characteristics of the neighbourhood area, population and role the settlement's in providing services. It is also considered that completions on brownfield land, may be a more reliable indicator of future brownfield potential rather than committed sites that may not come forward or where planning permission may lapse. It is also noted that, due to delivery challenges, lapse rates for planning permission on brownfield land tend to be higher than that of greenfield sites.

22. Notwithstanding our fundamental concerns regarding brownfield targets, in terms of the policy detail, it is not necessary to set a specific time period for the target to be assessed (the Report sets out a period of 2021 -2031). The quantum of development on previously development land could be monitored annually as part of the Council monitoring framework for the Local Plan, and any policy review action as part of the statutory five year review of local plans. With specific reference to Salisbury, the brownfield target for the City is 410 homes to be delivered in the period 2021-31. This represents nearly half of the overall residual housing requirement (940 homes) for Salisbury across the entire plan period. When viewed in this context, the Council's brownfield target is too high and is unlikely to be achievable.

PLANNING FOR SALISBURY

23. The Planning for Salisbury report sets out the scale of growth, priorities and sites to meet growth needs. The following section of these representations sets out Permission's comments in relation to housing and employment needs and the sites within Salisbury that are being promoted by the Company for residential development.

Housing Needs

24. The Planning for Salisbury report sets out a housing requirement of 5,240 new homes to be delivered in the plan period 2016-2036 (or 940 new homes if committed sites are included). However, in light of our comments, in the Spatial Strategy section in respect of the plan period and potential adjustments to housing needs, this housing requirement is likely to be too low. It is also unclear why this figure is not expressed as a range as per the County and HMA housing need figures.
25. With regards to housing supply, the Council has identified three new housing sites in Salisbury to meet needs (detailed commentary on sites 6¹ and 7 is set out below). The three sites have a combined capacity of 610 new homes, which leaves 330 new homes still to be found when considered against the 940 new homes residual housing requirement for Salisbury. Paragraph 30 of the Salisbury Report anticipates that this shortfall will be picked

¹ Site 6: North of Downton Road is controlled by Persimmon Homes (South Coast)

up through the emerging Salisbury Neighbourhood Plan (SNP) and the Central Area Framework (CAF).

26. The CAF, however, is not an allocations plan so there can be no certainty that this document will bring forward new sites over and above those already identified for allocation. With regards to the SNP, the Steering Group Agreed Site Allocation Report (February 2021) identifies four sites for allocation in the SNP². The sites, listed in Table 1 below and selected for possible allocation in the SNP, are capable of delivering around 100 homes; this falls considerably below the 330 dwellings that are needed to meet needs in Salisbury. Notwithstanding the above, the sites in Table 1 have potential suitability, availability and/or achievability constraints suggesting that even a combined capacity of 100 new homes may be ambitious. In light of the above, the Council should be cautious in relying on SNP allocations to meet Salisbury’s housing needs.

Table 1: SNP Preferred Allocation Sites

Site Address	Area (ha)	Capacity	SHELAA Assessment
18 College Street	0.4	4 dwellings - based on Wiltshire SHELAA 2017	Not suitable. Developable in long term.
22/30 High Street	0.39	4 dwellings - estimated based on above site)	Not assessed in SHELAA.
Gasworks site at Coldharbour Lane	0.86	8 dwellings (estimated based on above site)	Not assessed in SHELAA.
Quidhampton quarry	18.29	100 dwellings - based on developable area of approved planning application 16/05957/FUL	Not assessed in SHELAA.
Brown Street Car Park	0.40	0 dwellings - based on Wiltshire SHELAA 2017	Not suitable. Developable in long term.
Total		108 dwellings	

27. Given the role the City will play in meeting sub-regional housing needs alongside Salisbury’s own local needs, the Council should look to proactively address this shortfall in the Local Plan Review, and not defer allocations to a later Development Plan Document. As a means of addressing the considerable shortfall (at least 200 dwellings), the Council could look to intensify development on proposed sites such as North of Downton Road (Site 6). It could also consider the re-designation of sites for residential uses, for example the employment element of the Fugglestone Red site.

² Site 6 was considered in the SNP Site Allocation report but not taken forward for allocation.

Employment Needs.

28. Based on the Council's current evidence approximately 5 ha of additional employment land are needed up until 2036 to accommodate the growth forecast at Salisbury. It is not clear from the Council's consultation reports and its evidence (Employment Land Review and Functional Economic Market Assessment) how it has arrived at a 5 ha floorspace figure for Salisbury. Until the Council has published this information, Persimmon must reserve comment on whether the employment need for Salisbury is appropriate.

Place Priorities

29. The Salisbury Report sets out a number of priorities for the City. Persimmon has two development sites in Salisbury (North of Downton Road and Fugglestone Red) that will help the Council meet a number of these objectives including: conserving the landscape setting of Salisbury (including views to / from the cathedral) (priority iii), including maintaining the separation and distinctiveness of settlements (priority iv) and the delivery of new housing (priority v), employment floorspace (priority vi) and infrastructure (priority ix).

Salisbury Development Sites

30. Persimmon controls two development sites in Salisbury. One site is located to the North of Downton Road, and is identified in the Salisbury Report as 'preferred development site' 6. Persimmon's Fugglestone Red site is identified as a 'planning persimmon / completion' site. This site is under construction, but there remains a number of phases which do not yet have detailed planning permission. These sites are discussed in greater detail below.

North of Downton Road, Salisbury Development Opportunity

31. This identification of this site by the Council as a preferred development site in the draft Local Plan is firmly supported by Persimmon.
32. The Company would highlight, however, that not all of the Persimmon land is included on the Concept Masterplans. Persimmon controls additional land to the north of the existing Public Right of Way that extends along the northern edge of the site as shown on the Concept Masterplans. This land can play an important role providing drainage, ecology enhancements, landscaping, open space etc., and should therefore be included in the Concept Plan boundaries. Excluding this land will also result in an unnecessary reduction in the developable area. The boundary of the Persimmon land is set out in the Site Deliverability Statement. The Concept Masterplans red line boundaries should be redrawn to include the additional land set out in the Statement.
33. Persimmon has undertaken a number of detailed technical assessments of the site which has informed a draft Masterplan. This work is set out in detail in Persimmon's Site Deliverability Statement for the North of Downton Road site, which should be read along these representations.
34. The Downton Road site, alongside other potential sites in Salisbury, were considered in Council's Site Selection Report for Salisbury. Of the 4 sites selected for allocation (out of 27), the Downton Road is ranked second (see Stage 4 section of the Site Assessment). Persimmon welcomes the Council's positive assessment of the site. The Site Selection Report sets out a number of potential site constraints and policy issues related to the site,

including but not limited to heritage, landscape traffic and infrastructure provision. However, as demonstrated in the Deliverability Document, these constraints are not insurmountable and have been successfully considered as part of the masterplan.

35. The Salisbury Planning Report sets out a series of Concept Masterplans and design principles for the Downton Road site. The design principles are set out below:
- Approximately 220 new homes to include specialist provision
 - Feature of new quarter is Cathedral Vista, a circa 40m wide sightline through the designed scheme to Salisbury's most celebrated landmark
 - Building / parking featuring approx. 2,000 sqm / 80 place Early Years' setting and potentially other community uses (possible GP provision).
 - Nursery and community facilities are valid for both Sites 6 and 7 Walking and cycling links to the nearby Park & Ride, Salisbury District Hospital and the city centre
 - Wider countryside access
 - Open space including play provision,
 - New woodland, tree/hedgerow planting
36. The Masterplan contained in the Deliverability Statement, particularly Option A, broadly conforms to the development principles and Concept Plans sets out in the Salisbury Report. However, there are a number of instances (as detailed below) where the Persimmon's design approach diverges from that of the Council. Persimmon would welcome discussion with officers with a view to resolving these differences to allow the high-quality development to come forward at the site.
37. As a general point, whilst Persimmon recognises the value in the Council producing Concept Plans to test deliverability of sites, we would caution against the use of overly prescriptive plans in planning policy. The Concept Plans set out in the Salisbury Report including detail on development block arrangements, frontage locations, detailed road and right networks and the location of green infrastructure (amongst other items). In Persimmon's view, this detail is not necessary, is inflexible and could stifle site design and challenge site deliverability.
38. There is also a concern that the Concept Plans are not supported by detailed technical assessment. As an example, it is not clear how the Council has determined the location and scale for the SUDs as shown on the plan. As the Council's proposed capacity for the site is based on the land uses set out in the Concept Plan, it is important that the assumptions used in underpinning the disposition of land uses on the Concept Plan are accurate to enable the land to be brought forward efficiently and effectively as is required by national planning policy.
39. It is also noted that Paragraph 42 of the Report states that: '...sites [6 and 7] have been considered together so as to encourage integrated and comprehensive planning and design across these two adjacent parcels.' It is not clear what level of 'integration' is expected and to what extent collaboration between the landowners will be expected. Site 7 is located on the opposite site of Downton Road and is shown as being capable of delivering some 115 new homes alongside an extensive area of open space. The Council should be aware that

Persimmon has approach the owners of these lands with a view to discussing the potential for joint working. Persimmon would welcome further discussions with the Council and the other parties with regards to how the sites can be brought forward successfully.

40. The Deliverability Statement for the Downton Road site submitted by Persimmon demonstrates that it can accommodate around 350 new homes. Considering that the housing needs figure for Salisbury is likely to increase (see comments above), and the Local Plan Review underprovides housing in Salisbury against identified need, the Council may wish to reconsider whether its capacity estimates for the site could be increased so it can accommodate a greater proportion of development.
41. As part of the 275 homes proposed for the site in the draft Plan, there is a requirement for an unknown quantity of these homes to be for self-build and specialist housing. National planning policy and guidance requires that Council's produce evidence (including viability assessment) to support specialist accommodation and self-build allocation policies. However, we have been unable to find such evidence. Until such time as this evidence has been produced and considered, it should not be a requirement for strategic sites, including Downton Road, to provide for these types of development. Notwithstanding our overriding concerns, should the Council continue with this policy requirement, it will be necessary for the Local Plan to define what proportion / quantum of units would be expected.
42. Persimmon do not object to principle of including new nursery and GP provision on the site, but this must be underpinned by evidence of need. The same is true for the new allotments to the west of the site. The design principles also set out a potential requirement for other community uses but, aside from GP provision, there is no indication of what other community uses might be expected. These uses need to be clearly defined and justified. It is also unclear from the Plan whether the Council is expecting serviced land for these facilities or otherwise. The Site Assessment also makes reference to the potential for new primary education provision to be made on site. This requirement has not been carried forward into the Downton Road site development principles, but it is unclear whether this position will change going forward. The Council will be aware that Persimmon's Option 2 Masterplan has allowed for land for a new school should this be needed.
43. The design principles for the site also make reference the creation of a c. 40m wide sightline through the designed scheme to Salisbury's Cathedral. Persimmon support the design principle of creating views through the site to the Cathedral Spire; which has been incorporated in to the Persimmon masterplan. However, we are unclear on why the Council has opted for a 40m wide space. It is Persimmon's preference that the Plan does not specify the width of this view corridor, and this is instead informed by detailed townscape and landscape analysis.
44. Design principle four states, *'that nursery and community facilities are valid for both Sites 6 and 7'* but it is unclear on what is meant by this for planning purposes. For example, is there an expectation that infrastructure costs will be shared between the two sites, or that provision for such facilities can be made on either site? Clarity is required.
45. The Concept Masterplans (Figures 6 and 8) show four new accesses onto Downton Road. Considering that there are already 3 existing junctions along (or in close proximity to) the

site frontages, care will need to be taken to avoid negative traffic implications, particularly in terms of flow along Downton Road and through the Park and Ride. Rationalisation of these access points on the Concept Plans may be appropriate. Persimmon has previously tested a single access arrangement that excluded the western access, with main site access positioned opposite the Park and Ride. We would be willing to revisiting these Plan, should it be necessary, and would welcome discussions with the Council and highways officers in this regard.

Fugglestone Red, Salisbury Development Opportunity

46. The draft Local Plan's identification of the Fugglestone Red site as a 'committed site', where the principle of development is accepted, is supported by Persimmon. However, in light of the our previous comments regarding employment need and housing need and supply in Salisbury, Persimmon would welcome discussions with the Council as to whether re-designation of the employment element site for residential led-mixed use development might be a more appropriate approach.

47. The Fugglestone Red site (also known as St Peter's Place) was allocated in the adopted Core Strategy for 1,250 new homes and 8 hectares of employment land. The site received outline planning permission in 2012 for up to 1,250 new homes, employment, local community uses, primary school, public open space, landscaping and associated access works. Reserved matters approvals have been secured on around half of residential phases of the site, but the employment land remains subject to outline permission only. The St Peter's Place development has been a very successful sales site for Persimmon, and has been reliable source of housing for the Council for several years. If this site were to be re-designated for mixed use by the Council, it could continue to provide housing for Salisbury (within the existing settlement boundaries) for a number of more years to come.

48. It is considered that at least 5.5ha ha of the 8ha employment land site, could be re-designated for residential uses, with the remaining 2.5 ha safeguarded for small scale, start-up employment uses. From a sustainability point of view, continuing to allocate an employment site of this scale on the periphery of Salisbury has the potential increase unsustainable transport movements, and may compete with the City Centre employment offer.

RURAL COMMUNITIES

49. The Council has published an Empowering Rural Communities report which sets out the number of new homes to be delivered in 'Local Service Centres', 'Large Villages' and 'Elsewhere' (i.e. those settlement outside of the tier one and two 'main settlements'). As set out Paragraph 28 and 47 of the report Local Service Centres are 'intended to provide for modest levels of development in order to safeguard their role and to deliver affordable housing' and are 'expected to accommodate more growth than Large Villages'. This approach is supported by Persimmon as it recognises wider range of facilities and services at these settlement and the role and function they play in serving the surrounding rural hinterland.

50. The following section of these representations sets out Permission's comments in relation to housing needs of the rural communities, and sets out Persimmon's justification for the allocation of Persimmon's Salisbury Road, Downton for residential development.

Housing Distribution

51. Tables 2.3 and 2.4 of the Rural Communities Report set out the distribution of housing across the Local Service Centres and Large Villages within each of the HMAs. This distribution is based on a detailed methodology as explained in Appendix 1 of the Report. The Council's approach to the distribution of development across the rural communities is in broad conformity with the Planning Practice Guidance that directs local planning authorities to consider factors such as the characteristics of the neighbourhood area, population and role the settlement's in providing services.

Salisbury Road, Downton Development Opportunity

52. With regards to Persimmon's site at Salisbury Road, Downton, the Rural Communities Report described the settlement as a 'Local Service Centre' (tier three settlement). The Report sets out baseline indicative requirement of 235 new homes to be delivered in the plan period 2016-2036. Taking into account completions and commitments across the settlement, the residual housing requirement for Downton (i.e. how many new need to be provided at the town) is calculated as 108 new homes. The Council is looking to provide rural communities (including those covered by neighbourhood plan) with indicative housing requirements is supported by national policy and Persimmon Homes. This should provide a consistent basis for plan making across the rural area and should assist with the swift preparation of new neighbourhood plans and neighbourhood plan reviews. However, for reasons set out above, this housing requirement for Downton (and those for the individual HMAs and other settlement) may be too low.
53. It is concerning that in the Parish Council's response to the Local Plan consultation (Parish meeting report, 8th March 2021), members are seeking to reduce the draft housing requirement for Downton. The Parish's response also makes reference to '*a timed embargo on large scale speculative development*' and suggest that, if growth is directed to Downton, it should be phased towards the end of the plan period. The evidence base underpinning the Parish Council's assertions is, however underdeveloped, and does not reflect the positive planning approach as advocated by national planning policy. Wiltshire Council should therefore avoid reducing the Downton housing requirement as this would not be justified. Should Wiltshire Council be minded to reduce the requirement for Downton, it should be aware that this could also set an unhelpful precedent in terms of other neighbourhood plan groups seeking to lower their housing requirements. This could potentially undermine the Council's planning strategy to deliver appropriate levels of housing.
54. Persimmon has undertaken a number of detailed technical assessments of the site which has informed our initial Masterplan. This work is set out in detail in Persimmon's Site Deliverability Statement for the Salisbury Road site, which should be read along these representations. The Statement demonstrates that the sites is capable of delivering around 100 new homes, which could meet the indicative housing requirement for Downton. The Statement confirms that the site is a sustainable and deliverable development opportunity, that is bounded on three side by existing development and that can be brought forward in the short term, and should be considered for residential allocation.

55. Persimmon continue to seek to engage with the Parish Council regarding the review of the Downton Neighbourhood Plan, but at the current stage, Downton Parish has not formally announced whether a review of the Downton Plan will be undertaken. Given the Parish's response to the emerging Local Plan, there is considerable doubt that the Council will look to review the Plan. As such, Persimmon would urge the Council to consider making allocation through the Local Plan Review now (as opposed to waiting for a Site Allocations Plan or review of the NP) to ensure that housing needs of Downton are swiftly met and housing delivery with Wiltshire is boosted.

Rural Exceptions Sites and Community Led Housing Policy

56. The Rural Communities Paper sets out a revised policy wording for adopted Core Policy 44 relating to Rural Exceptions Sites and Community Led Housing. With regards to Community Led Housing, the policy should not be restricted to sites brought forward by a community land trust, and should instead be generally applied more generally to development that has demonstrable community support. It is also unclear why such sites should be required to provide 50% affordable housing. This threshold has not been subject to viability testing and may not represent the housing mix that local communities may wish to bring forward. As such, a specific percentage of affordable housing for Community Led Housing development should be deleted from the draft Policy.

Housing Requirements for Neighbourhood Area Designations in the Rural Area Policy

57. The Rural Communities Paper also sets out a new policy on the Council's approach to the delivery housing growth at Local Service Centres and Large Villages. The policy states that Site Allocations will generally be made through Neighbourhood Plan but, where this is not the case, it may be necessary for the Council to allocate sites (potentially as part of a Site Allocations Plan). The Council should be cautious about placing too much reliance on the delivery of new sites through neighbourhood plans. There is considerable uncertainty as to whether neighbourhood plans will be progressed / reviewed (the Downton Road Neighbourhood Plan is a case in point), and even where Plans are reviewed, there is not a requirement in national policy for new housing to be included within the scope of a plan. The Policy is also non-committal in terms of whether a Site Allocations Plan will be produced to identify new allocations where a Neighbourhood Plan have failed to do so. Indeed a Site Allocations Plan is not timetable within the LDS. As stated above, particularly with regards to Downton where there is considerable uncertainty as to whether a Neighbourhood Plan will be reviewed, the Council should look to proactively allocated sites now in the Local Plan Review. The Council should clearly sets out whether or not if intends on producing a Site Allocations Plan and this timetable confirmed in an updated LDS.

CLIMATE CHANGE AND BIODIVERSITY

58. The Council has produced a Climate Change and Biodiversity Report that sets out five linked key policy themes that will help support the Plan's objectives in respect of adapting to and mitigating climate change. The Report also sets out the direction of travel with regards to biodiversity net gain (BNG).

Climate Change

59. The Report sets out a number of 'Policy Themes' for addressing various aspects of climate change and associated environmental issues. Policy Theme 1 relates to Flood Risk and Promoting Sustainable Water Management. The theme includes provisions for managing water to achieve a greenfield runoff rate plus 20% 'betterment'. It is unclear from the Plan whether this betterment relates to standard climate change adjustments or whether the 20% is expected over and above the climate change adjustment. Clarity is required. It is also noted the requisite improvements to run off rates can be met through any measures in the drainage hierarchy which may, or may not, include SUDS. There should be no expectation in the plan that SUDS are the only means of addressing surface water.
60. Policy Theme 3 sets out the Council's approach to sustainable design and construction (net zero carbon and Electric Vehicle (EV) charging infrastructure). Policy Theme 4 relates to sustainable energy generation and management (on site renewables and storage capacity, decentralised energy systems and adaptation of existing buildings). Finally, Policy Theme 5 relates to Sustainable Transport and Air Quality, including air quality issues and modal shift). With regards to all policy requirements sets out in these Policy Themes, the increased sustainably and efficiently standards will inevitably increase development cost. Persimmon support the inclusion of these policies where they are underpinned by evidence, particularly in relation viability. Until the viability work has been published, many of the elements set out in the Policy Themes cannot be supported. Persimmon welcomed the opportunity to comment on the local plan viability report in due course.

Biodiversity Net Gain

61. Policy Theme 2 (Enhancing Green/Blue Infrastructure and biodiversity) sets out a number of measures to enhance and create new Green/Blue Infrastructure. The Policy Theme also sets out a requirement for all new development to provide a minimum of 10% biodiversity net gain (BNG), which should be protected and positively managed post development for a minimum period of 30 years.
62. With regard to the BNG provisions it would be helpful if the Council adopted a specific method for the assessing and quantifying BNG increase to allow for consistency of approach between planning applications. Persimmon would welcome the opportunity to input towards this method document in due course.
63. It is noted that BNG is referred to within the National Planning Policy Framework (NPPF, Para 170(d) and Para 175(d)), but the NPPF does not specify a number/percentage for net gain. The forthcoming Environment Bill includes a requirement for all future schemes, including the development of land, to deliver a mandatory 10% BNG to be maintained for a period of at least 30 years.
64. Persimmon welcomes the principle of requiring BNG but, without a policy or legislative basis for the 10% requirement it would be premature for the Council to set this target in the Plan at this stage. It is Persimmon's view that this element of the Policy should be more flexibility worded so that applicants should '...seek to achieve a 10% net gain in biodiversity...' as opposed to this being a mandatory requirement.
65. Another issue with the policy is the potential impact on site viability and local plan viability more generally. From site specific point of view, some sites that are due to be brought

forward within new plan period will have been contracted prior to the introduction of BNG. The introduction of BNG may negatively impact on viability of sites due to the impact of BNG on land budgets, which may in turn may create issues with minimum values and minimum area provisions in existing contracts. Related to the above point, given the considerable impact that BNG requirements may have on developable areas and/or development costs, it will be necessary for the Council to account for these costs to development within its Local Plan viability evidence, which is yet to be published. Persimmon welcomes the opportunity to comment on this viability work once it has been made available by the Council. Depending on the site in question, we are aware of instances where BNG requirements can take up around 50% of the overall site area. The Council should also be aware of these possible implications of 'land hungry' BNG on the amount of land that may need to be identified in the Plan.

66. There is also insufficient consideration of impact of this new Policy on sites that may be the subject of live planning applications (or reserved matters applications) where land budgets have been fixed. Assuming this Policy is carried forward in the Plan, it may be challenging for some sites to meet the BNG requirements due to unforeseen viability and land budget issues associated with BNG. As such, the Council should introduce transitional arrangements to guard against these unintended consequences outlined above and/or consider and excluding all 'committed' sites identified in the draft Plan from the 10% BNG requirement.
67. Wiltshire Council has not made it clear whether open space and mitigation land (for example or nutrient off-set land) would contribute towards the percentage requirement for BNG. We are aware that in other areas of the Country, Natural England are taking a view that mitigation and BNG must be provided on separate areas. Persimmon strongly objects to this approach. There is no valid reason why land can't serve multiple purposes. Indeed, the NPPF requires that the planning system uses land effectively and efficiently.

HABITATS REGULATIONS ASSESSMENT

68. The Council has commenced work on a Habitats Regulations Assessment (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 potential for likely significant effects on these sites as a result of development, a HRA assessment of the emerging Plan is welcomed and necessary. Persimmon does not have any comments on the Scoping report but we look forward to inputting towards the more detailed HRA report in due course.