

RURAL 341



Wiltshire Local Plan review consultation March 2021

Thank you for providing Historic England an opportunity to consider this consultation relating to the amount and distribution of new homes and land for employment; neighbourhood planning; climate change and biodiversity net gain.

Our following comments supplement those previously made in our letter of 18 December 2017 which mainly emphasised the need for any review to consider the current state of Wiltshire's historic environment and how it's planning documents had performed regarding the delivery of a positive strategy for the historic environment (NPPF para 185). The scope of your proposals in this consultation may well have followed a review of how the current plan(s) have met their objectives, and how they have performed in relation to the delivery of sustainable development in respect of the historic environment. Is this evaluation available to view?

Our consultation response is informed by Historic England advice and guidance which you may also find useful in helping to provide a clear and positive strategy for the conservation, enjoyment and enhancement of Wiltshire's rich and varied historic environments.

- **The Historic Environment in Local Plans**
<https://historicengland.org.uk/images-books/publications/gpa1-historic-environment-local-plans/>
- **How to consider the Setting of Heritage Assets**
<https://historicengland.org.uk/images-books/publications/gpa3-setting-of-heritage-assets/>
- **Considering the historic environment when allocating sites in Local Plans**
<https://historicengland.org.uk/images-books/publications/historic-environment-and-site-allocations-in-local-plans/>
- **Neighbourhood Planning and the historic environment**
<https://historicengland.org.uk/advice/planning/improve-your-neighbourhood/>
- **Conservation Area Appraisal, Designation and Management**
<https://historicengland.org.uk/images-books/publications/conservation-area-appraisal-designation-management-advice-note-1/>
- **Optimising housing density within historic places**
<https://historicengland.org.uk/images-books/publications/increasing-residential-density-in-historic-environments/>

The 'Emerging Spatial Strategy'

The emerging spatial strategy indicates the proposed amount of new homes and land for employment that each main settlement should accommodate. We understand this has been informed by evidence including place-based assessments in *Formulating Alternative Development Strategies*, January 2021 (ADSs). These consider the (Red, Amber, Green) capacity of settlements in relation to historic environment, but you accept that such initial broad judgements may require further detailed evaluation.

We would support the Council's efforts to identify and allocate all brownfield sites, big and small, to help reinforce the often-compact nature of Wiltshire's historic settlements, their character and identity in an appropriate response to context, and in turn limiting sprawl and less accessible forms of development.

Having considered the suggested potential sites in each of the 15 x *Planning for...* reports we are concerned there may not be the capacity for every settlement to meet the spatial strategy commitments and levels of growth you envisage without causing significant harm to the historic environment, inconsistent with legislation, national policy, guidance and advice, rendering the spatial strategy relatively unsustainable, and the Local Plan potentially unsound.

National policy requires that significant adverse impacts on heritage assets be avoided and, wherever possible, alternative options employed that reduce or eliminate such effects. Consequently, we would welcome the Council's clarification that this draft spatial strategy does not predetermine the capacity of every settlement and that further evidence (e.g. additional more detailed evaluation of heritage and landscape capacity) may inform a review of those numbers and perhaps the inclusion of other sites in other settlements in that particular HMA or an adjacent HMA.

Historic England appreciates an initial level of evidence has been gathered and applied proportionate to an early 'sift' of sites. However, we also note that Wiltshire Council acknowledge further assessment and consideration of the historic environment is essential to determine whether or not the principle of certain sites is acceptable, and if so, the form they may take. This is an important matter as having considered the 15 Settlement reports we note several potential sites directly affect designated heritage assets and their settings.

At present without such evidence in the public domain, Historic England is unable to provide a fully informed view on whether sites affecting heritage assets are likely to safeguard their significance, and as such if the Local Plan has been prepared in accordance with legislation, national policy, guidance and advice for the historic environment. Our judgement on individual sites and such matters will consequently need to be deferred until that further evidence is available.

Nevertheless, for the time being, we have considered a sample of the suggested sites at Salisbury that we hope will help indicate, in our opinion, their potential suitability and the form of the further evidence that would be helpful for all other settlements. Please refer to an appendix to this letter for such an evaluation and response to the individual questions relating to each of the 15 settlements.

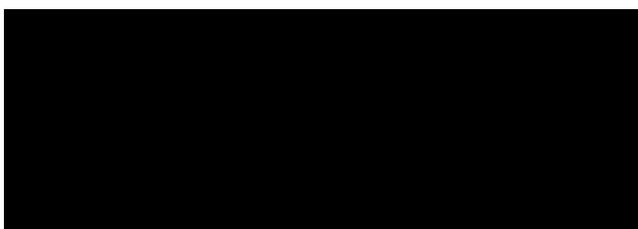
Neighbourhood Planning

We note that smaller village communities will be encouraged to identify their specific local housing requirements when preparing a Neighbourhood Plan (NP) and where a NP is not being prepared the Council has the option of allocating sites through a review of the Local Plan.

We note and welcome the Council's commitment to produce guidance for NP communities on site selection and framing proposals within their Plans that will help to ensure the historic environment is appropriately considered. Historic England would welcome the opportunity to help in the preparation of such clear and effective advice.

We look forward to continuing to work constructively with you on this important planning document.

Sincere regards.



Appendix: Historic England response to the individual settlement proposals and related questions

Settlement	Historic England comment
<p>Planning for Amesbury</p>	<p>It will be important to demonstrate how proposals have considered and responded to the historic environment, the town’s history, character, below round archaeology and landscape setting. The Amesbury Conservation Area Appraisal and Management Plan is now 13 years old; to ensure the Local Plan is informed by up to date information about the historic environment it seems timely that this document is perhaps updated and supplemented by a setting assessment, mindful of the towns significant historic landscape context and proposed expansion.</p>
	<p>AM1. What do you think to this scale of growth? Should there be a brownfield target? Should it be higher or lower?</p> <p>Historic England considers that the character of the historic settlement, within its wider landscape setting, and the availability of suitability sites should inform the proposed scale and form of growth.</p> <p>We would support Wiltshire Council’s efforts to identify, allocate and prioritise all potential brownfield opportunities, big and small, including repurposing existing vacant sites, or underused buildings of historic interest to help reinforce and enhance the character of the town and limit sprawl. An ambitious brownfield first target is encouraged although the related future capacity (numbers/amount of brownfield development) must relate to the context of the site(s) and the future form ensuring a good fit with the townscape. An accurate capacity can be informed by an updated Conservation Area Appraisal.</p>
	<p>AM2. Are these the right priorities? What priorities may be missing? How might these place shaping priorities be achieved?</p> <p>An updated Amesbury Conservation Area Appraisal and Management Plan and or Heritage Topic Paper can help to inform such priorities and in doing so demonstrate a positive strategy for the conservation and enjoyment of the historic environment, including heritage assets most at risk through neglect, decay or other threats (NPPF para 185).</p>
	<p>AM3. Is this the right pool of potential development sites? Are there any other sites we should be considering?</p> <p>An updated Conservation Appraisal and setting assessment can inform the availability of suitable development sites.</p> <p>Disclaimer – Historic England have not undertaken a detailed assessment of the suggested sites in and around Amesbury due to the additional evidence proposed to be gathered. We therefore respectfully reserve judgement on their suitability.</p>
	<p>AM4. 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?</p>

	<p>An understanding of the history, character, identity, appearance and landscape setting should inform the level of growth and site suitability in accordance with national policy. Historic England’s published advice on site allocations may be helpful. https://historicengland.org.uk/images-books/publications/historic-environment-and-site-allocations-in-local-plans/</p> <p>Up to date Conservation Appraisals and setting assessments will also help inform this exercise.</p>
	<p>AM5. Are there important social, economic and environmental factors you think we’ve missed that need to be considered, generally or in respect of individual sites?</p> <p>The information accompanying the consultation in the Settlement Profile does not appear to set out how a strategic understanding of the history, character and landscape setting has informed the spatial distribution, capacity and specific allocations proposed. To do so a heritage topic paper for each settlement is recommended including a strategic landscape setting assessment and up to date Conservation Area Appraisal to inform brownfield and place shaping opportunities.</p> <p>Any further site assessment should be independent and robust, and undertaken or commissioned by the local planning authority rather than relying solely on evidence provided by a site promoter.</p>
Planning for Bradford on Avon	<p>It will be important to demonstrate how proposals have considered and responded to the historic environment, the town’s history, character and landscape setting. Bradford on Avon doesn’t appear to have a Conservation Area Appraisal and Management Plan and the towns character assessment is now 13 years old. The Council should consider whether an update is required, and also a setting assessment to inform edge of town expansion.</p>
	<p>BR1. What do you think to this scale of growth? Should there be a brownfield target? Should it be higher or lower?</p> <p>The form and character of the historic settlement, within its wider landscape setting, and the availability of suitability sites should inform the proposed scale of growth.</p> <p>We would support Wiltshire Council’s efforts to identify, allocate and prioritise all potential brownfield opportunities, big and small, including repurposing existing vacant sites, or underused buildings of historic interest to help reinforce and enhance the character of the town and in turn limit sprawl. An ambitious brownfield first target is encouraged although the related future capacity (numbers/amount of brownfield development) must relate to the context of the site(s) and the future form ensuring a good fit with the townscape. An accurate capacity can be informed by an up to date Conservation Area Appraisal.</p>
	<p>BR2. Are these the right priorities? What priorities may be missing? How might these place shaping priorities be achieved?</p> <p>A Bradford on Avon Conservation Area Appraisal and Management Plan and or Heritage Topic Paper can help to inform such priorities and in doing so demonstrate a positive</p>

	strategy for the conservation and enjoyment of the historic environment, including heritage assets most at risk through neglect, decay or other threats (NPPF para 185).
	<p>BR3. Is this the right pool of potential development sites? Are there any other sites we should be considering?</p> <p>The Council should consider whether a Conservation Appraisal and setting assessment is required to inform the promotion of suitable development sites.</p> <p>Disclaimer – Historic England has not undertaken a detailed assessment of the suggested sites at Bradford on Avon due to Wiltshire Council’s intention to provide further evidence. We therefore reserve judgement until then.</p>
	<p>BR4. 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?</p> <p>An understanding of the history, character, identity, appearance and landscape setting should inform the level of growth and site suitability in accordance with national policy. Historic England’s published advice on site allocations may be useful. https://historicengland.org.uk/images-books/publications/historic-environment-and-site-allocations-in-local-plans/</p> <p>An up to date Conservation Appraisal and setting assessments, where appropriate, can help inform the Plan.</p> <p>It would be helpful to appreciate the judgements of the Council’s in-house heritage and landscape expertise, and any germane planning history. This information will be useful in relation to all 15 settlements.</p> <p>It will be important to be mindful of legislation, national policy, guidance and advice for the historic environment.</p>
	<p>BR5. Are there important social, economic and environmental factors you think we’ve missed that need to be considered, generally or in respect of individual sites?</p> <p>A strategic understanding of the history, character and landscape setting should inform the spatial distribution, capacity and specific allocations proposed. To do so a heritage topic paper for each settlement is recommended including a strategic landscape setting assessment and up to date Conservation Area Appraisal to inform brownfield capacity and place shaping opportunities.</p> <p>Any further site assessment should be independent and robust, undertaken or commissioned by the local planning authority rather than relying solely on evidence provided by the promoter of a site.</p>
Planning for Calne	It will be important to demonstrate how proposals have considered and responded to the historic environment, the town’s history, character and landscape setting. Calne doesn’t appear to have a Conservation Area Appraisal and Management Plan but more importantly perhaps is the absence of a setting assessment to inform considerable proposed edge of town expansion.

	<p>CA1. What do you think to this scale of growth? Should there be a brownfield target? Should it be higher or lower?</p> <p>The form and character of the town, within its wider landscape setting, and the availability of suitable sites should inform the proposed scale of growth.</p> <p>We would support Wiltshire Council’s efforts to identify, allocate and prioritise all potential brownfield opportunities, big and small, including repurposing existing vacant sites, or underused buildings of historic interest to help reinforce and enhance the character of the town and in turn limit sprawl. An ambitious brownfield first target is encouraged although the related future capacity (numbers/amount of brownfield development) must relate to the context of the site(s) and the future form ensuring a good fit with the townscape. An accurate capacity can be informed by a Conservation Area Appraisal, currently absent.</p>
	<p>CA2. Are these the right priorities? What priorities may be missing? How might these place shaping priorities be achieved?</p> <p>A Conservation Area Appraisal and Management Plan and or Heritage Topic Paper can help to inform such priorities and in doing so demonstrate a positive strategy for the conservation and enjoyment of the historic environment, including heritage assets most at risk through neglect, decay or other threats (NPPF para 185).</p>
	<p>CA3. Is this the right pool of potential development sites? Are there any other sites we should be considering?</p> <p>The Council should consider whether a Conservation Appraisal and setting assessment is required to inform the promotion of suitable development sites within the town.</p> <p>Disclaimer – Historic England has not undertaken a detailed assessment of the suggested sites at Calne due to Wiltshire Council’s intention to provide further evidence. We therefore reserve judgement until then. We note several proposed sites adjoin or effect the setting of designated heritage assets. Their significance needs to be determined and applied to inform site suitability and if the principle is acceptable, the form that development should take to avoid or minimise harm and deliver potential enhancement.</p>
	<p>CA4. 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?</p> <p>An understanding of the history, character, identity, appearance and landscape setting should inform the level of growth and site suitability in accordance with national policy. Historic England’s published advice on site allocations may be useful. https://historicengland.org.uk/images-books/publications/historic-environment-and-site-allocations-in-local-plans/</p> <p>An up to date Conservation Appraisal and setting assessment, where appropriate, can help inform the Plan.</p> <p>It would be helpful to appreciate the judgements of the Council’s in-house heritage and landscape expertise, and any germane planning history.</p>

	<p>It will be important to be mindful of legislation, national policy, guidance and advice for the historic environment.</p>
	<p>CA5. Are there important social, economic and environmental factors you think we've missed that need to be considered, generally or in respect of individual sites?</p> <p>A strategic understanding of the history, character and landscape setting should inform the spatial distribution, capacity and specific allocations proposed. To do so a heritage topic paper for Calne is recommended including a strategic landscape setting assessment and up to date Conservation Area Appraisal to inform brownfield capacity and place shaping opportunities.</p> <p>Any further site assessment should be independent and robust, undertaken or commissioned by the local planning authority rather than relying solely on evidence provided by the promoter of a site.</p>
Planning for Corsham	<p>It will be important to demonstrate how proposals have considered and responded to the historic environment, the town's history, character and landscape setting. It is unclear whether there are Conservation Area Appraisals and Management Plans available nor a setting assessment to inform considerable proposed edge of town expansion.</p>
	<p>CO1. What do you think to this scale of growth? Should there be a brownfield target? Should it be higher or lower?</p> <p>The form and character of the town, within its wider landscape setting, and the availability of suitable sites should inform the proposed scale of growth.</p> <p>We would support Wiltshire Council's efforts to identify, allocate and prioritise all potential brownfield opportunities, big and small, including repurposing existing vacant sites, or underused buildings of historic interest to help reinforce and enhance the character of the town and in turn limit sprawl. An ambitious brownfield first target is encouraged although the related future capacity (numbers/amount of brownfield development) must relate to the context of the site(s) and the future form ensuring a good fit with the townscape. An accurate capacity can be informed by Conservation Area Appraisals, which appear to be absent.</p>
	<p>CO2. Are these the right priorities? What priorities may be missing? How might these place shaping priorities be achieved?</p> <p>Conservation Area Appraisals and Management Plans and or a Heritage Topic Paper for the town can help inform such priorities and in doing so demonstrate a positive strategy for the conservation and enjoyment of the historic environment, including heritage assets most at risk through neglect, decay or other threats (NPPF para 185).</p> <p>Have the Corsham Conservation Statement and 2015 Public Realm Study informed priorities?</p>
	<p>CO3. Is this the right pool of potential development sites? Are there any other sites we should be considering?</p>

	<p>The Council should consider whether a Conservation Appraisal and setting assessment is required to inform the promotion of suitable development sites within and around the town.</p> <p>Disclaimer – Historic England has not undertaken a detailed assessment of the suggested sites at Corsham due to Wiltshire Council’s intention to provide further evidence. We therefore reserve judgement until then. We note several proposed sites adjoin or effect the setting of designated heritage assets. Their significance needs to be determined and applied to inform site suitability and if the principle is acceptable, the form that development should take to avoid or minimise harm and deliver potential enhancement.</p>
	<p>CO4. 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?</p> <p>An understanding of the history, character, identity, appearance and landscape setting should inform the level of growth and site suitability in accordance with national policy. Historic England’s published advice on site allocations may be useful. https://historicengland.org.uk/images-books/publications/historic-environment-and-site-allocations-in-local-plans/</p> <p>Up to date Conservation Appraisals and setting assessment, where appropriate, can help inform the Plan.</p> <p>It would be helpful to appreciate the judgements of the Council’s in-house heritage and landscape expertise, and any germane planning history.</p> <p>It will be important to be mindful of legislation, national policy, guidance and advice for the historic environment.</p>
	<p>CO5. Are there important social, economic and environmental factors you think we’ve missed that need to be considered, generally or in respect of individual sites?</p> <p>A strategic understanding of the history, character and landscape setting should inform the spatial distribution, capacity and specific allocations proposed. To do so a heritage topic paper for Corsham is recommended; and a strategic landscape setting assessment and up to date Conservation Area Appraisals to inform brownfield capacity and place shaping opportunities.</p> <p>Any further site assessment should be independent and robust, undertaken or commissioned by the local planning authority rather than relying solely on evidence provided by the promoter of a site.</p>
Planning for Chippenham	<p>It will be important to demonstrate how proposals have considered and responded to the historic environment, the town’s history, character and, in particular, Chippenham’s landscape setting and surrounding heritage assets. A heritage topic paper and up to date setting assessment for the town and affected assets will be important, mindful of the scale and distribution of potential development.</p>
	<p>CP1. What do you think to this scale of growth? Should there be a brownfield target?</p>

	<p>Should it be higher or lower?</p> <p>The form and character of the town and surrounding villages, within its landscape setting, and the availability of suitable sites should inform the proposed scale of growth.</p> <p>We would support Wiltshire Council’s efforts to identify, allocate and prioritise all potential brownfield opportunities, big and small, including repurposing existing vacant sites, or underused buildings of historic interest to help reinforce and enhance the character of the town and in turn limit sprawl.</p> <p>An ambitious brownfield first target is encouraged although the related future capacity (numbers/amount of brownfield development) must relate to the context of the site(s) ensuring a good fit with the townscape. An accurate capacity can be informed by up to date appraisals for the affected Conservation Areas. We note the Chippenham Conservation Appraisal and Management plan are somewhat dated and others may be absent e.g. Allington. The absence of such important evidence should be addressed.</p>
	<p>CP2. Are these the right priorities? What priorities may be missing? How might these place shaping priorities be achieved?</p> <p>Conservation Area Appraisals, Management Plans and a Heritage Topic Paper for the town can help to inform such priorities and in doing so demonstrate a positive strategy for the conservation and enjoyment of the historic environment, including heritage assets most at risk through neglect, decay or other threats (NPPF para 185).</p>
	<p>CP3. Do you agree these sites are the most appropriate upon which to build? If not, why not?</p> <p>We note that the Council has considered the impact of development on the historic environment, but it isn’t clear how it has informed the spatial strategy and site selection. A heritage topic paper could usefully provide this narrative. It can also include the judgements of the Council’s in-house heritage, archaeological and landscape expertise, and any germane planning history. We will defer a detailed evaluation of the suggested sites until such information is available.</p> <p>Needless to say, it will be important for any heritage topic paper to highlight how relevant legislation, national policy, guidance and advice for the historic environment has been applied.</p>
	<p>CP4. What are the most important aspects to consider if these sites are going to be built on?</p> <p>An understanding of the history, character, identity, appearance and landscape setting should inform development in accordance with national policy. Historic England’s published advice on site allocations may be useful. https://historicengland.org.uk/images-books/publications/historic-environment-and-site-allocations-in-local-plans/</p>
	<p>CP5. How can these concept plans be improved?</p> <p>At present it is unclear how an understanding of the significance of the historic</p>

	environment (heritage assessment) has informed the concept plans.
	<p>CP13. Is there anything we have missed that needs to be considered in planning for Chippenham?</p> <p>We hope the previous responses to Q CP1-5 will help to inform the further planning work to be undertaken.</p>
Planning for Devizes	It will be important to demonstrate how proposals have considered and responded to the historic environment, the town's history, character and, in particular, Devizes landscape setting and surrounding heritage assets. A heritage topic paper and up to date setting assessment for the town and affected assets will be important, mindful of the scale and distribution of potential development, and proximity to heritage assets.
	<p>DE1. What do you think to this scale of growth? Should there be a brownfield target? Should it be higher or lower?</p> <p>The form and character of the town, within its landscape setting, and the availability of suitable sites should inform the proposed scale of growth.</p> <p>We would support Wiltshire Council's efforts to identify, allocate and prioritise all potential brownfield opportunities, big and small, including repurposing existing vacant sites, or underused buildings of historic interest to help reinforce and enhance the character of the town and in turn limit sprawl.</p> <p>An ambitious brownfield first target is encouraged although the related future capacity (numbers/amount of brownfield development) must relate to the context of the site(s) ensuring a good fit with the townscape. An accurate capacity can be informed by an up to date Conservation Area appraisal. We note the towns conservation statement is now 15 years old.</p>
	<p>DE2. Are these the right priorities? What priorities may be missing? How might these place shaping priorities be achieved?</p> <p>A Conservation Area Appraisal, Management Plan and a Heritage Topic Paper for the town can help to inform such priorities and in doing so demonstrate a positive strategy for the conservation and enjoyment of the historic environment, including heritage assets most at risk through neglect, decay or other threats (NPPF para 185).</p>
	<p>DE3. Is this the right pool of potential development sites? Are there any other sites we should be considering?</p> <p>The Council should consider whether a Conservation Appraisal and setting assessment is required to inform the promotion of suitable development sites.</p> <p>Disclaimer – Historic England has not undertaken a detailed assessment of the suggested sites at Devizes due to Wiltshire Council's intention to provide further evidence. We therefore reserve judgement until then. We note several proposed sites adjoin or effect the setting of designated heritage assets. Their significance needs to be determined and applied to inform site suitability and if the principle is acceptable, the form that development should take to avoid or minimise harm and deliver potential</p>

	enhancement.
	<p>DE4. 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?</p> <p>An understanding of the history, character, identity, appearance and landscape setting should inform development in accordance with national policy. Historic England’s published advice on site allocations may be useful. https://historicengland.org.uk/images-books/publications/historic-environment-and-site-allocations-in-local-plans/</p>
	<p>DE5. 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?</p> <p>A strategic understanding of the history, character and landscape setting should inform the spatial distribution, capacity and specific allocations proposed. To do so a heritage topic paper for Devizes is recommended; and a strategic landscape setting assessment and up to date Conservation Area Appraisals to inform brownfield capacity and place shaping opportunities.</p> <p>Any further site assessment should be independent and robust, undertaken or commissioned by the local planning authority rather than relying solely on evidence provided by the promoter of a site.</p>
	<p>DE6. Are there any other issues or infrastructure requirements that should be identified?</p> <p>We note that the historic environment/heritage assets is an important component part of Wiltshire’s infrastructure – described in your Settlement Profile as Green & Blue Infrastructure. A heritage topic paper could establish whether there are any other issues, needs and opportunities relating to the historic environment.</p>
Planning for Malmesbury	<p>It will be important to demonstrate how proposals have considered and responded to the historic environment, the town’s history, character and landscape setting. Malmesbury doesn’t appear to have an up to date and the towns character assessment is now 13 years old. The Council should consider the preparation of a setting assessment to inform edge of town expansion and also whether an update of the 2010 Conservation Area Appraisal and Management Plan is required.</p>
	<p>MM1. What do you think to this scale of growth? Should there be a brownfield target? Should it be higher or lower?</p> <p>The form and character of the historic settlement, within its wider landscape setting, and the availability of suitability sites should inform the proposed scale of growth.</p> <p>We would support Wiltshire Council’s efforts to identify, allocate and prioritise all potential brownfield opportunities, big and small, including repurposing existing vacant sites, or underused buildings of historic interest to help reinforce and enhance the character of the town and in turn limit sprawl. An ambitious brownfield first target is encouraged although the related future capacity (numbers/amount of brownfield development) must relate to the context of the site(s) and the future form ensuring a good fit with the townscape. An accurate capacity can be informed by an up to date</p>

	Conservation Area Appraisal.
	<p>MM2. Are these the right priorities? What priorities may be missing? How might these place shaping priorities be achieved?</p> <p>An up to date Conservation Area Appraisal and Management Plan and or Heritage Topic Paper can help to inform such priorities and in doing so demonstrate a positive strategy for the conservation and enjoyment of the historic environment, including heritage assets most at risk through neglect, decay or other threats (NPPF para 185).</p>
	<p>MM3. Is this the right pool of potential development sites? Are there any other sites we should be considering?</p> <p>The Council should consider whether an updated Conservation Appraisal and setting assessment is required to inform the promotion of suitable development sites within the town.</p> <p>Disclaimer – Historic England has not undertaken a detailed assessment of the suggested sites due to Wiltshire Council’s intention to provide further evidence. We therefore reserve judgement until then. We note several proposed sites adjoin or effect the setting of designated heritage assets. Their significance needs to be determined and applied to inform site suitability and if the principle is acceptable, the form that development should take to avoid or minimise harm and deliver potential enhancement.</p>
	<p>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?</p> <p>An understanding of the history, character, identity, appearance and landscape setting should inform the level of growth and site suitability in accordance with national policy. Historic England’s published advice on site allocations may be useful. https://historicengland.org.uk/images-books/publications/historic-environment-and-site-allocations-in-local-plans/</p> <p>An up to date Conservation Appraisal and setting assessment might help inform the Plan.</p> <p>It would also be helpful to appreciate the views on proposals of the Council’s in-house heritage and landscape expertise, and any germane planning history.</p>
	<p>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?</p> <p>It is evident the Council appreciate that further heritage evidence needs to be gathered and applied.</p>
	<p>MM6. Are there any other issues or infrastructure requirements that should be identified?</p> <p>We note that the historic environment/heritage assets is an important component part of Wiltshire’s infrastructure – described in your Settlement Profile as Green & Blue Infrastructure. A heritage topic toper could establish the issues, needs and opportunities</p>

	relating to the historic environment.
Planning for Marlborough	It will be important to demonstrate how proposals have considered and responded to the historic environment, the town's history, character and landscape setting. Marlborough doesn't appear to have a Conservation Area Appraisal and Management Plan and a setting assessment to inform edge of town expansion would be invaluable.
	<p>MB1. What do you think to this scale of growth? Should there be a brownfield target? Should it be higher or lower?</p> <p>The form and character of the historic settlement, within its wider landscape setting, and the availability of suitable sites should inform the proposed scale of growth.</p> <p>We would support Wiltshire Council's efforts to identify, allocate and prioritise all potential brownfield opportunities, big and small, including repurposing existing vacant sites, or underused buildings of historic interest to help reinforce and enhance the character of the town and in turn limit sprawl. An ambitious brownfield first target is encouraged although the related future capacity (numbers/amount of brownfield development) must relate to the context of the site(s) and the future form ensuring a good fit with the townscape. An accurate capacity can be informed by an up to date Conservation Area Appraisal.</p>
	<p>MB2. Are these the right priorities? What priorities may be missing? How might these place shaping priorities be achieved?</p> <p>A Conservation Area Appraisal and Management Plan and or Heritage Topic Paper can help to inform such priorities and in doing so demonstrate a positive strategy for the conservation and enjoyment of the historic environment, including heritage assets most at risk through neglect, decay or other threats (NPPF para 185).</p>
	<p>MB3. Is this the right pool of potential development sites? Are there any other sites we should be considering?</p> <p>The Council should consider whether a Conservation Appraisal and setting assessment is required to inform the promotion of suitable development sites within the town.</p> <p>Disclaimer – Historic England has not undertaken a detailed assessment of the suggested sites due to Wiltshire Council's intention to provide further evidence. We therefore respectfully reserve judgement until then. We note several proposed sites adjoin or effect the setting of designated heritage assets. Their significance needs to be determined and applied to inform site suitability and if the principle is acceptable, the form that development should take to avoid or minimise harm and deliver potential enhancement.</p>
	<p>MB4. 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?</p> <p>An understanding of the history, character, identity, appearance and landscape setting of the city should inform the level of growth and site suitability in accordance with national policy. Historic England's published advice on site allocations may be useful. https://historicengland.org.uk/images-books/publications/historic-environment-and-</p>

	site-allocations-in-local-plans/
	<p>MB5. 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?</p> <p>A strategic understanding of the history, character and landscape setting should inform the spatial distribution, capacity and specific allocations proposed. To do so a heritage topic paper is suggested; a strategic landscape setting assessment and Conservation Area Appraisal to inform brownfield capacity and place shaping opportunities.</p> <p>Any further site assessment should be independent and robust, undertaken or commissioned by the local planning authority rather than relying solely on evidence provided by the promoter of a site.</p>
	<p>MB6. Are there any other issues or infrastructure requirements that should be identified?</p> <p>We note that the historic environment/heritage assets is considered an important component part of Wiltshire's infrastructure; described in your Settlement Profile as Green & Blue Infrastructure. A heritage topic paper could establish whether there are any 'other issues', needs and opportunities relating to the historic environment.</p>
Planning for Melksham	<p>It will be important to demonstrate how proposals have considered and responded to the historic environment, the town's history, character and landscape setting. Melksham doesn't appear to have a Conservation Area Appraisal and Management Plan but more importantly perhaps is the absence of a setting assessment to inform considerable proposed edge of town expansion.</p>
	<p>ME1. What do you think to this scale of growth? Should there be a brownfield target? Should it be higher or lower?</p> <p>The form and character of the historic settlement, within its wider landscape setting, and the availability of suitable sites should inform the proposed scale of growth.</p> <p>We would support Wiltshire Council's efforts to identify, allocate and prioritise all potential brownfield opportunities, big and small, including repurposing existing vacant sites, or underused buildings of historic interest to help reinforce and enhance the character of the town and in turn limit sprawl. An ambitious brownfield first target is encouraged although the related future capacity (numbers/amount of brownfield development) must relate to the context of the site(s) and the future form ensuring a good fit with the townscape. An accurate capacity can be informed by an up to date Conservation Area Appraisal.</p>
	<p>ME2. Are these the right priorities? What priorities may be missing? How might these place shaping priorities be achieved?</p> <p>A Conservation Area Appraisal and Management Plan and or Heritage Topic Paper can help to inform such priorities and in doing so demonstrate a positive strategy for the conservation and enjoyment of the historic environment, including heritage assets most at risk through neglect, decay or other threats (NPPF para 185).</p>
	ME3. Is this the right pool of potential development sites?

	<p>Are there any other sites we should be considering?</p> <p>The Council should consider whether a Conservation Appraisal and in particular a setting assessment is required to inform the promotion of suitable development sites within the town.</p> <p>Disclaimer – Historic England has not undertaken a detailed assessment of the suggested sites due to Wiltshire Council’s intention to provide further evidence. We therefore respectfully reserve judgement until then. We note several proposed sites adjoin or effect the setting of designated heritage assets. Their significance needs to be determined and applied to inform site suitability and if the principle is acceptable, the form that development should take to avoid or minimise harm and deliver potential enhancement.</p>
	<p>ME4. 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?</p> <p>An understanding of the history, character, identity, appearance and landscape setting of the city should inform the level of growth and site suitability in accordance with national policy. Historic England’s published advice on site allocations may be useful. https://historicengland.org.uk/images-books/publications/historic-environment-and-site-allocations-in-local-plans/</p>
	<p>ME5. 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?</p> <p>A strategic understanding of the history, character and landscape setting should inform the spatial distribution, capacity and specific allocations proposed. To do so a heritage topic paper is suggested; a strategic landscape setting assessment and Conservation Area Appraisal to inform brownfield capacity and place shaping opportunities.</p> <p>Any further site assessment should be independent and robust, undertaken or commissioned by the local planning authority rather than relying solely on evidence provided by the promoter of a site.</p>
	<p>ME6. Are there any other issues or infrastructure requirements that should be identified?</p> <p>We note that the historic environment/heritage assets is considered an important component part of Wiltshire’s infrastructure; described in your Settlement Profile as Green & Blue Infrastructure. A heritage topic paper could establish whether there are any ‘other issues’, needs and opportunities relating to the historic environment.</p>
<p>Planning for Royal Wootton Bassett</p>	<p>It will be important to demonstrate how proposals have considered and responded to the historic environment, the town’s history, character and landscape setting. Royal Wootton Bassett doesn’t appear to have a Conservation Area Appraisal and Management Plan but perhaps more importantly is the absence of a setting assessment to inform considerable proposed edge of town expansion.</p>
	<p>WB1. What do you think to this scale of growth? Should there be a brownfield target? Should it be higher or lower?</p>

	<p>The form and character of the town, within its wider landscape setting, and the availability of suitable sites should inform the proposed scale of growth.</p> <p>We would support Wiltshire Council’s efforts to identify, allocate and prioritise all potential brownfield opportunities, big and small, including repurposing existing vacant sites, or underused buildings of historic interest to help reinforce and enhance the character of the town and in turn limit sprawl. An ambitious brownfield first target is encouraged although the related future capacity (numbers/amount of brownfield development) must relate to the context of the site(s) ensuring a good fit with the townscape.</p>
	<p>WB2. Are these the right priorities? What priorities may be missing? How might these place shaping priorities be achieved?</p> <p>Historic England welcome inclusion of the following priorities: protecting the distinct character and identity of the town; safeguarding the historic alignment of the Wilts and Berks Canal and taking forward canal restoration; conserving and enhancing environmental assets around Royal Wootton Bassett; maintaining the town’s elevated historical setting and central conservation area.</p> <p>Have these priorities been informed by a particular study of the town? A Conservation Area Appraisal and Management Plan and or Heritage Topic Paper could certainly demonstrate how the towns ‘priorities’ have been identified and in doing so demonstrate a positive strategy for the conservation and enjoyment of the historic environment, including heritage assets most at risk through neglect, decay or other threats (NPPF para 185).</p>
	<p>WB3. Is this the right pool of potential development sites? Are there any other sites we should be considering?</p> <p>The Council should consider whether a setting assessment would help inform the promotion of suitable development sites.</p> <p>Disclaimer – Historic England has not undertaken a detailed assessment of the suggested sites due to Wiltshire Council’s intention to provide further evidence. We therefore respectfully reserve judgement until then. We note several proposed sites adjoin or effect the setting of designated heritage assets. Their significance needs to be determined and applied to inform site suitability and if the principle is acceptable, the form that development should take to avoid or minimise harm and deliver potential enhancement.</p>
	<p>WB4. 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?</p> <p>An understanding of the history, character, identity, appearance and landscape setting of the city should inform the level of growth and site suitability in accordance with national policy. Historic England’s published advice on site allocations may be useful. https://historicengland.org.uk/images-books/publications/historic-environment-and-site-allocations-in-local-plans/</p>
	<p>WB5. Are there important social, economic or environmental factors you think</p>

	<p>we've missed that need to be considered, generally or in respect of individual site?</p> <p>A strategic understanding of the history, character and landscape setting should inform the spatial distribution, capacity and specific allocations proposed. To do so a heritage topic paper is suggested; a strategic landscape setting assessment and Conservation Area Appraisal to inform brownfield capacity and place shaping opportunities.</p> <p>Any further site assessment should be independent and robust, undertaken or commissioned by the local planning authority rather than relying solely on evidence provided by the promoter of a site.</p>
	<p>WB6. Are there any other issues or infrastructure requirements that should be identified?</p> <p>We note that the historic environment/heritage assets is considered an important component part of Wiltshire's infrastructure; described in your Settlement Profile as Green & Blue Infrastructure. A heritage topic paper could establish whether there are any 'other issues', needs and opportunities relating to the historic environment.</p>
Planning for Salisbury	<p>It will be important to demonstrate how proposals have considered and responded to the historic environment, the town's history, character, below ground archaeology and, in particular, its landscape setting. The Council should consider whether an up to date setting assessment for the town is required.</p>
	<p>SB1. What do you think to this scale of growth? Should there be a brownfield target? Should it be higher or lower?</p> <p>The form and character of the town, within its wider landscape setting, and the availability of suitable sites should inform the proposed scale of growth.</p> <p>We would support Wiltshire Council's efforts to identify, allocate and prioritise all potential brownfield opportunities, big and small, including repurposing existing vacant sites, or underused buildings of historic interest to help reinforce and enhance the character of the town and in turn limit sprawl. An ambitious brownfield first target is encouraged although the related future capacity (numbers/amount of brownfield development) must relate to the context of the site(s) ensuring a good fit with the townscape.</p>
	<p>SB2. Are these the right priorities? What priorities may be missing? How might these place shaping priorities be achieved?</p> <p>We broadly welcome these priorities.</p> <p>The Conservation Area Appraisal and Management Plan and a Heritage Topic Paper can help to further inform potential additions and in doing so demonstrate a positive strategy for the conservation and enjoyment of the historic environment, including heritage assets most at risk through neglect, decay or other threats (NPPF para 185).</p>
	<p>SB3. Is this the right pool of potential development sites? Are there any other sites we should be considering?</p> <p>The Council should consider whether a strategic and up to date setting assessment is</p>

required to inform the promotion of suitable development sites.

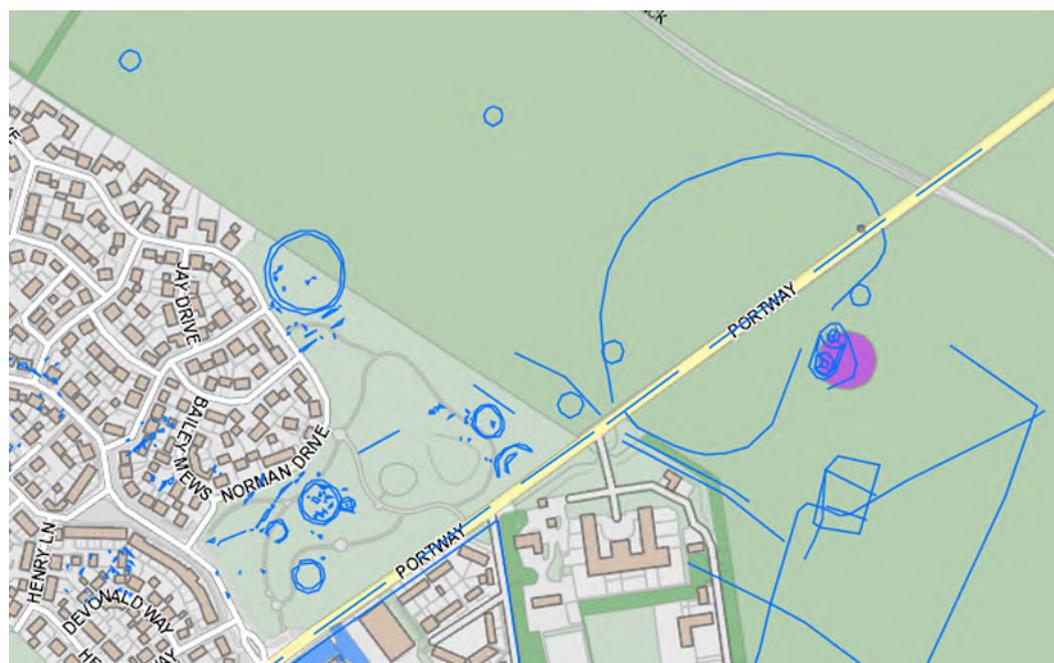
Site 1: Land NE of Old Sarum

“The site’s landscape character is prominent and exposed, with few hedgerows, and assessment shows that any development would have to accommodate this successfully whilst taking account of the setting for Ende Burgh scheduled long barrow to the east of The Portway”.

Without further expert assessment by the local authority as part of the plan making process and subsequent clear and appropriate response to the numerous heritage concerns, one must question how such development might successfully be accommodated in this sensitive and historic landscape setting.

Currently the view of the local authority’s in-house heritage and landscape expertise isn’t apparent. We assume the planning history and evidence base associated with previous planning applications and development plans also continue to be relevant and may help inform the principle of development today.

It isn’t clear how the indicative concept diagrams accompanying the consultation acknowledge or positively respond to the significance of numerous on and off-site heritage matters.



From our initial assessment we note that the barrow is not very well understood and could be Bronze Age or Roman, it could be one barrow or two. If Bronze Age, then it is likely to be part of a wider cemetery with other known barrows in the area (not scheduled as ploughed flat) including a large example on the north edge of the current development northwest of the Portway. Views to and from other Bronze Age monuments then becomes a factor of its significance.

If Roman, then it is likely to be associated with the Portway Roman Road and may be part of a cemetery along the road here. There is a single ditched oval enclosure next to it

	<p>which goes across the road. This may be Roman, and it may define a cemetery.</p> <p>The barrow is a significant landscape feature sitting on a high point in the landscape and is visible from a wide area. As a burial marker it was meant to be seen and to project power and control, the person buried here was important and they wanted to make sure everyone knew it.</p> <p>The undesignated barrows are the circles (single and double) forming a small cemetery. The public space next to Norman Drive preserves these.</p> <p>The view from Figsbury Ring may also be important, as is (certainly) the relationship of the site to the adjacent Monarchs Way, and Old Sarum heritage assets within their wider landscape setting.</p> <p>The nations heritage assets are an irreplaceable resource and should be conserved in a manner appropriate to their significance, so that they can be enjoyed for their contribution to the quality of life of existing and future generations. One must carefully consider whether further expansion of the current development off the Portway would accord with such national policy, legislation, guidance and advice to help protect such finite and nationally important heritage assets and their appreciation within context i.e. their setting.</p>
	<p>Site 6 & 7 Downton Road</p> <p>These sites to the south east of the city relate to several important heritage assets including the Woodbury scheduled monument and related undesignated and less known archaeology; Britford conservation area and associated listed buildings; the Salisbury conservation area, River Avon and meadows, and; the wider historic landscape setting including views of the Cathedral - all important matters to inform the relative suitability of these sites.</p> <p>It would be helpful to appreciate the thoughts of the council's in-house heritage and landscape expertise on how such matters have informed these proposals, and any previous planning history that may still be relevant.</p> <p>It will be important to demonstrate how legislation, national policy, guidance and advice for the historic environment has been applied, and in particular how the Britford conservation area appraisal and management plan has been considered especially in relation to site 6.</p> <p>Certainly, further expert assessment appears to be required as part of the plan making process to better understand the extensive and important below ground archaeology, and to better explain a contextual and positive response to the historic environment that would be required, should the principle be deemed appropriate.</p>
	<p>SB4. 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?</p> <p>An understanding of the history, character, identity, appearance and landscape setting of the city should inform the level of growth and site suitability in accordance with national policy. Historic England's published advice on site allocations may be useful.</p>

	https://historicengland.org.uk/images-books/publications/historic-environment-and-site-allocations-in-local-plans/
	<p>SB5. Are there important social, economic and environmental factors you think we've missed that need to be considered, generally or in respect of individual sites?</p> <p>A strategic understanding of the history, character and landscape setting should inform the spatial distribution, capacity and specific allocations proposed. To do so a heritage topic paper is recommended including a strategic landscape setting assessment and up to date Conservation Area Appraisal to inform brownfield capacity and place shaping opportunities.</p> <p>Any further site assessment should be independent and robust, undertaken or commissioned by the local planning authority rather than relying solely on evidence provided by the promoter of a site.</p>
Planning for Tidworth and Ludgershall	It will be important to demonstrate how proposals have considered and responded to the historic environment, in particular below ground archaeology, landscape setting and surrounding heritage assets. A heritage topic paper and up to date setting assessment will be important, mindful of the scale and distribution of potential development.
	<p>TL1. What do you think to this scale of growth? Should there be a brownfield target?</p> <p>Historic England considers that the character of these historic settlements, within their wider landscape setting, and the availability of suitability sites should inform the proposed scale and form of growth.</p> <p>We would support Wiltshire Council's efforts to identify, allocate and prioritise all potential brownfield opportunities, big and small, including repurposing existing vacant sites, or underused buildings of historic interest to help reinforce and enhance the character of the town and limit sprawl. An ambitious brownfield first target is encouraged although the related future capacity (numbers/amount of brownfield development) must relate to the context of the site(s).</p>
	<p>TL4. Are these the right priorities? What priorities may be missing? How might these place shaping priorities be achieved?</p> <p>A heritage topic paper might identify certain heritage matters requiring priority attention.</p>
	<p>TL5. Is this the right pool of potential development sites? Are there any other sites we should be considering?</p> <p>The Council should consider whether a setting assessment is required to inform the promotion of suitable development sites.</p> <p>Disclaimer – Historic England has not undertaken a detailed assessment of the suggested sites due to Wiltshire Council's intention to provide further evidence. We therefore respectfully reserve judgement until then.</p>
	TL7. Are there important social, economic or environmental factors you think

	<p>we've missed that need to be considered, generally or in respect of individual site?</p> <p>A heritage topic paper might identify certain heritage matters requiring attention.</p>
	<p>TL8. Are there any other issues or infrastructure requirements that should be identified?</p> <p>We note that the historic environment/heritage assets is an important component part of Wiltshire's infrastructure – described in your Settlement Profile as Green & Blue Infrastructure. A heritage topic paper could establish whether there are any 'other issues', needs and opportunities relating to the historic environment.</p>
Planning for Trowbridge	<p>It will be important to demonstrate, perhaps in a discrete heritage topic paper, how proposals have considered and responded to the historic environment, the town's history, character and, in particular, it's landscape setting and surrounding heritage assets such as Hilperton Conservation Area. It appears a setting assessment for the town and affected assets has been undertaken. This will be useful evidence to consider, and we assume will be publicly available in due course.</p>
	<p>TB1. What do you think to this scale of growth? Should there be a brownfield target? Should they be higher or lower?</p> <p>The form and character of the town, within its wider landscape setting, and the availability of suitable sites should inform the proposed scale of growth.</p> <p>We would support Wiltshire Council's efforts to identify, allocate and prioritise all potential brownfield opportunities, big and small, including repurposing existing vacant sites, or underused buildings of historic interest to help reinforce and enhance the character of the town and in turn limit sprawl. An ambitious brownfield first target is encouraged although the related future capacity (numbers/amount of brownfield development) must relate to the context of the site(s) ensuring a good fit with the townscape.</p>
	<p>TB2. Are these the right priorities? What priorities may be missing? How might these place shaping priorities be achieved?</p> <p>A Heritage Topic Paper can help to inform such priorities and in doing so demonstrate a positive strategy for the conservation and enjoyment of the historic environment, including heritage assets most at risk through neglect, decay or other threats (NPPF para 185). At present it isn't clear how these priorities have been established.</p>
	<p>TB3. Do you agree these sites are the most appropriate upon which to build? If not, why not?</p> <p>We assume that an understanding of the history, character, identity, appearance and landscape setting of the town has informed the level of growth and site suitability in accordance with national policy. We hope Historic England's published advice on site allocations may have been useful.</p> <p>https://historicengland.org.uk/images-books/publications/historic-environment-and-site-allocations-in-local-plans/</p>
Planning for	<p>It will be important to demonstrate, perhaps in a discrete heritage topic paper, how</p>

<p>Warminster</p>	<p>proposals will have considered and responded to the historic environment, the town's history, character and, in particular, its landscape setting and surrounding heritage assets. Warminster and Bishopstrow do not appear to have a Conservation Area Appraisal and Management Plan but perhaps more importantly is the apparent absence of a setting assessment to inform considerable potential edge of town expansion.</p>
	<p>WA1. What do you think to this scale of growth? Should there be a brownfield target? Should it be higher or lower?</p> <p>Historic England considers that the historic form and character of a historic settlement within its wider landscape setting, <u>and</u> the availability of suitable sites should inform the proposed scale of growth.</p> <p>We support Wiltshire Council's efforts to identify, allocate and prioritise all potential brownfield opportunities, big and small, including repurposing existing vacant or underused buildings of historic or architectural interest to help reinforce the character of the town and in turn limit sprawl. An ambitious target is encouraged although the related future capacity (amount of development) must relate to the context of the site(s) and the future form should ensure a good fit with the townscape.</p> <p>Historic England has prepared advice on optimising housing density within historic places which may be helpful. https://historicengland.org.uk/images-books/publications/increasing-residential-density-in-historic-environments/</p>
	<p>WA2. Are these the right priorities? What priorities may be missing? How might these place shaping priorities be achieved?</p> <p>Conservation Area Appraisal's and Management Plan's for the town and Bishopstrow, and a Heritage Topic Paper can help to inform such priorities and in doing so demonstrate a positive strategy for the conservation and enjoyment of the historic environment, including heritage assets most at risk through neglect, decay or other threats (NPPF para 185).</p>
	<p>WA3. Is this the right pool of potential development sites? Are there any other sites we should be considering?</p> <p>Conservation Appraisal's and a strategic setting assessment will be important evidence to inform a site's suitability.</p> <p>Disclaimer – Historic England have not undertaken a detailed assessment of the suggested sites in and around the town due to the additional evidence proposed to be gathered. We therefore respectfully reserve judgement on their suitability.</p>
	<p>WA4. 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?</p> <p>Wiltshire council acknowledge that further assessment and consideration of the historic environment is essential to determine whether or not the principle of certain sites is acceptable and if so the form they may take. At present without such evidence in the public domain, Historic England is unable to take a view on whether the Local Plan has been prepared in accordance with legislation, national policy, guidance and advice for</p>

	<p>the historic environment. Our judgement on such matters will consequently need to be deferred.</p> <p>Wiltshire Council explored several potential sites during the preparation of the recent Wiltshire Housing Allocations Plan's (2020). No doubt this experience can inform the current plan making process.</p> <p>Historic England's position on Site 2 East of Deane is illustrated by our previous statement provided for the Planning Inspectorate's Examination of the aforementioned Housing Allocations Plan. https://www.wiltshire.gov.uk/article/2353/Wiltshire-Housing-Sites-DPD-Examination</p> <p>This current consultation suggests a much larger site that may well exaggerate the impact and degree of harm.</p>
	<p>WA5. 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?</p> <p>A strategic understanding of the history, character and landscape setting should inform the spatial distribution, capacity and specific allocations proposed. To do so a heritage topic paper is suggested; a strategic landscape setting assessment and Conservation Area Appraisals to inform brownfield capacity and place shaping opportunities.</p> <p>Any further site assessment should be independent and robust, undertaken or commissioned by the local planning authority rather than relying solely on evidence provided by the promoter of a site.</p>
	<p>WA6. Are there any other issues or infrastructure requirements that should be identified?</p> <p>We note that the historic environment/heritage assets is an important component part of Wiltshire's infrastructure – described in your Settlement Profile as Green & Blue Infrastructure. A heritage topic paper could establish whether there are any 'other issues', needs and opportunities relating to the historic environment.</p>
<p>Planning for Westbury</p>	<p>It will be important to demonstrate, perhaps in a discrete heritage topic paper, how proposals will have considered and responded to the historic environment, the town's history, character and, in particular, it's landscape setting and surrounding heritage assets. Westbury doesn't appear to have an up to date Conservation Area Appraisal and Management Plan but perhaps more importantly is the apparent absence of a setting assessment to inform considerable potential edge of town expansion.</p>
	<p>WE1. What do you think to this scale of growth? Should there be a brownfield target? Should it be higher or lower?</p> <p>The form and character of the town, within its wider landscape setting, and the availability of suitable sites should inform the proposed scale of growth.</p> <p>We would support Wiltshire Council's efforts to identify, allocate and prioritise all potential brownfield opportunities, big and small, including repurposing existing vacant sites, or underused buildings of historic interest to help reinforce and enhance the character of the town and in turn limit sprawl. An ambitious brownfield first target is encouraged although the related future capacity (numbers/amount of brownfield</p>

	development) must relate to the context of the site(s) ensuring a good fit with the townscape.
	<p>WE2. Are these the right priorities? What priorities may be missing? How might these place shaping priorities be achieved?</p> <p>A Heritage Topic Paper can help to inform such priorities and in doing so demonstrate a positive strategy for the conservation and enjoyment of the historic environment, including heritage assets most at risk through neglect, decay or other threats (NPPF para 185). At present it isn't clear how these priorities have been established.</p>
	<p>WE3. Is this the right pool of potential development sites? Are there any other sites we should be considering?</p> <p>The Council should consider whether a setting assessment could help inform the promotion of suitable alternative development sites.</p> <p>Disclaimer – Historic England has not undertaken a detailed assessment of the suggested sites due to Wiltshire Council's intention to provide further evidence. We therefore respectfully reserve judgement until then. We note several proposed sites adjoin or effect the setting of designated heritage assets. Their significance needs to be determined and applied to inform site suitability and if the principle is acceptable, the form that development should take to avoid or minimise harm and deliver potential enhancement.</p>
	<p>WE4. 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?</p> <p>We note several proposed sites affect the setting of designated heritage assets. Their significance needs to be determined and applied to inform site suitability and if the principle is acceptable, the form that development should take to avoid or minimise harm and deliver potential enhancement.</p>
	<p>WE5. 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?</p> <p>A strategic understanding of the history, character and landscape setting should inform the spatial distribution, capacity and specific allocations proposed. To do so a heritage topic paper is suggested; a strategic landscape setting assessment and Conservation Area Appraisals to inform brownfield capacity and place shaping opportunities.</p> <p>Any further site assessment should be independent and robust, undertaken or commissioned by the local planning authority rather than relying solely on evidence provided by the promoter of a site.</p>
	<p>WE6. Are there any other issues or infrastructure requirements that should be identified?</p> <p>We note that the historic environment/heritage assets is an important component part of Wiltshire's infrastructure – described in your Settlement Profile as Green & Blue Infrastructure. A heritage topic paper could establish whether there are any 'other issues', needs and opportunities relating to the historic environment.</p>

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RURAL 343

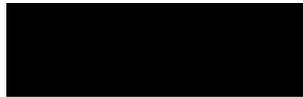
**Representations to the
Wiltshire Local Plan Review
Consultation**

On behalf of



LONGFORD ESTATES

Prepared by:



Date:

March 2021

Ref:

WILTS-247-AP





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1.0 **Introduction**

- 1.1 These representations have been prepared by Southern Planning Practice Ltd on behalf of Longford Estates, who are a large landowner in Wiltshire District, in response to the current Wiltshire Local Plan Review Consultation.
- 1.2 Longford Estates own several sites in Wiltshire District which are suitable for development over the plan period, these include:
- Land at Britford Lane, Harnham
 - Land adjacent to Salisbury Hospital
 - Barns at the Avenue, Odstock
 - Dairy Site at Nunton
 - Buildings at Longford Farm, Nunton
 - 219 Odstock
 - Barns at the Avenue, Odstock
 - Charlton Dairy
- 1.3 The two 'major' sites which are capable of accommodating a large number of homes are the Land at Britford Lane, Harnham and the Land adjacent to Salisbury Hospital. The remaining sites are small to medium sites which would provide an immediate, important contribution to Wiltshire's housing need.
- 1.4 The Land adjacent to Salisbury Hospital has been allocated in the Local Plan Review as part of Site 7 – Land south of Downton Road for the residential development of approximately 115 homes to include self-build, custom-build and specialist provision, together with a large area of public open space, potentially in the form of a country park. Longford Estates own the southern section of this site which has been identified in the concept plan to provide self-build and custom homes.
- 1.5 Land at Britford Lane, Harnham has not been taken forward for allocation in the Local Plan Review as Stage 2A and 2B of the Sustainability appraisal considered that development of the site would potentially be harmful to the landscape setting of Salisbury. However, we understand that limited landscape work was undertaken to come to this conclusion and



LONGFORD ESTATES

therefore our client, Longford Estates, have instructed a Landscape and Visual Appraisal which is submitted with these representations which demonstrates that there is development potential on the site, particularly in the eastern section. In addition to the landscape work, a Heritage Assessment has been undertaken and is submitted with these representations. Both reports demonstrate that the land at Britford Lane, Harnham could be sensitively developed through a landscape-led approach with respect to the surrounding historic environment and is suitable and available for development now.

- 1.6 The other smaller sites including redundant farm buildings, barns and a dairy, owned by Longford Estates have largely not been put forward for consideration to the Council previously. Land at Nunton Farm was submitted to the Wiltshire Call for Sites exercise in 2017. The site extents to 0.8 ha, is unconstrained and has the potential to accommodate 15-24 dwellings at a density of 30 dph. Whilst the sites are relatively small in terms of potential allocations, the residential development of these sites would provide a valuable contribution to Wiltshire's immediate housing land supply whilst providing support for the rural economy.
- 1.7 All of the sites owned by Longford Estates are available, suitable, achievable and deliverable and would help to meet Wiltshire's housing need in a sustainable way whilst also providing benefits to the local community and the District's economy.
- 1.8 As set out above, a Heritage Assessment and Landscape and Visual Appraisal are submitted to demonstrate the suitability of the land at Britford Lane, Harnham.



2.0 Response to Emerging Spatial Strategy Consultation Document

- 2.1 We support the settlement hierarchy set out on page 3 of the Emerging Spatial Strategy Consultation Document and also support the primary focus of development to be in Wiltshire's principal settlements, in particular Salisbury. We note that in the settlement hierarchy small villages are to be considered 'non-strategic' and encourage the Council to support proportionate growth in sustainable rural areas, which may be beyond the existing settlement boundary, to meet local needs and to support the District's rural economy. This approach is encouraged by paragraph 84 of the National Planning Policy Framework (NPPF) which sets out that planning policies should recognise that sites to meet local needs in rural areas may have to be found adjacent to or beyond existing settlements.
- 2.2 In order to have a robust five-year housing land supply, in addition to focusing growth in the principal settlements, the Council should look to all tier settlements in the hierarchy to deliver homes through a range of small, medium and strategic sites. The sites in Longford Estates ownership present an opportunity for Wiltshire to allocate a range of sites in the Local Plan Review. Paragraph 68 of the NPPF recognises the important contribution small and medium sized sites can make to meeting the housing requirement of an area as they are often built out relatively quickly. By allocating a range of sites, the Council will be able to maintain a stable housing land supply enabling the delivery of homes throughout the plan period to meet the identified local requirements and to ensure Wiltshire is not vulnerable to unsustainable, speculative development.
- 2.3 Delivery Principle 3 sets out that the Council will allocate land for development through the Local Plan where it is necessary to do so. It will be necessary to do so to ensure the scale of Wiltshire's housing and employment needs are met and to ensure a supply of deliverable land whilst providing support for the District's economy. The allocation of land through the Local Plan Review should be both within the principal settlements such as Salisbury and also in sustainable locations in the rural areas of the district to provide support for their local economy.



- 2.4 We recognise that the Council has calculated housing need in two ways (Paragraph 2.17), one way provides a figure based on the current Government's Standard Method which is a 'minimum' and the second way provides a slightly higher figure based on the Local Housing Need Assessment (LHNA). As acknowledged at paragraph 1.1 of the consultation document, the Government is currently in the process of reviewing the standard method and as such the objectively assessed housing need figure for Wiltshire may change and the Local Plan must be prepared to accommodate further growth. In light of this, and together with the LHNA housing need figure being higher than the Government's standard method figure, we consider that in accordance with Paragraph 59 of the NPPF which refers to the Government's objective of significantly boosting the supply of homes, the Council should be more ambitious and plan for the objectively assessed housing need as a minimum. This approach would be consistent with paragraph 60 of the NPPF which requires strategic policies to be informed by a local housing need assessment when determining the minimum number of homes needed.
- 2.5 As per the Planning Practice Guidance (PPG) (Paragraph: 001 Reference ID: 68-001-20190722), the standard method for calculating local housing need provides a **minimum** (our emphasis) number of homes to be planned for. It clearly sets out that authorities should use the standard method as the starting point when preparing the housing requirement in their plan, unless exceptional circumstances justify an alternative approach. We do not believe that there are any exceptional circumstances which would justify an alternative approach in Wiltshire.
- 2.6 Indeed, in order for the Local Plan Review to meet the 'positively prepared' test of soundness as required by paragraph 35 a) of the NPPF, the Local Plan review must:
- "provide (ing) a strategy which, as a minimum, seeks to meet the area's objectively assessed needs; and is informed by agreements with other authorities, so that unmet need from neighbouring areas is accommodated where it is practical to do so and is consistent with achieving sustainable development".*
- 2.7 We support the Council's different approaches in each Housing Market Area (HMA) set out in the emerging Spatial Strategy to ensure the strategy and delivery of homes is suitable and sustainable to meet local needs. Whilst we support the emerging strategy in the Salisbury HMA being based around 'SA-A - Roll forward the core strategy pattern of distribution', we



believe the Council should look to incorporate the alternative development strategy '*SA-B - Focus on Salisbury*'.

- 2.8 Salisbury is one of the most sustainable settlements in Wiltshire with a good level of facilities and services which would be further supported by additional development around the city. Placing a development focus on Salisbury would enable existing infrastructure to be utilised and supported together with the achievement of sustainable development. In addition, given the role of Salisbury as a principal settlement in the HMA, it is essential that sufficient sites are allocated around the City for new residential development in order to ensure delivery of homes over the plan period to meet both the objectively assessed housing need and economic aspirations of the District.
- 2.9 In addition to the focus on Salisbury approach, small villages within the Salisbury HMA should accommodate proportionate growth in order to sustain the local services and facilities of the rural areas of the District.
- 2.10 The emerging strategy and delivery of homes within the Salisbury HMA, set out in paragraphs 3.59 – 3.64 of the Consultation Document, indicates that greenfield sites will be allocated to accommodate new growth. We are supportive of this approach as it has been informed by the findings of the sustainability appraisal which recommends ways of mitigating any likely significant adverse effects and improving the benefits of the strategy overall. The Land at Britford Lane, Harnham is a greenfield site which is suitable for landscape-led development in accordance with the findings of the sustainability appraisal. Its suitability and an assessment against the Sustainability Appraisal Objectives are set out in Section 4 of these representations.



3.0 Response to Planning for Salisbury Consultation Document

Question SB1 - What do you think to this scale of growth? Should there be a brownfield target? Should they be higher or lower?

- 3.1 Paragraph 11 of the National Planning Policy Framework (2019) states that Local Plans should positively seek opportunities to meet the development needs of their area - as a minimum – but also be sufficiently flexible to adapt to rapid change as well as any needs that cannot be met within neighbouring areas. This stance is also reiterated in the Planning Policy Guidance.
- 3.2 Paragraph 9 of the Planning for Salisbury Consultation Document sets out that the new strategy relates to Salisbury only and proposes the requirement of 5,240 homes for the plan period 2016-2036. This equates to approximately 262 dwellings per annum. Paragraph 11 explains that when the number of homes already built and homes in the pipeline is deducted from this housing need, it leaves a further 940 homes to be accommodated up until 2036.
- 3.3 We are supportive of the Council planning to meet their currently objectively assessed housing need, however we believe that this figure of 940 homes should be a **minimum** (our emphasis) figure in accordance with paragraph 11 b) of the National Planning Policy Framework and the Planning Practice Guidance.
- 3.4 Salisbury is the only principal settlement within the southern section of Wiltshire District. Therefore, it should be looking to accommodate sufficient growth to support this section of the District. We believe the council should be more ambitious when planning growth and look beyond the plan period to provide sufficient growth going forward. As such, the Council should look to allocate additional sites for residential development in Salisbury.
- 3.5 We agree that there should be a brownfield target to help accommodate growth in Salisbury, however this figure should be both realistic and achievable. Brownfield sites are notorious for taking longer to build out due to complications such as contamination and as a result are not always delivered in accordance with the required timeframe. One key example of this in the nearby Local Planning Authority of Winchester City Council, which given its historic nature draws parallels to Salisbury. In 2006, Winchester City Council allocated a city centre site known as 'Silver Hill' for redevelopment. However, due to the complexities involved in bringing such sites forward, this allocation has not progressed. It is considered that the same is likely



to occur on allocated brownfield sites in Salisbury, particularly in the Town Centre where there is much archaeological interest. Therefore, we believe that the 410 homes that the Local Plan Review is proposing to build on brownfield sites in Salisbury in ten years from 2021-2031 is not realistic or achievable. As such, the Council should look to further sustainable greenfield sites to accommodate the objectively assessed housing need.

Question SB3 - Do you agree these sites are the most appropriate upon which to build? If not, why not?

- 3.6 We agree that sites 6 and 7, in particular site 7, are suitable sites to accommodate new residential development, together with associated infrastructure, in Salisbury. The sites adjoin existing residential development, with Salisbury Hospital to the south. Therefore, both sites are well related to the existing built up area and the allocation of these sites provide a comprehensive, logical, well thought-out addition to Salisbury. In addition, the allocated sites are located close to the existing park and ride and an extensive public rights of way network which will encourage healthy lifestyles as required by the social objective (Paragraph 8b) and Section 8 (Promoting healthy and safe communities) of the NPPF.
- 3.7 With regards to Site 1, we disagree that this is one of the most appropriate sites for new residential development in Salisbury. The site is located some way to the north of the Salisbury City Centre and is considered to be in an unsuitable, and to some extent an isolated location. The site is surrounded by open countryside on all sides with the exception of the southern boundary where there is some residential development. Whilst we appreciate that the area of land to the west of the site has been granted planning permission, we believe that there are far more suitable sites which are available in more sustainable locations. One example of a more suitable site is the land at Britford Lane, Harnham which will be discussed in more detail later in these representations.
- 3.8 We note that paragraph 30 of the Planning for Salisbury Consultation Document sets out that the proposed allocations will only provide two-thirds (approximately 610 dwellings) of the homes which need to be planned for in the Salisbury HMA over the plan period. Whilst we understand a Neighbourhood Plan for the city is underway and some brownfield sites will become available, but should not be relied on for the complexities they present as set out above, we do not believe that the Local Plan Review is robustly planning to meet the



objectively assessed needs of the city. Therefore, at present the plan would not be found sound by an Inspector as it fails the 'positively prepared' test set out at paragraph 35 of the NPPF.

- 3.9 In order to meet the 'positively prepared' test to ensure the plan meets the test of soundness, the Local Plan Review should look to allocate further greenfield sites which can achieve sustainable development. Land at Britford Lane, Harnham is an unconstrained site which is available and suitable for development now. The site lies within the settlement of Harnham which is very well related to Salisbury City Centre. The site is in a highly accessible location with access to an extensive public rights of way network which provide links to Salisbury City Centre and the surrounding countryside. The site presents a key opportunity to helping to accommodate growth in Salisbury and should therefore be considered for allocation in the Local Plan Review.

Question SB4 - What are the most important aspects to consider if these sites are going to be built on?

- 3.10 Consideration will need to be given to many factors to ensure the sites are suitably and sustainably built out. One of the key considerations will be to ensure that the sites are sustainably developed to meet the three objectives of the NPPF set out in paragraph 8.
- 3.11 The sites should be master planned in a way which provides a well-designed and safe environment which incorporates high-quality areas of open space and sustainable connections to the wider area. The development of the sites should make efficient use of land whilst ensuring the density of development respects and enhances the surrounding landscape and existing built form in the site's vicinity. Opportunities should be sought to enhance the biodiversity on site. Also, careful consideration will need to be given the adaptability of homes and opportunities should be sought to reduce carbon emissions and adapt to climate change. We believe sites 6 and 7 can achieve all these requirements, however we have reservations about the development of site 1.
- 3.12 Site 1 would introduce built form in a relatively open landscape, and therefore to reduce its visual impact, much consideration would need to be given to the landscaping of the site. At present, the concept plan proposes some areas of planting, however we do not believe this is sufficient to reduce the harm on the surrounding landscape. Further landscape work should



be undertaken to understand the impact of the development of the site on the surrounding landscape and the required mitigation measures which need to be included to reduce this impact. In addition, thought needs to be given to how the site could be developed to provide a distinctive edge and an 'end' to the built form of the northern part of Salisbury.

Question SB5 – How can these concept plans be improved?

- 3.13 We believe that the area for residential development indicated on the concept plan for site 1 would represent overdevelopment of land. A significant proportion of the site looks to be residential development, with some areas of open space around the periphery of the site. The proposed areas for green infrastructure, particularly in the north, east and west of the site, appear to be an after thought and, in our opinion, do not provide meaningful, good quality open space as required by paragraph 96 of the NPPF. The LEAP/MUGA has been included in an area where there are proposed sustainable drainage swales and basins, obviously the plans are only 'concept' at this stage and there is limited detail, however if these drainage basins do become 'ponds' in the winter months or times of heavy rainfall, this would render the area useless.
- 3.14 We are supportive of the Local Plan Review looking at sites 6 and 7 comprehensively. The location of the Nursery and GP surgery has been well thought out to provide easy access for both existing and future residents. However, the green infrastructure provided on site 6 appears to be relatively limited and relies on the provision of the country park in site 7. Whilst the country park would be a great addition to this area of Salisbury, we believe site 6 should look to provide appropriate green infrastructure within close proximity to future residents and not be reliant on the open space in site 7.
- 3.15 Whilst we are supportive of the creation of a new country park, we believe that site 7 has the capacity to provide additional residential development without reducing the quality of the proposed green infrastructure network. We are supportive of the proposed new footways and cycleways through the sites and we would encourage a further footpath and cycleway to be provided to link the parcel of the residential development to the west of the park and ride to the country park to the south to encourage connectivity through the site and inclusive communities in accordance with the Local Plan Review Sustainability Appraisal Objectives and the NPPF.



Question SB6 – Do you agree with the range of uses proposed? Which other uses should be considered?

- 3.16 We are supportive of the proposed uses on sites 6 and 7. The only other additional use which may be required is a local centre combined with the GP and nursery on site 6. The local centre could include a community centre which would be used for a plethora of uses. The need for this could be scoped out and established through a local facilities and services assessment.
- 3.17 It is essential to encourage suitable economic growth in Wiltshire district, including support for existing businesses. It will be vital to provide economic growth in tandem with housing provision to ensure the District grows and functions sustainably. The Land at Britford Lane, Harnham provides a unique opportunity and could be developed appropriately to support home-based businesses making the site futureproofed and such spaces would be designed to be adaptable as ways of working evolve. Some of which we have already seen as a result of the COVID-19 pandemic.

Question SB8 – Do you agree with the proposed locations for self-build and custom-build housing? Would you prefer alternative locations? If so, please explain.

- 3.18 In practical terms we understand why the self-build and custom-build housing provision has been located in the southernmost section of site 7 and we support this. The number of self-build and custom-build plots provided through the Local Plan Review should be directly reflective of the number of households on Wiltshire's self-build and custom-build register.



4.0 Response to Salisbury Site Selection Report

Comments relating to land south of Downton Road

- 4.1 We support the allocation of the land to the south of Downton Road and the Council's pragmatic identification of the potential to combine several parcels of land in this area to provide a comprehensive development which would continue past growth patterns and contribute to meeting Salisbury's objectively assessed housing need.
- 4.2 Through the allocation of several adjoining sites at land to the north and south of Downton Road, the Local Plan Review demonstrates how it is comprehensively planning to meet the districts housing need whilst seeking opportunities to provide additional community benefits, such as the proposed nursery, GP surgery and country park which piecemeal development would not be able to. The two sites at Downton Road will provide a good contribution to the number of homes required in the Salisbury HMA in a sustainable location.

Assessment of Land at Britford Lane, Harnham

- 4.3 Land at Britford Lane, Harnham was considered in the site selection process under SHELAA reference 3435, however at Stage 2A and 2B it was not taken forward due to the Council considering that the development of the site would potentially be harmful to the landscape setting of Salisbury. A Landscape and Visual Appraisal has been undertaken together with a Heritage Impact Assessment to assess the impact of the development on Salisbury. The Landscape Report concludes that the site has potential for development, particularly in the eastern section.
- 4.4 In a similar vein, the Heritage Impact Assessment concludes that the impact of the proposed development on the city of Salisbury Conservation Area will be slight to minor once the landscaping mitigation has been fully established. The following sets out our assessment of the land at Britford Lane, Harnham in light of the additional landscape and heritage work which has been undertaken.



SHELAA Reference	Site	Accessibility	Flood Risk	Heritage	Landscape	Traffic
3435	Land off Britford Lane, Harnham					

Accessibility

4.5 The site is in a highly sustainable location given its close proximity to Salisbury City Centre which would encourage walking and cycling and reduce the reliance on a private car, in turn encouraging healthy lifestyles in accordance with paragraph 91 c) of the NPPF. Such a sustainable site provides a rare opportunity in a rural district and is in accordance with the approach set out in paragraphs 102 and 104 of the NPPF. The Site Selection Report concurs with our findings.

Flood Risk

4.6 The majority of the site falls within Flood Zone 1 as identified by the Environment Agency and as such is considered to be at a very low risk of flooding. A small section of the north-western corner of the site falls within Flood Zone 2, however the site would be appropriately master planned to avoid this area for development and to ensure there would be no risk of flooding to future residents. As such, flood risk does not prevent the development, or allocation of the site. The Site Selection Report site assessment agrees with this.

Heritage

4.7 The site lies within the boundary of the Salisbury City Conservation Area and as such, a Heritage Impact Assessment has been undertaken to assess the magnitude of impact of the proposed development on the Conservation Area and heritage assets within it. The report sets



out that the impact of the proposed development on the setting of Britford Water-meadows and Churchill Gardens, a component of the City of Salisbury Conservation Area, would be Moderate/Large during the construction/initial operational phase of the development, reducing to Moderate/Slight once the proposed landscaping measures have been fully implemented. The report concludes that the magnitude of impact is assessed as Moderate during the construction phase but reducing to Minor once the landscaping mitigation has been fully established.

- 4.8 The Heritage Impact Assessment also assessed the impact of the proposed development on the Cathedral Church of St Mary, a Grade I Listed Building, and the impact on the Sluice House and Eel Trap North of Manor Ditch which is Grade II listed. The Assessment concluded that the impact of the development of land at Britford Lane would be negligible to minor to both heritage assets.
- 4.9 Therefore, we disagree with the Site Selection Report highlighting the heritage in 'amber' as the Heritage Impact Assessment has demonstrated that the development of the site would have a negligible to minor impact on the Conservation Area and heritage assets in the site's vicinity. We request that the Council review the rating of the site in accordance with the submitted Heritage Impact Assessment.

Landscape

- 4.10 We disagree with the Site Selection Report highlighting landscape in 'red' and discounting the site on landscape grounds. A Landscape and Visual Appraisal has been undertaken and is submitted in support of these representations to demonstrate that the site is suitable for development. The site can therefore sensitively provide a landscape-led development with appropriate mitigation to reduce any harm on surrounding landscape. In particular, careful consideration can be given to the scale and massing of any development on the site to ensure it respects the surrounding landscape.
- 4.11 In light of the above, it is considered that the site was wrongly discounted for allocation on landscape grounds and therefore the Council should review its conclusions. The site should instead be considered as 'amber' as there are a few landscape considerations which would need to be factored in for the development of the site.



Traffic

- 4.12 The Site Selection Report concluded at Stage 2A and 2B that the “*parcel is located within 500m of a congested traffic corridor, and development would risk compounding this issue...*”. Whilst it is recognised that the development of the site would increase traffic levels on the immediate highway network, mitigation measures could be identified to minimise travel demand to ensure that any development of the site is acceptable in transport terms.
- 4.13 We therefore believe that through appropriate mitigation measures, and the sustainable location of the site reducing the reliance on a private car, the development of the site would not result in unacceptable impact on highways. As such, we believe the Council should reassess the rating of the traffic impact from ‘amber’ to ‘green’ providing appropriate mitigation is identified and agreed.

Sustainability Appraisal of Land at Britford Lane, Harnham and Review of and comparison with other potential sites

- 4.14 As we believe the site is suitable for development and should be taken forward for allocation in the Local Plan Review, to demonstrate the suitability of the site we have assessed the site against the 12 Sustainability Appraisal (SA) Objectives. The scoring takes into account the technical work which has been undertaken and is submitted in support of these representations.

SA Objective	Justification for rating	Recommended score
SA1 Biodiversity	- A Phase I ecology survey was undertaken of the site and this confirmed the absence of any protected species on site. The existing ecological value of the site is considered to be low. The development of the site could increase the biodiversity on site through the introduction of new habitats and ecological corridors to encourage protected species to move through the site.	+



SA2 – Land and Soil	The Natural England Agricultural Land Classification Map of the South West Region classifies the site within Class 4 – Poor quality land. As such, the development of the land would have a neutral impact as there would be no loss of good quality agricultural land.	-
SA3 - Water	The site is not understood to be within a source protection zone and therefore negligible effect is expected.	0
SA4 – Air and Pollution	The site is not connected to an AQMA and therefore a negligible effect is found.	-
SA5 - Climate	The site is within close proximity to the City centre and can be easily accessed via footpaths, cycleways and a bus stop. Therefore, this is scored positively as the site is in a sustainable location with sustainable methods of transport readily available. The site also provides opportunity for detailed masterplanning to accommodate climate change mitigation measures.	+
SA6 - Energy	The site provides the opportunity to include energy efficient measures during both the construction phase and following completion when the development is occupied. Therefore, this is scored positively.	++
SA7 – Heritage	The site is located within the Salisbury City Centre Conservation Area which contains several heritage assets. The Heritage Impact Assessment demonstrates how the site could be appropriately developed to ensure it respects and enhances the Conservation Area and avoids any harm to the surrounding historic environment.	-
SA8 – Landscape	It is noted that given Wiltshire’s rural character, the majority of the sites have been identified to have some landscape impact. As per the attached Landscape and Visual, there are opportunities for the site to be developed that would not have a significant impact on	-



		the wider landscape through a landscape-led development incorporating appropriate landscape planting.	
SA9 - Housing		The site has the opportunity to deliver circa 100 homes, including a policy compliant level of affordable housing in a location that is very sustainable due to its close proximity to the City centre and its facilities and services. Therefore, its development would have a significant positive effect.	+++
SA10 Inclusive communities	-	The site has the potential to provide a mix of tenure, size and types of homes to meet local needs, as such this SA objective is scored positively.	++
SA11 Transport	-	The site is very sustainably located in terms of its close proximity to Salisbury City Centre which is accessible on foot, by bike or by bus. The wider area is also accessible via sustainable transport and as such this scores positively. However the impact of the additional traffic on the junction needs to be considered and on balance, there is a negligible impact.	-
SA12 Economic	-	The site would provide a mix of homes which would generate additional population to support the District's economy.	+



4.15 Taking account of the above, the following table provides a comparison between the site and the other allocations proposed in the Wiltshire Local Plan Review.

SA Objective	Land at Britford lane	Site 1	Site 7	Site 6	Site 8	Site 5	Site 3	Site 12	Site 4
Overall site score	5	-1	-2	-3	-5	-6	-7	-10	-11
SA1 - Biodiversity	+	-	-	-	-	-	-	---	--
SA2 – Land and Soil	-	-	--	--	--	0	-	--	-
SA3 - Water	0	--	--	--	-	--	-	--	--
SA4 – Air and Pollution	-	--	--	--	--	-	--	--	--
SA5 - Climate	+	-	-	-	-	-	-	-	-
SA6 - Energy	++	++	++	++	++	+	+	++	+
SA7 - Heritage	-	-	--	--	--	0	-	-	0
SA8 - Landscape	-	-	-	--	-	0	-	-	-
SA9 - Housing	+++	+++	+++	+++	++	+	+	+	0
SA10 - Inclusive communities	++	++	+++	+++	++	+	+	+	0
SA11 - Transport	-	-	--	--	--	---	---	---	---
SA12 - Economic	+	++	+++	+++	+	-	+	+	0



- 4.16 The above assessment against the 12 sustainability appraisal objective's ranks the site as the highest in terms of site sustainability performance when compared to the other sites considered against the SA objectives and as such, we urge the Council to consider the additional information submitted and review the site for potential allocation.
- 4.17 In light of the above SA appraisal of the sites undertaken by the Council, only sites 1, 6 and 7 were taken forward for allocation in the Local Plan Review. We agree with sites 6 and 7 being taken forward for allocation, however we raise some concerns regarding the scoring relating to site 1. As set out previously, site 1 is located to the north of Salisbury City Centre and on the edge of the settlement boundary and therefore we raise concerns over impact on the wider landscape and the separation distances.
- 4.18 We have reviewed the Interim Sustainability Appraisal Annex II – Principal Settlements Site Assessments to understand how the scoring has been arrived at in relation to site 1, in particular in relation to the assessment against SA objective 8 – Landscape. This objective requires development to conserve and enhance the character and quality of rural and urban landscapes, maintaining and strengthening local distinctiveness and sense of place. The assessment on page 81 of Annex II sets out that the surrounding landscape is characterised by large fields bound by low hedgerows with limited tree cover, which allows for expansive long-distance views. Whilst the immediate surrounds are undesignated, the Cranborne Chase AONB is located approximately 7.5km to the west of the site. The impact on this designation and the surrounding landscape have not been fully considered as there is no evidence to this effect and therefore we disagree that the assessment outcome for SA objective 8 is a minor adverse effect.
- 4.19 We would also like to raise some concerns over the stage 4 assessment of site 1 against the place-shaping priorities (PSP) for Salisbury. Whilst we do not disagree that the development of the site would provide additional population to support the District's economy and in particular the city centres facilities and services, we believe that there are more suitable, sustainability located sites which would provide more support for the city centre. With regards to PSP2 – Landscape Setting, this has been identified as a 'strength' of Site 1. We believe this is presumptuous given the limited landscape work undertaken on the site. The assessment even confirms that further effects depend upon effective mitigation and master planning. Therefore, at this stage, until further landscape work has been undertaken, we



believe the site should be scored as ‘neutral’ or ‘weakness’. PSP3 – Separation and distinctiveness is also scored as a ‘strength’, we disagree with this assessment. Whilst we understand an area of land to the north may be designated as a ‘countryside gap’ following the sites allocation, the development of the site will result in a reduction of this gap and therefore the separation distance between Salisbury and The Winterbournes. Such an approach may be acceptable in the future when all other reasonable alternatives have been utilised, however at present with more suitable sites available such as the land at Britford Lane, we do not agree with this site being allocated and indeed being rated as a ‘strength’ against PSP3.

4.20 In addition to the sustainability appraisal objective assessment, we have undertaken the following ‘Stage 4’ assessment of the site against the PSP’s for Salisbury to assist the Council in the plan-making process.

<p>PSP1 City Centre and Visitor Economy</p>	<p>Strength</p>	<p>A benefit for this priority group would be an increased quantum of residents to support the vitality of the facilities and services within Salisbury City Centre. The site is close to the city centre and therefore residents are likely to walk or cycle in frequently to use the facilities and services.</p> <p>Strengths and opportunities are more likely than weaknesses and threats against this SP group.</p>
<p>PSP2 Landscape Setting</p>	<p>Neutral/Strength</p>	<p>Appropriate mitigation measures as set out in the supporting landscape work will be implemented to reduce any impact on the surrounding landscape. The scale and massing of any proposed development would be carefully considered to ensure it respected the landscape setting.</p> <p>Outcomes are likely to be more positive than negative against this PSP.</p>



<p>PSP3 Separation and Distinctiveness</p>	<p>Strength</p>	<p>The River Avon and its tributaries to the north of the site provide a definitive and distinctive separation of Harnham from Salisbury. As such, the development of the site would not result in the merging of two settlements.</p> <p>On balance, strengths and opportunities are more likely than weaknesses and threats against this PSP as the distance and visual separation between two urban areas could be retained.</p>
<p>PSP4 Employment</p>	<p>Strength</p>	<p>The site would generate an increase in the population of the area which would provide additional workforce which would support Salisbury.</p> <p>Strengths and opportunities are more likely than weaknesses and threats against this SP group.</p>
<p>PSP5 Affordable Housing and Infrastructure</p>	<p>Strength</p>	<p>The proposed development of the site would include a policy compliant level of affordable housing and would also support the provision of required infrastructure.</p> <p>On balance, strengths and opportunities are more likely than weaknesses and threats against this SP.</p>

4.21 In summary, it is demonstrated above that the land at Britford Lane, Harnham is a suitable and sustainably located site for residential development to help meet the objectively assessed housing need of Salisbury. The site provides an opportunity to sustain the existing businesses and services within the city centre through increased footfall and spending and the provision of a workforce through additional population. Therefore, the proposed development of the site would also have a positive impact on the local economy. The site would also maintain the separation from Salisbury and distinctiveness of Harnham and provide mitigation measures to reduce any landscape and visual impact. The site would also provide much needed affordable homes in close proximity to the city centre.



- 4.22 The land at Britford Lane is available, suitable, achievable and deliverable in accordance with the definition set out in the NPPF and would provide many benefits to Salisbury and the wider district.
- 4.23 In addition to the land south of Downton Road and the Land at Britford Lane, Harnham, all of the sites owned by Longford Estates are available for development now and are suitable, achievable and deliverable in accordance with the definition of 'deliverable' in the NPPF.



5.0 Response to Empowering Rural Communities

- 5.1 Whilst we encourage Neighbourhood Plans to allocate homes to emphasise a 'bottom-up' approach, we encourage the Council to ensure that new homes which are being allocated and built in rural areas are sufficient to meet local needs.
- 5.2 A Rural Housing Needs Survey will appropriately assess the local housing need and inform the Neighbourhood Plan accordingly. We therefore encourage these to be undertaken to establish the size, type and tenure of homes which are needed to meet housing requirements in different rural locations.
- 5.3 We would like to highlight the lack of provision currently made for rural worker dwellings in the Empowering Rural Communities Consultation Document. Given Wiltshire is a largely rural district, we would expect there to be a Local Plan Policy which allows for rural worker dwellings. Such provision should include dwellings for agricultural, forestry and rural estates workers where it is a need for workers to live at, or close to, their site of work. Policies for rural worker dwellings are common and are included in nearby Local Plan's such as the New Forest District Local Plan and the South Down National Park Local Plan.

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?

- 5.4 Whilst some new rural residential development may be suitable to accommodate 40% affordable housing, others may not be and therefore we do not suggest that this approach is applied to all rural housing sites. Instead, the Council should set a target of 40% affordable housing for schemes where there is an identified need for this level of affordable housing and it would not render a scheme unviable to do so. In other cases 30% affordable housing should be sought on 'major' development, ie 10 units or more, unless it is demonstrated that it is not viable to do so.
- 5.5 In any event, the approach which the Council decide to use must be based on locally identified housing needs to ensure the correct level of affordable housing is being provided. Some of the affordable housing provision should be for rural workers to ensure a sufficient supply of suitable, affordable homes near places of work in rural parts of the district.



5.6 Whilst we note that paragraph 63 of the NPPF allows affordable housing to be sought on sites below the identified threshold in designated rural areas, a practical point to note, is that if schemes as small as five homes are providing affordable homes, the contribution will be minimal and sometimes affordable housing providers are not keen to accept and service one or two affordable homes in a rural location. This is a key factor the Council should consider and where this is the case it may be appropriate to seek a financial contribution to provide off-site affordable housing which is meaningful and more practical.

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

5.7 Whilst we support the protection of the countryside and agree that affordable housing should be one of the reasons for allowing development in such locations, we do not agree that it should be the 'primary purpose' as set out in Revised Core Policy 44. We believe the policy should be worded as follows:

*"At rural settlements, development proposals will be supported where their primary purpose is to provide **both market and** affordable housing to meet **identified** local needs, provided:..."*

5.8 This amendment reflects the Council's requirement to provide the appropriate number, type, size and tenure of housing to meet the objectively assessed need.

5.9 We also believe some amendments should be made to the criteria set out in Revised Core Policy 44. Criterion iii. requires proposals to be within, adjoining or well related to the existing settlement without reliance on travel by private car. Whilst we support that proposals should be well-related to existing settlements to reduce the reliance on a private car, the Council must acknowledge that in a rural district, opportunities which do not rely on a private car for a key mode of transport are limited. Therefore, this criterion should be reworded to reflect this and should aim to 'reduce' the reliance on private car, not eliminate the reliance entirely.

5.10 In addition to the criteria set out in Revised Core Policy 44, we believe that the Council should include a criterion which requires efficient use of land, and where possible prioritising the redevelopment of farmsteads and agricultural buildings in, adjacent or well-related to existing settlements. Longford Estates have several sites which are redundant barns, farm buildings



and dairy's in rural locations which are in sustainable locations would provide suitable 'rural exception sites' for development. These should be considered for allocation in Neighbourhood Plans in accordance with the housing requirements for designated neighbourhood areas set out in the Local Plan Review. Such a strategy is in accordance with the paragraph 65 of the NPPF which requires strategic policies to set out a housing requirement for designated neighbourhood areas. The sites could also come forward as small-scale windfall sites which appears to have been the historic strategy in the district.

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?

- 5.11 We largely agree with the housing requirements for Local Service Centres and Large Villages set out in page 9 of the Empowering Rural Communities Consultation Document as they are based on a methodology which considers 6 factors set out in Appendix 1. This methodology recognises that no two settlements are the same in terms of shape, size, density, or the extent that they are affected by constraints. It also considers that some constraints are more restrictive to housing development than others. In addition to the 6 factors already considered, we believe that the methodology should also factor in any local housing needs assessments which may have been undertaken for Local Service Centres, Large Villages and Small Villages. Whilst this methodology is a good starting point for the housing requirements for smaller settlements, each settlement should take the figure as a starting point and use it as a 'minimum' housing requirement to ensure they are planning ambitiously to meet locally identified needs.
- 5.12 In addition, whilst the figures consider several different factors and constraints to development, we emphasise that each settlement should be considered on its own merits and sites which come forward should be considered on a case-by-case basis.
- 5.13 The New Core Policy on page 10 sets out the housing requirements for neighbourhood area designations in rural areas. We believe that it should be amended to include small sites on previously developed land which are within, adjacent or well-related to existing settlements as a further way which housing requirements for neighbourhood area designations will be met.
- 5.14 With regards to new residential development in Small Villages, as acknowledged at paragraph 30 of the Empowering Rural Communities Consultation Document, some modest



development may be appropriate to respond to local needs and contribute to the vitality of rural communities but generally limited to infill. In addition to infill, the Council should encourage the efficient use of previously developed land, including the reuse of redundant farms and buildings. The reuse of previously developed land would be in accordance with Section 11 of the NPPF and the Local Plan Review's development strategy whilst providing support for small villages services and facilities. It is noted that the 'elsewhere' housing provision in the table on page 9 for Salisbury and Chippenham HMA is quite high due to Wiltshire's rural nature and therefore in these areas we would really encourage the use of previously developed land to help accommodate this identified need.



6.0 **Conclusion**

- 6.1 Paragraph 16 b) of the NPPF sets out that plans should be positively prepared in a way that is aspirational but deliverable.
- 6.2 It is considered that as currently drafted, the emerging Local Plan Review is not positively prepared in accordance with paragraph 35 a) of the NPPF and is therefore unlikely to assist the Government in its objective to significantly boost the supply of new homes as it carries forward previous allocations which are yet to deliver and relies too heavily on brownfield sites coming forward which take a long time to deliver homes, when the need is now.
- 6.3 To remedy this deficiency, it is considered that the Council should allocate further sites of varying size to provide a flexible, responsive and deliverable housing land supply. Both greenfield sites and previously developed land in rural areas including redundant farmsteads and agricultural buildings should be allocated to enable the Local Plan Review to meet its objectively assessed need and be found 'sound' by an Inspector. In this respect, we would point out the suitability of the Land at Britford Lane, Harnham for allocation in the Local Plan Review and the other smaller sites owned by Longford Estates which are suitable to come forward through Neighbourhood Plan allocations or under small-scale windfall sites.
- 6.4 In accordance with the definition of 'deliverable' within the NPPF (2019), the sites are available for development now, they are a suitable and sustainable location for future residential development and they are achievable with a realistic prospect that housing will be delivered on site within five years following their allocation.
- 6.5 In summary, the Land at Britford Lane is available, suitable, achievable and deliverable in accordance with the definition set out in the NPPF and would provide many benefits to Salisbury, including:
- A highly accessible location, which will encourage healthy active lifestyles through walking and cycling and reduce the reliance on a private car;
 - Contribution of a mix of size, type and tenure of home, including much needed affordable housing, to Wiltshire's housing land supply;



- Improved connectivity to the city centre through the provision of cycle and footways through the site, further encouraging sustainability.

6.6 In light of the above and the details provided in the representations, it is requested that the Council review their allocated sites together with their housing requirement and look to allocate additional greenfield sites, such as land at Britford Lane, Harnham to meet Wiltshire's housing need over the plan period and beyond.

RURAL 346

The Emerging Spatial Strategy Consultation Response Form

Ref:

(For official use only)

The overarching 'Emerging Spatial Strategy' paper identifies the proposed overall level of new homes and employment land for each main settlement and rural part of the HMA, over the plan period, together with what remains to be planned for once existing housing completions and commitments have been accounted for.

To view the Emerging Spatial Strategies paper please visit the Council's Local Plan Review Consultation page on it's 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:

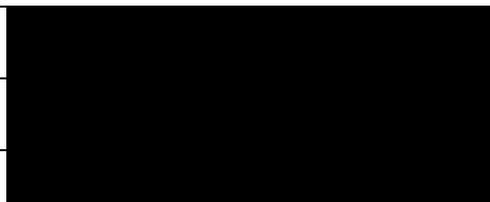
Section One – Personal details

Section Two – Your comments on the Emerging Spatial Strategy. Please use a separate sheet for each representation.

Section One – Personal details

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

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

Postcode		
Telephone Number		
Email Address		

Section Two – Please enter any comments you have regarding the Emerging Spatial Strategy in the box below.

Comment:

Please see attached.

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

YES: NO:

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

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

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

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

Signature:

Date:

Thank you for completing this form.

Data Protection

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

Empowering Rural Communities Consultation Response Form

Ref:

(For official use only)

The paper 'Empowering Rural Communities' looks at ways the Council's planning policies and proposals might be changed for rural communities along with suggesting scales of housing growth.

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

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

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

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

This form has two sections:

Section One – Personal details

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

Section One – Personal details

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

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

Telephone Number		
Email Address		

Section Two – Questions

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

Answer:

No – please see attached.

Do you agree with the approach set out in the suggested policy? If not, why not? How could it be improved?

Answer:

No – please see attached.

Do you think this approach is worth pursuing?

Please explain your answer

Answer:

Please see attached.

What local evidence would be needed to justify applying restrictions like these?

Answer:

Please see attached.

To comment on the housing figure that interests you, please state which area of the county the settlement falls within.

Answer:

Colerne in the Corsham Community Area and Chippenham Housing Market Area

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?

Answer:

Please see attached.

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

Please see attached.

Future notification

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

YES: NO:

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

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Signature:



Date:

9/3/2021

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By Email Only – spatialplanningpolicy@wiltshire.gov.uk

9 March 2021

Dear Sir / Madam

LOCAL PLAN REVIEW (REGULATION 18) CONSULTATION (JANUARY – MARCH 2021 – REPRESENTATIONS ON BEHALF OF [REDACTED]

We write on behalf of our client, [REDACTED] in response to the Wiltshire Local Plan Review (LPR) 'Issues and Options' (Regulation 18) consultation. As illustrated on the attached red line plan, our client owns approximately 18.3 acres / 7.4 hectares of land adjacent to Colerne Rugby Club, north of the C151, and 2.77 acres / 1.12 hectares of land north of the Bath Road at 'Payne's Field', Colerne.

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

- Emerging Spatial Strategy
- Empowering Rural Communities

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

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

The representation is structured in the following sections:

1. Wiltshire LPR Consultation Documents
2. Supporting Evidence Documents
3. [REDACTED] s Land at Colerne – North of the C151
4. [REDACTED] s Land at Colerne – North of the Bath Road at Payne's Field

1. The Emerging Spatial Strategy: -

We are supportive of Wiltshire's preparation of a Local Plan Review and alongside it, the identification of key issues and aspirations for the County. However, we are concerned that the review is being undertaken in a piecemeal way which is not embracing the opportunity to review the adopted Development Plan as a whole,

including the Chippenham Site Allocations Plan (CSAP) and the Site Allocations Development Plan Document (SADPD). We consider that, due to the proposed extent of the Local Plan Review, the other adopted documents in the Development Plan will be considerably changed and that by the time the plan is adopted, the CSAP will be at least six years old and that the SADPD will be nearing the end of its life. For efficiency (in both resources and cost) and simplicity's sake, we suggest that it would be more prudent to assess the functionality of the Development Plan as a whole and review it in its entirety now.

Whilst we generally concur with the Council's initial considerations in relation to the Spatial Strategy (paragraphs 2.4 – 2.13) we consider that sites, especially large scale sites, can be developed to be sustainable by including mixed use development, employment, community benefits and improved public transport along with green and blue infrastructure to encourage active travel. The development of sites in smaller scale settlements can actually improve their sustainability through the introduction of small scale employment, retail and enhanced community benefits whilst increasing footfall to the existing centre. We therefore respectfully suggest that paragraph 2.7 should refer to the opportunity to improve sustainability through development.

The impact of Covid-19 has certainly changed the way we live and work and this does provide the opportunity for the reconsideration of spatial planning. Settlements, and particularly smaller scale settlements, should be encouraged to embrace this change to limit out commuting further by making provision for community work hubs and meeting facilities with fast broadband in smaller settlements.

Whilst brownfield sites play an important role in contributing to overall housing need, their contribution should be to compliment the strategic housing sites allocated in the Local Plan, rather than to be relied upon to meet the housing targets. It is unclear how the LPR's Brownfield Targets will limit the pressure of development on greenfield sites as it does not provide an incentive for these sites to come forward. Indeed, brownfield sites generally take longer to be redeveloped due to the time required for remediation and decontamination.

The Council's 2019 Brownfield Land Register demonstrates that only 3,613 dwellings are potentially available to come forward on previously developed sites with only 45% of the sites having achieved planning permission since the Government requirement to produce a Register. A target for brownfield sites in the LPR is unlikely to change the speed of these sites coming forward and we suggest that Neighbourhood Development Plans could be an appropriate platform to positively plan for bringing forward smaller scale brownfield sites to complement the Local Plan allocations.

Delivery Principles – Neighbourhood Planning

Whilst the Wiltshire community has to a large extent embraced Neighbourhood Planning, there are still parishes that have not sought to produce a Neighbourhood Plan. Consequently, there is concern that the LPR's reliance on sites being identified and coming forward through this mechanism to address the recognised need is aspirational. Therefore, it is considered that it is the responsibility of Wiltshire Council through the LPR to allocate sites outside of the principal Settlements and Market Towns where Neighbourhood Plans are not being produced, or where Neighbourhood Plans do not allocate sites for residential development to meet their recognised local housing need.

Additionally, we do not consider the need to phase the construction of Greenfield sites as, logistically, large sites do not come forward in one lump due to the nature of construction. Indeed, due to Covid restrictions on construction sites, the building out of sites has decelerated due to socially distanced working requirements. By putting the brakes on large consented schemes, that have undoubtedly had many years of promotion and planning, only seeks to delay deliverability and constrain the market resulting in increased property prices. Such interference is unhelpful.

Delivery Principles – Brownfield Target

Whilst it is laudable for the Council to place emphasis on the development of previously developed land these should be complimentary to the strategic sites allocated in the Development Plan which provide more certainty in addressing the housing need. It is unclear as to why the proposed Brownfield Target only covers the ten year period 2021-2031 and not the plan period as it is possible that it may take a longer period for these sites to come forward. A situation that is unlikely to arise with greenfield sites. As is acknowledged at Para 3.9, large windfall sites are more infrequent and much harder to predict therefore, to ensure the certainty of housing delivery, caution should be given to a brownfield target and an over reliance on previously developed sites coming forward.

Paragraph 11 of Appendix One: The Role and Function of Brownfield Targets states that ‘*a large pool of brownfield sites will reduce requirements for new greenfield land to be identified*’ however, as evidenced by the Brownfield Register, just because a brownfield site has been identified, it does not necessarily correlate that the site is deliverable and will be developed. For brownfield sites to be added to the supply of deliverable land for housing, “*the site should be available now, offer a suitable location for development now and be achievable with a realistic prospect that housing will be delivered on the site within five years*” NPPF definition of deliverable.

Additionally, there is concern in relation to the Brownfield Target calculation limiting permissions to sites within a certain range of units depending on the settlement’s status in the Settlement Hierarchy (Para 15 Appendix One) as this is contrary to positive, aspirational planning and the presumption in favour of sustainable development as contained in the NPPF. Also, as the calculation is based upon previous permissions, there is an assumption that similar previously developed sites are available within the settlement which is a flawed assumption to make, especially when considered against the number of sites currently on the brownfield register and the expectations contained in the table at Para 17 Appendix One.

Housing Numbers

The NPPF (2019) sets out that the Standard Method for calculating Local Housing Need (LHN) should be used to identify a *minimum* annual housing need figure (paragraph 60), and PPG guidance reiterates that the Standard Method does not provide a housing requirement figure in itself (paragraph: 002 Reference ID: 2a-002-20190220). It is therefore clear that the calculation of LHN is a starting point in identifying the number of homes that must be planned for through the Wiltshire LPR. In this instance, the Standard Method generates a minimum housing need of 40,840 dwellings over the 20 year Local Plan period (2016-2036).

Whilst the Standard Method takes into account projected household growth, the LHN Assessment (April 2019) undertaken for Swindon Borough Council and Wiltshire Council takes into account longer term migration trends and employment growth amongst other factors. The Assessment concludes that to ensure that there will be sufficient resident workers to align with the job growth identified by the 2017 EDNA forecast, it would be necessary consider increasing the minimum LHN by up to 5,700 dwellings with most of this increase (at least 85%) being in Wiltshire. This takes the housing calculation to 45,630 dwellings in Wiltshire over the Plan period.

The PPG makes clear that the Standard Method calculation does not predict the impact that future government policies, changing economic circumstances or other factors might have on demographic behaviour and that therefore, there will be circumstances where it is appropriate to consider whether actual housing need is higher than the standard method indicates (paragraph: 010 Reference ID: 2a-010-20201216). The Emerging Spatial Strategy is therefore supported insofar as it recognises the need to plan for a higher figure than the LHN and moreover, that the alternative development strategies for each of the Housing Market Areas (HMAs) should be based on the higher end of the range (45,630 homes).

Chippenham Housing Market Area (HMA)

We support the findings of the interim sustainability appraisal that the Chippenham Expanded Community option performs the best in sustainability terms however, we are concerned that due to the funding of the Future Chippenham road scheme and Melksham bypass (which will encourage additional vehicle trips) the Melksham focus is the preferred option. Paragraph 3.34 acknowledges that the increased level of housing need is translated directly into an increase in housing requirements at rural settlements however, there is concern that the result is a scale of growth equivalent to past rates of housing development which is not reflective of the ever growing housing need and affordability gap.

We also consider that there is a policy disconnect in relation to the Future Chippenham road consultation and the LPR consultation. Whilst the Future Chippenham consultation closes on the 12th March, it is somewhat surprising that the LPR makes limited, if any, mention of this proposal. It is considered that, due to the Government grant of £75million to deliver the road scheme, the future direction of growth for Chippenham has already been decided.

Empowering Rural Communities

We consider that the 'Empowering Rural Communities' paper downplays the importance that Local Service Centres and Large Villages contribute to meeting the County's residential and employment needs and that it is a flawed approach to take for these higher order settlements. Indeed, some Local Service Centres such as Pewsey contain more facilities (eg train station and secondary education) than the Market Towns. The onus should not be placed on Neighbourhood Plans to meet the identified housing requirements as town and parish Councils are not equipped or, in some cases reluctant, to embrace such a challenge.

Whilst it is welcomed that guidance will be prepared by the Council to support Towns and Parishes on the selection of the most appropriate sites for development, there does not appear to be a policy requirement for these needs to be met. Additionally, a single combined policy devalues the settlement hierarchy and does not provide a positive vision for the future of each area, contrary to NPPF Para 15.

We are concerned with the ambitious blanket target of 40% affordable homes on all new schemes of more than five dwellings in the rural area as this goes far beyond the minimum 10% requirement of NPPF Para 64 and fails to recognise the level of affordable housing actually required in the area. Indeed, this target may result in fewer sites coming forward for development as local communities may resist such levels of social housing.

Whilst one policy reference for assessing planning proposals to meet local housing needs at rural settlements simplifies the Local Plan Review, it is inappropriate to consider Local Service Centres and Large Villages under the same umbrella as Small Villages due to their varying levels of population, facilities and services (Para 20). The NPPF Para 67 recognises the important contribution that small and medium sized sites can make to meeting the housing requirement of an area and it is considered that due to the level of housing required to be met by the 'rest of the HMAs' (1,435 dwellings at Large Villages in the Chippenham HMA), this necessitates the need for additional allocations to be made now outside the Principal Settlements and Market Towns.

Rural Settlements, by their very nature, have limited access to public transport therefore the revised Core Policy 44 (iii) requirement of proposals not being reliant on travel by private car is aspirational but unfortunately considered unachievable due to the level of public transport provision in the rural settlements. We therefore suggest that the policy is amended to remove this requirement.

Additionally, we consider that an arbitrary cap of 20 dwellings per settlement as proposed in Core Policy 44 (v) will prevent suitable and sustainable sites from coming on both greenfield and particularly brownfield sites

where densities are likely to be higher if apartments are considered. This is in conflict with NPPF Para 122 in that it fails to support development that makes efficient use of land. This draft policy is also contrary to NPPF Para 123 in that it will encourage lower density development and will not ensure that developments make optimal use of the potential of each site.

Due to the large requirement for additional dwellings in the Local Service Centres (1,070 dwellings in Salisbury HMA) and Large Villages (1,435 dwellings in the Chippenham HMA) detailed in the Table on Page 9, we consider that the LPR should seize the opportunity now to make additional housing allocations in these mid tier settlements in the form of additional allocations. Due to the delay in the adoption of the Core Strategy, subsequent CSAP and SADPD, we suggest that the LPR should address the housing requirement across all tiers of settlements now due to the levels of housing need identified rather than wait for a review of the SADPD.

In conclusion, we consider that the housing requirements for the Local Service Centres and Large Villages should be higher as it is not appropriate for these mid-tier settlements to be grouped with small villages as they benefit from a far greater level of services and facilities and are therefore more able to receive sustainable growth.

2. Supporting Evidence Documents

Local Housing Needs Assessment (LHNA) - Swindon Borough Council and Wiltshire Council (Opinion Research Services April 2019)

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

Local Plan Review Interim Sustainability Appraisal - January 2021

It is noted that the Interim Sustainability Appraisal (ISA) tests a range of local housing needs from 40,840 to 45,600 dwellings for the period 2016 to 2036. The Sustainability Appraisal assessment of the alternative development strategies for the HMAs concludes that there would be no adverse effects of such significance that would prevent the higher figures (of each alternative strategy) from being progressed. Moreover, it concludes that a higher figure level would be more robust when planning for the longer term and has a greater level of contribution to meeting national and local needs for more homes. We are therefore supportive of the LPR's approach in taking the higher level as a basis for developing the spatial strategy.

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

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

Chippenham HMA: Formulating Alternative Development Strategies

The acknowledgement that Box, Colerne and Rudloe have together accommodated less than a hundred additional homes over a decade is welcomed, as is the recognition of the housing need at these settlements

with the expectation that they will accommodate a greater scale of development. However, we disagree that the recognised under delivery and need does not justify an exceptional circumstance for an assessment of the green belt. If there is a need for additional housing in Colerne, due to local connections, then this need should be met at Colerne and not at other settlements.

It is recognised at paragraph 69 of the Formulating Alternative Development Strategies for the Chippenham HMA that development at the Corsham Community Area has been much less than that forecasted over 2016-2036 and that by rolling forward the current strategy would require housing rates at the Corsham Community Area to increase by 54%.

The challenges associated with increasing the housing delivery within the Chippenham HMA are noted (Para 78) as a substantial proportion of the land necessary to achieve higher rates of development has yet to be identified. The LPR Review therefore provides us with an opportunity to table our clients land at Colerne as being available to meet the recognised housing need.

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

3. [REDACTED] Land in Colerne – north of C151

Our client's land north of C151 in Colerne is a greenfield site extending to circa 18.3 acres / 1.12 hectares. The site, which is predominantly flat and currently in agricultural use, is adjacent to the Rugby Club and south of the area known locally as 'Three Hangars'. Further north of the site lies Colerne airfield and Azimghur Barracks beyond. It is considered that our clients land could be developed for employment and community buildings, providing a community work hub with meeting rooms and cafe for the wider community in addition to new public open space provision. However, it will be necessary for an element of housing to be part of any proposals for this site to enable these uses to come forward as a mixed-use scheme.

Development north of the C151 could enhance the transport infrastructure in proximity of the site and include an active travel route through the site providing improved connecting links between the village and the airfield and barracks. Development in this location could facilitate a reduced speed limit along the C151, provide new pavements and safe pelican crossing points for pedestrians to the primary school and to the facilities in the village. Parking associated with the community hub could provide electric charging points, with further electric charging points provided throughout the residential development.

4. [REDACTED] Land in Colerne – North of Bath Road at Paynes Field

'Payne's Field', north of Bath Road, on the western perimeter of Colerne village extends to circa 2.77 acres / 1.12 hectares and abuts residential development to the east with Colerne recreation grounds immediately to the north and west with the villages' allotments further west. The site is acknowledged to be a sustainable location and, despite its Green Belt status, should be allocated for development to meet the long term housing needs of the village in the absence of suitable sustainable alternatives.

Due to the Local Plan Review, now is an ideal time for the County to make amendments to the Green Belt boundary in this location to enable the site to come forward expeditiously for housing. This approach is supported by NPPF Para 136. Payne's Field is an unconstrained greenfield site in a sustainable location, not burdened by flooding, bats or historic assets and does not fulfil the five criteria of Green Belt designation. It is

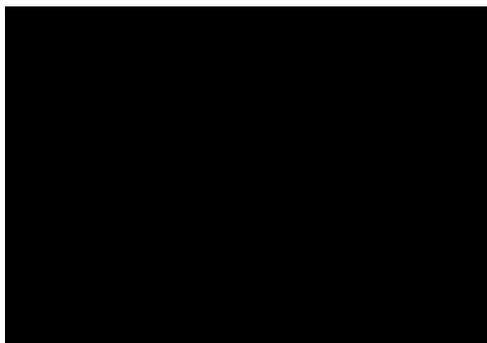
therefore considered that exceptional circumstances exist for the site's removal from the Green Belt and a residential allocation be made in this location.

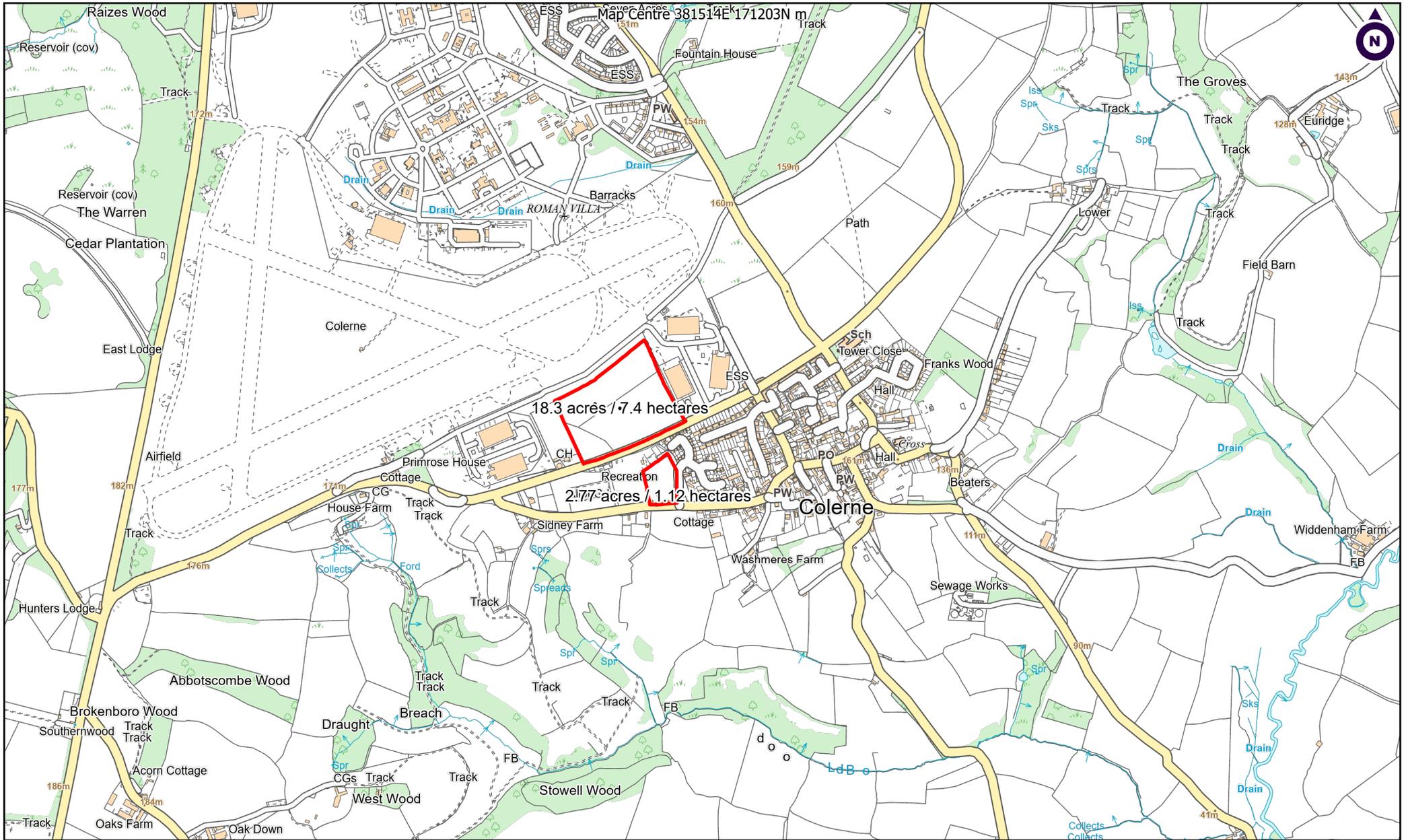
Summary

These representations seek to encourage the authority to make additional allocations outside the Principal Settlements and Market Towns to address the identified local housing need in the Large Villages in the Chippenham HMA. Both sites, which are considered to be sustainable, have the potential to become a natural logical extension to the Large Village of Colerne to help meet the established local housing need. [REDACTED]'s land at Colerne provides the village with the opportunity for a community work hub, meeting room facilities, community café, public open space and residential development supported by electric car charging points, active travel routes and enhanced biodiversity.

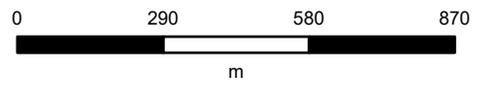
We are pleased to have had the opportunity to comment on this stage of the Wiltshire Local Plan Review. We trust that the information provided assists the Council with its ongoing work as part of the LPR process. However, please do not hesitate to contact me should you have any queries. We look forward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

Yours faithfully





Client:



Scale 1:15,000

@A4

Date: 3/3/2021

Drawn By: SB

Dwg no:

RURAL 347

4th March 2021

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

Planning Policy Team,
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South Walks House,
Dorchester,
Dorset,
DT1 1UZ

Dear Sir/ Madam,

**WILTSHIRE LOCAL PLAN REVIEW
DORSET COUNCIL LOCAL PLAN OPTIONS CONSULTATION**

I write further to the publication of the above documents to provide you with written representations. Gleeson Strategic Land Ltd (Gleeson) are in discussions with the owners of the land edged 'red' on the enclosed site plan and will shortly be in control of this land (the Site). These representations are therefore framed with the Site in mind.

Whilst the Site directly abuts Shaftesbury which is within Dorset, it actually falls within Wiltshire. It is therefore timely that both Local Plans are being reviewed simultaneously, since it provides an opportunity for these representations to respond to both consultation exercises, taking into account the requirement for the two authorities to engage under the Duty to Cooperate.

The Site

The Site is situated on the north eastern edge of Shaftesbury, which falls within Dorset (formerly North Dorset). The Site is c.11ha and is bound by the A350 to the east (to which there is direct access) beyond which is Littledown Business Park and the Blackmore Down housing development. Wincombe Business Park lies to the south, whilst the Site is encompassed to the north and east by Shaftesbury Solar Farm (which whilst falling within the same land ownership are proposed to remain as a solar farm, particularly since permission has recently been granted to extend the planning permission from 25 to 40 years). It is fairly unconstrained in

landscape terms, as demonstrated by the 'North Dorset Strategic Landscape and Heritage Study Stage 2 Assessment' Shaftesbury' (LUC, 2019) which concludes that Assessment Area J within which the site falls, has a moderate landscape sensitivity overall, and a low to moderate heritage asset sensitivity. We estimate that site would be able to accommodate up to 250 homes.

The Site is in agricultural use and is generally fairly level, but with some undulations. It falls within Flood Zone 1 and lies outside of the AONB. There is a pedestrian footway up to the boundary of the site and it is within walking distance of shops, services and other facilities. Vehicular access issues have been considered and there is scope to provide a junction directly onto the A350. There is a Public Right of Way, DSTM4, along the eastern boundary of the Site which connected to NI/3, which in turn leads directly to the centre of Shaftesbury.

Dorset Local Plan

The Dorset Local Plan Consultation documentation sets out how Shaftesbury is a Tier 2 settlement within the settlement hierarchy, and Shaftesbury is one of five such settlements within the North Dorset Functional Area. Tier 2 settlements are sustainable, providing a range of facilities including schools, shops and services, employment uses. In addition, Shaftesbury is located along the A350 and A30 corridors providing access to other settlements to the north and south in particular, whilst also being in close proximity to Gillingham, another Tier 2 settlement. It is agreed that such settlements should therefore be the focus for growth. The Local Plan also notes that Shaftesbury and Gillingham provide services and facilities that serve residents in the northern part of Dorset and parts of Wiltshire east of the town.

Shaftesbury is a fairly constrained settlement as acknowledged within Section 30 of the Local Plan, which states that:

- The hilltop location creates constraints, with steep slopes to the south, west and north of the town centre with further development in these locations being impracticable, harmful to landscape views or harmful to the heritage of the town

The constraints are also evident from the adopted North Dorset Plan Proposals Map, which highlights areas of AONB encompassing the settlement on three sides, SNCIs to the north and west, and SSSIs to the west. There is also a large number of listed buildings and Scheduled Monuments within the core and along the southern boundary of Shaftesbury itself.

Thus, whilst the settlement is sustainable, it is constrained. This is noted at paragraph 30.3.3 of the draft Plan, where the Council acknowledge that there are limited opportunities remaining to expand without impacting on the town's character. As such the draft Plan states that only modest expansion is proposed at Shaftesbury, with more growth directed to Gillingham and Sherborne.

Alongside this however Paragraph 30.2 goes on to set out 'The Vision' for Shaftesbury which includes:

- A range of shops, services and community facilities so that the town functions as a key service centre, meeting the need for current and future residents;

- Retain and enhance its distinctive natural and historic character;
- Maintain and improve local employment opportunities;
- Have an improved network of green infrastructure – particularly linking the town's slopes with the wider landscape;
- Improve linkages with Gillingham including through the provision of a new link road from the B3081 to the A30 at Enmore Green.
- Have improved and safe pedestrian and cyclist routes around the town.

These align with the list of objectives under the 'Developing Spatial Strategies for the Other Functional Areas' heading forming part of the Development Strategy section of the draft Plan, which seek: to concentrate growth at larger settlements; to locate new development where it would or could be made accessible through a choice of transport modes; and, protect environmental, character, history and landscape settings.

These objectives are ambitious and it is considered that in order to achieve them development of a more substantial, rather than modest, scale should be proposed at Shaftesbury.

Therefore, whilst both the Vision for Shaftesbury and the spatial options are supported, this is only in part as it is considered that these objectives have not been suitably translated into the associated policy for the North Dorset functional area Policy under DEV 4: Growth in the northern Dorset functional area which seek major growth at Gillingham and Sherborne, including urban extensions, with modest expansion at Shaftesbury. The 190 units proposed are not considered adequate to achieve the objectives, nor other community facilities such as those listed at Policy SHAF4: Land South of Wincombe Lane, which is seeking a primary school, community hall or GP Surgery. The distribution is also heavily weighted towards Gillingham and Sherborne with c.2,000 and c.1,500 houses proposed respectively and 1,800 homes forming part of a southern extension to Gillingham which could have delivery implications. Hence consideration should be given to a wider distribution of growth on deliverable sites.

Thus, whilst limited housing opportunities form part of proposals map for Shaftesbury, we have identified a further opportunity for growth at Shaftesbury which is in a sustainable, unconstrained location, namely the Site. Whilst this falls within Wiltshire, from a sustainability perspective this Site should not be discounted, and the two neighbouring authorities should work collaboratively in accordance with the Duty to Cooperate to consider the scope for expansion in this location. This would help meet the Vision for Shaftesbury, help deliver infrastructure including social infrastructure, align with the spatial options relating to greenfield development listed above whilst also distributing development across the main settlements within the Functional Area rather than focusing and relying on housing growth at just two settlements.

Wiltshire Local Plan

The spatial strategy aligns with that for Dorset, directing the primary focus of development at the principal settlements. These are the three Principal Settlements of Chippenham, Salisbury and Trowbridge, along with a number of Market Towns, the latter of which are described as having the potential for significant development to increase jobs and homes, help sustain / enhance services and facilities and promote self-containment and

sustainable communities. The scale of Shaftesbury is akin to a Market Town, however no growth is proposed here on the Melksham side of the boundary which should be revisited.

Delivery Principle 3 within the Emerging Spatial Strategy states that:

- *The Council will allocate land for development through the Local Plan where it is necessary to do so. It will be necessary to do so to ensure the scale of the County's housing and employment needs are met and to ensure a supply of deliverable land. It will also do so where there are large or complex sites or where land for greenfield development crosses the boundaries of neighbourhood plans or into rural parishes that adjoin an urban area. (My emphasis).*

This suggests that the Council may seek to allocate land for greenfield development across neighbourhood plans or rural parish boundaries, but it is not clear as to whether this also applies to adjoining authorities. If this is indeed the case, then it is welcomed and supported, as it would help to provide housing development in sustainable locations such as the site in question, helping to create a sustainable pattern of development whilst contributing to meeting addressing climate change, particularly since the Council have declared a climate emergency. If it is not, then Delivery Principle 3 should be revised to factor in cross-boundary working and allowing the Council to allocate land that adjoins an urban area, whether or not that urban area lies within Wiltshire.

Whilst the site lies adjacent to a sustainable settlement, the Council's position is that Neighbourhood Planning would deal with development here. However, whilst there is a Neighbourhood Plan in place for Shaftesbury, this only applies to the area that falls within Dorset. It is unlikely that a Neighbourhood Plan would be produced which addresses the Site.

We would also note that the site falls within the Tisbury Community Area, where the vast majority of land is AONB, apart from two small areas to the north and east of Shaftesbury within which the Site lies.

Taking into account Shaftesbury's position within the settlement hierarchy, the constrained nature of the settlement and the Tisbury Community Area, in the interests of achieving sustainable development whilst it is proposed the Site would need to be dealt with through Neighbourhood Plans, an allowance in policy terms should allow for development to take place in exceptional circumstances such as this.

Summary

We acknowledge that paragraph 11 of the NPPF states that for plan-making, plans should positively seek opportunities to meet the development needs of their own area. However, preceding this paragraph is paragraph 8 which sets out the three overarching objectives for achieving sustainable development. As you are aware these are economic, social and environmental objectives and these should be borne in mind when formulating plans.

In our view this may mean that spatial strategies should be considered more flexibly and may require plan-makers to compromise in seeking to achieve the three objectives underpinning sustainable development.

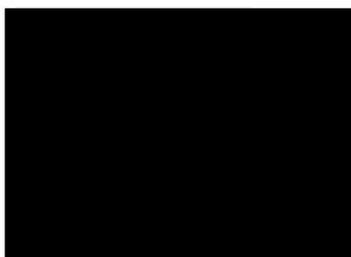
One such compromise which should form part of Duty to Cooperate discussions, could be apportioning housing numbers to the most sustainable settlements and to land where there are limited constraints, whether the land in question falls within an authorities' own or neighbouring authorities' jurisdiction. The Site is one such example, since it involves land that is in a sustainable location, adjacent to the settlement boundary of a higher tier settlement in Dorset and within walking distance of shops and services, but falls within Wiltshire.

Simply due to the fact that the site falls on one side of the boundary and therefore suddenly becomes a Rural Community where limited growth is proposed due to sustainability factors and can only be dealt with through Neighbourhood Planning, seems illogical and not considered to align with the three sustainability objectives set out in the NPPF, particularly where a site may be in a sustainable location but due to anomalies in the plan making system cannot come forward for development to help meet housing requirements.

This could help provide a number of benefits. It is noted that a common issue with the main settlements (para 2.3.16 of the draft Dorset Local Plan) is an elderly/increasingly ageing population; a shortage of affordable housing; limited facilities and / or infrastructure and out-commuting. Additional housing growth at Shaftesbury, which we estimate could be up to 20 homes, could provide a mix of housing and in particular a policy compliant level of affordable housing. It would also help sustain local shops and services whilst provide contributions towards social infrastructure. An element of the site could also be reserved and ultimately help deliver, an A350 eastern bypass corridor, land for which continues to be safeguarded.

We trust these comments are helpful, but should you wish to discuss them further then please do not hesitate to contact me.

Yours sincerely



RURAL 348

Chippenham Draft Local Plan to 2036

Why proposals for development of the Avon and
Marden Vale should be withdrawn

9th March 2021



CAUSE

Chippenham Draft Local Plan: -
Why proposals for development of the Avon and Marden Vale should be withdrawn

Front cover image: View from Bencroft Hill towards the East of Chippenham

'CAUSE' is the Campaign Against Urban Sprawl to the East (of Chippenham).

CAUSE has wide support, including from residents of Chippenham and Bremhill Parish. Our online petition has over 5,000 signatures.

The contact for this paper is info@causewiltshire.com



View from Bencroft Hill towards the proposed development (artist's impression)

Chippenham Draft Local Plan: -

Why proposals for development of the Avon and Marden Vale should be withdrawn

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1. Executive Summary

This Section to be included in the Further Comments section of the Chippenham Principal Settlement consultation response form

1.1 Chippenham Site 1 Should not be a Selected Site for Development

Why? – Simply there would be huge environmental and Climate Change impacts from Wiltshire



Socially distanced protest at Black Bridge - 200 attendees

Council selecting Site 1, including destruction of two river valleys, hundreds of acres of productive farmland and destroying natural capital causing an ecological catastrophe. The Local Plan is written with the stench of predetermination of site selection to support the Council's HIF bid for a £75m road. In the document following we show how Site selection, place shaping priorities and the Sustainability Appraisal all lead to the conclusion that Site 1 is not suitable for development.

1.2 The Consultation is Confusing, Complex and leads to a Huge Democratic Deficit

There are nearly 100 documents for the public to read, questions are scattered amongst documents without any clear guidance to where they are. Response forms in Word are limited by text box sizes. Online the inability to save partially completed responses. Documents are misleading and many contradict each other. The whole consultation (while understanding the issues caused by Covid) can only really be completed by someone with access to internet and good computer skills. Documents are not available at Council offices for non-internet users to read. Most seriously, two consultations on linked subjects are running at the same time, causing confusion with the public on even which consultation they are responding on. There is a demonstrable absence of democracy and inclusivity in the consultation process.

1.3 Housing Targets in Wiltshire are too high

The housing targets to 2036 for Wiltshire are too high. They are based on 2014 housing projections, when the national population was growing much faster than currently. In addition, Wiltshire Council have, for their own reasons, increased the housing target by nearly 5,000, apparently to promote

growth of local jobs. But the reality is that 64% of workers who live in Chippenham don't work here, so the balance should be redressed by recruiting more local residents for the growth in local jobs, and not by building ever more houses for out-commuters.

1.4 Housing Targets in Chippenham are too high

From the Wiltshire housing target, far too many houses have been allocated to Chippenham. The numbers are double previous targets and way above what has been outlined by the 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 more land for development is premature. 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 new suburbs are proposed which will turn Chippenham into a mini-Swindon. An additional 15,000 cars will increase traffic very significantly on Chippenham's road network.

1.5 The Plan Takes Little Account of the Climate Emergency in Wiltshire

Wiltshire Council's current Local Plan proposals would substantially increase the county's carbon/greenhouse gas emissions and lock in emissions for years to come.

Wiltshire Council proposes a Place Shaping Priority for Chippenham that assists site selection to be ready access to the River Avon. Therefore, sites along the river are favoured even though there are huge impacts on climate and the environment. Flood risk is increased on land not suitable for SUDS.

Wiltshire Council 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 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.

Nearly 1,500 acres of farmland will be destroyed. The carbon footprint of destroying prime countryside to create this massive development has not been calculated, but will be huge, and completely at odds with the aim of becoming carbon neutral by 2030.

1.6 The Plan is Premature and Yesterday's Thinking with the Consequences of a post Covid Economy

As a result of the Covid pandemic, our priorities have changed in ways we could not have imagined a year ago. Population growth has stalled. Road traffic in Chippenham has reduced as we have switched to Working from Home. We have become even more appreciative of our countryside as we have exercised locally on foot and bicycle. And as a nation we aim to grow back "greener" by reducing our carbon footprint. Importantly Brexit has led to a greater focus on utilising our productive farm land, buying local and reducing food miles. Wiltshire Council must reflect on these changes before destroying the countryside for all the future generations who choose to live in and around Chippenham.

1.7 There are Brownfield and Town Centre Opportunities not Evaluated

Focus should be placed on the regeneration of the Chippenham town centre and location of many new homes on brownfield sites. The Town Centre could well provide housing opportunities as shopping patterns may irreversibly change to online and cashless shopping. This needs to be reviewed and a strategy built before development sites are chosen.

1.8 The Distributor Road Has Been 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, from our research, is confused. Some think it is a bypass, some think the road can be built with no housing. Chippenham Town Council, Calne Town Council and Bremhill Parish Council have all passed resolutions opposing any distributor road at all.

1.9 The Sustainability Appraisal is Fatally Flawed

It is scandalous that this almost incomprehensible mass/mess of Sustainability Appraisal information is thrown at the public in such an indigestible form. Development strategies are postulated with small gobbets of text about huge development areas with no back up evidence. 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" on Sustainability, glossing over environmental destruction while trumpeting unproven economic benefits.

1.10 There is a plan to extend building to up to 18,550 homes past the plan period

The housing capacity in the sites is up to 18,550 homes and the Council state in paragraph 31 of Planning for Chippenham document "The size of these areas is likely to see construction continuing

Chippenham Draft Local Plan: -

Why proposals for development of the Avon and Marden Vale should be withdrawn

beyond the end of the plan period (2036). This scale of proposals allows us to set in place a new long-term boundary to the town. It also provides long term certainty to infrastructure providers and other service providers."

1.11 Employment is Hardly mentioned

The previous mantra of "employment led development" has been brushed aside by Wiltshire Council who are now proposing large suburbs with no employment plan. Employment land is also proposed well away from the A350 corridor, unattractive for employers and adding to the carbon footprint. This plan reinforces at least 65% of the Chippenham workforce out commuting, mainly by car, adding to local road congestion.



Marden Vale ridge at New Leaze Farm. River Marden to left, North Rivers Cycle Route to right. Derry Hill in background

1.12 Existing Residents Are Ignored

Existing residents are hardly mentioned at all within the plan. All the economic benefits and new infrastructure talked about in new housing areas, not existing ones. Local people are stakeholders in the Town's future and this plan ignores that localism.

These plans destroy the environment for the residents of Pewsham, London Road and Monkton Park, becoming 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 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.

Chippenham Town Council have rejected the Local Plan. Residents through their councillors in neighbouring Bremhill Parish and Calne Town have also opposed this plan in its entirety. No residents have been asked what they want their town to look like in the future. CAUSE has organised a petition to enable resident's voices to be heard with nearly 5,500 signatures opposed to this building and a distributor road.

1.13 There is a More Positive Vision for Wiltshire and Chippenham

We suggest a vision for the County farms engaging with the local community and increasing the sustainability of the local environment. We also suggest the Marden Valley is protected and enhanced, retaining the existing varied green means of accessing Chippenham and Calne. We

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believe that Wiltshire Council can work with rural communities to build better infrastructure and services in rural centres alongside small scale development to build a sense of place in villages. We also believe an appropriate level of housing can be delivered in Chippenham utilising town centre regeneration and brownfield development.

We must protect and cherish the natural capital of our open countryside in Wiltshire.



Cycle track near R Avon towards New Leaze farm

2. Comments on the Emerging Spatial Strategy

WITH A PARTICULAR FOCUS ON CHIPPENHAM

This section to be included as the response to the Emerging Spatial Strategy consultation response form

This section provides comments on the following supporting documents:

The Emerging Spatial Strategy report

Swindon BC and Wiltshire Council Local Housing Needs Assessment 2019

Formulating Alternative Development Strategies - Chippenham HMA

1. The minimum number of homes required for Wiltshire using the Government's "standard method" gives a baseline rate of 1,497 households/year or 29,940 over the period to 2036. This approach is flawed because:
 - a) The "standard method" uses household projections based on 2014 and published by ONS in 2016 which is for 210,000 houses/year. A subsequent projection based on 2016 and published in 2018 gave a much lower figure and, as a consequence, MHCLG¹ stated that 2014 projections should continue to be used as the basis for calculating housing requirements. However, household projections based on 2018 are now available from ONS and are very similar to the 2016 projections, at 160,000 houses/year, thus discrediting the use of 2014 as the baseline. If either the 2016 or 2018 projection were used this would result in a 24% lower baseline housing target of 22,750 households to 2036. ***WC should push back on the MHCLG requirement to base the "standard method" on outdated projections.***
 - b) Furthermore, the UK population has recently stopped growing – the birth rate has declined and the impact of Brexit and Covid has reduced immigration. We have seen other countries, such as Japan and Spain, where the population has declined, which has led to an increasing amount of empty housing with no one to fill it. Whilst it is difficult to project forward from the current uncertainties for population growth in the UK, we should resist committing to the certainty of the destruction caused by concreting over swathes of countryside to build housing, which might not be needed in the future. ***Given the current uncertainty, we recommend a more cautious approach to increasing***

¹ MHCLG = Ministry of Housing, Communities & Local Government

the housing need figures at this juncture. This would avoid the risk of committing now to the irreversible destruction of more of our beautiful Wiltshire countryside than may ultimately be necessary.

2. The Government's "standard method" requires an adjustment to the baseline figure to take account of affordability. The theory is that if an area has insufficient houses then they will be priced at a premium relative to average earnings called the "workplace affordability factor". For Wiltshire this has been calculated to be 9.82 and results in a 36% uplift on the basic housing needs figure of 29,940, increasing it to 40,840. But this concept is flawed since Wiltshire has a significant population who work for organisations outside of the county, by some combination of working from home and/or out-commuting, but they choose to live in the rural county of Wiltshire. Many of these out workers enjoy significantly higher earnings than the average for Wiltshire, and it is this group who will continue to put pressure on house prices. As the housing supply is increased even more outworkers will be attracted to move away from cities to live in Wiltshire. Chippenham, which is conveniently situated for commuting by being near both the railway station and M4, will become a commuter town. ***WC should challenge MHCLG as to whether the affordability uplift in their "standard method" is correct, as it will result in building ever more houses for people who do not work for Wiltshire businesses.***
3. At their sole discretion, WC have increased the housing target of 40,840, derived using the Government's "standard method", by 4,790, to 45,630. This higher figure is based on using economic trends for Wiltshire to 2016, to forecast jobs growth for the 20-year period to 2036. This was carried out by Hardisty Jones Associates. For example, after allowing for inward commuting, the Chippenham Housing Market Area (HMA)² is forecast to need an extra 6,503 resident workers. The Local Housing Needs Assessment allocated 17,411 houses out of the 40,840 to the Chippenham HMA but estimates a further 2,979 houses are needed to align to the forecast growth in jobs.

It seems odd that an additional 20,390 houses are needed in the Chippenham HMA to support an additional 6,503 resident workers, although this is partly explained by the demographics of out-commuters, an aging population and trend to smaller households. ***Given that a significant part of the population works for non-Chippenham HMA (or more widely, non-Wiltshire) based organisations, surely some of the increased economic activity and need for more resident workers (local jobs for local people) could be satisfied by recruiting from the residents already living but not working in the Chippenham HMA (or Wiltshire)? In which case this adjustment to the housing needs figure, increasing it from 40,840 to 45,630 across Wiltshire, is not required and should be removed. Furthermore, we have set out in the first points above that the population is not increasing, and therefore that the national housing targets are too high. And since this additional figure of***

² The Chippenham HMA includes Chippenham, Devizes, Melksham, Corsham, Calne and Malmesbury

4,790 homes was only added at the discretion of WC, this is another reason why it should be removed from the Wiltshire housing targets.

4. There is a growing awareness of climate change and the need to reach zero carbon emissions by 2030. This is a bold target, which has been endorsed by Wiltshire Council. It is difficult to see how this target can be reconciled with the carbon released by concreting over large swathes of countryside and the consequent increased carbon emissions from new roads and developments.

It is not just the residents of Wiltshire, who have already been most vocal on the Public Consultation Zoom calls, but there is a growing national awareness that we all need to think twice, before committing to largescale developments which will impact our ability as a nation to reach the net zero carbon emissions target by 2030.

In conclusion, the Wiltshire County housing target should be a maximum of 40,840, and WC should push back on MHCLG to get this target further reduced for the reasons set out above.

5. The allocation of housing to Chippenham HMA should be scaled back.

Even if just the discretionary increase added by WC were removed, this would proportionately reduce the housing allocation for the Chippenham HMA from 20,400 to 17,410.

6. The Emerging Spatial Strategy report considers alternative strategies for allocating housing and employment land within the Chippenham HMA. It concludes that Chippenham, as the main settlement, should take a higher allocation of growth than in previous Local Plans. This alternative development strategy is referred to as the “Chippenham Expanded Community” (CH-B). ***Some of the rationale is incorrect:***
 - a) Chippenham does not have the capacity to take an increased allocation of housing because it does not already have the existing road infrastructure. The £75m HIF grant is a red herring as the infrastructure for the road and 2 river bridges still needs to be built and the funding needs to be recovered from developers.
 - b) The argument for focussing housing growth on the main settlements to enable increased local employment is simplistic. Chippenham already has a disproportionately high percentage of residents, 64%, who live in Chippenham but work elsewhere. And for the newer housing estates e.g., Pewsham and Cepen Park, this proportion is even higher. What Chippenham needs to boost local employment is not more houses, which will simply result in more out-commuters, but a strategy to encourage those who already live in Chippenham to take up local jobs. And reducing the current level of out-commuting will reduce carbon emissions and assist in the Council’s target of reaching

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zero carbon by 2030

- c) Delivering affordable housing is supposed to be a key outcome sought by the Local Plan. The Council's housing register suggests a significant need at Devizes and to a lesser extent at Calne but no significant need at Chippenham and the other settlements within the Chippenham HMA. Since housing growth is needed to deliver a proportion of affordable housing, this analysis indicates that more growth is needed at Devizes and less at Chippenham.
- d) Expansion at Chippenham is constrained by the River Avon, being surrounded on the South and East by beautiful and biodiverse countryside and by the impact on outlying rural settlements, many of which are in conservation areas.

The Chippenham share should be no more than the previous Local Plan (This alternative development strategy is referred to as "Roll Forward" or CH-A). Even based on the higher Chippenham HMA allocation of 20,400 this would result in 6,440 houses for Chippenham instead of 9,225. And based on our proposed allocation of 18,741 houses to the Chippenham HMA this would result in 5,495 houses which seems a more logical progression since the last Chippenham Local Plan figure was 4,510. This would leave a residual number of houses to be built of just 1,370 which could more easily be accommodated on a combination of Brownfield sites and other smaller sites, without needing to build to the South and East of Chippenham.

No mention is made of the £75m HIF grant to build a distributor road to the South and East of Chippenham with a commitment to build not just an additional 5,100 houses by 2036 but a total of 7,500 houses by 2041. **It appears that this grant has predetermined the disproportionately large allocation of the housing target to Chippenham. It would be prudent to wait for the outcome of the Local Plan Review before progressing with the HIF project to build a new distributor road at Chippenham.** The Emerging Spatial Strategy suggests that it is more sustainable to focus growth on the Principal Settlements. The resulting residual housing needs allocated to the Principal Settlements are 940 to Salisbury, 1,805 to Trowbridge and 5,100 to Chippenham. **The residual housing target allocated to Chippenham seems disproportionately high. We have suggested above, that a figure of 1,370 would be more appropriate.**

- 7. There are still at least 2,050 houses that were approved in the 2016 Chippenham Site Allocations Plan to 2026 that have not progressed to full planning application nor been built. This indicates that the developers are banking these strategic sites until the market is ready, and it is unlikely that they can now all be built within the 2026 plan period. Since delivery of that smaller number of houses approved in 2017 hasn't progressed, it is unreasonable to expect a massive step-change in housing targets could be deliverable in this next plan period. MHC&LG suggest that a cap should be placed on housing numbers, to ensure they are deliverable. **WC should not be considering allocating more houses to Chippenham until the current strategic sites are progressed further. The only certainty in committing to**

more houses now is the destruction of the Wiltshire countryside and increasing carbon emissions.

8. Currently most people in Wiltshire live in rural settlements or small towns. This new policy of focussing development on large towns seems flawed, particularly in the post-COVID world, where around 30% more people are expected to work from home. Rural communities would benefit from more affordable housing, primary schools, surgeries, local shops and pubs. All of these would reduce private car journeys from rural communities and allow people to work and live in their local area. **The Local Plan should consider allocating more houses to rural settlements and less to the main settlements and towns.**

9. Vastly more effort should be made to make use of Brownfield sites within Chippenham, before destroying open countryside on the outskirts of Chippenham. In the 2016 Chippenham Site Allocations Plan allowance was made for just 240 houses on Brownfield sites and yet there have been recent developments at Middlefield, the Causeway garage, the former police station and former law courts. It feels as though almost as many houses have recently been built on Brownfield sites as on the new edge of town sites. More housing sites will come forward during the plan period including potentially Langley Park, the Bridge centre, the former Wiltshire college, the site which had been earmarked for a new Good Energy building by the new multistorey car park, the temporary car park on Cocklebury Road and St Nicholas school on the Malmesbury Road. And no doubt further sites can be identified during the plan period. Such Brownfield sites meet all the sustainability criteria without destroying the countryside and should be the first choice for future development. **The Council should redirect its resources from the “Future Chippenham” project which will destroy our countryside and river valleys and instead come up with a strategy and investment to encourage development of Brownfield sites. With the right kind of development, this strategy would also enable the much-needed rejuvenation of the centre of Chippenham. The Local Plan should set a target of at least 500 more houses on Brownfield sites in Chippenham by 2036.**

10. The Chippenham Neighbourhood Plan has already concluded that the level of housing needed should be no more than to accommodate 250 to 300 people per annum, based on ONS forecasts. At an average occupation of 2.4 people/house, this would equate to no more than 2,000 houses over the remainder of the plan period to 2036. This is fewer than the houses already approved and not yet being built including 650 at Rawlings Green and 1,400 to the South West of Chippenham which were approved in the 2017 Chippenham Site Allocations Plan. The Neighbourhood Plan work on housing needs indicates that no further houses need be planned for at Chippenham up to 2036 and that the focus should be on developing the sites that have already been approved.

In conclusion, we have demonstrated that the proposed residual housing number allocated to Chippenham is far too high. At most the figure should be reduced to 1,370 based using the government target and rolling forward the distribution across the Chippenham HMA, as used in the last Local Plan. Maximum use should be made of Brownfield sites.

3. Comments on Addressing Climate Change and Biodiversity Net Gain

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.”

There are however two key issues with Wiltshire Council’s approach, namely:

- It fails to properly consider climate change and biodiversity in relation housing numbers and potential locations; and
- It fails to propose a strategy and policies that would deliver what it acknowledges is needed (as cited above).

Firstly, the numbers of houses and their locations will determine more than anything, whether or not the Plan is sustainable and able to deliver the dramatic reductions in carbon emission that are needed. Adding 5,000 more houses to an inflated housing target based on an out of date (2014) multiplier, 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. The excessive numbers are unnecessary and unsupported by evidence, as well as flying in the face of the evidence showing a sharp decline in population growth and the need for prioritising climate and biodiversity protection. They put even greater pressure on Wiltshire Council to find yet more and larger greenfield sites, removing carbon sinks, requiring additional carbon intensive 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, risking adding further emissions through uncontrolled development. They also undermine existing Neighbourhood Plans (e.g., the Bremhill Neighbourhood Plan) 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.

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.” Housing numbers need to be reduced to a point that allows many more people to live near their place of

employment, make fewer journeys by car and preserves existing natural capital and carbon sinks. The net result would be fewer roads, fewer bridges and floodplain fly-overs, fewer drainage schemes and flood alleviation measures, shorter grid connections, fewer carbon emissions. More green fields would be left intact for carbon capture, food production and biodiversity habitats, and there would be substantially less transport emissions, currently the biggest source of greenhouse gas emissions in the county.

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” 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 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. In other words, nothing is preventing LPAs from setting net zero development policies. 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.

In order to further reduce emissions and environmental damage, a sustainable construction policy should also be introduced 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, including Chippenham’s, which seem to be further advanced than Wiltshire Council’s Local Plan in this respect.

The papers 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 contribute towards 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

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(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).

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. Their view is supported by a 2014 Australian Senate enquiry into offsetting in which it was reported that after a decade of offsetting there was no evidence that it has worked in practice and there were studies actually showed the opposite. In 2017 a review of 10 years of offsetting in New South Wales found that it would take over 140 years for the promised net gain in nature to be provided.

As Friends of the Earth point out, there is no substitute for proper nature conservation, which is proven to work and to be good value for money. Scientific evidence demonstrates that it is not feasible in most circumstances to destroy biodiversity in one area and reinstate in another. Whilst there is an urgent need to improve protection of nature and biodiversity in the planning system, we cannot expect market-based offsetting and biodiversity net gain to achieve it.

In terms of habitat destruction and biodiversity loss, no material consideration seems to have been given to the natural capital/biodiversity impacts of developing 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



Woodland east of Chippenham

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

Marden 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.

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, urban regeneration and the development of brownfield sites; the NPPF states that “planning policies and decisions should promote an effective use of land in meeting the need for homes and other uses,” and 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.” Also that strategic policies should “give substantial weight to the value of using suitable brownfield land within settlements for homes and other identified needs, and support appropriate opportunities to remediate despoiled, degraded, derelict, contaminated or unstable land,” and “promote and support the development of under-utilised land and buildings, especially if this would help to meet identified needs for housing where land supply is constrained and available sites could be used more effectively (for example converting space above shops...)”

This aspect of the NPPF and the contribution that brownfield land could make to housing numbers seems to have been completely overlooked in these proposals, being regarded as low priority and “windfall”. The fact is that significant numbers of dwellings are possible within existing parts of Chippenham, which could reduce the need for damaging greenfield development and would deliver affordable apartments, without damaging the environment, without the need for cars, and with the added bonus of helping keep the town centre alive.

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 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 climate change paper, and its [Climate Emergency declaration](#) in which the Council commits 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).

For Chippenham, this would mean a local employment led plan that radically reduces the need for additional commuting. It would mean abandoning a strategy for unsustainable growth that simply attracts relocation from along the M4 corridor, with its associated dependency on commuting. It would mean housing numbers that genuinely meet local needs, and not exceeding Chippenham’s current growth (based on in-migration) of 250-300 people per annum (as measured by the ONS), which equates to 2,500 houses (at most) for the Plan period. And it would mean maximising regeneration and brownfield development (and including this in the housing numbers).

A plan with these lower housing numbers and brownfield development focus, would not require 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. Nor would the Plan embed vast quantities of emissions for years to come as a result of the commuting that will inevitably result, as has happened with previous urban expansion of the town, causing the current level of congestion and tailpipe emissions.

Appropriate and sustainable housing numbers supported by investment in attracting suitable employers, bringing skilled jobs into the area, would go a long way towards reducing commuting and private car dependency. More innovative approaches to public transport, including rail (e.g., new stations at Devizes, Corsham and potentially Hullavington) could 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.

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

<https://www.agricology.co.uk/farming-themes/agroecological-approaches/biodynamic-farming> and learn from the example of leading agro-ecological farms such as the one in nearby Yatesbury, only 12 miles from Chippenham <https://yatesbury.webs.com/>.

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 net carbon emissions) have been calculated.

The farms in Site 1 (and elsewhere) should be retained and measured in terms of their net carbon emissions over time and policies adjusted accordingly in line with national and Wiltshire carbon reduction targets.

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?

The measures do not go far enough. As stated in the LPR 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 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 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.

From a sustainable water management perspective, Site 1 is in a Groundwater Source Protection Zone (i.e., a zone in which there is a risk of water source contamination), which brings into question the wisdom of have extensive housing development, employment sites and road in terms of polluting groundwater used for potable water supply.

Sustainability Appraisal Appendix 2 criteria 3

This site is entirely covered by Source Protection Zone 2c, which is an extension to the Outer Protection Zone. Therefore, it does not require an assessment as to whether it poses an unacceptable risk to the source of supply. Some zones are extended because activities below the surface, such as deep drilling, could create pathways for pollutants to enter the groundwater. Zone 2 is defined by the 400-day travel time from pollutant to source. The 400-day travel time is based loosely on consideration of the minimum time required to provide delay, dilution and attenuation of slowly degrading pollutants. The site is not covered by Drinking Water Protected Areas or Drinking Water Safeguard Zones. In line with the provisions of local planning policy and the Water Framework Directive, the development of this site will need to make suitable provision to protect and, where appropriate, improve local surface, ground and potable drinking water quality – this includes

ensuring that enough buffer zones are located adjacent to watercourses and ensuring that runoff does not enter these watercourses.

Consideration should be given to the inclusion of Sustainable Drainage Systems to control the risk of surface water flooding from impermeable surfaces. As this site covers a Source Protection Zone, the extent to which Sustainable Drainage systems can be used, may be affected.

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 by siting development to the East of Chippenham in the Avon and Marden valley. Any measures to incorporate 'nature' within the proposed urban conurbations would be tokenistic relative to 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 statements about benefiting carbon sequestration, air quality improvements, passive cooling, health and wellbeing and biodiversity enhancement, which are precisely what the proposed development would destroy.

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 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 infrastructure intensive development and selection of sites on which the destruction can be limited.

Since there are no questions about biodiversity impacts, comments have been added at the end of this section on the impacts on wildlife habitats and protected species that would occur if sites 1 and 2 were to be developed.

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?

The measures set out do not go far enough. The adoption of policies that require net zero carbon development in line with the UKGBC approach, and the promotion of renewable energy generation are important and necessary. However, they 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 existing and future carbon sinks;
- construction of carbon intensive infrastructure (included embedded emissions in materials such as concrete and asphalt);
- additional transport mileage 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 any additional costs into their land purchase. Once a clear policy has been set, the additional costs of carbon neutral development will fall rapidly, as this becomes the standard method of building and developing sites. Government net zero carbon targets require this to happen as soon as possible, given that Core Policy 41 has been abandoned 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 be net carbon neutral, focused on providing housing where there is employment (to be 'employment led'), avoiding the destruction of natural capital and carbon sinks, avoiding climate damaging 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 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. 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.

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 [master planning](#) 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 in-migration, 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 to 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 obliged 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. This sort of air pollution would be made worse by the proposed development on sites 1 and 2.

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 (preferably 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 counties, 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 people 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 (e.g., see comments on viability above). Wiltshire Council needs to develop a Plan for the 21st Century and stop resisting taking the necessary measures. The way forward is to:

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;

Chippenham Draft Local Plan: -

Why proposals for development of the Avon and Marden Vale should be withdrawn

- 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.



Bees are critical for pollination of food crops

Ecological and biodiversity impacts

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 has 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 and 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.



River Marden 1

There have been several sightings of otters on the River Marden, e.g., the River Marden Ecological Appraisal commissioned by Bremhill parish council in Sept 2020 has in paragraph 3.2.6 - Otter, water vole and widespread species of mammal Signs of otters were recorded in one location (see Target note 9. above), though it is considered likely that there is otter activity in other sections of the river due to the presence of large areas of suitable habitat. In particular, otters are highly likely to

be present in the area near the confluence with the River Avon as the habitat is ideal for otters here.

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.

Further comments

In December 2020, the UK committed to a nationally declared contribution of a 68% reduction in greenhouse gas emissions by 2030 for the latest iteration of the Paris Accord, with a reference year of 1990. Wiltshire Council has made no attempt to calculate its own contribution to that target. It has no idea what its levels of GHGs were between 1990 and 2019, or even between 2019 and 2021. It has not even confirmed that its target date for net zero would be in line with the IPCC's special report on the impacts of global warming of 1.5 °C <https://www.ipcc.ch/sr15/> or the UK Committee on Climate Change definition of net zero.

It has no base line against which future emissions can be measured and therefore no way of determining the contribution the Local Plan can potentially make or the relative impact of the current Local Plan proposals on the county's overall emissions reduction (or in the case of the version before us, the substantial increase in emissions that will take us in the opposite direction).

Wiltshire Council has admitted that use of "the government backed SCATTER [Setting City Area Targets and Trajectories for Emissions Reduction] tool does not produce a reliable estimate of greenhouse gas emissions for rural counties like Wiltshire but, unlike other rural local authorities like Cornwall, has not developed or implemented another method.

Wiltshire Council's Global Warming and Climate Emergency Task Group has - published two reports (the first in September and the second in December 2020), the second of which includes robust, evidence-based recommendations on planning, which Wiltshire Council's Cabinet has pushed back against, rather than embracing.

The document entitled *Wiltshire Council Looking to the Future: Addressing climate change and biodiversity net gain through the Local Plan—raising the ambition* (January 2021) includes many of the key themes that the Task group has made recommendations on yet fails to propose how these themes will be addressed by the Local Plan.

Not only does this call into question the premise on which the Local Plan Review is predicated but, *Looking to the Future* (January 2021) highlights that:

- "Although there are some policies relating directly to climate change (Core Policies 41 and 42), mitigation and adaptation practices really need to be embedded throughout other policies,"

Chippenham Draft Local Plan: -

Why proposals for development of the Avon and Marden Vale should be withdrawn

- “Without a carbon baseline and time-series data on sector emissions, there is a lack of precise understanding about the challenge Wiltshire faces in terms of tackling climate change;” and
- “To measure the effectiveness of the policies there needs to be a new monitoring programme in place.”

Two years before this damaging observation was made, the Council declared a Climate Emergency and committed the county to net zero carbon by 2030. In common with its entire approach to this Local Plan Review, it has failed since 2019 to set annual measurable targets for carbon reduction—targets compatible with achieving net zero by 2030.



Climate change demonstration outside Bristol City Council offices in 2020

Nowhere has the Council detailed how it will increase clean energy generation, or achieve reduced greenhouse gas emissions in the county as a whole. Nor has it attempted to identify stringent near-term targets for emitted and embedded carbon in its development plans, least of all in this draft review of the Local Plan for Chippenham.

The Council does not seem to care about this failure to transition to the future green and ultra-low carbon economy. Its failure to identify baseline measures of the county’s greenhouse gas emissions seems to be symptomatic of this.

Wiltshire Council seems to be planning to grow Chippenham through a housing led strategy with no regard for the consequences (intended and unintended) of failing to ensure that the growth of the town will not compromise the climate, environment and overall health, wellbeing and security of its citizens in the near and medium-term future.

4. Comments on the Wiltshire Local Plan Transport Review

with particular focus on Chippenham

This section to be included as a single response to the Supporting Evidence consultation response form in respect of the document Local Transport Review

1) The requirement for an Eastern Link has not previously been established:

Paragraph 2.3.1 states “Previous work has shown that any meaningful growth would require a new Eastern Distributor Road (EDR) connecting the east of the town to the A350 to the north.” And at para 4.2.3 “The previous Chippenham Site Allocations Plan (CSAP) established the requirement for a new Eastern Distributor Road, connecting around the north of the town from the A4 east of Pewsham to the A350 at Malmesbury Road.”

Both these statements are incorrect. The CSAP Examination in Public on 28th September 2016 examined under Matter 5 – General: Has the selection process taken full account of the potential performance of a southern link road?

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

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

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

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

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

Chippenham Draft Local Plan: -

Why proposals for development of the Avon and Marden Vale should be withdrawn

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

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

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

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

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

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

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

Reasonable alternative traffic models *might* evaluate the impact of placing -

- a) 500 houses on brownfield sites in the centre of Chippenham which should have less car trips; and
- b) 900 houses on Site 7, Barrow Farm to the North of Chippenham which will provide sustainable access to schools and the railway station and enable out-commuting to the A350 and A4 without adding to congestion in the centre of Chippenham

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

- c) to either the South of Chippenham with an SLR, or
- d) to the East of Chippenham with an ELR for traffic relief.

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

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

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

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

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

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

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

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

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

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



River Marden towards New Leaze Farm

8) The impact of traffic rat running on country lanes has not been evaluated

The ELR crosses Stanley Lane, and the Local Plan map shows another development access further East on Stanley Lane. Traffic will take the shorter routes via either Studley or Bremhill to/from Calne adding to the traffic on unsuitable narrow country lanes. Before Site 1, East of Chippenham is progressed, the effect of traffic on the country lanes must be properly evaluated. Such modelling is likely to show that the further any distributor or access roads onto Stanley Lane are from the A4, then the greater propensity for traffic taking short cuts via the country lanes.

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

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

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

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

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

5. Comments on the Strategic Flood Risk Assessment

This section to be included as a single response to the Supporting Evidence consultation response form in respect of the document Level 1 Strategic flood Assessment

The world is facing a major crisis of Climate Change, the planet is heating up and there appears to be little willingness to stop, or even reverse this trend.

The consequences for the continued asset stripping of the environment will be increased temperatures, rising to over 40 degrees in summer months by 2040, and increased storm damage through severe weather systems bringing intense rain and wind.

Lord Krebs, Chair of the Adaptation sub-committee of the Climate Change Committee³ stated: “the six immediate priority areas are related to the risks of flooding and coastal change, the impact of high temperatures on health and wellbeing, risks of future water shortages, impacts on the global food system, and risks arising from new and emerging pests and diseases (COVID)”



Flooding in Monkton Park – building on Site 1 will make this worse

³ [UK Climate Change risk assessment 2017. Synthesis report: priorities for the next 5 years.](#)

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

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

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

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

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

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

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

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

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

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

Soundness Issues:

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

“Over-allocation of both housing and employment land is driven primarily by the need to support and justify the eastern part of the ELR⁴.

This appears to ignore significant and legitimate environmental, landscape and flood risk concerns which would suggest that inclusion of housing allocation to the north of the North Wilts Rivers Route

⁴ ELR = Eastern Link Road

and the larger of the two employment sites intended for development beyond the plan period are unsound.”

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

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

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

Steve Scothern Senior Drainage Engineer for Wiltshire Council stated in the planning application for the Riverside Development to the East of Chippenham on 15th January 2016.

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

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

Comments on the JBA Consulting Level 1 Flood Risk Assessment report (May 2019):

This Flood assessment for the Chippenham Site Allocation process for land to the East of Chippenham is not appropriate for a level 1 assessment as the area has been subject to numerous flooding incidents, which are increasing year on year.

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

Table 2-2

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

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

2.8.1 NPPF

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

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

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

Impacts of Climate Change:

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

2.10 Surface water management plan (SWMPs)

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

However, this report was published in 2011 and is now over 10 years old and out of date. It should not be used in this report. Please let's have an up-to-date report.

2.15 Sewers for adaption

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

3.2 South West River Flows:

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

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

Chippenham Draft Local Plan: -

Why proposals for development of the Avon and Marden Vale should be withdrawn

Surface water flooding for Salisbury, Trowbridge and Chippenham will increase between 20% and 40% in the period 2020-2039

These are massive increases when the Chippenham radial gate is already at risk of overtopping. Wiltshire Council should not be considering building 10,000 houses adjacent to the river Avon, to the south and east of Chippenham?

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

Other questions and observations:

Various appendixes were NOT provided.

Appendix J Recorded Flood History is missing?

Appendix O Action 993 What are the options for renewing the radial gate at Chippenham?

Q Record of flood history.

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

Conclusion:

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

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

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

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

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

Wiltshire Council has always stated that drainage of the land in Site 1 could be managed by Urban Surface Drainage Units (SUDS), this engineering solution is not suitable for this land as it is

impermeable, and the SUDS will over spill and create a considerable flooding risk to properties. With large quantities of surface water much of it will enter the sewer systems contaminating properties and the valued river tributaries threatening fish, and wildlife.

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

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

The risk to Chippenham from flooding from an estate of 5,000 houses on one side of the River Avon, and a further 700 houses on the other side at Rawlings Green must be substantial as Mr. Steve Scothern Wiltshire Council Drainage Engineer stated in his response to the planning application in 2015 to build 1600 houses on this very site this flood risk assessment is considering. Where is Mr Scothern's statement and photographs he sent to the planning department in 2013 showing the radial gate being topped and flood waters in Chippenham Town. Just where is this evidence?

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

SUDS - Surface Urban Drainage Systems

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

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

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

As the soil is impermeable the run off into SUDS will increase the risk of over topping.

In conclusion SUDS is not the right drainage engineering solution for Site 1.

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

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

Chippenham Draft Local Plan: -

Why proposals for development of the Avon and Marden Vale should be withdrawn

Summary

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



Avenue La Fleche from the old playing fields in Chippenham

6. Comments on the Interim Sustainability Appraisals

This section to be included as a single response to the Supporting Evidence consultation response form in respect of the documents Interim Sustainability Appraisal, Interim Sustainability Appraisal Annex I and Interim Sustainability Appraisal Annex II

The Interim Sustainability Appraisal (SA) should be demonstrably shown to be fair, proportioned and adequate. We believe that if the SA is subject to any detailed examination it would become readily apparent that it is not adequate. This Interim Sustainability Appraisal has many of the fatal flaws that were in the Chippenham Site Allocations Plan in 2015 that made that SA inadequate, in fact many of these flaws are even more visible in 2021.

Choosing a Preferred Strategy for the Chippenham Housing Market Area (HMA)

The first comment is on the first activity in assessing sites with the methodology; Stage B - Developing and refining alternatives and assessing likely effects.

The crucial paragraph on the SA methodology is 2.3.5, which makes it clear how subjective and unaccountable it is: *"Evaluation involves forming a judgement on whether the predicted effects are likely to be significant. The principal technique used to assess the significance of effects is a qualitative assessment based on expert judgement and supported by specific evidence."* As far as we can see, no information is given about who's 'expert judgement' or which 'specific evidence' is being used. This is an inadequate methodology, resulting in invalid conclusions. Consequently, the whole set of Local Plan preferences and proposals are fatally flawed.

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

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

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

- There are more "negative" environmental SA objectives evaluated than "positive" economic ones for each individual settlement in a housing market area.
- Therefore, less development in a settlement within the HMA, although being less positive for economic opportunities is outweighed by lower negative environmental impacts to provide an overall more positive (or less negative) score for the SA. i.e., the settlement looks more sustainable.
- The bias towards a single settlement being chosen then comes about by the SA for the Chippenham HMA strategy being totalled up using the total score for ALL settlements in the HMA (Chippenham, Devizes, Melksham, Malmesbury, Corsham, Calne and Rural) and then

divided by the number of these settlements (7). This is hidden away only in footnote 31 on page 20 of the report *“Calculated by adding the scores for each settlement (including ‘Rest of HMA’) and dividing by the number of settlements”*.

- It is obvious that less damaging environmental impacts on all the other six settlements in the Chippenham HMA will always outweigh the large environmental impact on a single settlement (Chippenham itself), making a single large development area likely to be promoted by Wiltshire Council.

In addition, there are *serious shortcomings* in the detailed evaluation of the Chippenham HMA in Annexe 1 of the SA report. There are three main categories of problems:

- 1) There is not enough granularity in the impact assessments, for example minor adverse and moderate adverse. As an example, for SA Objective 1 “Protect and enhance all biodiversity and geological features and avoid irreversible losses.” the reduction in numbers of 800 houses in Devizes between CH-A and CH-B takes the assessment from “moderate adverse” to “minor adverse”. However, adding 3,300 houses to the Chippenham settlement does not impact the assessment for Chippenham from “moderate adverse”. There are many, many examples of this throughout Annexe 1, for each of the SA objectives.
- 2) The evaluation is based on selecting a strategy based on the housing number in Chippenham for CH-B for 9,225 homes. However, the areas eventually selected have a housing capacity of 18,500 homes. This would have a massive impact on the SA evaluation of each objective, particularly the environmental objectives, even at the HMA Assessment decision making stage.
- 3) Single statements are made for a whole settlement against a SA Objective, huge areas being evaluated in a few short sentences. For example, against SA1 Biodiversity for CH-B in Chippenham the analysis is *“Additional to housing development, it is likely that significant additional infrastructure will be needed. As a result, moderate adverse impacts are considered likely against this objective. Adverse effects are likely to be more significant than CH-A and CH-C but mitigation measures are possible.”*
- 4) Amazingly, then results seem to be further refined with the footnote on page 4 of Annexe 1 which states *“Average scores in this annexe are rounded up or down to nearest significance category e.g., -1.4 is rounded down to -1, -1.6 is rounded up to -2, -1.5 is rounded up to -2.”*

It can be seen that the whole process of evaluation is shooting in the dark, with no proper analysis of these huge areas for sustainability. Instead, we have subjective judgements, biased evaluation, rounding of numbers and insignificant differences between strategies.

In 4.2.4 in preferring the focus on Chippenham CH-B development the report states “Under CH-B where growth levels are significantly higher, there are also likely significant adverse effects on climate change adaptation, heritage assets and landscapes. However, at this stage, the assessment of likely significant effects is based on the level of growth proposed and a high-level assessment of constraints around the town, not on actual development locations, which are not known.”

Based on this flawed strategy, the key assessments for the Chippenham HMA *eventually* appear in Table 5.2 on page 45, and in the subsequent paras. 5.2.4 and 5.2.5 of the main report.

A preferred strategy is somehow chosen out of this exercise, where the evidence is *ludicrously* unhelpfully thin or entirely missing. Amazingly (or not), this strategy just happens to match the requirement to support the Housing Infrastructure Fund agreement made between Wiltshire Council and Homes England to increase housing numbers in Chippenham settlement to above 7,500. The **weasel words on pp 21-22** provide no support, thrashing around with a belief that the huge environmental negatives might be mitigated “with infrastructure”.

2) Site Selection and the Sustainability Appraisal

This SA has major similarities with the failed SA in 2015 for the CSAP. Two areas that the Planning Inspector commented on are still concerns here:

- a) Huge sites have a single evaluation and scoring, where there may be issues impossible to mitigate in parts of the site, whereas other parts of the site could well have potential for development. This was highlighted in the Barrow Farm site (Site 7) in the 2105 evaluation. This flawed evaluation applies again here, even more so as there is a road infrastructure already built next to the site, so environmental damage has already taken place to impact its SA score. Here in 2021 the sites are even larger than those in 2015 and the process is even more flawed.
- b) In the Table, tiny changes in what are subjective judgements that lead to scoring taken as gospel would completely change the futures proposed for Chippenham.

For Site 1, massive Biodiversity (SA1), Land & Soil (SA2), Water (SA3), Air Quality (SA4), Climate (SA5), Heritage (SA7) and Landscape (SA8) issues are glossed over, summarised as a minor or moderate adverse effect. For example, the text includes just one sentence on the loss of productive farmland: "*Land/soil: given the significant size of this site, there will be a significant loss of greenfield, agricultural land of medium quality*". No indication is given of the weight given to this loss, and it is not mentioned again, but clearly it is not high, given the conclusions that follow in the Site Selection process. Unsurprisingly there are lots of proposed Mitigation Measures for Chippenham, but none of them refer to the loss of productive farm land.

Our comments on Site 1 are as follows:

In the WC document ‘Interim Sustainability Appraisal Annex I – Assessment of Alternative Development Strategies for the four Housing Market Areas (HMAs)’ –

Sustainability Appraisal Objective 1: Protect and enhance all biodiversity and geological features and avoid irreversible losses

The assessment for Chippenham in all three strategies is the same – Likely effects: Moderate.

Wiltshire Council have not yet carried out a proper biodiversity assessment for Site 1, relying it appears on a scant PEOAR report in the Future Chippenham consultation (not even included as part

of this consultation). Somehow Wiltshire Council can still assess the impact "Moderate Adverse" without any of the baseline evidence.

Yet we know from the recent assessments commissioned by Bremhill Parish Council, and available on their website (River_Marden_Draft_v2.pdf and Wildlife Update on the River Marden.pdf) that the Marden Valley has a particularly rich biodiversity and should be protected rather than destroyed. Yet, even though their own decision-aiding question (DAQ) 1 asks "*Avoid potential negative impacts of development on designated wildlife sites, protected species and priority species and habitats (international, national, local) and enhance these where possible?*", WC still prefers the overdevelopment of Chippenham in Strategy CH-B (Chippenham Expanded Community), without recognising that, where the effects are always going to be 'moderate adverse', those adverse effects will be **cumulative in direct proportion to any increase in the housing numbers required**. There is no recognition of the fact that at some point, the effect will swing into major adverse – there is only so much 'mitigation' which can be planned in, and that is usually very ineffective anyway, except in the view of developers and WC.

There are no measures described to evidence that the significant adverse effects can possibly be mitigated! The huge area of land being proposed for inclusion cannot possibly be replaced or mitigated elsewhere, and the potential damage to the town of Chippenham not least due to excessive rainwater run-off from any new developments has not been taken into account. The town centre is already prone to flooding, as is the Avenue LA fleche by-pass, mainly due to excessive expansion of the urban areas with no thought of what might happen due to future climate change – the more grassland and woodland that is built on the worse the adverse effect will be.

Option 2 is the preferred option for WC, *even though the effect on Chippenham will be much more than moderate adverse!* The WC comment in the average score section is that overall, it is likely to lead to MINOR ADVERSE EFFECTS overall, *ignoring the threat to Chippenham itself*. Chippenham is glibly thrown to one side as everywhere else will be OK, Jack!

In DAQ 3: Aid in the delivery of a network of multifunctional Green Infrastructure? is stated "*the design of developments may incorporate measures to enhance biodiversity and contribute to networks of multifunctional green space known as green infrastructure. The preparation of a Green Infrastructure (GI) Strategy will help to provide a long-term vision and strategic framework to aid the delivery of GI. However, at this stage of the process, it is not possible to comment on the likelihood of GI being adopted as part of development.*"

Why is it not possible to comment? Surely this is precisely when such comment requiring a Green Infrastructure to be adopted should be made!

Various recent wildlife surveys have shown that in the Avon and Marden river vale, there are many protected species such as otters, bats, newts and more, yet no account has been taken of those, even though the WC is aware of them.



Stanley bridge towards New Leaze Farm with runner on the cycle track

What better green infrastructure could you have than the one already in place – multiple farms contributing to the food economy of the area, whilst assisting with water retention, CO2 retention, wildlife, etc.?

The conclusion reached that “*The SA findings suggest that the levels of growth proposed would not lead to any ‘major’ adverse effects at any of*

the settlements which would mean that mitigation measures are not achievable” is staggering, and completely without merit, specifically in relation to Chippenham!

Sustainability Appraisal Objective 2: Ensure efficient and effective use of land and the use of suitably located previously developed land and buildings

The first requirement in DAQ 1 is *to ensure efficient use of land*. Nowhere, in the documents provided, is there any recognition of either climate change requirements or changing patterns of use of dwellings due to post-Covid working arrangements, such as more and more people who can, not commuting but choosing to largely work from home. This entails having the space to do so, which most national-developer built boxes do not take into account.

The second requirement is the *reuse of Previously Developed Land where possible*, and the statement that “*There is a lack of previously developed land (PDL) across the whole of the HMA. Therefore, all strategies are likely to result in significant loss of greenfield land*”! Certainly, in relation to Chippenham this is not true! At ground floor level, and certainly on upper floors, in the High Street area there are many opportunities for change of use to dwellings. Bumpers Farm Industrial Estate has empty units, and the new development at Chippenham Gateway next to J17 on the M4 has yet to find a tenant, even though work is about to begin on a second large-scale unit there. Perhaps an option would be to increase development at Chippenham Gateway to provide business premises to replace Bumpers Farm, then use the site to provide dwellings? The land at Chippenham Gateway is already scheduled for development anyway.

In **DAQ 4: Result in the permanent loss of the Best and Most Versatile Agricultural land (Grades 1, 2, 3a)?** WC states “*The majority of the agricultural land surrounding Chippenham is Grade 3 (good to moderate) with areas of Grade 2 (very good) land in the north east and south, where there are also*

smaller areas of Grade 1 (excellent)." Most of the areas that WC wish to build 2 new suburbs of Chippenham in, are Grade 2, and again there appears to be no thought applied to the need to reduce food-miles - or indeed any joined-up long-term thinking at all.

Again, the conclusions for Chippenham are all moderate adverse. *"Further assessment is needed on the proportion of Grade 3a land within Grade 3 at Chippenham to understand the potential loss of the best and most versatile (BMV) agricultural land as well as any potential impacts associated with the MSA. As this strategy proposes a high level of growth proportional to the settlement combined with the relatively low amount of previously developed land (PDL) available for development, a moderate adverse effect is considered likely. Furthermore, this strategy proposes the highest level of comparative housing and employment growth in Chippenham..."* This statement ignores the fact there are available brown-field sites in Chippenham, many of which *are already, or being, developed* for housing (numbers in the hundreds) which WC considers as 'windfalls' and steadfastly refuses to include in the housing numbers. Nor is any effort made either by WC or developers to ensure that existing permissions are built!

The fact that unbuilt permissions are not included towards the 5-year land supply is staggering beyond belief. The developers can use that exclusion to 'prove' that WC doesn't have the required land supply, even though it possibly does – and just as incomprehensible is the fact that a unitary authority doesn't even know whether or not it can meet its obligations, *and relies on land-speculating developers to provide that evidence!* It also fails to provide any evidence that building more houses in Chippenham produces jobs – in fact the contrary is true. Prior to the Covid emergency, some 64% of Chippenham residents commuted out of Chippenham, either by road or rail, to work. The increase in dwellings over the last 30 years has produced no discernible benefits to the town at all, and there is no reason to expect that future increases will do so either.

The conclusion in DAQ 4 still recommends Strategy CH-B whilst it gives the nod to moderate adverse effects on Chippenham but *still* claims to be more sustainable.

Sustainability Appraisal Objective 3: Use and manage water resources in a sustainable manner.

At Chippenham, Wessex Water have identified a need to invest in water network assets to improve capacity between 2025 and 2036. There is a moderate probability that the roll forward would require construction works to accommodate development.

The underlying geology of the area consists of Kellaways or Oxford Clay. Increased run off from urbanized sprawl will not be absorbed by the surrounding land, and can only increase the pressure on an already stretched flood management regimen along the Tetbury and Chippenham Avon.

In view of the current pressures on Wessex Water in Chippenham because of climate change, increased rainfall and less absorption of rainfall into land (due to all the building that has taken place over the last 30 years with no increase in water run-off provisioning), the risk level should be HIGH, not moderate!

Site 1 is rated the equivalent of Site 2 "Minor Adverse", which is just not believable. Site 1 is in a Source Protection Zone; Site 2 is not. Site 2 includes a STW within its boundaries, Site 1 is remote from the STW and "it is very probable that this site (Site 1) will require a significant investment in water, sewerage and drainage infrastructure".

Site 1 is the only site upstream of Chippenham with the potential consequent impact on flooding. Added to this the SA states that "Consideration should be given to the inclusion of SUDS to control the risk of surface water flooding from impermeable surfaces. As this site covers a Source Protection Zone, the extent to which SUDS can be used may be affected."

For all these reasons it is amazing that Site 1 is rated as Site 2 as "minor adverse", there are issues that may prove difficult to mitigate or even insurmountable and questions the viability of Site 1.

Sustainability Appraisal Objective 4: Improve air quality and minimise all sources of environmental pollution

There are no baseline measures whatsoever of PM10, PM2.5 or PM or suspended particulate matter (all Group One carcinogens) in Chippenham. This objective is completely meaningless in the absence of time series data collection or comparison of before/after quantification of the relevant measures, whether of air quality, noise pollution (undoubtedly influenced by Chippenham's low-lying location), or light pollution.

Minimise and, where possible, improve on unacceptable levels of noise, light pollution, odour, and vibration?

Chippenham has been highlighted as a settlement at risk of an AQMA declaration, due to rising levels of Nitrogen Dioxide. Chippenham continues to be monitored for exceedance of Nitrogen Dioxide and commitments to improving air quality form part of the Air Quality Strategy.

Sustainability Appraisal Objective 8 Conserve and enhance the character and quality of rural and urban landscapes, maintaining and strengthening local distinctiveness and sense of place.

There are comments in this document for Site 1 that are not reflected in the Wiltshire Council Core Strategy Landscape Assessment, and for which no evidence at all is provided. ***The claims are value judgements, apparently based on no systematic assessment, quantification, or context,*** so we wonder who made them and what evidence there is to back them up:

"...in combination with some absent and weak field boundary hedgerows with few hedgerow trees suggest that this is a landscape in decline." (repeated twice in the assessment)

"The landscape is considered to be in generally moderate condition."

"It is a relatively ordinary, rural landscape with some distinctive characteristics such as the tree-lined rivers."

The site has strong landscape characteristics that should be recognized in DAQ1 and DAQ2. The *appalling* conclusion reached by Wiltshire Council of this only being a Minor Adverse Impact on Landscape in the SA should be reviewed and better reflect the assessments from ourselves, independent consultants and Wiltshire Council's own consultant.

WILTSHIRE COUNCIL ASSESSMENT OF SITE 1 LANDSCAPE

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

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

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

CAUSE'S ASSESSMENT OF THE LANDSCAPE

- 1) The Wider Landscape: As does Chippenham itself, the site sits in a bowl of surrounding hills over the Rivers Avon and Marden Vale, rarely rising above 60m AOD, creating ideal conditions for air pollution, temperature inversions (exacerbated by urban sprawl), and for flooding. The view from higher ground of the limestone ridge would be impacted at Lyneham Banks, Charlcott Ridge and Bencroft Hill, Studley and Bowood, and Spye Park. From the North Rivers Cycle Route even Cherhill and the White Horse can be seen, so the visual impact would affect views from a great distance, both during day and night time.
- 2) Locally valued landscape: From the south the site is the landscape view for Chippenham residents along London Road from Abbeyfield to Chippenham Town Centre, sloping down to the river vale. From the west the landscape is the context of the view for the residents of Monkton Park. From the north the rising ground provides the landscape view of the Marden Vale from the conservation village of Tytherton Lucas. From the east the landscape provides the rural character of Stanley.

The site also provides “the countryside” for residents of Chippenham using the North Rivers Cycle track for walking and cycling, usage of which has increased exponentially during the Covid crisis. It is possible to cycle or walk from Chippenham to Calne from the Bridge in Chippenham to Castlefields in Calne along this route without once passing between two buildings, a wonderful green landscape corridor between two towns in Wiltshire.

Through Site 1 the cycle track is on a ridge, and therefore provides landscape views to both the south and north of low-lying river landscape with rich riparian vegetation, meadowland and a sense of place.

INDEPENDENT ASSESSMENT OF THE LANDSCAPE

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

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

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

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

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

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

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

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

WILTSHIRE COUNCIL'S APPALLING ASSESSMENT FOR SA8 IN THE SUSTAINABILITY APPRAISAL

The Landscape Assessment after taking into account the assessments above and covering this landscape with 3,000 houses and employment land is an Assessment Outcome of a **Minor Adverse** effect.

This is an affront to the residents of Chippenham and the surrounding villages and a total embarrassment for Wiltshire Council.

It is a complex landscape site, as noted by the Planning Inspector in 2017 who stated that it would be virtually impossible to mitigate the landscape impact to the north of the cycle track and difficult

to do so to the south. The rolling countryside rising to the low ridge of the North Rivers cycle track from both the south and north means that the land is visible for most views from east Chippenham and also highly visible from the surrounding higher ground of the limestone ridge. The route alignment description is exactly as set out in Atkins (19 February 2015) and remains impossible to mitigate.

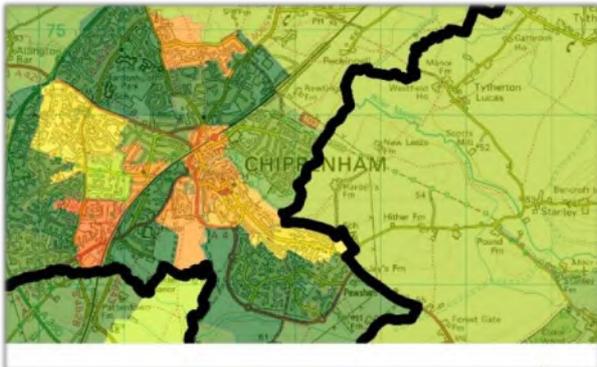
Sustainability Appraisal Objective 10 Reduce poverty and deprivation and promote more inclusive communities with better services and facilities

Site 1 (together with Site 7) rank positively most high as “Major Positive” in the SA assessment document (page 11 of Annexe II). There are some serious questions about this assessment.

The assessment states: *“This site falls within an area where there are concerns relating to deprivation, as indicated by the Indices of Multiple Deprivation (IMD) 2019. Development at this site would create opportunities for better social cohesion.”*

No evidence whatsoever is given for this assertion. It is a meaningless claim.

Leaving aside that this is a green field site that itself would have no deprivation, even looking at the IMD 2019 map for Chippenham, it is difficult to see where these concerns are – the areas of high deprivation are orange to red, and are mainly in the centre of town and to the west.



The assessment also states: *The site could deliver a significant level of affordable housing alongside employment land.* This is at odds with the quotes from the lead developer in the past who has wanted to build executive style homes modelled on Poundbury.

In terms of DAQ2, *Be accessible to educational, health, amenity greenspace, community and town*

centre facilities which are able to cope with the additional demand? The site is the worst for distance to the town centre, as the assessment itself says “The western edge of this site is within cycling distance of the town centre, but walking would be more difficult”. Unfortunately, all the land proposed is to the east. In addition, the only secondary school near is full, there are no doctors’ surgeries within walking distance. This will lead to increased travel by car, or the creation of a Swindon style mini suburb with its own facilities disconnected from the rest of the town.

The site is said to have potential to *“capable of delivering a sizeable amount of public open space and additional community facilities.”* However, this sustainability appraisal is entirely silent on the existing residents of Chippenham. For the residents of large areas of London Road, Hardens Mead, Monkton Park, they have had their access to public open space destroyed and they find themselves up to 2km away from the countryside that was on their doorstep previously. If a sustainability appraisal of these communities who now become an inner urban ward was carried out, there would be more chance of social deprivation and lack of inclusivity and a major adverse rating for this

Chippenham Draft Local Plan: -

Why proposals for development of the Avon and Marden Vale should be withdrawn

objective. The wanton destruction of the natural capital such as river vales accessible to the people of Chippenham is a huge price to pay for the provision of a bit of “public open space” and a “community centre”.



New Leaze Farm from Anscombe Bridge 1

7. Comments on the Chippenham Site Selection and Draft Plans

CP1 What do you think of the scale of growth? Should there be a brownfield target?

The housing need figures for Wiltshire are too high

According to the Emerging Spatial Strategy document, the Government target for Wiltshire, calculated using the national “Standard Method”, is for 40,835 additional dwellings between 2016 and 2036. Wiltshire Council have decided to increase this target to 45,630. In other words, almost 5,000 additional dwellings.

- Wiltshire Council should challenge the Government on why so many additional houses are needed when:
 - there is already a huge bank of sites with planning permission (around 1 million houses) which developers are not progressing;
 - our population has stopped growing, and
 - concreting over additional swathes of countryside will accelerate climate change and worsen the climate emergency;

This is a national issue but Wiltshire Council should also be standing up for our county and pushing back.

- The “Standard Method” for allocating housing targets to councils is yet another spurious Government formula that should be challenged. For example, does it level up housing expansion between the North and South of England?
- Wiltshire Council has voluntarily increased its own baseline target by almost 5,000 additional houses without sound justification. This needs to be challenged. The Government target set for Wiltshire is already too high and Wiltshire Council should not be increasing this at a time of such uncertainty for population growth and the need to reverse climate change. We all need to challenge these numbers to avoid irreversible loss to our precious Wiltshire countryside.

The housing target allocated to Chippenham is far too high

Housing development is now being focussed on the 3 larger settlements in Wiltshire on the basis they already have the infrastructure to support growth and can better incorporate carbon reduction measures, including alternatives to private car usage. Chippenham has been allocated a target of 9,225 dwellings, **which is over 20% of the total target for Wiltshire.**

- The South and East of Chippenham surrounded by particularly beautiful countryside and river vales, rich in biodiversity and used for exercise and wellbeing - substantial natural assets - which would be irreversibly destroyed by such enormous housing targets.
- Chippenham has already seen substantial growth with over 4,000 dwellings that have either been built (including Birds Marsh) or approved since 2016.

Chippenham Draft Local Plan: -

Why proposals for development of the Avon and Marden Vale should be withdrawn

- Over 2,000 dwellings that were approved in the previous Chippenham Local Plan to 2026 (adopted in May 2017) have neither been built or even received planning permission, indicating that there may not be the need for further large-scale developments. Wiltshire Council should focus on getting the existing approved sites built before allocating further sites for development.
- The allocated target for Chippenham has doubled since the last Local Plan from 4,510 to 9,225 homes. This is massive! Equivalent to adding another town the size of Calne. All town councillors at Chippenham and Calne as well as Bremhill parish council have voted unanimously against this scale of development for Chippenham.
- Prior to the Housing Infrastructure Fund (HIF) bid for road funding, the number being put forward for this Plan period was 3,000, which equates to predicted growth in the Chippenham Neighbourhood Plan Housing Needs Assessment report. In the Emerging Spatial Strategy commentary, we have suggested a residual housing figure of circa 1,370 dwellings to 2036, would be a more appropriate allocation for Chippenham.
- Chippenham was chosen as a focus for development based on having existing infrastructure, but this is not the case as the proposed sites to the South and East require a massive investment in building a distributor road with 2 river bridges. The carbon footprint of creating such a road is huge. Wiltshire Council have obtained a £75m grant from central government to build the road and river bridges. But the public were never consulted on this grant. Indeed, the only evidence of local support was from Chippenham Town Council and the Chippenham MP, who are now withdrawing their original support as details of the scheme have become known and they reflect on the tsunami of public opposition – voiced at council meetings, in the press and through an online petition which has been signed by over 5,000 people. This grant seems to have predetermined the disproportionate housing allocation to Chippenham. Neither the houses, nor the road, are wanted.
- The Sustainability Appraisal and its supporting appendices attempt to justify the selection of strategy CH-B which focuses most of the Chippenham Housing Market Area (HMA) housing at Chippenham rather than rolling forward the current strategy spreading development more fairly across all the towns within the Chippenham HMA. The Sustainability Appraisal is extremely difficult to follow and the evaluation is fatally flawed by its inherent subjectivity, which is made clear in para. 2.3.5 of the ISA.

‘Evaluation involves forming a judgement on whether the predicted effects are likely to be significant. The principal technique used to assess the significance of effects is a qualitative assessment based on expert judgement and supported by specific evidence’

- The draft Local Plan talks of promoting cycling over private cars to minimise the carbon footprint. Based on evidence to date this is not realistic (e.g., every new house at Birds Marsh seems to have at least 2 cars parked outside and the general trend is upwards).
- The draft Local Plan aspires to reduce out-commuting, and the associated carbon footprint, by matching increased housing with increased local employment. Currently 64% of workers who live in Chippenham commute to work outside Chippenham. Improvements to the A350 (dual carriageway), the mainline railway (enabling London to be reached in under 1 hour since electrification) and access to J17 on the M4 encourage out-commuting. The reality is that any

new housing development at Chippenham will attract people who work in Bath, Bristol, Swindon, Reading and London, generating huge carbon emissions as a result. Wiltshire Council's arguments about reducing carbon emissions simply don't stand up.

In summary the residual housing target for Chippenham should be reduced to circa 1,370 additional dwellings to 2036.

Brownfield Sites

There are a number of brownfield sites in Chippenham that have already been built or are in the process of being built – The Police Station site, the Causeway Vauxhall site, the magistrates court site are examples. Brownfield housing sites are described by Wiltshire Council as 'windfall' sites, and the dwellings are not included against the stated requirements for housing supply, but they should be. The high street is full of vacant brownfield sites, particularly since the demise of the High street for shopping. It needs to be redesigned to create a smaller and more vibrant town centre with other redundant commercial buildings being imaginatively repurposed to provide accommodation. Such town centre housing would be particularly suitable with residents having no need of cars, instead walking cycling and using public transport.

It seems that some of the commercial sites e.g., Bumper's farm Industrial Estate are not fully utilised at present. Rather than setting aside even more land for commercial sites around Chippenham, efforts should be made to accommodate more businesses on the existing commercial sites. Also, the first large distribution warehouse at Chippenham Gateway still remains empty after being built over one year ago. It would make sense to maximise use of this new site before expanding commercial land at Chippenham.

In summary Wiltshire Council and the Chippenham Neighbourhood Plan team should come up with a strategy for redeveloping Chippenham town centre including brownfield sites, focussing new employment on to the existing commercial sites and minimising the destruction of our cherished countryside and river vales.

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

There are many issues with these place shaping priorities. Who developed them? Who reviewed them in Chippenham? These Place Shaping Priorities surely needed to be reviewed before the whole sustainability appraisal and site selection process proceeded and massive documents predetermining the outcome were developed. If the fundamentals of the process are incorrect everything that follows is wrong.

For example, for the most part these concern the town centre. However insufficient attention is given to the relationship of the town to the open spaces of its hinterland, much of which is peri-urban farmland. Previous surveys have reported how much local people value that relationship, and

future priorities for place shaping must include those aspirations and the benefits that can be achieved.

Urban communities such as Chippenham can and should be shaped positively by the relationships with their peri-urban green hinterlands, including farms with strong connections to local communities. This point is developed further in the answers to CP 12 and CP 13. So that weight should be given in place shaping to the social and health benefits of peri-urban spaces. This particularly the case when neighbouring farmland is in public ownership and its relationship to the local community is open to shaping by positive policies. The current PSP2, PSP3 and PSP6 should be amended and a new priority added to reflect the important contribution that good connections to progressively managed farmland can make. This is further elaborated in CP 12 and 13.

PSP1 – Development to provide new employment opportunities.

This is pre Covid thinking in a post Covid world. Simply providing sites for employment does not bring employment and leads to a massive amount of out-commuting, solidifying Chippenham as a dormitory town. The last Core Strategy was supposedly built upon “employment led development”, this Place Shaping Priority seems to be “development led employment (we hope)”. In the last review CAUSE argued for all employment opportunities to be put around the A350/J17 infrastructure, our argument for J17 as a superb employment site was rejected. However, that site is now available for warehousing and potential office and manufacturing sites. With a good sustainable transport link to the town this, and other sites close to the A350, should be preferred employment land. Existing employment land could well become available as working from home dominates going forward.

PSP2 – Improving the Resilience of the Town Centre.

This is aspirational and has much to agree with BUT it is not based on a post Covid strategy of what Town Centres will look like. How many retail units will be permanently vacant, what will the state be of hospitality venues? This whole process needs to be put on hold until a complete post Covid Town Centre strategy is developed and we understand what major brownfield and town centre regeneration opportunities could exist to build affordable homes near to central facilities.

PSP3 - Improved access to the River Avon Vale through Chippenham as an important green infrastructure corridor for the town.

This is a total environmental and ecological disaster of a Place Shaping Priority. It is a priority to concrete over the natural environment of river vales versus building next to existing transport infrastructure? It is the complete opposite of what a place shaping priority should be. Besides destroying natural capital, it blights the lives of existing residents (for example London Road, Pewsham and Monkton Park) who move from being next to unspoilt countryside available with a short walk or cycle on existing routes, to becoming inner urban estates with a car journey needed to access open countryside, adding to traffic and causing additional environmental damage. This PSP should be removed.

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PSP4 - Ensuring a network of well-connected footpaths and cycleways and connectivity for public transport across the town, to/from the town centre, and through into the surrounding countryside, so that more people can choose active travel and public transport as a means of getting around.

This again appears at first glance to be a noble objective to have, but “from the town centre into the surrounding countryside” instead of being a few hundred yards as it is now, will become for most of the current residents inside these massive new development areas, a major walk or cycle just to reach a green field. As we stated in the previous consultation, a more than adequate set of existing footpaths and cycle tracks exist, quickly taking residents from town into country.



This River Avon landscape from Black Bridge will be blighted by a Distributor Road bridge

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

This is a strange “place shaping priority”. It is obviously added purely to predetermine in favour of sites that would have the HIF Bid road going through them.

In that context priority PSP5 should be omitted, as badly planned roads could put the currently productive farmland at risk. If there had to be a transport related PSP it could (and should be) instead “Ensure development fully exploits existing road infrastructure to minimize climate impacts and increase sustainable transport use”.

PSP6 - Respect the individual identities of villages within the landscape setting of Chippenham and their relationship to the town.

We agree with this Place Shaping Priority. The only problem is, it is not fairly and equitably applied to villages such as Tytherton Lucas and Stanley in Site 1, compared to Langley Burrell in Site 7, for example. It also seems to be a priority considered low, and easily offset with those PSPs that build roads and concrete over countryside.

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

This question is premature, and **based on a predetermined outcome**.

The whole requirement for housing numbers and sites across Wiltshire needs to be reviewed in the light of a post-Covid world and the need to be serious rather than pay lip service to a Climate Emergency.

Three elements of a post-Covid world need to be urgently looked at:

1. Review the Building of sustainable rural communities in a post Covid world.
Can small towns and villages be given an appropriate small level of development that supports many more people working from home and builds a critical mass for essential services; to regenerate rural communities with provision of Post Offices, surgeries, recreational facilities and primary schools. A plan that does not compromise the rural nature of communities but builds resilience in local communities could absorb a far higher proportion of the required housing numbers.
2. Re-evaluate the needs of Town Centres in a post-Covid world
Town Centres could be regenerated, as offices and retail outlets surplus to requirements become brownfield development opportunities. This would allow for people living close to central facilities and revitalizing boarded up premises. This brownfield development could provide affordable homes near to services and transport hubs with minimal environmental damage.
3. Employment Land Evaluation in a post-Covid world
An urgent survey should take place of existing businesses of their office, factory and warehousing requirements in a post-Covid world. It could be that vast swathes of existing employment land could become unused in the next 12-24 months. It could allow a consolidation of industrial/office capacity into specific employment sites close to existing road infrastructure would free up space for brownfield development. For example, Bumpers Farm inside the A350 in Chippenham.

The detailed review of the case for selecting Site 1 (along with 2 and 3) is mainly set out in the Chippenham Site Selection Report (CSSR), the main Interim Sustainability document and its Annex II. It is seriously flawed. Once again, the inherently subjective methodology is a serious weakness. The subjective nature of the Interim Sustainability Appraisal has already been shown above in respect of the choice of the Chippenham CH-B maximum development option. The same methodological shortcoming applies to the ISA site selection analysis and conclusions.

The Chippenham Site Selection is discussed in the main ISA in 5.2 on page 32. The starting point is a grouping of Chippenham sites into seven areas, which is very briefly proposed and explained, but not

justified, on page 6 (para.16) in the Site Selection Report. On page 27 of the report four groups are briefly explained but no mention is made of the other three areas.

The use of this grouping deserves some attention, and comment. It is taken for granted in both the ISA and in the Principal Settlement analysis in the ISA Annexe II. In neither case it is discussed, let alone justified. The possible effect on the subsequent analysis is nowhere considered, as it should have been.

These three reports lead to the proposal to select Site 1 for development. The connections between them is unusual and needs first to be examined. The first part of the CSSR carries out a site-by-site analysis, with criteria different from those used in the ISA, which is then only used to exclude some sites. It presumably (but not explicitly) feeds into the grouping of Chippenham sites into seven areas, though this is nowhere justified – a regrettable omission. Though it too is not explained, the seven-area so-called Sustainability Analysis is carried out in Annexe II and a tabulated version is then pasted into the ISA and then the CSSR. The ISA then produces a selective summary of the analysis in Annexe II, as is briefly admitted at the beginning of section 5.2.5 on p. 46 and the summary Table 5.2 on p. 45. The CSSR then resumes and carries out a SWOT analysis on the seven areas and emerges with slight adjustment to the Annexe II table, still with Site 1 at the top.

If correct this actual process does not map onto the diagram of the Site Selection process on page 4 of the CSSR. All this process confusion raises questions about the presentation, organisation and validity of the Chippenham Site Selection process.

The validity of the analyses in each of the steps in this tortuous process is weakened by the absence in all of them of appropriate consideration of the value and potential of the farmland in Site 1. In the initial analysis of the individual sites in the CSSR, the criteria used are different from those in the ISA and Annexes, for reasons which are again not explained. Two of those criteria are Landscape and Flood Risk. Landscape is explicated as follows: “A site that creates a harmful landscape or visual impact that is unlikely to be successfully mitigated may be rejected”. When it comes to the site-by-site commentary, no reference is made to the existence of productive farms and farmland, and the harm which would be done to the landscape by their destruction and replacement by road and houses. One of several examples of this the commentary on Site 506b, which is labelled Hardens and New Leaze farms but then only comments on the Grade II listed Hardens farm buildings and not on the farm landscape which constitutes the area. If that is taken into account, it would not be possible to so quickly conclude that there are ‘no overriding significant impacts.’ Similarly, no attention is paid to the contributions that well managed farmland makes to managing water levels and flood reduction. These points are expanded in the sections CP 12 and 13 below. The wider concern – and Local Plan weakness – is that nowhere is the existence of farmland taken into account where it should be, in this case when reviewing landscape change.

The next contribution to site selection is the ISA Annexe II. There are similar presentational shortcomings to those in Annexe 1, which were criticised in CP1 above. If anything, Annexe II is even more dense and inaccessible. There are 231 pages in all, with no index or easily visible distinction between the sections dealing with different towns, or the sites within the towns. The opaque presentation is frankly an affront to democracy and ought in a sane world to be reason enough to abort this as a public consultation.

As things stand this Annexe is crucial to the decisions that follow. The issues and questions which frame this Annexe appear to push the responses in a direction favourable to predetermined outcomes. Throughout they restrict the opportunity to take account of the positive farming futures set out in CP 12 and 13 responses below. Even so, proper attention should, and can, be given the farmland and its benefits in the Site 1 text, for example:

- The Objective 1 text is one of the very few to even recognise the farmland nature of the area, but still attached no value to that in respect of biodiversity, habitats and protected species, and green infrastructure, which no doubt contributes to the subjective judgement that the adverse effect of building on this land is only minor.
- In Objective 2 there is a straightforwardly false statement that 3A and 3b land 'cannot be separated out'. The MAGIC map referred to in the first footnote gives the lie to that. This is also one case where the lumping together of several sites gives a false impression. There are substantial areas of 3A land in site 506b, Hardens and New Leaze farms. Consequently, the statement in DAQ 4 that there would be a 'significant loss of medium quality land' is not correct. The question asked - will development here 'result in the permanent loss of the Best and Most Versatile Agricultural land (Grades 1, 2, 3a)?' The answer should simply be Yes. The conclusion of this section is the fence-sitting 'Moderate (significant) adverse effect. When the error on 3a land is corrected, the conclusion must be Significant Adverse Effect, which must in turn have an effect of the overall judgement of Site 1.
- Objective 3 is about using and managing water resources effectively. Farming has a mixed record on this to date but publicly owned farms have the means to prioritise positive contributions on this, which is again missing from the text. If that farmland potential was included the effect should be increased from Minor Adverse to Moderate or arguably Significant.
- Objective 4 – an objective analysis of these air quality and pollution questions would admit that the adverse effect of massive development of Site 1 was Significant, not another fence-sitting Moderate (Significant), which appears to invent a new category to allow for reduced impact.
- Objective 5 is to minimise the impacts on climate change now and in the future. To some extent this replicates Objective 3. Given what is already written here about flooding risks, and the neighbouring Avon and Marden rivers, it is remarkable, and wrong, that the conclusion is only a Minor Adverse effect. If the loss of farmland that can help with soil quality and drainage is included, then the case for at least Moderate Effect is clear.
- Objective 6 is about renewable sources of energy. Once again, the analysis ignores the effect of the loss of 700 acres of farmland with significant capacity to include sustainable energy

generation alongside productive progressive farming. No calculation is offered of the benefits/disbenefits of replacing that farmland capacity with solar panels on houses, while at the same time increasing carbon emissions. This is also one example of where the DAQs themselves bias the answers in favour of development. In these circumstances the safest conclusion would be neutral.

- It is worth rehearsing the text of Objective 8 in full: Conserve and enhance the character and quality of rural and urban landscapes, maintaining and strengthening local distinctiveness and sense of place. Here the first two DAQs reveal the bias in the process, as they obscure the Objective by referring only to nationally designated landscapes and then to minimising impact by building nicely designed houses. In addition to bias, this is arguably the most obvious example of avoiding any consideration of the loss of farmland and its actual and future potential. It is precisely the retention of the farmland in Site 1, including its two County Farms, that would make the best and most significant contributions to achieving this objective - not least by maintaining and strengthening local distinctiveness and sense of place. So, the loss of that farmland must have a Significant Adverse Effect. The Minor Adverse Effect conclusion is simply not sustainable.
- Objective 10 is about reducing poverty and deprivation. It is hard to understand how the building of expensive housing in the proposed 'Chippenham suburbs' can be talked up to be a Major Significant Positive Effect to this objective, as Annex II proposes. Conversely what would be lost is the ability of community-oriented farms to provide ongoing job opportunities, opportunities for volunteering and in general to provide the 'accessible educational, health and amenity greenspace' defined in the second DAQ. Community farms can also provide the 'public spaces and community facilities that support public health, civic cultural, recreational and community functions.' That would in fact be a good definition of one of their key contributions, as set out in the CP12 response below. So that the loss of those opportunities must be weighed in the balance against the overstated claims of the current text. This must lead to at best a Moderate Adverse Effect, in contrast to the current hyper positive conclusion.
- Objective 12 is about a vibrant and diverse local economy. Once again, the loss of productive peri-urban farmland on Chippenham's doorstep is not taken into account. This Plan is looking many years ahead, so it is bound to consider both the actual and potential losses against claimed for gains. Local small-scale farms are unquestionably a contribution to a diverse local economy. They provide a variety of employment and employment land in response to one of the DAQs. Development of this site will remove that, which must reduce its overall benefit to at best Moderate.

The changed positive/negative effects resulting from a proper recognition of contributions of the Site 1 farmland and its future potential, would significantly alter the balance of judgement on the development of the area, currently set out in table 5.2 on p. 45 of the ISA. Some but not all of these changes would also apply to other areas, but Site 1 has the specific characteristics of its river boundaries, its County Farms and the large proportion of publicly owned farmland.

The Site Selection process is then capped off by the SWOT exercise described on pages 32-38 of the CSSP. SWOT is by definition a subjective exercise, described on Wikipedia as "designed for use in the

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preliminary stages of decision-making processes” and also “SWOT is intended as a starting point... Menon et al. (1999) and Hill and Westbrook (1997) suggested "no-one subsequently used the outputs within the later stages of the strategy". There are many other critiques of SWOT, and anyway a visible consensus that it should only be used at an early stage of a decision process. So it is unusual, to say the least, to see Planning Officers using it in final decision making. Moreover, no information is provided on how many and which people participated in the SWOT process and how any differences of view were resolved. This is then compounded by the results of the SWOT being presented in an odd way – for example the first result for Site 1, is simply recorded as ‘Strength’, and a later one as ‘Neutral’. There is no indication of how these singular conclusions emerged from the SWOT review. Last but not least, the SWOT used the Place Shaping Priorities still being consulted on in pages 5-6 and CP2 of the overarching Planning for Chippenham document – to which amendments have been suggested in CP2 above and no doubt by others. So that a provisional set of criteria were used to provide a conclusive recommendation in a process which is widely regarded as an early-stage tool, with variations which are not explained, and with no information about who made the SWOT judgements. The results of this are set out on p. 45 of the CSSR as the basis for the Preferred Options for Development of Chippenham. They are simply not credible, and should be withdrawn as soon as possible.

As a footnote, the chart on p 42 shows conclusively that the place shaping priorities are designed to support development in all circumstances, as there is no room for other priorities that might question development as the one answer for the town’s future. As such they are exclusive of alternatives.



Recent Flooding from north of Site 1 at Tytherton Lucas - imagine what happens next

Summary of Site 1 Being Inappropriate for Development

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

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

a. Remote from the Main Areas of Employment. "Employment should improve the self-containment of the town by providing more jobs for local people". Site 1 is less attractive to businesses looking for employment land as it is the most remote from the A350 which Wiltshire Council promotes as key to growth prospects. Instead, people with jobs outside Chippenham will be attracted to riverside housing and promulgate out-commuting.

b. Avoiding the risk of flooding. Site 1 is upstream of Chippenham and will create the greatest risk of flooding of all sites. This would be exacerbated by a river bridge across the floodplain. The flood plain is regularly flooded, the closure of Maud Heath's Causeway has greatly increased. Wiltshire has a declared Climate Emergency. Developers will rely on SUDS but even the use of SUDS is questioned in Annex II "Consideration should be given to the inclusion of Sustainable Drainage Systems to control the risk of surface water flooding from impermeable surfaces. As this site covers a Source Protection Zone, the extent to which Sustainable Drainage systems can be used may be affected."

c. Landscape and biodiversity. The Landscape evidence report from 2015 concludes that, for Site 1, it is an "area where development would be more difficult to accommodate". Site 1 is the most visually prominent from Chippenham and the surrounding rural and conservation villages, still completely unspoilt and therefore very rich in natural riparian vegetation and wildlife, with good access via footpaths and the North Rivers cycle track to enjoy the countryside. Bremhill Parish have commissioned two wildlife reports on Site 1 which show the rich and diverse nature of the ecology of the area. Upstream of Chippenham the Avon and Marden valleys should be left undeveloped to allow the wildlife to flourish, undisturbed by riverside paths, domestic animals and development.

d. Huge Dependence on Infrastructure. As with this site in 2015, there is a major dependence on infrastructure being delivered prior to this site being viable. There needs to be a main line railway crossing in addition to a river and floodplain crossing (on concrete piles) before the site can be accessed. In 2015 the Planning Inspector likened this to a string of pearls that with a link missing causes collapse of the whole necklace. Wiltshire Council still depends on developers providing some of this infrastructure.

e. A premature decision with the impact of a Covid pandemic. There is a need for an urgent review of planning in the post Covid world. Rural areas such as ours should be evaluated for the ability for local provision of services, as more people work from home and need local access to shops, post

offices, surgeries, schools. Perhaps limited development in rural areas around clusters of villages to reach crucial mass of people to have these services could provide this. At the same time town centres and the opportunity from unfortunate failed retail and leisure businesses can provide town centre residential development. The time for huge green field development such as Site 1, based on out-commuting and on a premise of town centre services may well have passed. Indeed, the North Rivers Cycle Route provides solace during the pandemic to the residents of Chippenham, Calne and the surrounding villages, 5000 people signing a petition recently to keep the cycleway open.

CP5. How can these concept plans be improved?

General comments on the so-called sustainability appraisal:

The sustainability appraisal objectives are incoherent, poorly laid out and, in fact, bear no relation to a properly conducted appraisal according to any acceptable matrix.

The “discussions” of sustainability issues consist of descriptions of the farmland on which Wiltshire Council proposes to build, with little attempt to evaluate current environmental, economic, or social characteristics of the sites. Without these baseline evaluations it will be impossible to measure changes, irrespective of the directions they take. It is unacceptable to expect the public to take on trust any assurance about future assessments in these topics. They should have been set out in this Review in order for consultees to make informed appraisals of the information given.

Wiltshire Council provides no overarching theme for its discussion of sustainability. There are merely disjointed statements designed to justify its selection of these farmland sites for development, and the imposition on Chippenham of housing targets that are based on deeply unreliable data, as detailed elsewhere in this response.

Apart from the absence of baseline data, there are no quantifiable targets against which to measure the sustainability performance of these sites once developed. Nor does the council provide a detailed timeline with milestones and review dates.

As noted above, the council provides no baseline environmental data about habitats, biodiversity, flora, or fauna, despite claiming at the beginning of 2021 in an absurdly sketchy infographic that environmental investigations and surveys had begun in January 2020.

Greenhouse gas emissions

In December 2020, the UK committed to a nationally declared contribution of a 68% reduction in greenhouse gas emissions by 2030 for the latest iteration of the Paris Accord, with a reference year of 1990.

Wiltshire Council has made no attempt to calculate its own contribution to that target. It has no idea what its levels of GHGs were between 1990 and 2021.

The Council seems to think that it can estimate its carbon budget as a percentage of the UK's total embedded and emitted carbon. Similarly, it thinks it can continue to estimate its carbon budget spend simply by guessing its contribution to the UK's budget as a whole.

Wiltshire Council aims for economic transformation of the market town of Chippenham with no regard for the consequences (intended and unintended) of failing to ensure that the growth of the town will not compromise the overall health, wellbeing, and security of its citizens in the near and medium-term future.

But in 2019, the council declared a climate emergency and committed the county to net zero carbon by 2030. In common with its practice in this plan, it has failed since 2019 to set annual measurable targets for carbon reduction—targets compatible with achieving net zero by 2030.

Nowhere has the council detailed how it will increase clean energy generation, or achieve reduced greenhouse gas emissions in the county as a whole. Nor has it attempted to identify stringent near-term targets for emitted and embedded carbon in its development plans, least of all in this draft review of the Local Plan for Chippenham.

The council does not seem to care that its reputation might be damaged by a failure to transition to green and low-carbon growth. It is most culpable for its failure to identify baseline measures of the county's greenhouse gas emissions, starting in 2019 when it declared a climate emergency. It simply has no idea whether total embedded and emitted carbon in the county is rising (and if so, when it will peak) or falling (and if so, whether the decline is in line with a target of net zero by 2030).

As discussed in detail below, Wiltshire Council utterly fails to assess the sustainability of Chippenham's social structures by failing to disaggregate past undersupply, market signals, projected employment growth, demographics such as age, household types, health and social needs

The council ignores its own data, for example, on relative deprivation in the town, simply claiming that this plan will benefit deprived areas that are both contiguous and non-contiguous with the development boundaries.

Addressing Climate Change and Biodiversity (p 8)

“There needs to be greater engagement at a local level to raise the game in terms of tackling climate change.”

Wiltshire Council seems to expect the public who respond to this consultation to provide evidence that it has been for years remiss in not gathering and evaluating to justify its plans for Chippenham.

The objective described in Sustainability Appraisal Objective 2 is mutually incompatible with the stated purpose of the plan as a whole - to build thousands of houses on farmland around Chippenham. It appears to have been included for the purposes of distracting from, and cosmetically enhancing, a destructive plan for greenfield sites.

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Farming and Agricultural Needs

Wiltshire Council fails to account for the changed circumstances for British farmers following the UK's exit from the European Union, nor for the documented problems for importers of food from Europe and wider global markets.

CP11 Should there be any development north of the North Rivers Cycle Path:



View from the North Rivers Cycle Route between New Leaze Farm and Hardens Farm

The River Marden Vale is a valued unspoilt resource for the people of Chippenham, Bremhill Parish and beyond. Development should not be permitted in the open countryside north of the North Rivers Cycle Route, between the cycle route and the Tytherton Lucas Conservation Area. This will allow users of the cycle route to enjoy a clear uninterrupted view to the north and east, maintain the unspoilt nature of the River Marden Vale for amenity and leisure and visually separate Tytherton Lucas from coalescence with Chippenham (Bremhill Neighbourhood Plan Policy NP.3).

Proposals for development north of the Cycle Route is against both national and local plans and policies. The area is something like 2-3% of the total area proposed for development, yet a hugely disproportionate amount of landscape and biodiversity damage would be caused by this action.

Plans and policies that are severely compromised by development north of the cycle track include:

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- National Planning Policy Framework
- Wiltshire Core Strategy
- Wiltshire Council Assessment of the area in the Chippenham Site Allocations Plan
- Report from the Inspector of the Examination in Public of the Chippenham Site Allocations Plan
- Bremhill Neighbourhood Plan
- Tytherton Lucas Residents Association Landscape Assessment

The evidence base against this development is given for each area in turn:

1. National Policy Planning Framework

NPPF paragraph 170 (b) – Planning policies and decisions should contribute to and enhance the natural and local environment by:

- a) protecting and enhancing valued landscapes, sites of biodiversity or geological value and soils (in a manner commensurate with their statutory status or identified quality in the development plan);
- 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;

NPPF paragraph 180 – Planning policies and decisions should also ensure that new development is appropriate for its location taking into account the likely effects (including cumulative effects) of pollution on health, living conditions and the natural environment, as well as the potential sensitivity of the site or the wider area to impacts that could arise from the development. In doing so they should:

- a) mitigate and reduce to a minimum potential adverse impact resulting from noise from new development – and avoid noise giving rise to significant adverse impacts on health and the quality of life;
- b) identify and protect tranquil areas which have remained relatively undisturbed by noise and are prized for their recreational and amenity value for this reason; and
- c) limit the impact of light pollution from artificial light on local amenity, intrinsically dark landscapes and nature conservation.

2. Wiltshire Core Strategy

Wiltshire Council Core Policy 8 Spatial Strategy for Calne Community Area

In CP8, there is an objective of “*protecting and enhancing the important ecological value and landscape character of the River Marden corridor*” as stipulated in bullet 3 of paragraph 5.41 of the Issues and Considerations of CP8.

In paragraph 5.42 of Core Policy 8 there is the objective of using the River Marden to provide a “*wider green infrastructure network linking Calne with Chippenham and the wider countryside*”.

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Wiltshire Council Core Policy 50 Biodiversity and Geodiversity – *Sustainable development will avoid direct and indirect impacts upon local sites through sensitive site location and layout, and by maintaining sufficient buffers and ecological connectivity with the wider environment. Damage or disturbance to local sites will generally be unacceptable, other than in exceptional circumstances.*

The River Marden is identified as a Priority Habitat (Running Water) in the Wiltshire and Swindon Biodiversity Action Plan.



Wild life abounds on the River Marden at Tytherton Lucas

Wiltshire Council Core Policy 51 Landscape - *Development should protect, conserve and where possible enhance landscape character and must not have an unacceptable 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 considered:*

- 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 and*
- viii. landscape functions including places to live, work, relax and recreate.*

This applies to the River Marden Vale.

Wiltshire Council Core Policy 58 Ensuring the conservation of the historic environment - *Development should protect, conserve and where possible enhance the historic environment.*

Designated heritage assets and their settings will be conserved, and where appropriate enhanced in a manner appropriate to their significance, including:

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iii. *Buildings and structures of special architectural or historic interest*

iv. *The special character or appearance of conservation areas*

Distinctive elements of Wiltshire's historic environment, including non-designated heritage assets, which contribute to a sense of local character and identity will be conserved, and where possible enhanced.

This refers to the Conservation area of Tytherton Lucas, and the listed and historical buildings of St Nicholas Church (Grade II*) and Scotts Mill (Grade II) within the area outlined in the Policy.

3. Wiltshire Council Assessment of the area in the Chippenham Site Allocations Plan



Bencroft Hill from the North Rivers cycle route

*The area has an attractive landscape character. The open character and strong association with the rivers and floodplain are important characteristics to safeguard. Development in this Strategic Area has the potential to reduce separation between Tytherton Lucas and Chippenham, which would reduce its remote and tranquil character. In addition, development would be visually prominent from surrounding high ground and could make this edge of Chippenham considerably more notable in the surrounding countryside. **The options which broach the North Wiltshire Rivers Route have a higher potential to reduce separation between Chippenham and Tytherton Lucas.** It follows that the strategic site options which present the greatest scale of development and therefore encroach further into the landscape setting of Chippenham perform the worst in terms of potential landscape impact, with option that broaches the North Wiltshire Rivers Route performing worst.*

The Wiltshire Council Chippenham Landscape Setting Assessment December 2014 stated: Landscape Quality “The landscape has a predominantly rural character particularly...to the north of the North Wiltshire Rivers Route cycleway”. Qualities to be safeguarded within this strategic area include: “Remote rural character of the land to the north of the North Wiltshire Rivers Route characterised

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by large arable fields bound by tree lined watercourses and onward views over the expansive river floodplain flanked by the wooded limestone ridge to the east”.

In addition, it states the context of the “Remote character of Tytherton Lucas with the edge of Chippenham appearing generally distant and wooded”.

Development within this area “has the potential to reduce separation between Tytherton Lucas and Chippenham which would reduce its remote and tranquil character. In addition, development would be visually prominent from surrounding high ground and could make the edge of Chippenham considerably more noticeable”.

The recommendation was to “Ensure development does not extend north of the North Wiltshire Rivers Route as it would substantially reduce separation between Tytherton Lucas and Chippenham and would increase visibility of the town from beyond Tytherton Lucas towards East Tytherton.

4. Report from the Inspector at the Examination in Public of the Chippenham Site Allocations Plan

Amongst the concerns identified (para 8.61) with the Submitted Plan Strategy were that the site is recognised as having particular adverse environmental effects that are also problematic to mitigate. In particular, impact on the attractiveness of the Marden Vale north of the North Wiltshire Rivers Route (NWRR) and possibly on the character of the Tytherton Lucas Conservation Area (CA) were matters of concern. Additionally, the assessment indicates that even if the housing and employment elements were removed from the more sensitive areas the strategy would still involve the intrusion into those areas of the new road and the traffic it would bring.

5. Bremhill Neighbourhood Plan

See policy NP.3 at top of this section

1. This policy supports the following Vision Statements in Bremhill Neighbourhood Plan.
 - (b) “Appreciate our Green Environment
 - (d) “An Attractive Parish”
2. This policy supports the following Objectives in our Neighbourhood Plan.
 - (c) “Green and Open Spaces” and “The local landscape and wildlife”
 - (e) “Management of water courses and flood mitigation”

The Bremhill Parish questionnaire responses showed **86%** of respondents agreed it was **highly important** that the rural areas of the Parish remain unspoilt. **88%** of people were **highly concerned** about maintaining separation from surrounding towns.

6. Tytherton Lucas Residents Association Landscape Assessment

A Landscape Report by independent consultants WH Landscape Consultancy, provided by Tytherton Lucas Residents Association for the Bremhill Parish Neighbourhood Plan

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“Although not covered by any statutory landscape designations the river corridors and the surrounding countryside, particularly to the north of the cycle route, are of considerable landscape value, being located in a tranquil and complete rural landscape and providing the landscape setting for the Tytherton Lucas Conservation Area... This area has a low capacity and is susceptible to development. It is considered to have a High/Medium sensitivity and the magnitude of change will be Substantial, which will result in a Major to Major/Moderate adverse impact on the landscape resource, which cannot readily be mitigated. “

Summary

The Avon and Marden river Vale may not be designated as an Area of Outstanding Natural Beauty but it is “our” AONB as far as the residents of Chippenham and surrounding villages are concerned. Already there are attractive river walks and Route 403 - a national cycle route - takes advantage of the disused Chippenham to Calne railway bed. It is possible to walk and cycle from the Town Bridge in Chippenham to Castlefields in Calne without ever passing between two buildings and at the same time enjoy the landscape and natural environment of the river vales and the views to Lyneham Banks, Cherhill and Derry Hill.



Centre right the tree lined River Marden, New Leaze Farm centre left

CP12 Proposed uses for Hardens Farm and New Leaze Farm:

It is argued here, and by very many others elsewhere, that the housing numbers for Chippenham need to be adjusted and much reduced. Alongside that the case for prioritising development in Site 1 has been shown to be fatally flawed. At the same time, there is a credible and realistic future for the farmland in Chippenham Site 1 which includes the two Hardens Farms and New Leaze farm. This should be taken fully into account going forward. This response to CP12 outlines that positive case, and offers a 'Greenprint' for its further development.



Tranquil countryside at Hardens Farm towards Bencroft Hill

The absence of attention to that positive alternative is an unfortunate omission from the discussion of Chippenham's future. So that this section is also a contribution to answering question CP13.

The farmland in Site 1 is just over 700 acres. In all just under 500 acres of this is believed to be in public (Wiltshire Council) ownership. The Hardens Farms are 200 acres, and these are also County Farms, held in stewardship by Wiltshire Council for the public benefit. County farms originate as a land use reform response to the late-Victorian agricultural depression, and were then embedded in legislation in 1892, 1908 and 1926.

*"Today, they remain one of the most powerful levers that a local authority has for directly helping new people into farming. They are a national public asset and in England alone cover a huge 200,000 acres. As such they have real potential to support the economic viability of local farming, to promote innovative farming methods, and to deliver environmentally sustainable farming."*⁵

A sizable area of this land is Grade 3A, Best and Most Valuable, as shown on the MAGIC map of local farmland quality.⁶ It is worth noting that some part of Site 1 has not yet been graded and it is remiss of the Council to propose it for development in the absence of that knowledge. As has already been pointed out the analysis in Annex II of the ISA has mistakenly claimed that 3A and 3B land cannot be differentiated, and therefore failed to identify the two areas of 3A land in Site 1— one of which surrounds the Hardens Farm buildings.

⁵ Graham, K et al, (2019), Reviving County Farms, CPRE

⁶ <https://magic.defra.gov.uk/>

Site 1 is bordered and defined by two rivers, the Avon and Marden, which contributes to its varied character and farming opportunities. Accordingly, it can be thought of as the **Avon and Marden Vale** (AMV). It contains the two previously named working farms. Its character was briefly touched on in the Preliminary Environmental Assessment of Options Report (PEAOR) ⁷. Its rather general account reported that *'the broad, flat, low-lying clay vale, is strongly characterised by the presence of the River Avon, River Marden and other tributaries'* (3.6.2) and that

'the lowland valley landscape comprises medium scale, mixed arable farmland with some grazed meadow that is strongly defined by a framework of woodland blocks and intact and predominantly well-managed hedgerows frequently with hedgerow trees, although in places hedgerows have been removed creating a more open and fragmented landscape character'. (3.6.3)

Views across the generally semi-open landscape within the study area mean that the extent of views are contained by subtle changes in landform, localised hillocks or ridges to the east and north-east of Chippenham. (3.6.6)

The report also acknowledges that *'Sensitive features identified in the Wiltshire Landscape Character Assessment, 2005 include: 'rural tranquillity; hedgerow pattern; water bodies and water ways of varied character and ecological value; streamside willows and other riparian vegetation; remnant hay meadows; wide open views; and settlement pattern of nucleated villages with variety of vernacular building materials'*. (3.6.5)

This is peri-urban farmland. In the words of this Report *'The quality of the landscape is influenced by the proximity to Chippenham settlement edge'*. It is also defined by its proximity to the Conservation village of Tytherton Lucas, the hamlet of Stanley, both within the larger parish of Bremhill. In other words, it is the neighbourhood farmland of urban Chippenham and rural Bremhill. Its destruction would have a significant adverse negative effect on both communities. Conversely both communities will benefit from its continuation and from the many opportunities there are for its improvement in the Plan period. Increasing attention is being given to the contribution of peri-urban farmland, for example the August 2020 Sustain Alliance⁸ report on Fringe Farming⁹ in and around London, which highlighted the benefits of peri-urban farming for increased food production and resilience, skills and training and new routes to local markets. It also makes the case that *'notably this should include protection of the County Farms estate so it can provide land for new entrants, varied land holding sizes allowing farmers to progress in farming, and testing and demonstration sites of agroecological, nature- and climate-friendly farming systems'* (pp. 13-14)

The report included specific recommendations for Local Authorities:

- Those with land holdings in the urban fringe to take more responsibility for how their land is managed to achieve wider public benefits.

⁷ part of the widely criticised Future Chippenham plans for a distributor road round Chippenham which would cross Area 1.

⁸ <https://www.sustainweb.org/>

⁹ <https://www.sustainweb.org/publications/Fringe-Farming-Breifing-Aug2020/>

- Build relationships with landowners and any tenant farmers to identify opportunities and barriers to growing more agroecological food and getting it into local market outlets.
- Innovate and encourage different models of food production that include community engagement.
- Adopt new models of land management such as those presented by the Ecological Land Cooperative, the Soil Association and the Land Trust, to allow more flexibility and progression for farming careers.
- Integrate opportunities into Climate Change Action Plans and food procurement contracts.

These have immediate relevance for a positive future for the Avon and Marden Vale, and will be returned to later in this response.

Food production in peri-urban areas is often on a small scale, in smallholdings or modestly sized farms. One of the urban myths in some policy discussions is that small farms have no future and the only future is large scale agglomeration. This is not the case. The 2019 Defra Evidence Compendium (p. 70) shows that size of farm is not necessarily the issue but how well the farm is managed ; it shows that on a scale of farm profitability (defined by £ profit for every £100 of inputs) very small economic size farms make up 40% of the top 10% of such farms. Other evidence and argument in favour of small scale food production can be found in the 2017 'A Matter of Scale' study ¹⁰, which examined productivity data, local marketing, employment, reductions in waste and motivation for environmental improvement – all supporting the contribution that small farms make. Further support for the contribution of small farms comes in the 2017 CPRE Uncertain Harvest report¹¹ and a 2016 Prince's Countryside Fund Report ¹² recommends actions to improve small farm futures. The case for small farms is increasingly being made:

<https://landworkersalliance.org.uk/wp-content/uploads/2018/10/matterofscale.pdf>

None of which is to deny that small farms have been and are under pressure and that many have been unable to survive. So that a 'business as usual' approach to farming in the Avon and Marden Vale is not recommended. There is a bright farmland future for the Vale but it requires innovation (of which diversification is one example), funding and policy support, local connection and public engagement.

British farming, large and small is already moving down the diversification path. Defra has reported that "uptake of diversified activities has increased from 51% of farm businesses in 2009/10 to 66% in 2017/18. For those farms with a diversified activity, their income from that activity accounted for

¹⁰Laughton, R. (2017) A Matter of Scale: A study of the productivity, financial viability and multifunctional benefits of small farms (20 ha and less). Landworkers' Alliance and Centre for Agroecology, Coventry University.

¹¹ Willis, G. (2017) 'Uncertain Harvest: Does the loss of farms matter?', CPRE

¹² Winter, M. and Loble, M. (2016) Is there a future for the small family farm in the UK? Report to The Prince's Countryside Fund, London: Prince's Countryside Fund. ISBN 978-902746-36-7

28% of their profit in 2017/18.”¹³ An excellent example of successful diversification can be found locally at Hartley Farm at Bradford on Avon <https://www.hartley-farm.co.uk/about/our-story/>. Local connectivity is crucial for success of this kind of diversification, which is returned to below.

Emerging environmental approaches to farming are another promising form of diversification open to the AMV farms. Perhaps the most promising for the future of the Avon and Marden Vale is *agroecology*, simply put the application of ecological principles to farming. Agroecology promotes farming practices that;

- **Mitigate climate change** - reducing emissions, recycling resources and prioritising local supply chains.
- **Work with wildlife** - managing the impact of farming on wildlife and harnessing nature to do the hard work for us, such as pollinating crops and controlling pests.
- **Put farmers and communities in the driving seat** - they give power to approaches led by local people and adapt agricultural techniques to suit the local area - and its specific social, environmental and economic conditions.¹⁴

One option for the future of the AMV can be seen in this extended discussion of agroecology:

“So instead of the conventional, monoculture-based industrial approach which relies on external inputs, we need to develop sustainable, regenerative farming systems that improve the well-being of small-scale farmers, create diversity to make food production resilient to a changing and unpredictable climate, and produce sufficient food whilst enhancing biodiversity. Instead of marginalising sustainable local food producers, we need to put sustainable local food at the centre of our food supply, with small-scale producers feeding local communities, rather than being squeezed by industrial-scale global supply chains.

Agroecological farming is needed to preserve natural resources. This includes recycling nutrients and energy on the farm, rather than using external inputs; integrating crop and livestock farming; diversifying species (and therefore genetic resources); and focusing on the ways in which crops and livestock can mutually benefit each other, rather than on individual species. By using organic matter and improving the soil, farmers can promote better plant growth. This is an agro-ecology knowledge-intensive system, but the knowledge is developed by the farmer through understanding local conditions and experimenting.

Re-connecting farmers and consumers is important to help building vibrant local food economies. The aim is to support local producers, processors and retailers, and build links between consumers, local farmers and local food businesses. This means creating decentralized short supply chains, diversified markets based on solidarity and fair prices, and closer links between producers and consumers locally. Consumers should be able to purchase ecologically-produced food from small-scale producers. Short distance distribution models are also an important aspect for the closure of nutrient cycles, a basic need in agro-ecological farming practices. To return plant

¹³ DEFRA Future Farming and Environment Evidence Compendium (2019 update) [PowerPoint Presentation \(publishing.service.gov.uk\)](#)

¹⁴ From the Soil Association web site <https://www.soilassociation.org/causes-campaigns/a-ten-year-transition-to-agroecology/what-is-agroecology/>

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nutrients back into the loop, back to the soil, on the right spot, in the right composition and in the right amounts, is a complex issue. This complexity increases significantly over distance, so agroecology promotes closed production loop and minimised external inputs. In this way local food economies answer the basic need for plant nutrients in agroecological farming practices.”¹⁵

There are several other online sources for agroecology¹⁶ but there is also a successful example of it in practice less than a dozen miles from the AMV, Yatesbury Farm: <https://yatesbury.webs.com/> where the principles are put into successful practice.

One example of agroecology is *agroforestry*, usually combining tree planting with pasture. Adding trees delivers multiple benefits especially in an area where the aim is to improve landscape and recreation for the local population – integrating trees within the farmed landscape to create a patchwork where the trees complement production or are part of it. More trees in the landscape would also combine farming with carbon storage and, if well managed, provide landscape enhancement.¹⁷

For example, one option for the flood plain would be planting of suitable tree species to create a woodland underplanted with wildflowers which local people could visit – perhaps via a new footbridge across the river – i.e., the floodplains in the AMV area could become managed wetlands – wetlands are increasingly being recognised for their carbon storage value as well as flood capacity, ability to filter out pollutants etc. In agroforestry models, these areas could be grazed or left undisturbed.



Avon and Marden Vale - the wooded line is the North Rivers Cycle Route

Fruit and horticulture also offer new smaller scale niche-farming options, which can sometimes be combined with arable and pastoral farms.

From all this it is evident that there are innovative and realistic options for small scale farming in the Avon and Marden Vale, which have the capacity to improve the soil¹⁸, reduce

¹⁵ From the ARC 2020 web site <https://www.arc2020.eu/agroecology/briefing-note-agroecology/>

¹⁶ For example <https://www.agricology.co.uk/>

https://www.sustainweb.org/blogs/nov18_agroecology_future_ukfarming/

¹⁷ [About Agroforestry – The Agroforestry Research Trust](#)

¹⁸ Back to the Land, 2021, CPRE

the carbon footprint and explore the potential for carbon capture. Opportunities for – and the benefits of - engagement with local communities appears as a common theme. Local connections can include local markets and interactions with residents as consumers, but extend far beyond that. They can also provide opportunities for employment, volunteering, learning new skills and entry into the farming profession – one of the original aims of County Farms. There would also be scope for the kind of small-scale landholdings and micro businesses to grow food for local consumption.¹⁹

And of course, these options could – and should - be accompanied by the provision of new allotments for local residents. Demand for allotments is likely to follow from developers cramming in houses with small ‘manageable’ gardens, alongside the benefits of growing your own at a time of visible food insecurity.

Community ownership and support should also be explored. There are practical and successful examples of community farm ownership, and one model offers shares in the local farm to the local community. Options could include promoting a public ownership stake in at least one of the AMV County Farms. [There is even a consultancy that specifically supports fresh thinking about farming ownership: https://sharedassets.org.uk/](https://sharedassets.org.uk/)

Community Supported Agriculture is a variation on ownership.²⁰ The Soil Association defines CSA as a partnership between farmers and the local community, in which the responsibilities, risks and rewards of farming are shared. One community supported farm has 8,000 investor members. They can be farmer- or community-led and produce food on one acre or hundreds. Vegetables are most common, but produce also includes eggs, bread, meat, fruit and dairy. CSAs are also developing to manage woodlands.

Locally engaged farming would be a significant place shaping boost for the communities on both sides of the AMV, encouraging a sense of the important connections of the place where they live with the local countryside and food production – and very relevant to CP2, above.

These innovative approaches to diversified small scale farming are not only practical but have several opportunities to attract funding. The first comes within the Agricultural Transition Plan [Agricultural transition plan 2021 to 2024 - GOV.UK \(www.gov.uk\)](https://www.gov.uk/government/policies/agricultural-transition-plan) which could provide funding for a Local Authority wishing to invest in their council farmland to create new small holdings or incubator hubs for new entrants. This is being piloted in 2021 and due to launch by 2022.²¹

¹⁹ [ecologicallyland.coop | For a Living, Working Countryside](https://ecologicallyland.coop/)

²⁰ <https://communitysupportedagriculture.org.uk>

²¹ There is an introduction to the scheme on p 24

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At the same time, the whole of Government support for farming is undergoing radical change after the departure from the European Union. Government is clearly signalling a new farming focus on public benefit in addition to food production. The replacement will be the Environmental Land Management Scheme (ELMS). This will have three components, which are still being worked through.

<https://www.gov.uk/government/publications/the-environmental-land-management-scheme-an-overview>

<https://townsendcharteredurveyors.co.uk/professional-services/environmental-land-management-schemes-elms/>

As they currently appear, two of these (Sustainable Farm Incentive and Local Nature Recovery) should provide opportunities for funding the innovative farming approaches described above, in the AMV. The SFI is broad based and covers farm land and will set standards for how land is managed for environmental improvement. The Local Nature Recovery component seems likely to enable local priorities to be addressed, including improving or connecting up habitats, landscape and public access, as per the published Agricultural Transition Plan:

“Local Nature Recovery will focus on: creating, managing and restoring habitats such as woodland, wetlands, freshwater, peatland, heathland, species-rich grassland, and coastal habitat, as well as connecting isolated habitats to form networks; natural flood management; species management; rights of way, navigation and recreation infrastructure; education infrastructure, events and services; and geodiversity and heritage asset management.” ²²[Agricultural transition plan 2021 to 2024 - GOV.UK \(www.gov.uk\)](https://www.gov.uk/government/publications/agricultural-transition-plan-2021-to-2024)

Locally engaged small scale food production should also be eligible for charitable funding.

Conclusion

This is strong evidence that recent innovative developments in farming methods offer promising opportunities for refreshed, small scale farming on the Avon and Marden Vale, which are in tune with emerging Government thinking on funding. These could also provide significant health, consumption and recreation benefits for the local community, including of course the people of Chippenham. The available benefits also include biodiversity / wildlife increase, carbon reduction, improved water and air quality, public access and landscape enhancement.

The publicly owned land in the AMV (currently designated as Site 1) provides the ideal opportunity to begin a change process to take advantage of these opportunities at time when food production

²² referenced above. This extract is from p33.

and food security are rapidly rising up public concerns and policy priorities. The County farms should over time be the catalysts for wider change.

The recommendations emerging from this analysis are:

- ✓ first and foremost, the retention of this Avon and Marden Vale land for a progressive farming based, locally connected future, and the removal of the land from any development priorities.
- ✓ Early discussions between the representatives of Chippenham and Bremhill Parish about the future options, particularly the future of the County Farms and other publicly owned farmland in the area.
- ✓ To include any local farmers who are interested in these options.
- ✓ An accompanying and parallel public debate, informed by appropriate outside expertise.

Summary

There is ample evidence of opportunities for developing a positive, community-oriented farm-based vision for this area as a 2021 alternative to roads, concrete and Chippenham suburbs. Opportunities that are not only in tune with the best of today's farming, but could be in tune with developing Government policies and attract significant funding.

There is more detail to be considered and some blue sky thinking to be cultivated. In discussion with local people. Probably but not necessarily beginning by pressing for restoring the County Farms to their original purposes, including encouragement of new entrants into farming and connections with the local community. County farms should deliver wider public goods –being managed in ways that do more for the community and the environment – be that better public access or chances to volunteer on food growing, better soil, water and carbon management for example and expansion of wildlife. Towards a green Avon and Marden Vale.

CP13 Other important factors that need to be considered in planning for Chippenham

There are innovative ideas that need to be considered in developing Chippenham in the future outlined in our response to CP12, to develop a greener future for the Avon and Marden Vale.

The climate crisis and the pandemic have combined to render obsolete Wiltshire Council's ideologically driven and longstanding policies on house-building that encouraged developers to alight on Chippenham as a town where the county planning authority was very happy to unlock land for building. Wiltshire Council has had therefore to concoct excuses for maintaining a stance that, as time goes by, becomes steadily more untenable. Their excuses are simply that. The council fails to provide robust and proportionate evidence.

Household projections are only a starting point. Wiltshire Council fails to disaggregate past undersupply, market signals, projected employment growth, demographics such as age, household types, health and social needs. Actual household sizes should determine, for example, specified bedroom numbers, housing types, and tenures. Wiltshire Council also fails to disaggregate and account for:

- concealed households
- disabled and older people living in institutional settings because of a lack of suitable housing stock
- Overcrowded households
- Homeless sofa surfers
- Existing housing stock that age and disrepair have made unsuitable
- Existing housing stock that is no longer suitable for owners who cannot access affordable housing suitable for their needs
- Existing housing stock that is unsuitable for households with young children or teenagers.

There isn't actually a housing crisis for the more affluent who typically can service the mortgages for second homes, buy-to-lets, for large dwellings in relatively large grounds, and who already have property. Land owners have been able to release land for building low density medium sized houses. Land bankers release land opportunistically when they judge they can maximize profits. Low-density single-family-home land-use planning has come to be seen as an apolitical norm, with advantageous financial arrangements compared to alternatives. It creates a political constituency wedded to car dependence regardless of other positions (<https://bit.ly/39mMm5a>).

Suburban sprawl, such as that proposed for Chippenham, can be seen as the effect of state capture by the car-dependent transport system, rather than an outcome of citizen preferences (as it is often presented). One analysis of housing requirements notes that venal attitudes among supporters of the dominant housing market model include—

- a desire to see house prices continue to increase
- A tendency to rationalize problems such as car dependence as “congestion”
- A reluctance to pay for local services that they don't use such as bus subsidies.

But a first-time buyer earning £30,000 cannot afford an average Barrett or Persimmon house in Chippenham unless he or she has more than half the asking price in savings.

Wiltshire Council equates road-building with demonstrating its competence in policy making. It presents low-density single-family-home land-use planning as an apolitical norm. It offers advantageous financial arrangements to developers compared to alternatives. It has created a political constituency wedded to car dependence regardless of other positions. (<https://bit.ly/39mMm5a>) It completely ignores low-cost forms of housing tenure, e.g., increased provision of housing association/council housing where housing prices are not driven by market forces.

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The emerging spatial strategy conveniently omits to cite the Wiltshire Local Plan Review Scale and Distribution of Growth (Regulation 18 consultation) Report of Informal Consultation with Town and Parish Councils (April 2019) in which:

- Chippenham consultees broadly stated a preference for “high quality design with green infrastructure and recreation routes linking existing community to the countryside”
- they preferred to place development towards the south and south east of the town with the remaining numbers being accommodated by smaller sites around the periphery of the settlement boundary along with a significant number within the town itself in the form of brownfield development.
- They highlighted “a number of potential constraints were highlighted in attempting to accommodate the level of growth being proposed including the loss of agricultural land, impacts on air pollution, building in flood risk zones (and the impact of climate change on this constraint), traffic congestion, the capacity of the road infrastructure to adapt and accommodate this level of growth along with concerns over the viability of proposed solutions to the current levels of congestion within the town;
- Chippenham consultees supported “a southern link road which was seen as a more viable solution to relieve current congestion.”

Wiltshire Council has disregarded every single one of these preferences on the part of Chippenham people.

8. Conclusions

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To: Wiltshire Council

Stop Urban Sprawl and Destruction of Wiltshire Countryside

Campaign created by Cause Wiltshire



Stop 7,500 houses and £75 million- worth of roads being built on open landscape in the Marden and Avon river valleys.

Why is this important?

Wiltshire Council plan to build 7,500 new houses (with 10,000 plus additional vehicles) and a large distributor road on unspoilt, ecologically significant parts of North Wiltshire.

This will:

- Turn Chippenham into an even bigger commuter town, with even more congestion;
- Worsen already poor air quality in and around Calne and Chippenham;
- Massively increase greenhouse gas emissions as a result of the additional traffic;
- Have an adverse impact on the health and premature deaths as a result of air pollution;
- Increase flood risk in downstream Chippenham and beyond;
- Destroy the wildlife corridor and biodiversity along the River Avon and Marden valleys;
- Destroy good quality farmland needed to stop our reliance on other countries for food supply, including the loss of county farms;
- Destroy valuable, unspoiled river landscapes and their public amenity value.

Given the declared Global Climate Emergency, it is astonishing that the Council would even consider building on land that is so vital to our future and that would undermine the battle against climate change. In fact, we believe that in the midst of a global Climate Emergency, unsustainable development of this kind should not be permitted.

It seems clear to us that this scheme has been devised by Wiltshire Council purely in the interests of meeting housing targets and is being imposed on the residents of Chippenham, Calne and its surrounding villages outside of democratic process and WITHOUT public support.

Chippenham residents share our concerns about the green spaces around their town. In a survey conducted for the Neighbourhood Plan in 2019 declared 'over-development' and 'urban sprawl' declared one of the top - three issues in a long list of concerns.

This Housing Infrastructure Fund application and associated road and 7,500 houses, is also in direct conflict with the existing Chippenham Site Allocations Plan (part of the Local Plan) and is an attempt to predetermine the outcome of the Local Plan Review, which had been working up proposals for much smaller expansion of the town.

We are therefore asking the 38 degrees community to help us stop this destruction of North Wiltshire's beautiful river valleys and unspoilt countryside, and create havoc on our roads and let Wiltshire Council know that we will not let them get away with it.

5,324 of 6,000 signatures

Sign the petition

First Name *

Last Name *

Email *

Postcode *

I'd like to be emailed about this, and other great 38 Degrees campaigns

keep me informed via email
 don't send me emails or keep me updated in future

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Please note that, if you give us your permission to contact you, you can withdraw it at any time by updating your preferences [here](#).

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LAST SIGNED BY:

Joshua S.	2 hours ago
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Dan C.	2 hours ago
Karl D.	2 hours ago
Luke L.	2 hours ago

As seen above the 38 degrees petition has been signed by over 5,300 people as of Monday March 8th

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As can be seen above the 38 degrees petition has been signed by over 5,300 people as of Monday March 8th.

Chippenham Town Council have unanimously voted against this scale and form of development.

Calne Town Council have unanimously voted against this scale and form of development.

Bremhill Parish council have unanimously voted against this scale and form of development.



SAVE OUR AVON AND MARDEN VALLEYS!

STOP THE ROAD!

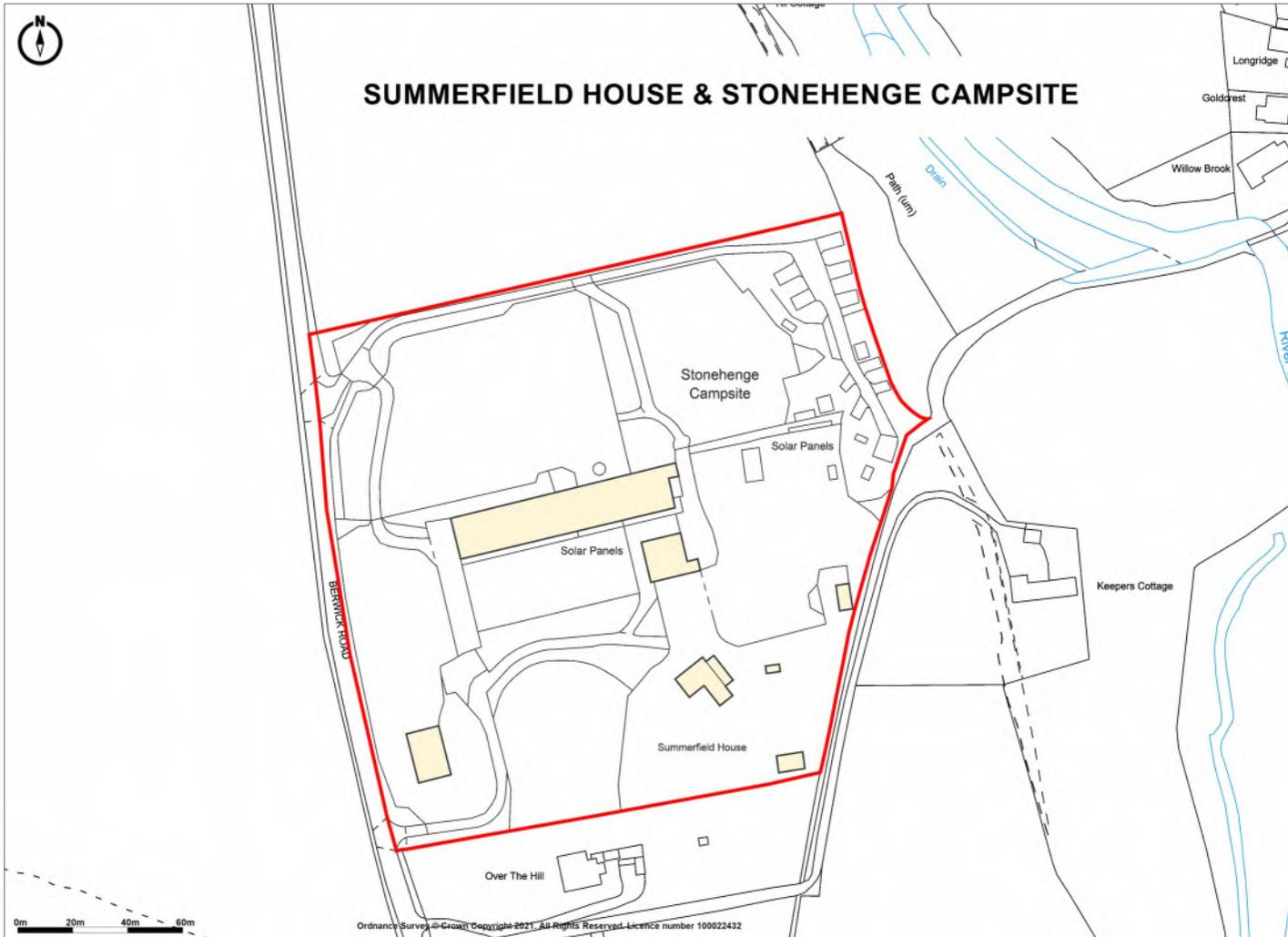
NO TO THE HOUSING!

Chippenham Draft Local Plan: -

Why proposals for development of the Avon and Marden Vale should be withdrawn

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RURAL 349 A



Promap

● LANDMARK INFORMATION

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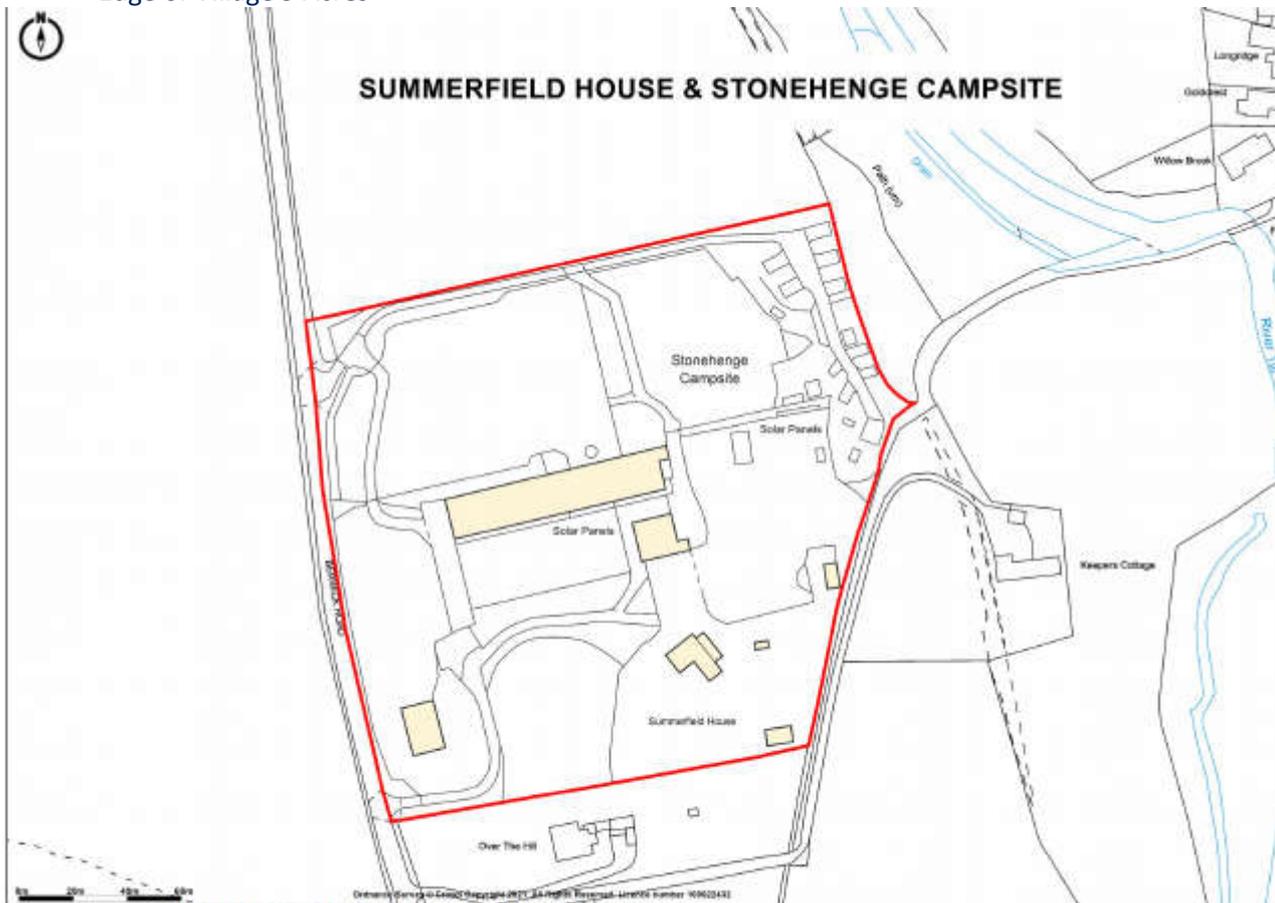
From: [REDACTED]
Sent: 08 March 2021 15:55
To: Spatial Planning Policy
Cc: [REDACTED]
Subject: Local Plan Review consultation - SHELAA Site S198 - Summerfield House & Stonehenge Campsite , Berwick St James - 8 March 2021
Attachments: SCS Plan.pdf
Importance: High
Categories: BG

Dear Sir / Madam,

I am writing to confirm that 'Land at Wisma Farm, Berwick St James', identified as Site Reference **S198** within the Wiltshire Council Strategic Housing and Economic Land Availability Assessment (2017), is available for development. I am the joint owner of the land and would like for it to be considered as part of Wiltshire's Local Plan Review. I also welcome the opportunity to share my views on the issues and opportunities associated with LPR in respect of tourism which will help to shape future growth in the area over the plan-period 2016 to 2036.

Please find enclosed:

- Location Plan for **SHELAA Site S198** - Land at Wisma Farm, Berwick St James.
- (Please note the site is **now known as Summerfield House & Stonehenge Campsite**)
- Edge of Village 9 Acres



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The site benefits from a number of planning permissions in relation to the 'Stonehenge Campsite & Glamping' and Summerfield House and an live permission for **B1/B8 uses** (Ref: S/2011/0518). Therefore, I request that the SHELAA

be updated to reflect the fact that the site is 'available' and is brownfield/PDL. On this basis I request that the site is considered as a future housing allocation.

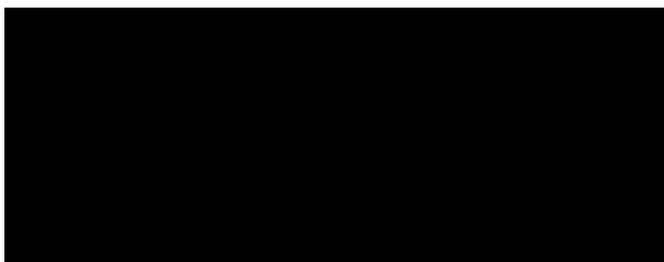
I would also like to highlight that, with the new emphasis on 'staycations' and the ongoing interest in Stonehenge, Wiltshire must use its assets to maximise the opportunity that tourism can bring to the area; the added economic benefit of money being spent and the jobs created in the local area should be given a greater prominence in the Local Plan.

Facilities like **'Stonehenge Campsite & Glamping'** should be supported by the Local Plan by forming flexible Planning Policies which allow campsites to grow and encourage more tourism in Wiltshire. Flexible Planning Policy can help small businesses in this post-COVID19 world and boost the local economy at the same time. So far, it seems that the Local Plan is all but silent on such matters.

I suggest that Core Policy 39 from Wiltshire Core Strategy (2015) is, at the very least, retained as a saved policy. However, this should be reviewed in terms of more people wanting to holiday in Wiltshire so the need for additional accommodation will become acute; especially outside of the Principal Settlements and Market Towns. More accommodation near to main attractions, such as Stonehenge, would reduce the number of vehicle trips needed in the area which would help preserve the local environment.

If you require any further information please advise

Kind regards,



The Country & Equestrian Property Specialists

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The advertisement banner features a central illustration of a large stone house with a chimney, set against a light background with silhouettes of trees and a flock of birds. Below the illustration is a dark blue horizontal bar containing the company name, phone number, website, and a Trustpilot rating. At the bottom, there are four categories: Country & Village, Farms & Land, Equestrian & Smallholdings, and Tourism & Leisure, each with a small icon.

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RURAL 350



HSL | HOLLINS STRATEGIC LAND

Representations to Wiltshire Local Plan Review 2036



Hollins Strategic Land

March 2021

Overview

These representations are prepared by HSL and reflect our views on the emerging Local Plan policies having regard to a number of our interest areas/sites that we are promoting through the Development Plan process across the different housing market areas in Wiltshire;

- Land at Turnpike Close, Semington – Trowbridge HMA
- Land at Restrop Road, Purton – Swindon HMA
- Land at Sherston Road, Malmesbury – Chippenham HMA
- Lane at Nine Elms, Swindon (Wiltshire) – Swindon HMA
- Land at School, Christian Malford – Chippenham HMA

Each site is referred to in more detail at Appendices 1 – 5 at the end of this representation.

The following sections provide our representations on the Local Plan Review consultation documents.

Additional detailed representations on Purton and Malmesbury have been submitted by Nexus Planning on behalf of HSL.

Emerging Spatial Strategy

Housing Requirement

- 1.1** We note the housing need is calculated in two ways; a minimum based on standard method and a higher figure based on longer term migration and economic forecasts.
- 1.2** The minimum figure referred to is not a housing requirement figure. It merely represents the minimum starting point for the number of homes expected to be planned for and highlights minimum overall housing need but does not provide the true scale of housing need in Wiltshire when economic objectives are applied and indeed the cap is removed.
- 1.3** We note the evidence base alludes to it being prudent for the Council to consider a number that is higher than the minimum Local Housing Needs (LHN) to provide a buffer against possible future changes when testing different alternatives while reviewing local plans. We agree and therefore support the higher range.
- 1.4** Of interest and worth noting is that the Government's initial revised Standard Methodology calculation (August 2020) (referred to as SM2) identified a requirement in the region of 2,917 dwellings a year which was primarily driven by removing the cap and meeting affordability needs in full. Whilst this figure was revised downwards and an affordability cap re-established, we feel this is the true housing need figure for Wiltshire. Indeed, given the fact that the relevant strategic policies for housing were adopted on 20 January 2015 which is now more than 5 years ago, it is arguable that the most recently adopted strategic policies (i.e. 2,100 per year) with a 40% uplift is applied which yields a true requirement of 2,940 dwellings a year to meet need. This higher figure reflects calculations in the now abandoned SM2 calculation.
- 1.5** We would advocate that this higher figure is acknowledged should the Council adopt a strategy which heavily relies on the Neighbourhood Plan (NP) process to deliver housing needs over the next plan period. Adopting this higher figure would ensure flexibility in the plan where delays might occur and ensure affordability issues are properly addressed and indeed housing needs of all tenures are properly met in full where possible. It would also provide communities an understanding of likely upper end figures as opposed to planning for the baseline as indicated in the emerging evidence base.

Strategic Policies

- 1.6** National planning policy guidance is clear [Para 22 National Planning Policy Framework – NPPF Feb 2019) that strategic policies should set out the overall strategy for pattern, scale and quality of development and look ahead over a minimum of 15 years from adoption. We note from the Local Development Scheme (LDS 2020) that the anticipated adoption date of the Local Plan Review (LPR) is mid-2023 (assuming the timetable is adhered to). This would inevitably fall short of the minimum 15-year period and therefore the Plan may well be found unsound at Examination. We would advocate the plan base date is amended from 2016 to at least 2018 and have an end date of 2038 in order to meet the minimum 15-year period from adoption.

-
- 1.7** In terms of strategic policies, we advocate that the plan includes longer term visioning and indicates broad locations for development to at least give some strategic direction for implementing non-strategic policies such as NPs.
- 1.8** The LPR should identify broad areas / locations where land could be brought forward to meet needs over the plan period and in line with the presumption in favour of sustainable development should supply fall short in any 5 year period. Broad areas could include location with rail infrastructure or strategic bus corridors and / or near major employment centres / hubs / industrial areas. The west of Swindon area must be a preferred location for contingency planning.
- 1.9** The LPR needs to provide a clear strategy for bringing sufficient land forward and highlight focus areas for longer term planning to meet all housing needs in full.

Housing Market Areas

- 1.10** We welcome the approach to identifying the Housing Market Areas (HMA). Whilst the most significant change is to the Chippenham HMA which now includes Melksham, we note some discrepancies with the evidence base;.

Chippenham HMA

- 1.11** We support growth to Chippenham and at Melksham given the higher order status of these settlements. Whilst Melksham has greater capacity to absorb growth and with the proposed by-pass it will provide greater opportunity to expand and connect to other larger settlements to the north. However, Chippenham is somewhat constrained, and we are not convinced that the uplifted housing figures can be delivered within the plan period. There is therefore an overconcentration of growth at Chippenham which will effectively put the deliverability of the plan's spatial strategy at risk by failing to deliver the necessary homes in accordance with the housing trajectory. This will inevitably lead to increasing shortfalls of land supply and thereby increased need to support 'speculative' applications in order to boost supply. In this case, we would advocate that a slightly more dispersed strategy is adopted which increases housing provision to the larger villages within the HMA. The larger villages and key service centers have a greater role to play in meeting the housing needs of the HMA. By spreading proportional growth to these settlements that are least environmentally constrained and have capacity will ensure needs are met in the right locations and supply is delivered in accordance with the housing trajectory. We would therefore advocate that a blend of the proposed alternative scenarios is adopted which retains focus on both Chippenham and Melksham but also see increased growth to the other larger settlements.
- 1.12** Of particular note, is the reduction in housing numbers to Malmesbury. We do not see any compelling evidence before us at this time which supports a lower figure to the town. At the very minimum, it should reflect existing growth levels as set out in the Core Strategy (which was founded upon an evidence base and deemed to be deliverable). We have submitted separate comments on Malmesbury.

Swindon (the Wiltshire Part) HMA

- 1.13** We note some discrepancies in the evidence base relating to the Swindon (the Wiltshire part) HMA. There is no doubt that Swindon will remain a focal point of economic growth and job provision notwithstanding any current impact due to COVID and / or in relation to the closure of Honda. Indeed, recent reports (Swindon Advertiser 19th February) by co-chairman and chairman of the Swindon & Wiltshire Local Enterprise Partnership Paul Moorby stated “*SWLEP is committed to supporting associates leaving Honda’s employment in July*” and stated “*We are funding a £250,000 study to understand how local roads, rail and green energy supply will support a range of future uses of the site, potentially supporting up to 8,000 jobs*”. Indeed, it was reported that ‘*Many Honda staff who have already left the company since the announcement in 2019 are in new jobs, or training or education.*’.
- 1.14** Furthermore, and although it is just speculation, we understand that BMW may be in the running to take over the Honda facility. Our point here is that economic forecasting models ebb and flow but a constant will remain is that economic objectives will seek to boost growth at higher order centres such as Swindon.
- 1.15** The suggested total requirement of 3,450 homes for the period 2016-2036 is clearly an under provision. The HMA (particularly the ‘West of Swindon’ part) is probably the most sustainable location within Wiltshire given its proximity to a large regional centre and job provision. The functional economic study highlights this. Indeed, the LHN report (2019) concludes that the area should plan for an upper range of 4,800 new homes to meet expected job growth, particularly in the shorter term. We note the figure relating to the longer-term trend is lower and has been adopted but this fails to recognise the needs over the shorter term or the first five years of the plan. This is contrary to the evidence base.
- 1.16** We advocate, in line with the evidence base, that at least 4,800 dwellings are planned for from 2016-2036 in the Swindon HMA and at least 1,000 dwellings are provided for within the ‘West of Swindon’ area. This would reflect sustainable patterns of movement, encourage shorter journey times (thereby helping climate change policies objectives) and more importantly allow for the proper planning and investment over the longer term of improved infrastructure and services.
- 1.17** It is also worth noting that the Economic evidence base has yet to be tested and as such planning strategies for both Wiltshire and Swindon may well be amended to reflect higher levels of economic growth. This is particularly pertinent where it is likely that Central Government will no doubt be seeking to grow the economy post Covid-19.
- 1.18** We would therefore advocate that the ‘West of Swindon’ area is properly defined within the LPR and an allocation of at least 1,000 dwellings is made over the plan period in line with the evidence base and to ensure flexibility is provided for in the plan. This allocation would also provide the LPR with an appropriate contingency framework should any of the other HMA’s fail to deliver in accordance with the housing trajectory whilst also providing a robust fallback option to boost supply in a sustainable location close to a major urban centre. This would relieve pressure on smaller rural settlements should land supply fail in future years.

Trowbridge

- 1.19** We acknowledge the focus of growth should be on Principle settlements and market towns, however we feel further recognition of the key services centres and larger villages is required in this HMA.
- 1.20** For example, the main town of Trowbridge has historically failed to meet delivery targets and whilst proposed numbers are somewhat reduced there is risk that the increase at Westbury could also lead to failed delivery objectives within the HMA. We would therefore advocate that the housing requirements within the 'Rest of the HMA' is increased and contingency policies in place to boost supply should larger sites fail to deliver in accordance with the housing trajectory.
- 1.21** Local Service Centres and Larger Villages have a key role in facilitating future housing needs, particularly at Semington and Dilton Marsh given their proximity to key transport infrastructure. A review of these centres is critical in order to assess the most sustainable locations and to ensure that future minimum housing requirements are directed to the most sustainable settlements with capacity.

2.0 Other Strategic Policy

Presumption in favour of Sustainable Development

- 2.1 We would expect to see a reflection of national policy relating to the presumption in favour of sustainable development in a forthcoming LPR.

Windfall Allowance & Brownfield Land

- 2.2 In accordance with national policy guidance, we expect to see compelling evidence that the level of windfall will provide a reliable source of supply. Likewise, we have not seen any compelling evidence that would support the level of housing planned for on brownfield sites and indeed the deliverability of such.

Entry level exception sites

- 2.3 We expect to see a specific policy which will properly address the provision of first-time homes either to buy or to rent as advocated at Para 71 of NPPF 2019.

Planning for an Older Generation

- 2.4 We expect to see a specific policy which allows for the proper planning and deliverability of homes for older generations either as bespoke sites or to be delivered as part of a mixed and balanced community alongside market homes. There should be no restriction on site size thresholds.
- 2.5 Wiltshire has an older population that is set to increase over the next ten years where it's expected that the number of people in Wiltshire aged over 65 will increase by around a quarter and the number over 85 will increase by over a third. Over 65s will see the largest growth of the next 20 years with the number of people over 75 and 85 years old growing fastest. Whilst a large proportion of people will live full active lives, an older population typically has more complex health and care needs this has implications for the provision of healthcare but more significantly on community care.
- 2.6 There is no doubt that an increasingly large ageing population will place further demand on care services (which are already operating over capacity) to support older people with long term conditions and complex needs. The NHS as national care provider is therefore driving the agenda of increasing 'care in the community' which primarily allows for older people to live healthily at home for as long as possible, and when care is needed for it to be provided in the most suitable setting. It is widely acknowledged that a high proportion of older people are living in inappropriate accommodation to meet aging needs and as such there is a need to increase housing provision aimed at the over-55s which is delivered as part of market led housing developments. We would therefore advocate that appropriate policies are set out in the LPR which provides the necessary policy framework to allow for this housing provision to be delivered alongside market homes.

3.0 Empowering Rural Communities

- 3.1** We welcome the Council's theme of 'Empowering Rural Communities' and attempting to provide appropriate mechanisms to empower and not frustrate local initiatives and facilitate meeting needs. However, the current approach is not robust and does not properly assess the housing need or locational sustainability of centres, particularly Larger Villages which have capacity to absorb future housing needs in locations with good accessibility and close to larger urban centres.
- 3.2** There is no doubt that Wiltshire has a thriving rural community and many of the larger villages contain everyday services and facilities that also serve the wider rural hinterland. To ensure centres remain vibrant, we agree that it is vital that planning supports the role of these communities by providing a proper policy framework that encourages sensible growth so that these centres can continue to sustain and indeed improve the level of services and facilities they have to offer in addition to providing housing needs in full across all tenures.
- 3.3** We agree the role of the LPR should set an appropriate scale of housing for Large Villages and Local Service Centres over the plan period. However, we disagree with the proposed approach which appears to be based on constraints mapping and not reflecting sustainability credentials such as the level of services and facilities, education provision, transport and proximity to larger urban centres (whereby the focus is on reducing travel time and ensuring shorter journey times).

Meeting Local Needs and Market Housing

- 3.4** Setting a housing requirement for community areas is a strategic policy and therefore it must be led by the LPR. Designated Neighbourhood Plan areas cannot be left to define their own housing needs as proposed – this is flawed and the LPR will likely be found unsound if it progresses this approach. The LPA must therefore prepare the evidence and lead on preparing housing needs assessments for community areas in order to determine a robust housing requirement figure for each area. Adopting this approach would ensure that the evidence is tested at examination allowing for NPs to implement the housing requirement figure without challenge and make allocations (through non-strategic policies) as they see fit. This approach is advocated at Paragraph: 009 Reference ID: 41-009-20190509 of National Planning Policy Guidance (NPPG).
- 3.5** In defining non-strategic policies in NP areas, we would advocate that the LPR includes an appropriate policy framework that allows for NP's to include landowner's agents/developer partners given their expertise and professionalism.

Community Needs and Dwelling Size

- 3.6** A clear definition of 'smaller' dwellings needs to be provided in the LPR.
- 3.7** We disagree with the approach to remove permitted development rights on smaller properties. There is no compelling case to do so. Providing the right level of new homes in any location should ensure a flow is maintained in the housing market. The issues relating to

smaller homes in village locations being extended is primarily due to lack of new supply in those locations and therefore no choice for people to move to as and when needed. The provision of a mix of new homes on any one site should be the absolute priority.

Revised Core Policy 44

- 3.8** The amended policy is welcomed but it must not limit development size. Whilst the increased threshold is supported in principle, we feel the limit of 20 dwellings is overly restrictive and defeatist. It is at odds with the objective of boosting housing to meet needs in addition to creating potential conflict with the proposed indicative requirements at larger villages for example.
- 3.9** Other planning policies will and can control scale of development and ensure size of proposals are appropriate to each settlement.
- 3.10** Alongside a revision to Core Policy 44 must also be a revision to Core Policy 1 whereby settlement boundaries are allowed to be flexible in order to meet needs and a new definition of small sites is required to align with NP allowances to make site allocations. The current limit of 10 will no doubt limit and restrict supply.

40% affordable homes target

- 3.11** We welcome the initiatives to boost affordable supply across all the HMAs. However, we have not seen any clear evidence that would support a blanket policy of 40% affordable housing across the rural areas. There are clear differences between the HMAs in terms of affordability and as such policy must reflect the differing locational circumstances.
- 3.12** The approach needs to start at boosting supply and ensuring a positive policy framework is provided for which allows supply of affordable homes to be delivered not just through 'Exception site policies' but alongside market homes and on sites above 10 and indeed 20 dwellings.

Proposals for New Housing

- 3.13** We welcome the LPR will set out housing requirements for Local Centres and Large Villages. However, in doing so, the housing requirement for each settlement is a 'strategic policy' and must be based on robust evidence and should be tested against local plan objectives. National policy aims to promote sustainable development in rural areas and outlines that housing should be located where it will enhance or maintain the vitality of rural communities. It is expected that the LPR will identify opportunities for villages to grow as advocated at Para 77/78 of the NPPF 2019.

Calculating the Requirement (Rural Areas)

- 3.14** NPs should support the strategic development needs set out in the Local Plan. They should not promote less development than set out in the Local Plan, undermine its strategic policies or be used to constrain the delivery of a strategic site allocated for development in the Local Plan.

Delivering the Requirement – New Core Policy

- 3.15** The policy only works where a robust housing requirement for each area has been agreed and tested at Examination as part of the LPR process. The policy is an implementation policy and must therefore have regard to the presumption in favour of sustainable development (Para 11 NPPF 2019).

Housing Requirements – Indicative Outputs for Local Service Centres

- 3.16** It is recognised that Local Service Centres have a higher role than Large Villages. However, we would advocate that an updated reassessment is undertaken to assess the function of the current centres and define whether additional Local Services Centres should be included. For example, and based on evidence, it is clear that Purton performs well as a Local Service Centre in terms of its characteristics. It has a large population (over 2,000), is a significant employment base and has a secondary school. The road network is local but its accessible and no more constrained than the road network at Market Lavington and Pewsey, which both lie further from strategic networks and main urban centres.

Housing Requirements – Indicative Outputs for Large Villages Chippenham HMA

- 3.17** We presume further work will be undertaken to define and test the robustness of the housing requirement for each area such as progressing a local housing needs assessment as part of the LPR. With this in mind we are concerned with the emerging approach as it overly focusses on Chippenham. In this case, as set out earlier, we would advocate that a slightly more dispersed strategy is adopted which increases housing provision to the larger villages within the HMA.
- 3.18** HSL is promoting land at Christian Malford. An NP is in place since 2018 and covers the period 2015 – 2035. It makes several small-scale housing allocations totaling around 30 dwellings across 6 sites. Each site ranges from 4 dwellings to a maximum of 6 dwellings. However, given the scale of the allocations no affordable provision will be provided and the settlement remains no better off in terms of meeting local housing needs. Since 2006, a total of 6 affordable homes were delivered at Christian Malford and although a NP is in place that covers the period to 2035 it is highly unlikely to generate any further affordable provision at the settlement. Planned development in Large Villages must be through larger sites where mixed communities can be delivered and the necessary infrastructure to support new development can be properly provided for.

Housing Requirements – Indicative Outputs for Large Villages Swindon HMA

- 3.19** We presume further work will be undertaken to define and test the robustness of the housing requirement for each area such as progressing a local housing needs assessment as part of the LPR. With this in mind, we make the following observations.
- 3.20** We are concerned with the emerging approach as it focusses housing to unsustainable locations in sensitive areas. For example, we note that of the 10 large villages within the Swindon HMA, 6 are located within AONB designation. As we understand it, such locations would be restricted to an annualised baseline of 1 dpa but the table 2.6 indicated higher annualised rates are envisaged at these constrained often remote settlements despite their

'large village' status. Realigning the annualised baseline requirement of 1 dpa at these sensitive settlements would mean that a further 65 dwellings is required on top of the 191 residual need. This would mean a total residual need of 256 dwellings to be delivered within the HMA across only four settlements.

Housing Requirements – Indicative Outputs for Large Villages Trowbridge HMA

- 3.21** We presume further work will be undertaken to define and test the robustness of the housing requirement for each area such as progressing a local housing needs assessment as part of the LPR. With this in mind, we make the following observations.
- 3.22** We are concerned with the emerging approach as it focusses housing to unsustainable locations in sensitive areas. For example, we note that of the 15 large villages within the HMA, 3 are located within an AONB designation. As we understand it, such locations would be restricted to an annualised baseline of 1 dpa but table 2.7 indicates higher annualised rates are envisaged at these constrained often remote settlements despite their 'large village' status. Additionally, we note two of the settlements are constrained in part or whole by Green Belt and as such cannot be expected to deliver without further evidence to justify green belt exceptional circumstances. By removing these constrained locations and/or reducing scope of dwellings, it would mean that a further 75 dwellings needs be added to the residual of 371 dwellings. This would mean that a total of at least 446 dwellings needs to be planned for across the remaining 11 settlements of which the focus must be to those large villages which score the highest in terms of sustainability and provision of services.
- 3.23** The higher order larger villages would no doubt support an annualised housing requirement of at least 5 dwellings a year. The larger villages must therefore be prioritised and ranked to assess future requirements and the proper spatial distribution of growth across the Trowbridge HMA.
- 3.24** The two top settlements that perform extremely well over and beyond others are Semington and Dilton Marsh. Semington lies on the primary road network with good access to the strategic bus network and has potential to encourage modal shift by improving means of travel other than the private for shorter journeys particularly given its proximity to the larger urban centers of Melksham and Trowbridge. Dilton Marsh has the benefit of rail access and given this uniqueness to create modal shift in this regard then it must also be highlighted as a priority settlement.
- 3.25** We would advocate that at least 80 dwellings is directed to Semington (4dpa) and an additional 100 dwellings to Dilton Marsh (5dpa).

Appendix 1: Semington and Land at Turnpike Close – Trowbridge HMA

- 1 HSL is promoting land at Semington for residential led housing to meet local needs.
- 2 As we highlighted, the Trowbridge HMA requires at least a further 446 dwellings to be found (based on the current indicative figures presented in the consultation documents). We advocate that the LPR set out a ranking order of sustainable larger villages.
- 3 Our analysis shows that Semington is a high-ranking Large Village and is capable of absorbing some growth over the plan period.
- 4 HSL has been promoting land at Turnpike through the Development Plan process for some years now. The site measures 6.43 acres and lies outside any protected landscape area and the site is not within a functional floodplain.
- 5 Semington lies 2 miles south of Melksham and 3 miles northeast of Trowbridge with an existing population of 930 people (Census 2011). The surrounding highway network provides good connectivity to local urban areas, both by car and bus.
- 6 The village has a range of employment, services and facilities. These include;
 - Saint George’s C of E Primary School
 - Saint George’s Semington Church
 - Village Hall,
 - Social Club,
 - Post Office (Part-Time)
 - The Somerset Arms Public House
 - Football Club
 - Tennis Courts
 - Stems Florist
 - Bridge House B&B
- 7 The village benefits from a ‘strategic’ bus service, providing regular public transport connections to Melksham, Trowbridge and Chippenham every half hour (the x34 service) as well as hourly services to Swindon, Devizes and other surrounding towns (the 49 service). Both stop directly outside Turnpike and offer sustainable forms of transport for potential future residents.
- 8 Employment opportunities are available nearby namely at the school, Semington Turnpike and at Hampton Park and nearby industrial estates all of which are within short journey times by either public transport or alternatively by walking/cycling.
- 9 In terms of existing supply, there are two sites in Semington which currently have planning consent for a collective total of 44 dwellings:
 - St Georges Road Hannick Homes 24 dwellings (inc 30% affordable homes) (Ref 19/07938/REM)

-
- St Georges Road, Greystoke Land – 20 entry level affordable homes
(Ref 20/01306/OUT / Appeal Ref 3236860)

- 10** Assuming the above will contribute to supply and Semington has capacity to absorb at least 80 homes over a 20 year period there is potential for at least another 40 dwellings to be delivered.
- 11** The settlement has capacity to accommodate a modest proposal of around 40 dwellings (with 40% affordable housing). Given the location of the site i.e., access from Turnpike and from the a361 we envisage a future proposal to include a village shop and children's nursery. The location of which is appropriate given the ease of access from the primary road network and the potential to sustain these village services.



Key:

- Key Frontage ●
- Local Store ●
- Nursery ●
- Frontage onto green space ←
- Potential Pedestrian Link ←
- Potential tree planting ●
- Boundary planting ●●●
- Existing Trees ●

NOTES:

NOT FOR SITE PURPOSES: This drawing is a general arrangement plan only and is not intended for site purposes.

SCALE: Do not scale from this drawing.

SETTING OUT: All setting out, levels, dimensions to be agreed on site. Do not use the information on this drawing without checking all dimensions on site. Any discrepancies between drawings, specifications and site works are to be reported to The Urbanists. Order of construction and setting out is to be agreed on site.

CHECK: This drawing must be the latest revision, read in conjunction with all other drawings, details, specifications and schedules. All dimensions are in millimetres unless otherwise stated. Where and contradiction or uncertainty arises between the drawings and/or the schedule of works, it is the contractor's responsibility to seek verification from The Urbanists before proceeding. No claims will be met by The Urbanists, where the contractor continues work in absence of such confirmation.

STATUS:

FINAL

theurbanists
planning & design

Client: Hollis Strategic Plan
 Project: Turmpike, Serrington
 Title: Concept Plan - Option 2

Project ID	Organiser	Rev	Block	Level	Type	Series	Drawn	Rev	Status
LURB	XX	XX	GA	90	601	B	FINAL		

Drawn: FV JD Date: 08/03/2023 Checked: JD Scale: 1:1000

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 T: 0300 300241 E: info@theurbanists.com We are the urbanists and
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Appendix 2: Land at Restrop Road, Purton – Swindon HMA

1. HSL is promoting land at Restrop Road for residential development. A planning application has been submitted for 61 dwellings providing a range of smaller homes to family sized properties in addition to bungalow provision.
2. The Site lies east of Restrop Road, south of the High Street and to the west of Reid's Piece and extends to approximately 3.56 hectares. The northern boundary of the eastern field abuts residential properties accessed from High Street, whilst the northern boundary of the western field abuts an existing area of allotments and a residential development, accessed from Restrop Road, currently being built out by Persimmon Homes. The Site's western boundary is formed by Restrop Road. Residential properties at Reid's Piece, Kibblewhite Close and Willis Way abut the entire eastern boundary.
3. Access to the Site is from an existing field gate on Restrop Road and from High Street (via a footpath through the eastern field).
4. The Site lies entirely within Flood Zone 1 with reference to the Environment Agency Flood Map for Planning. There are no listed buildings within the Site, nor is any part of it either within or adjacent to a conservation area.
5. Purton centre is approximately 150m to the north of the Site and provides access to a range of amenities including local shops, community facilities, public houses, a primary school and a secondary school. The majority of these facilities and services, including the Secondary School, are within an acceptable walking distance.
6. The nearest bus stop is located on Restrop Road, approximate 390 metres from the centre of the Site. The No. 53 bus service can be accessed from this location, providing services to Cricklade, Purton Stoke, Greatfield and Swindon town centre.
7. The centre of Swindon is located approximately 7.5km from the Site, and provides a wide range of employment, retail and leisure opportunities. The nearest large supermarket is the Asda Superstore, located in the West Swindon Shopping Centre, which can be accessed via a 13-minute bus ride (via the 53 bus service).
8. Swindon Train Station is the closest rail station and can again be accessed via the No. 53 bus service. The station provides frequent rail services to a wide range of destinations on the Great Western Main Line including large accessible / commutable employment centres such as London (58 minutes), Bristol (39minutes), Oxford (40minutes), Reading (25 minutes) and Gloucester (52 minutes).
9. The land immediately to the north of the western field has permission for 38 dwellings (Application Ref: 16/10513/FUL) and is currently under construction.

Local Facilities

10. The Site is in an accessible location and is located within close proximity to a number of key local amenities including primary services, as well as retail and leisure facilities. The 2,000 metre pedestrian catchment specified in the TA illustrates that the majority of Purton can be accessed along various amenities such as Spice Express, One Stop convenience store, Lloyds Pharmacy, Purton Surgery, Royal George Inn public house, Bradon Forrest School, The Angel public house, St. Mary's Church of England Primary School and Best One convenience store.

-
11. The various shops and services, including a One Stop convenience store, within Purton are accessible within an acceptable walking distance of the Site.
 12. Purton Surgery lies 630m to the north-west of the centre of the Site and can be reached in a 7 minute walk. Purton Dental Practice is a 12 minute walk away or 7 minutes via the 53 bus.

- Key**
- Proposed Development Area 2 Storey (including residential uses, roads and parking)
 - Proposed Development Area 1 Storey
 - Key Frontage onto POS
 - Key Frontage
 - Potential Focal / Feature Buildings
 - Pedestrian Links
 - Public Right of Way
 - 5m Wide Buffer
 - Public Open Space (including landscape buffers, public open space, landscape planting, SuDS)
 - Retained Trees and Hedge Groups
 - Retained Trees
 - Attenuation Basin
 - Wildlife Corridor
 - Local Area of Play
 - Retained Pond
 - Potential Links



STATUS:

PLANNING

theurbanists
planning & design

Client: Hellins Strategic Land

Project: Purton

Title: Parameter Plan

Project ID	Organiser	Role	Block	Level	Type	Series	Dwg	Rev.	Status
1915	URB	XX	XX	XX	SK	90	002	E	PLANNING

Drawn: JD Date: 03/02/2022 Checked: JD Scale: 1:1250@A3

The Urbanists - The Creative Quarter - SA Morgan Arcade - Cardiff - CF10 1AF
 T: 029 2023 6133 E: info@theurbanists.net W: www.theurbanists.net
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Appendix 3: Land at Sherston Road, Malmesbury – Chippenham HMA

- 1 HSL is promoting land at Sherston Road, Malmesbury in partnership with the Gloucestershire Health & Care NHS Foundation Trust as landowners.
- 2 The land at Park Lane is located to the west of Malmesbury. Sherston Road (B4040) is located to the south of the site. It forms the southern boundary and is the main access from the west into the centre of Malmesbury. The site extends to approximately 7 acres (2.8 hectares) and is a field bounded by hedgerows and hedgerow trees on all sides. There are no other notable features on site with the exception of telegraph poles which run across the site from the north-west to the south-east corners. To the immediate east of the site is the existing residential cul-de-sac of Silveston Way and Parklands. The north-western boundary of the site is formed by Park Lane. Land to the north, west and south is agricultural land. The site therefore has strong defensible boundaries comprising Sherston Road and Park Road, and the existing residential development to the east. By virtue of this, the site is well related to the existing built development and a logical location for future development.
- 3 The Environment Agency flood map confirms the site is located in Flood Zone 1 and is therefore at the lowest risk from flooding. There is a Grade II listed milestone along Sherston Road to the immediate south-west of the site. The site is surrounded by the Cotswolds AONB to the north-western and south-western sides but not within it. A variety of services and facilities are available within a short walking distance of the site. These include:
 - Bus stop (Parklands SE bound and NW bound) – adjacent to site boundary on Sherston Road
 - Malmesbury School (high school, 11-18 years) – 600 metres, 7 minute walk
 - The Activity Zone Leisure centre – 850 metres, 10 minute walk
 - Red Bull Pub – 950 metres, 12 minute walk
 - Malmesbury Youth Football Club – 1.1km, 13 minute walk
 - Co-operative Food – 1.3km, 15 minute walk
 - Malmesbury Church of England Primary School – 1.5km, 17 minute walk
 - Town centre – 1.6km, 20 minute walk
 - St Joseph’s Catholic Primary School 1.8km, 22 minute walk
 - Malmesbury Primary Care Centre – 2.5km, 31 minutes
- 4 Swindon railway station is located within a 35 minute drive from Malmesbury and provides access to the Great Western Railway and a direct route to Bristol, London and the national rail network.
- 5 Malmesbury is one of the key settlements in Wiltshire and is a sustainable location for development. The site is located on the edge of the existing urban area of the market town of Malmesbury. Access to the town centre and local public services is excellent, making it a highly sustainable location for future development. The site is currently use as grazing/pasture land.

The site has capacity to deliver at least 50 dwellings.

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LEGEND	
	SITE BOUNDARY
	EXISTING HEDGEROW
	EXISTING SHRUB PLANTING
	PROPOSED NATIVE TREE PLANTING
	PROPOSED NATIVE HEDGEROW
	PROPOSED NATIVE PLANTING TO THICKEN HEDGEROW
	PROPOSED PUBLIC OPEN SPACE INCLUDING INFORMAL PLAY AREAS
	PROPOSED SITE ACCESS
	PROPOSED HOUSING EDGE SET BACK FROM AONB TO OPTIMISE SCREENING EFFECTS OF HEDGEROW
	PROPOSED DEVELOPMENT AREA



SLR 
 global environmental solutions

ASPECT HOUSE
 ASPECT BUSINESS PARK
 BENNERLEY ROAD
 NOTTINGHAM, NG6 8WR
 T: 01159 647280
 F: 01159 751576
 www.slrconsulting.com

SHERSTON ROAD, MALMESBURY

**CONCEPTUAL LANDSCAPE
 MASTERPLAN**

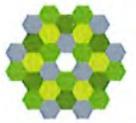


Scale 1:1,000 @ A3 Date DECEMBER 2019

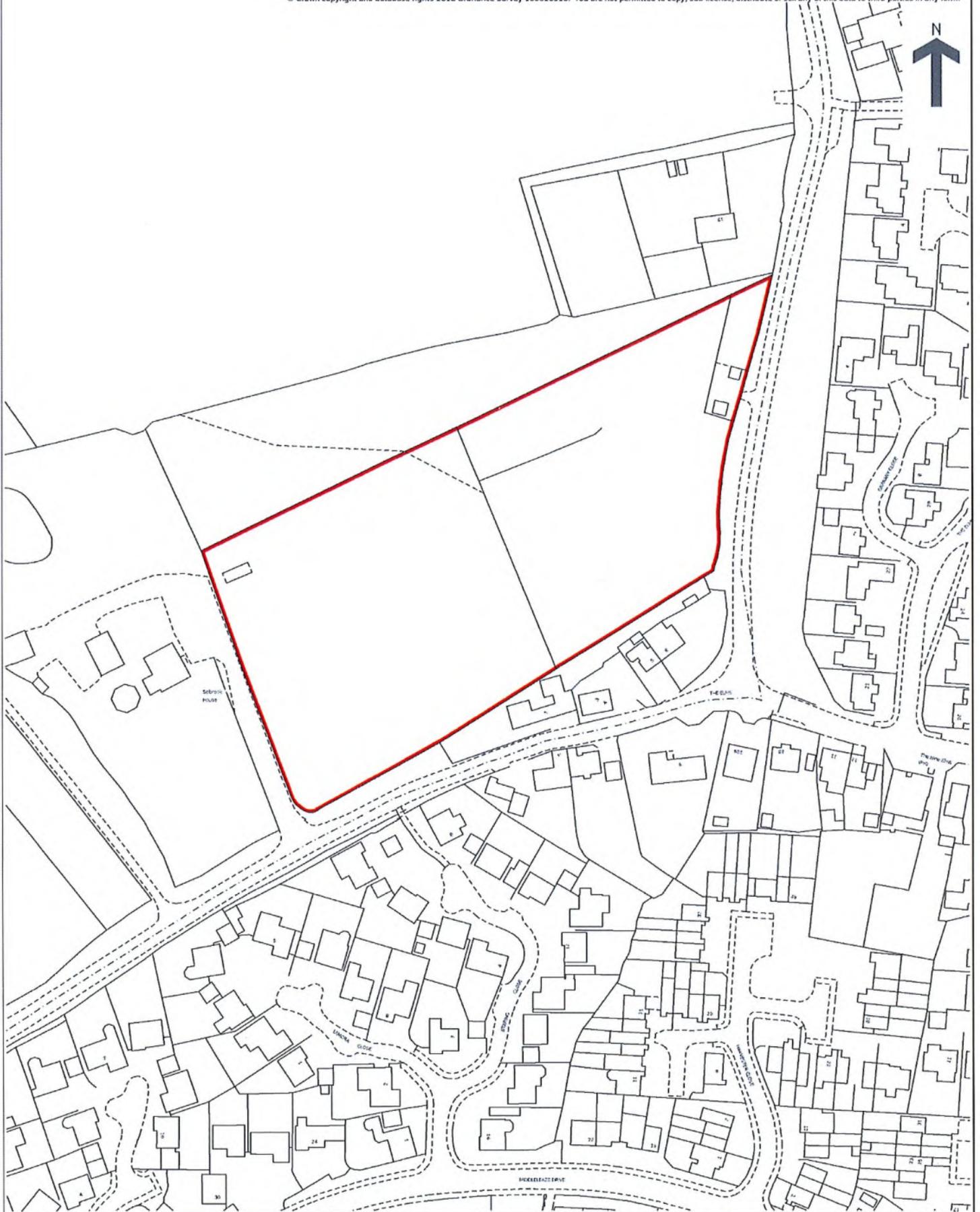
Appendix 4: Land at Nine Elms, Swindon (Wiltshire)

Swindon HMA (west of Swindon)

1. HSL is promoting 3.8 acres of land at Nine Elms for residential led development to meet the needs of the west of Swindon part of the HMA.



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LAND AT LYDIARD MILLICENT, THE ELMS, SWINDON SN5 5PL

Appendix 5: Land at Station Road, Christian Malford, - Chippenham HMA

1. HSL is promoting land at Station Road for residential development to meet local housing needs (SHLAA Ref 3248). The land off Station Road would be capable of accommodating at least 40-50 homes. It can provide homes in a sustainable manner that would be consistent with national and local planning policies.
2. The site is well related to the existing built settlement and culs-de-sac off Station Road. Its development could reflect the character of the existing development off Lime Trees and its relationship with Church Lane. Good design can be achieved and importantly, the development could provide much needed starter homes/affordable housing, as well as homes that are suitable for lifetime occupation.

Benefits of planned growth

3. Whilst we understand the current NP choose not to propose any modest sized allocations, we are also mindful that doing so does not allow for planned growth over the Plan period in line with spatial policies.
4. We support the view that additional development to meet housing demand and local need would provide an increased customer base and potentially a financial benefit in the form of developer contributions either via CIL or S106 agreement's used to provide/fund community facilities/improvements to infrastructure.
5. By taking a positive approach in line with national guidance, planned growth at Christian Malford would help ensure the needs and desires of the community could be delivered, such as those already identified by the Parish Council such as;
 - Contributing to delivery of 'an outdoor classroom' for the primary school;
 - Redevelopment of the Village Hall;
 - Fibre optic broadband;
 - Traffic calming measures along Station Road.
6. Additional development in accordance with the capacity of the settlement and in line with a robust evidence base on housing demand and need, would inevitably assist in delivering the above and more. Modest development would also help sustain existing services and facilities such as the village store/ post office. A future Neighbourhood Plan should be encouraged to identify specific housing allocations of suitable scale to enable planned growth and ensure local housing needs are met in full and the necessary infrastructure along with community benefits are delivered in line with the core objectives of the Local Plan.

RURAL 351



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

Our ref: 00039/SM
Your ref:

By email: spatialplanningpolicy@wiltshire.gov.uk

9th March 2021

Dear Sir/Madam

Wiltshire Local Plan Review Consultation on behalf of Newland Homes Ltd

We are writing on behalf of Newland Homes Ltd, to provide a representation to your Local Plan Review consultation.

Newland Homes has an interest in a site at Stones Farm, Cricklade. The site is indicated on the location plan at **Enclosure 1**.

It proposes this site for a new residential development, along with an ecological support area intended to support the ecological value of North Meadows SAC. This representation supports that proposal.

The representation is structured as follows:

1. Response to Emerging Spatial Strategy
2. Response to Empowering Rural Communities
3. Details of Stones Farm site

Response to Emerging Spatial Strategy

The Emerging Spatial Strategy proposes the delivery of 40,840 to 45,630 homes across Wiltshire between 2016 and 2036 and sets a range of dwellings to be delivered in each Housing Market Area. The Sustainability Appraisal suggests that Wiltshire could

Cont/d...

accommodate the higher end of this range, which Newland Homes would support.

The Emerging Spatial Strategy proposes to maintain the hierarchy of settlements set out in the current Wiltshire Core Strategy, for the majority of growth to be in the Principal Settlements of Chippenham, Salisbury and Trowbridge, and for the Local Plan to allocate sites for development in the Principal Settlements and Market Towns.

Allocations in the Local Service Centres, Large Villages and Small Villages (as appropriate) would be left to Neighbourhood Plans.

In principle, this strategy is logical and reasonable.

Cricklade, in which the Stones Farm site is located, lies in the proposed Swindon Housing Market Area and the Royal Wootton Bassett Community Area.

The Local Plan proposes an increased focus on growth at Royal Wootton Bassett, rather than west of Swindon or Marlborough. This results in an increased target of 1,255 dwellings to be delivered between 2016–2036 in the Royal Wootton Bassett Community Area (it was 1,070 dwellings between 2006 and 2026, set in the Core Strategy). Newland Homes would support this.

Response to Empowering Local Communities

Empowering Local Communities proposes that the Local Plan would set the appropriate scale of housing growth in each of the Local Service Centres and the Large Villages, and that Neighbourhood Plans would allocate housing sites to meet these housing requirements. This accords with NPPF paragraph 65 and the Localism agenda, so Newland Homes would support this. We also note that the recent NPPF consultation does not propose to alter NPPF paragraph 65, although it is proposed to become paragraph 66 as a result of changes elsewhere, so this principle can be expected to remain as national policy.

Appendix One of Empowering Local Communities sets a housing requirement for each Local Service Centre and Large Village. The baseline indicative housing requirement for 2016 to 2036 for Cricklade is 385 dwellings, or 19.25 dwellings per annum if Neighbourhood Plans choose a different plan period.

The indicative housing requirement for Cricklade appears to be of an appropriate order, given the existing scale of Cricklade compared with other settlements. However, we would caution against giving Neighbourhood Planning bodies too much flexibility in terms of the Cont/d...



plan period for Neighbourhood Plans. The NPPF notes that “*the planning system should be genuinely plan-led*” (para 15) so, although the NPPF does not specify a minimum plan period for non-strategic plans, in our view a Neighbourhood Planning Body should be required to demonstrate sound planning reasons for choosing a shorter plan period than the 15 years minimum required for strategic policies.

Finally, Appendix One notes that 149 dwellings are completed or committed at Cricklade up to 1st April 2019. This implies a need to find another 236 dwellings between 1st April 2019 and 31st March 2036. The implication is that this will be Cricklade Neighbourhood Plan’s housing requirement, and that sufficient allocations should be identified in the Neighbourhood Plan to deliver this requirement. It would help to specify that this is the case, subject of course to changes that might result from additional completions and commitments between now and the Local Plan’s adoption.

The Stones Farm Site

An application for residential development and an associated Suitable Alternative Natural Greenspace (SANG) was submitted in relation to the Stones Farm site in 2016, and later withdrawn (reference 16/12052/OUT).

The development would be accessed via the existing development of 25 homes permitted via applications referenced 15/01159/OUT and 19/02537/REM. This development demonstrates Newland Homes’ commitment to producing high quality residential developments incorporating a mix of market and affordable homes. We enclose a brochure relating to this site at **Enclosure 2**.

The most significant issue that led to the withdrawal of the 2016 application was the potential impact of the new dwellings’ occupants on North Meadow, which forms part of the North Meadow and Clattinger Farm SAC. Natural England requested substantial further evidence, including visitors’ surveys, to enable them to consider the impact of the proposal on the SAC. As a result of the time it would take to produce this evidence, the application was withdrawn.

The Stones Farm site was included in the 2017 SHLAA (reference 696).

Both the application and the SHLAA site included two existing agricultural fields, with the southern field proposed for residential development and the northern field proposed as a SANG.

Cont/d...



We submitted details of the Stones Farm site to you on 30th January 2019, and submitted a pre-app for the site to your Development Management colleagues on 29th June 2020 (reference 20/05669/PREAPP). By this time, informed by the outcome of further discussions with Natural England, the site had been expanded to include an additional field to the north west of the proposed residential area, to enable the provision of a larger SANG.

The pre-app raised similar concerns about the ecological impact of the proposals.

Since then, we have held further discussions with Natural England. In those discussions Natural England explained that LUC are instructed to draft a management strategy for the SAC, which will set out the mitigation required to enable the delivery of new residential developments within the SAC's zone of influence.

In our discussions with Natural England, they expressed support for the principle of the two fields north of the residential development being proposed as what they describe as an "ecological support area". This would include:

- an extension/recreation of the North Meadows habitat type, potentially with fritillaries planted in the flood plain, i.e. more a local nature reserve than a SANG;
- some elements of a SANG, e.g. an area for dog walking, but this will be a secondary purpose, with no need to rigidly meet the SANG specifications, e.g. the 2.4 km walking route;
- access from the residential development, and design measures to encourage new and existing residents to visit the support area rather than the SAC;
- potentially car parking, but to be located and designed so as to encourage people to visit the support area rather than the SAC;
- development within a yet to be defined zone of influence funding measures proposed in the SAC management strategy, potentially with a claw back mechanism for the Stones Farm development as the fritillary enhancement area is created.

A draft note of the meeting with Natural England is attached at **Enclosure 3**, for your information.

We are currently working up a revised layout for the housing development and ecological support area, and will provide this to you when it is available.

In our view, the Stones Farm site has strategic advantages over other potential housing sites around Cricklade. Much of the land on Cricklade's northern and eastern boundaries
Cont/d...



is at risk of flooding, and land to the south would be affected by the local community's concerns about coalescence with Swindon.

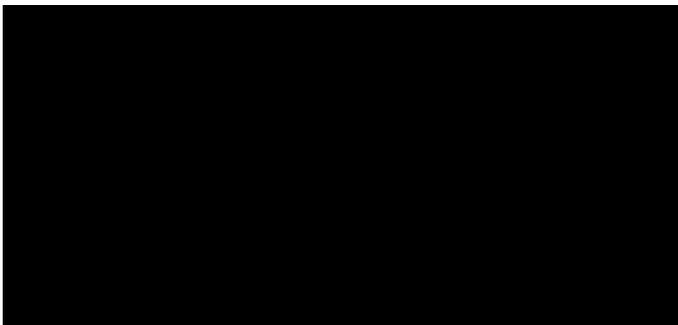
This leaves the potential for the allocation of housing sites on the western side of Cricklade, and in our view the ability of the Stones Farm site to deliver an ecological support area adjacent to the SAC is a substantial advantage because it would enable the SAC's habitat to expand whilst protecting the SAC from recreational pressures.

We understand the important role that Cricklade Town Council will play in determining where new housing should be allocated at Cricklade, and we will be discussing the Stones Farm site with them. However, in our view, the Local Plan should note the importance of any development in or near Cricklade delivering the type of mitigation proposed at Stones Farm.

Finally, in response to the climate emergency acknowledged by Wiltshire Council and others, we would note that Newland Homes is looking to achieve zero carbon (energy) housing on all developments.

Please feel free to contact me if you have any questions.

Yours Faithfully



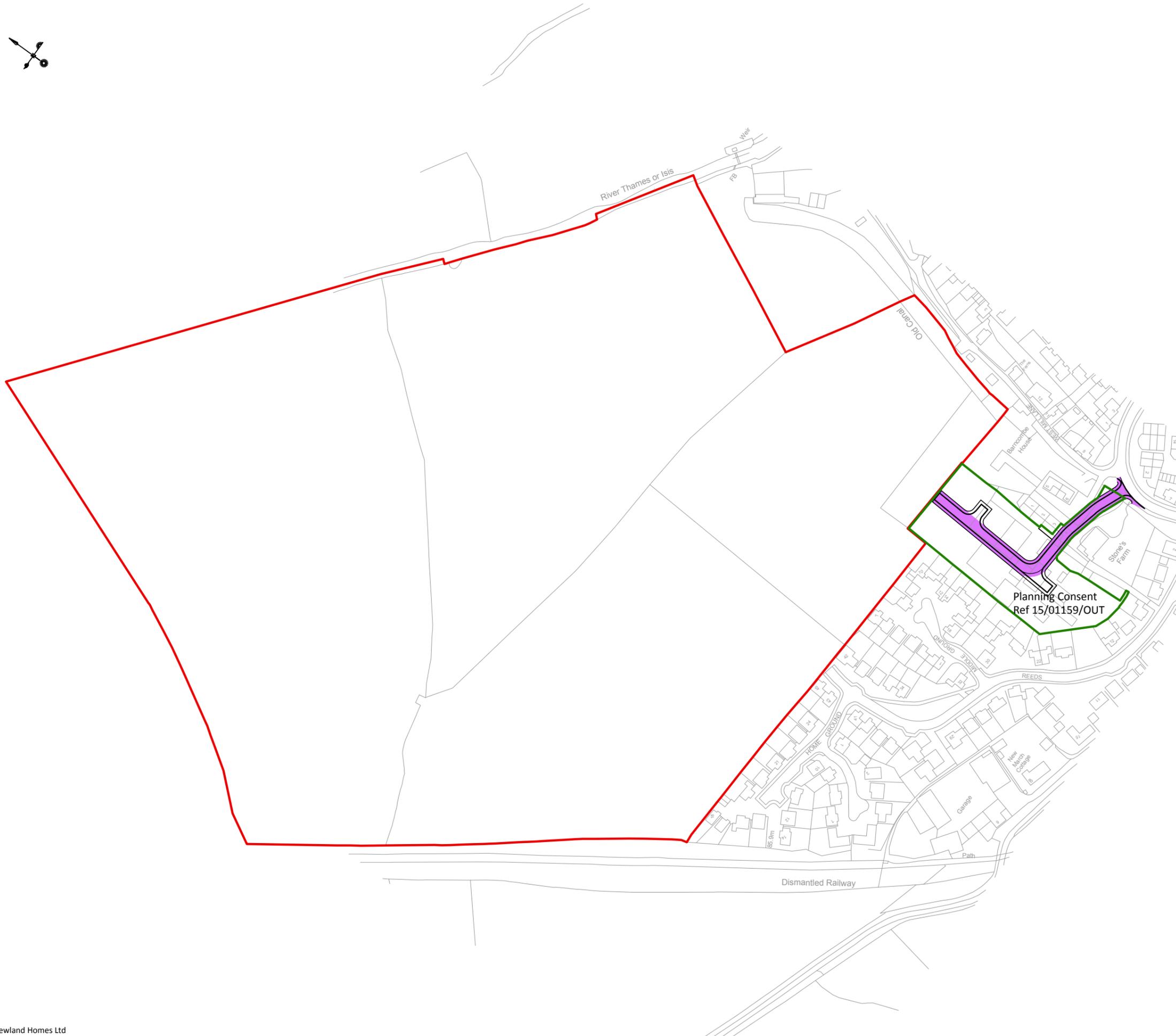
- Enc: 1: Stones Farm phase 2 location plan
2: Stones Farm phase 1 brochure
3: Draft note of meeting with Natural England





DO NOT SCALE FROM THIS DRAWING
All dimensions to be checked on site prior to manufacture of prefabricated items. Any discrepancy or query to be reported and clarified before associated work proceeds. All construction to be in accordance with relevant Trade and Professional Standards and Guidelines, Statutory requirements and product manufacturers' specifications. Read in conjunction with Finishing specification, Workmanship specification, all other associated drawings issued and details which may be issued from time to time.

- Site Boundary
- Location of Access Road



.- First Issue
REV

30.01.19 BJ
DATE INITIAL

Stone's Farm, Cricklade Location Plan

1:2500
Scale

824 - LND - 01
Drawing No.

BJ
Drawn
30.01.19
First Issue
-
Revision

Stones Farm

CRICKLADE

A charming development of 3 and 4 bedroom homes reflecting the unique character of Cricklade and the surrounding area.

 **Newland**
HOMES



Cricklade: contemporary country living

A wonderful opportunity to combine a stunning and eco-friendly natural setting with an abundance of amenities and a close-knit community.

The charming Wiltshire town of Cricklade is home to Stones Farm, a stunning new development by Newland Homes consisting of 25 bespoke 3 and 4 bedroom properties. Cricklade is a Saxon town rich in history that sits on the banks of the River Thames between Cirencester and Swindon. Its motto is 'In loco delicoso', which means 'in a delightful place', and for good reason; it is surrounded by areas of natural beauty, boasts excellent transport links, and benefits from a general helping of modern amenities on its doorstep.

Stones Farm is a discreet development in a carefully handpicked location. Specifically designed with an enhanced landscape, its name derives from the stones used in the town's infamous North Meadow National nature reserve, a unique habitat and Site of Specific Scientific Interest, and which is home to the rare 'Snakeshead Fritillary'.

Exceptional and eco-friendly design

As well as nestling naturally among the surrounding Cotswold stone and countryside, each home boasts a layout with exquisite and carefully considered touches that provide practicality and comfort in every room. Family members of all ages will particularly love having the kitchen at the heart

of the home, and how the innovative design maximises natural light throughout. You will also love the development's meticulous commitment to sustainability, with ecological and biodiverse details added throughout designed to make a difference to the way you live.

The town itself is well connected. The A419 provides easy access to Swindon and the M4 and M5 motorways. Swindon train station is just 8.3 miles away and provides access to local and national rail networks including Oxford, London, the south west and Wales, and other cross-country routes. For those who require international travel, Bristol airport is just over an hour's drive.

A beautiful setting with a wealth of facilities

The only Wiltshire-based town on the River Thames, Cricklade has plenty of walking trails and is close to Cotswold Water Park, complete with its 132 lakes, which makes it a perfect base for wildlife enthusiasts and those who love walking, riding and cycling. It's also the perfect gateway to the nearby Cotswold 'Area of Natural Beauty'.

New inhabitants to Cricklade can expect to be greeted by a wonderful sense of friendliness and community. In June, that warmth extends to thousands of visitors to the Cricklade town festival, an event described as one of the largest street events in the west of England. There is a lot to explore all-year round too, from the Swindon & Cricklade Steam Railway, a high street packed full of speciality shops and a labyrinth of listed buildings.

Nearby Swindon is enjoying a mini-boom and it offers a profuse choice of amenities. The Old Town area in particular is home to a wonderful selection of independent shops, art galleries and eating and drinking venues. Serious shoppers can choose from the nearby Orbital and regenerated Regent Circus retail parks, while the Designer Outlet Village – located in the beautifully restored railway works – is home to over 90 stores including iconic fashion brands and high-street favourites.

Those with an active lifestyle can choose between Cricklade's rugby club or leisure centre, while Swindon also has a wide range of sports clubs and fitness/leisure facilities, including the renowned Oasis swimming centre and its planned £270m indoor snow centre.

All of this can be enjoyed with the added advantage of a location that offers an excellent range of Outstanding and Good Ofsted-rated schools, including Cricklade Manor Prep School, St Sampson's Primary school, and the nearby Isambard Community School in Swindon.



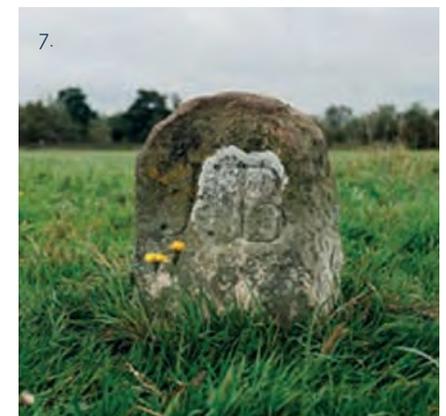
Go and explore... 

1. Swindon's Designer Outlet Village.
2. The only Wiltshire-based town on the River Thames.
3. Cotswold Water Park.
4. St Sampson's Church.
5. Cricklade High Street.
6. Swindon's heritage railway.
7. One of the famous North Meadow stones.

Travel Connections

Swindon Town Centre - 9 Miles
Swindon Railway Station - 9 Miles
M4 Junction 15 - 11.8 Miles
Bristol Airport - 52.1 Miles
Cirencester - 8.8 Miles
Cheltenham - 23.3 Miles
Oxford - 35.3 Miles

Please note: All times and distances from Googlemaps. Car travel times fastest route.





The Hartpury

4 bedroom detached



The Sherston

4 bedroom detached



The Prestbury

4 bedroom detached



The Hampton

4 bedroom detached



The Cricklade

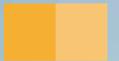
3 bedroom semi-detached



The Bourton

3 bedroom semi-detached

For further information
contact our sales team.





Stones Farm

CRICKLADE

Important Notice The site layout is intended for illustrative purposes only and may change, for example, in response to market demand or ground conditions. It should be treated as general guidance and cannot be relied upon as accurately describing any one of the specified matters prescribed by any order made under the Consumer Protection from Unfair Trading Regulations 2008. Landscaping is indicative. Please refer to the Landscape Plan and Engineering Layout available from the Sales Consultant or Agents.



The Hartpury

PLOTS 23 & 24

This striking 4 bedroom detached home flows beautifully from the traditional hallway to the contemporary open plan kitchen, leading on to a sociable family room and into the well proportioned lounge. Both plots 23 and 24 feature spacious south/south west rear facing gardens. Upstairs boasts a principal bedroom with ensuite and built in wardrobes.

GROUND FLOOR



FIRST FLOOR



Lounge
3.89m x 5.35m
12'9" x 17'6"

Kitchen/Breakfast
4.35m x 3.53m
14'3" x 11'7"

Dining
3.30m x 3.02m
10'10" x 9'10"

Sun Lounge
4.61m x 2.63m
15'1" x 8'7"

Bedroom 1*
3.30m (max) x 3.88m (max)
10'10" (max) x 12'8" (max)

Bedroom 2
3.30m x 3.52m
10'10" x 11'6"

Bedroom 3
3.94m x 3.13m
12'11" x 10'3"

Bedroom 4
2.95m x 2.12m
9'8" x 6'11"

FLOOR PLAN KEY

- A/C Airing cupboard
- B Boiler
- C Cupboard
- CYL Cylinder cupboard
- DW Integrated dishwasher
- Eco-bin
- FF Integrated fridge freezer
- L Larder unit
- O Eye level dual single ovens and combination microwave
- TD Tumble dryer space
- W Wardrobe
- WM Washing machine space
- WO Optional wardrobe - see Sales Consultant
- * Dims exclude Wardrobe



The Sherston

PLOTS 12 & 25

A superb double fronted 4 bedroom detached home, built with contemporary living in mind. Both the lounge and kitchen lead on to the garden though the French doors, bringing the outside in. Upstairs the principal bedroom benefits from ensuite shower room and built in wardrobes.

GROUND FLOOR



FIRST FLOOR



Lounge

3.55m x 6.41m

11'8" x 21'1"

Kitchen/Dining/Sun Lounge

4.51m (max) x 9.34m (max)

14'9" (max) x 30'7" (max)

Bedroom 1*

3.60m (max) x 3.92m (max)

11'10" (max) x 12'10" (max)

Bedroom 2

3.32m x 2.92m

10'11" x 9'7"

Bedroom 3

3.32m (max) x 3.39m (max)

10'11" (max) x 11'1" (max)

Bedroom 4

3.09m (max) x 2.09 (max)

10'1" (max) x 6'10" (max)

FLOOR PLAN KEY

- A/C Airing cupboard
- B Boiler
- C Cupboard
- CYL Cylinder cupboard
- DW Integrated dishwasher
- Eco-bin
- FF Integrated fridge freezer
- O Eye level dual single ovens and combination microwave
- TD Tumble dryer space
- W Wardrobe
- WM Washing machine space
- WO Optional wardrobe - see Sales Consultant
- * Dims exclude Wardrobe



The Prestbury

PLOT 9

A beautifully presented 4 bedroom detached home, with the kitchen forming the heart of this home, including feature island, sun lounge and an abundance of space for dining. Upstairs, the principal bedroom features an ensuite shower room and generous fitted wardrobes, ideal for organising clothing.

GROUND FLOOR



FIRST FLOOR



Lounge

4.15m (max) X 4.98m (max)
13'7" (max) X 16'4" (max)

Kitchen/Dining/Sun Lounge

6.35m (max) X 8.45m (max)
20'10" (max) X 27'8" (max)

Bedroom 1*

3.01m (max) X 4.53m (max)
9'10" (max) X 14'10" (max)

Bedroom 2

3.25m (max) X 4.53m (max)
10'8" (max) X 14'10" (max)

Bedroom 3

3.55m (max) X 3.97m (max)
11'8" (max) X 13'1" (max)

Bedroom 4

2.70m (max) X 3.07m (max)
8'10" (max) X 10'1" (max)

FLOOR PLAN KEY

- A/C Airing cupboard
- B Boiler
- C Cupboard
- CYL Cylinder cupboard
- DW Integrated dishwasher
- Eco-bin
- FF Integrated fridge freezer
- O Eye level dual single ovens and combination microwave
- TD Tumble dryer space
- W Wardrobe
- WM Washing machine space
- WO Optional wardrobe - see Sales Consultant
- * Dims exclude Wardrobe



The Hampton

PLOTS 10 & 11

Designed to entertain, this 4 bedroom detached home boasts a light and spacious ground floor with breakfast bar island and family sun room, equally matched by the galleried top floor principal suite with ensuite and walk in wardrobe.

GROUND FLOOR



FIRST FLOOR



SECOND FLOOR



Lounge
3.40m (max) X 4.74m (max)
11'2" (max) X 15'6" (max)

Kitchen/Sun Lounge
5.40m (max) X 7.39m (max)
17'8" (max) X 24'3" (max)

Bedroom 1*
5.40m (max) X 4.08m (max)
17'8" (max) X 13'4" (max)

Bedroom 2
3.36m X 3.16m
11'1" X 10'4"

Bedroom 3
3.42m X 2.69m
11'2" X 8'9"

Bedroom 4
1.94m (max) X 3.16m (max)
6'4" (max) X 10'4" (max)

FLOOR PLAN KEY

- A/C Airing cupboard
- AS Appliance space
- B Boiler
- C Cupboard
- CYL Cylinder cupboard
- DW Integrated dishwasher
- Eco-bin
- FF Integrated fridge freezer
- O Eye level dual single ovens and combination microwave
- WM Washing machine space
- WO Optional wardrobe - see Sales Consultant
- Denotes restricted headroom
- * Dims exclude Wardrobe



The Cricklade

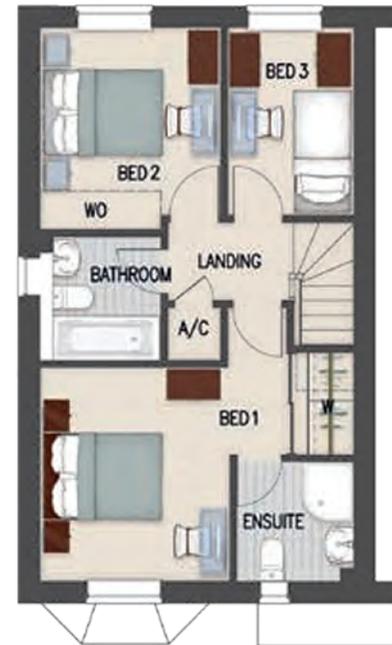
PLOTS 12A, 14, 15, 16, 21 & 22

A 3 bedroom semi-detached home, built with contemporary living in mind. The free-flowing ground floor maximises light and space with feature bay window to the kitchen and wide aspect French doors opening on to the garden. Upstairs 3 bedrooms can be found with the principal bedroom boasting a spacious ensuite and fitted wardrobes.

GROUND FLOOR



FIRST FLOOR



Lounge
4.90m (max) X 3.23m (max)
16'1" (max) X 10'7" (max)

Kitchen/Dining
3.97m (max) X 5.77m (max)
13'1" (max) X 18'11" (max)

Bedroom 1*
3.86m (max) X 4.24m (max)
12'8" (max) X 13'11" (max)

Bedroom 2
2.83m (max) X 3.13m (max)
9'3" (max) X 10'3" (max)

Bedroom 3
1.98m X 2.91m
6'6" X 9'6"

FLOOR PLAN KEY

- A/C Airing cupboard
- AS Appliance space
- B Boiler
- DW Integrated dishwasher
- Eco-bin
- FF Integrated fridge freezer
- O Single ovens
- W Wardrobe
- WM Washing machine space
- WO Optional wardrobe – see Sales Consultant
- * Dims exclude Wardrobe



The Bourton

PLOTS 19 & 20

An eye catching 3 double bedroom, 3 storey semi-detached home with spacious open plan kitchen/dining and feature island and full width panoramic glazing and French doors over looking the garden. The sumptuous principal bedroom suite occupies its own floor, with a beautiful galleried landing, walk in wardrobe and ensuite shower room, whilst the first floor has two further double bedrooms and a family bathroom.

GROUND FLOOR



FIRST FLOOR



SECOND FLOOR



- Lounge**
2.99m (max) X 5.27m (max)
9'9" (max) X 17'3" (max)
- Kitchen/Dining**
4.99m (max) X 6.15m (max)
16'4" (max) X 20'2" (max)
- Bedroom 1***
4.99m (max) X 4.12m (max)
16'4" (max) X 13'6" (max)
- Bedroom 2**
2.98m X 3.54m
9'9" X 11'7"
- Bedroom 3**
2.98m (max) X 3.42m (max)
9'9" (max) X 11'2" (max)

FLOOR PLAN KEY

- A/C Airing cupboard
- AS Appliance space
- B Boiler
- C Cupboard
- DW Integrated dishwasher
- Eco-bin
- FF Integrated fridge freezer
- O Eye level dual single ovens and combination microwave
- WM Washing machine space
- WO Optional wardrobe - see Sales Consultant
- Denotes restricted headroom
- * Dims exclude Wardrobe



Solar PV provision for all detached homes, exceeding planning requirements



Comprehensive new tree and shrub planting



Composting facilities for each home



Rainwater harvesting for each home



Recycling facilities designed into each kitchen



SUDS – Sustainable Urban Drainage Systems

Sustainable living

There is evidence to show that our climate is changing due to a combination of physical and human factors. At Newland Homes, we want to encourage our homeowners' aspirations to live both sustainably and stylishly.



Our approach

We live up to our company's core values: we are Considerate of the environment; Conscientious in our role; and we therefore have a responsibility to Craft homes which are attractive, durable, efficient (both in construction and in use) and comfortable.

This is our promise as a sustainable developer. Each development starts with a comprehensive assessment. Our in-house team commissions specialists to assess the existing ecological habitat – the flora and fauna – even in urban areas, so we can strive to ensure that a development protects and enhances important features and wildlife. We introduce sustainable storm drainage solutions that do not increase flood risk, and commonly produce ecological benefits. We also consider the landscape context and visual impact, so homes are positioned to enjoy natural features, views and sunlight. Only once we have the full story of a site, can we properly start to design each individual home.

Building sustainability into our homes

We adopt a 'fabric first' philosophy to the way we build our homes. This means that the better the insulation, construction, ventilation, and detailed design, the more efficiently and comfortably your home will operate, saving money in the long term and keeping your carbon footprint low.

Our homes have:

- Traditional masonry or timber framed construction, with highly efficient thermal insulation to walls, floors and roof
- Double glazed windows with innovative coatings to minimise heat loss and reduce summer overheating
- Highly efficient gas condensing boilers. We have also installed air source heat pumps on some of our sites as a means to avoid fossil fuel use, and we continue to explore the use of this and other low carbon products
- Low energy LED downlighters and motion detector lighting, as well as A++ rated fitted appliances. All designed to minimise electricity use and be lighter on your pocket
- Dual flush toilets and water saving aerated taps as standard, which use less water but maintain pressure

Our homes are built to achieve and often exceed the latest construction requirements, without compromising on their good looks. All timber used in our homes is from certified sustainable sources. Any suitable demolition material from clearing a site is crushed, re-used and recycled on site, and construction waste is sorted to maximise re-use.





ENABLING YOU TO LIVE GREENER

Part of our promise as a sustainable developer is to facilitate homeowners to avoid waste and conserve resources.

Sometimes it's small initiatives which make a big difference to everyday life, and including them into the design of a house at the outset means it's easier for you in the long term.

Such as:

Rainwater butts to harvest water for use in your garden, along with compost areas and ample space for your local Council's recycling containers.

Somewhere to store a bike. Be it a generously proportioned garage, a shed, or a cycle store for apartments, to encourage the use of alternative transport forms.

An integrated eco-bin in the kitchen to assist with sorting recyclables. Research has shown that sorting waste at the point of use results in a higher rate of recycling.

Stones Farm exceeds Building Regulation requirements, having significantly enhanced renewable power, by incorporating a generous array of solar PV panels to detached homes. With the future in mind, homes are wired with provision for an electric car charging point to be added.

Embracing the future

The way we live in our homes is rapidly evolving and Newland Homes is embracing technological opportunities to make our homes more convenient, comfortable and economic to run. Our home is no longer just a place to sleep and eat, but also to work. Remote working is on the increase, reducing the need to travel to a place of work.

Newland Homes helps to facilitate this sustainable choice and wherever possible, our homes are provided with a Superfast Fibre Broadband connection with at least two data sockets within the property. We include smart meters in many of our homes.

These help you to monitor and efficiently manage your household electricity use, as well as allowing the electricity supply grid to function more effectively. The next logical step is Smart Home Automation.

Our communities

Sustainable development is often defined as development that meets the needs of the present without compromising the ability of future generations to meet their own needs. We take a long term view with all our sites and our aim is always to enhance the communities in which we build.

We invest in the community infrastructure, and crucially, build homes that people want to live in, for now and for many years to come. As technology and its take-up improves, we expect to deliver more homes that are ever closer to carbon neutral.

We hope to share this journey with all our customers, and in all our respective walks of life, to ensure we deliver a future fit for our children, grandchildren and generations to come.



Newland
HOMES



Our specification

We think about more than just the fixtures and fittings at Newland Homes. We apply our considerate, conscientious and crafted approach across all aspects of design and construction. Here are just some of the ways we do this...



Helping you save energy and money

Our homes are designed with energy efficiency and therefore cost-saving in mind. Many homes are oriented to make the most of natural light and solar gain, and utilise the roof space, reducing energy costs. Innovation at its best.



Choice of fixtures and fittings

Optional extras can be chosen subject to stage of construction, please ask our Sales Consultant for more information.



Be part of the community

Our aim is always to enhance the communities in which we build. Each Newland development is carefully selected and has its own unique character, being sympathetic to the surrounding architectural landscape.



Move in and live

Our Sales Consultant is on hand every step of the way to make your purchase as smooth as possible. Before you move in we'll demonstrate your new home to you, then it's all ready to go with a 10 year LABC warranty for complete peace of mind.

Kitchens

- Choice of fully fitted kitchen units with soft close cupboards and drawers*
- Choice of 40mm laminate worktops*
- Optional solid surface worktops with undermount sink*
- Carron Phoenix Zeta stainless steel 1.5 bowl sink
- Carron Phoenix Savoy mono side-lever tap
- Eye level Neff single multifunction oven. Please note Cricklade has built under oven. Please see Sales Consultant for more info
- Optional Neff single multifunction oven with "hide and slide" door
- Secondary combination oven and microwave (check with Sales Consultant for applicable plots)
- Choice of Neff 5 burner gas 75cm hob or Neff 5 zone 80cm ceramic or induction hob available as an option*
- Integrated dishwasher
- Integrated 50:50 fridge freezer
- Integrated eco-bins as part of kitchen design to assist with recycling
- Plumbing for washing machine

Bathrooms and Ensuites

- Villeroy and Boch white sanitaryware including vanity units where applicable (check with Sales Consultant)
- Vado taps
- Rain shower with handset to main bathroom with shower screen
- Rain shower with separate handset to all ensuites
- Choice of ceramic wall tiles*
- Classic curved chrome ladder radiator in bathrooms and ensuites

Electrical

- Telephone points on each floor including lounge and principal bedroom with homes wired for fibre optic connection (check with Sales Consultant for positions)

Newland Homes support

**CONSUMER
CODE FOR
HOME BUILDERS**

www.consumercode.co.uk

*Choices available dependent on stage of construction. Please ask Sales Consultant for individual plot specification, including clarification of kitchen drawings.

- TV/FM points to principal rooms with ducting and additional high-level sockets for tidy wall mounting (check with Sales Consultant for homes applicable)
- Power points with high performance RCD protection
- USB charging point as part of a double socket provided in kitchen, lounge, principal bedroom and study (if applicable)
- Mains operated smoke alarms and carbon monoxide detector
- Under unit LED lighting strips to kitchen
- Chrome downlighters to kitchen, bathroom and ensuites
- Black aluminium traditional lantern to front
- Wiring included for optional electric vehicle charging point.
- Wireless intruder alarm available as an option*

Internal Finish

- Vertical panel doors with chrome ironmongery
- Woodwork finished in pure brilliant white satinwood
- Matt emulsion walls in brilliant white
- Smooth ceilings in brilliant white
- Principal bedroom with fitted wardrobe; sliding mirror wardrobe or walk in wardrobe
- Optional additional sliding mirror sliding wardrobes in other bedrooms (check with Sales Consultant for availability)
- Carpet and hard flooring packages available*

External Finish

- Quality facing external finishes including brick, re-con stone and render elevations
- Black rainwater goods
- PVCu double glazed energy efficient windows and French doors
- Front door with 3-point locking and chrome lever handles
- Wireless doorbell and chrome door numerals

- Turf to rear gardens with frontages landscaped as shown on development landscaping masterplan
- Outside tap (check with Sales Consultant for homes applicable and positions)
- Power and light to garage (check with Sales Consultant for homes applicable)

Energy Saving Homes

- Each home is designed with a 'Predicted Energy Assessment' (PEA) to ensure it is energy efficient and meets or exceeds current regulative standards
- Every home is then air tested for leakage to ensure exacting predicted energy performance ratings are met, and the PEA is converted into the homes' 'Energy Performance Certificate' (EPC)

This is all achieved through using energy efficient materials in the fabric of the construction materials, including:

- High performance insulation to roof, ground floor and external walls
- Double glazed windows and doors with energy efficient glazing
- Highly efficient gas central heating system
- Thermostatic radiator valves
- 'A' rated appliances or higher fitted within homes
- Dual flush toilets and water saving aerated taps as standard, which use less water but maintain pressure
- Composting facilities to assist with food waste and gardening
- Water butt for rainwater harvesting
- Solar PV to detached homes to assist with sustainable energy production



 **Newland**
HOMES



Local Authority Building Control (LABC) carries out an independent survey of each home during construction and issues a 10-year warranty certificate when the home is completed.

Images depict specification and upgrades from sister developments.

Considerate | Conscientious | Crafted

At Newland Homes, we've built a solid reputation for developing carefully crafted, high quality homes and enhancing local communities. We constantly push the boundaries of new home design through applying innovation to the way we choose our hand-picked locations, offering considerate design, crafted construction and a conscientious approach to environmental sustainability.

With people at the heart of our focus, we understand that everybody is different. Whatever lifestyle you lead, we feel quietly proud of our passionate commitment to the details that matter to you most.

Before a spade goes in the ground, every location is judged on its merit and its impact on the environment. Every room in every home is thoughtfully considered, maximising light, space and storage for you to enjoy.

Each location warrants its own palette of materials and finishes in keeping with the locale and our dedicated team will never compromise on the quality of our specification.

Award winning design touches evolve from an established talented team who understand that in our ever-changing world, your home has never been so important.

Creating a sustainable legacy by engaging with the needs of our customers is what inspires our strategy and drives our curiosity.





A selection of Newland Homes' recently completed developments.



SATNAV: SN6 6JL
 Stones Farm,
 off West Mill Lane,
 Cricklade, SN6 6JL
 T: 01793 398108

Considerate | Conscientious | Crafted



Newland Homes Ltd, Brighthouse Court, Barnett Way, Barnwood, Gloucester, GL4 3RT | T: 01452 623000 | E: sales@newlandhomes.co.uk | www.newlandhomes.co.uk

All purchasers must check with our Sales Consultant to ascertain the final layout and dimensions. Artists impressions of elevations showing mature landscaping are for illustration purposes only. The measurements shown in this brochure are for guidance purposes only and all dimensions should be checked and verified. Kitchen and Bathroom layouts are for guidance purposes and will probably vary depending upon final suppliers' alterations. Please check with our Sales Consultant to confirm final layouts for these areas. Computer generated images have been provided to give an indication of the overall finish and size of the completed properties. These images are computer interpretations and should be regarded as such. The quoted specification can be changed or altered without notice and is for guidance purposes only. Please check with our Sales Consultant to confirm the specification for your property. Although every care has been taken to ensure the accuracy of all information in this brochure, the contents do not form part or constitute any representation, warranty or part of any contract. In order to make each home individual external finishes and window positions do vary. Please ask our Sales Consultant for full details. 08/20.

Follow us...



@newlandhomes

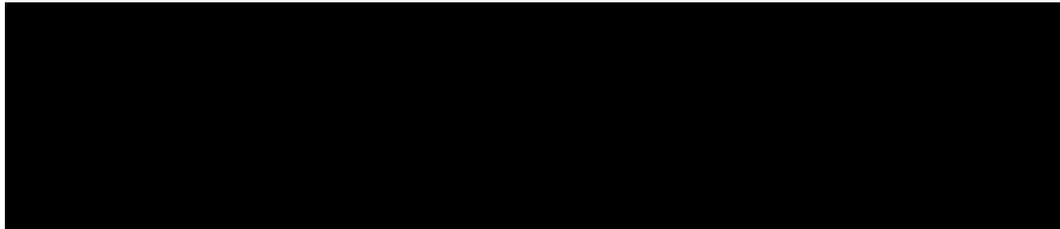
Stones Farm

Meeting with Natural England to discuss SANG at Stones Farm

Via MS Teams

Wednesday 27th January 2021, 1:00pm

Attendees:



█ introduced the meeting. He noted that there were two items that we would like to discuss:

1. The strategic issue of implications on North Meadows and Clattinger Farm SAC of new development being proposed in Wiltshire and Swindon up to 2036;
2. The more local issue of the acceptability of the proposed SANG.

█ shared a site location plan and explained the relationship between the site and the North Meadows part of the SAC. He noted the area previously proposed for residential development, the previously proposed SANG and the area now proposed for a SANG extension.

█ also noted that the Local Plan consultation suggested 385 dwellings were needed in Cricklade between 2016 and 2036, with 200+ of these likely to be delivered via allocations in the next Neighbourhood Plan.

█ asked for a summary of the consultation with Natural England undertaken in 2016.

█ explained that we had met on site, and that generally Natural England reps were favourable to the idea of a SANG, particular if it was larger than proposed (i.e. to include the NW field now proposed). But Natural England asked for a Visitor Survey to be undertaken so they could better understand the visitor pressure on the SAC, and therefore understand how recreational impacts might or might not be mitigated by the SANG.

█ referred to two points from the Habitat Regs Assessment released as part of Wiltshire's current Local Plan consultation:

- a reference to the SAC having a 15 kilometre zone of influence; and

- a recommendation in relation to the emerging Swindon Local Plan about “strengthening the policy wording in relation to recreation to include specific commitment for residential developments within 7 km of the SAC.”

■■■■■ asked if this suggested a need for a strategic SANG to which all development within 7km or 15km of the SAC would contribute.

■■■■■ responded that Natural England’s thoughts were not finalised yet, but that LUC were working on a management strategy for the SAC (LUC also produced the HRA for the Wilts LP Review). This will set out the mitigation required, and the costings. He imagined that all residential development, within perhaps 7 kms of the SAC, would be asked to contribute towards the management of the SAC itself. He envisaged this to be via CIL rather than S106, and said it would be a “modest” amount per dwelling.

■■■■■ view is that we should not propose a SANG as such at Stones Farm. Instead, we should propose an “ecological support area” for North Meadows. He does not believe that a SANG at Stones Farm would be used by people who drive some distance to see the fritillaries, but it might be used by local dog walkers. ■■■■■ sees the support area providing the following:

- an extension/recreation of the North Meadows habitat type, potentially with fritillaries planted in the flood plain – more a local nature reserve than a SANG;
- some elements of a SANG, e.g. an area for dog walking, but this will be a secondary purpose and there is no need to rigidly meet the SANG specifications, e.g. the 2.4 km walking route;
- access from any residential development, and design measures to encourage new and existing residents to visit the support area rather than the SAC;
- potentially car parking, but locate and design this so it encourages people to visit the support area and not the SAC;
- but still with any Stones Farm development funding whatever measures are required out of LUC’s SAC management strategy, potentially with a claw back mechanism as the fritillary enhancement area is created.
- The site provides opportunity to deliver the biodiversity net gain requirements for the proposed development, but it was considered unlikely that any surplus could be “sold on”

■■■■■ noted that in his view the ecological support area would mitigate the impacts of the residential development at Stones Farm on the SAC. He also suggested it could mitigate impacts of other development at Cricklade depending on its location (Stuart noted that other land to the north of Cricklade floods, and further residential developments were likely to be to Cricklade’s west or south).

In regard to the support area, ■■■■■ noted that “it is getting to the point where he would prefer the ecological support area to be built than not”.

██████████ noted that, ideally, the narrow strip of farmland between the river and the SAC would be acquired through the wider SAC management strategy, to enable the reserve to be extended. ██████████ explained that this land is in different ownership, as far as he knew.

██████████ asked for the 2016 Visitor Survey to be circulated to ██████████ at LUC and ██████████ at Swindon Borough Council.

Note by ██████████

RURAL 352



Spatial Planning
Economic Development and Planning
Wiltshire Council

Chapman Lily Planning Ltd
Unit 5 Designer House
Sandford Lane
Wareham
BH20 4DY

By email only: spatialplanningpolicy@wiltshire.gov.uk

Date: 7th March 2021
Your reference: Local Plan Review Consultation
Our reference: BS-2380



W: www.clplanning.co.uk

Dear Sir or Madam

RESPONSE TO THE WILTSHIRE LOCAL PLAN REVIEW: OPTIONS

On behalf of  I herein provide a response to the Wiltshire Local Plan review consultation and enclose an indicative Site Layout Plan.

My client acknowledges that the current consultation is on potential options and that the emerging Plan will continue to evolve. As you are aware, the submission draft will need to meet the tests of soundness, as set out in paragraph 35 of the revised NPPF:

*'a) **Positively prepared** – providing a strategy which, as a minimum, seeks to meet the area's objectively assessed needs; and is informed by agreements with other authorities, so that unmet need from neighbouring areas is accommodated where it is practical to do so and is consistent with achieving sustainable development;*

*b) **Justified** – an appropriate strategy, taking into account the reasonable alternatives, and based on proportionate evidence;*

*c) **Effective** – deliverable over the plan period, and based on effective joint working on cross-boundary strategic matters that have been dealt with rather than deferred, as evidenced by the statement of common ground; and*

*d) **Consistent with national policy** – enabling the delivery of sustainable development in accordance with the policies in this Framework'.*

Given the above requirement, this seeks to address potential deficiencies so that the plan can be found to be sound in due course.

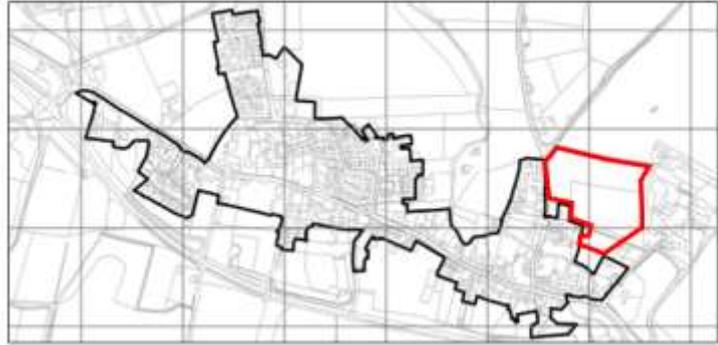
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This response comments on the following elements of the review;

- Emerging Spatial Strategy
- Empowering Rural Communities

The land to which this representation relates is located on the north-eastern edge of the village of Codford – see aerial photograph below. It measures c.2.83ha and substantive frontage along Chitterne Road.



The northern boundary is delineated by a post and wire fence and a newly planted hedge, beyond which lies by a private access track a further hedgerow and open fields. The eastern boundary is delineated by post and wire fence with trees along its length, beyond which lies [REDACTED] mixed commercial/ agricultural hub. The southern boundary is delineated by the rear gardens of neighbouring residential dwellings, albeit presents a largely sylvan setting. The western boundary is partly delineated by an established hedgerow, which opens-up as one moves north along Chitterne Road. Residential dwellings front the western side of the Chitterne Road giving it a domestic character. The land is currently split up into five small fields and used for a mixture of agricultural (classified grade II) and equestrian use.



Figure 1: Illustrative location plan, courtesy of Google Maps

The land to the north and east of the site is also in the same ownership. The site is not constrained by topography or flood risk. It lies in flood zone 1 – at the lowest probability of fluvial and tidal flooding (see figure 4 below) and is not susceptible to surface water flooding (see figure 5 below). The flood maps also reveal that a swathe of the village is at risk from fluvial flooding from a tributary to the River Wylfe.

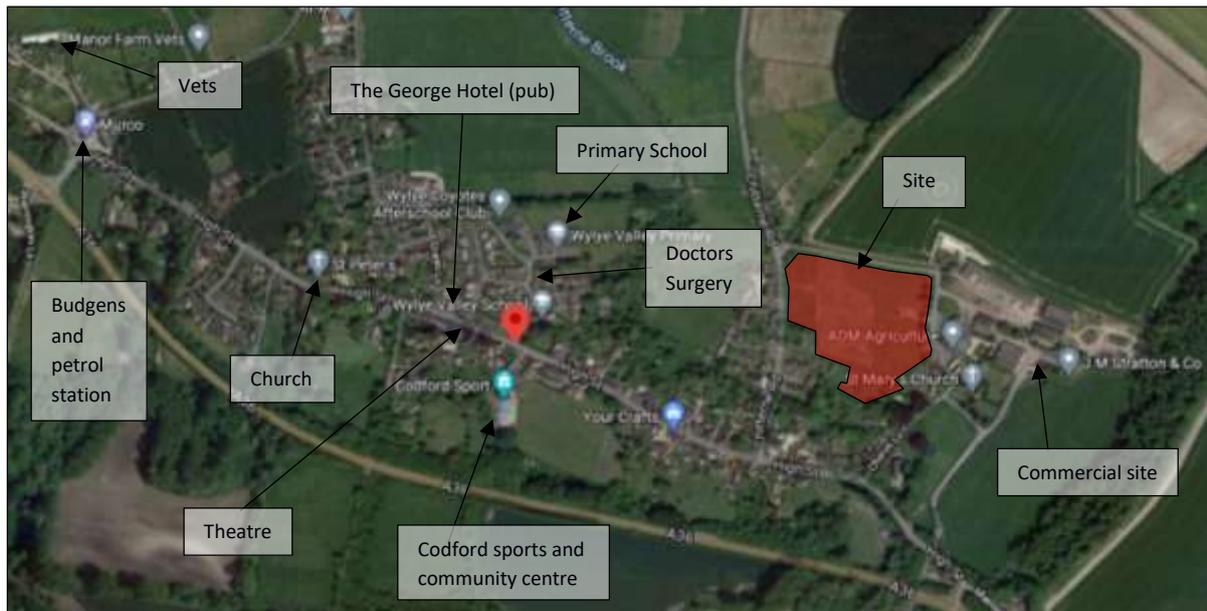


Figure 2: Codford local community facilities

As shown in figure 2 above, Codford is a larger village, with a range of basic services, employment, education and leisure opportunities; notably a local convenience shop, petrol filling station, garage, pub / cafe, primary school, doctors, vets, theatre, community centre and sports pitches. To this end the village enjoys a degree of self-containment, with good access to higher tier shops and services via the A36. Bus stops supporting services are evenly spaced along the High Street.

The land has the ability to deliver family housing (market and affordable) which will provide future pupils for the local school intake. The site abuts the defined settlement boundary of the village and is washed over by the Cranborne Chase and West Wiltshire Area of Outstanding Natural Beauty [“AONB”]. The Management Plan establishes landscape typologies including Chalk River Valleys, such as the Wylfe. It goes on to set out the special landscape qualities, together with cultural influences and present-day land management practices. Development pressures are identified as a key issue and Landscape and Visual Impact Assessments are seen as an important tool in ensuring that the special qualities of the area are properly considered. The AONB Partnership has endorsed (6 April 2016) a Position Statement on ‘Good enough to approve in an AONB’.

The prevailing character of the immediate area is presented by a mix of residential and commercial use. The development of the site would read as a continuation and rounding-off of the existing settlement without appearing as encroachment into the open countryside. Indeed, it is our opinion that a sensitive scheme could be devised that delivers both homes and new open space (the latter

buffering heritage assets) that avoids detriment to the landscape qualities of the AONB and offers scope for enhancement.

Emerging Spatial Strategy

██████████ contests the assertion that delivering ‘*Climate Change outcomes*’ can only arise from focusing development in the County’s main settlements. The allocation of c.20 dwellings and accompanying open space at Codford would achieve the four stated outcomes; i.e.:

- make best use of existing infrastructure, such as energy networks, public buildings, services and local transport networks, reducing the need for additional infrastructure that would create more carbon;
- better support existing businesses by growing local spending and supply chains. In particular, it can help each town centre to continue serving its local community;
- reduce the need to travel, and travel by the private car in particular, by providing jobs, facilities and services locally and support active means of travel such as walking and cycling; and
- provide opportunities on a scale to design new neighbourhoods for renewable energy supply, alternatives to the private car and more energy efficient new buildings - opportunities that are likely to be more difficult to realise in rural areas.

With respect to the first it is notable that ██████████ have established an operational Anaerobic Digestion plant and solar PV park, to manage waste arisings and generate renewable energy for export to the local distribution grid – much of which is drawn down by homes and businesses in Codford. There is also an opportunity for a ‘private wire’ arrangement for powering new developments directly with renewable electricity. The mainstay of the services, health, education and leisure opportunities in the village are within easy walking and cycling distance. The neighbouring agricultural and business park, together with the nearby resource park, provide job opportunities.

██████████ acknowledge the benefits of growth to meet local needs, an allocation of circa 20 homes at Codford will support the vital everyday local services that exist within the village (village shop and pub) and ensure a sustainable level of future intakes for the local schools – with the result being that village residents will not have to travel by car to access such services, thereby providing the opportunity to reduce carbon emissions and supporting the Council’s identified climate change outcomes. The opportunity for a mix of housing will ensure that local housing need is met and that a sustainable pattern of development is delivered.

The risks of not progressing with an allocation of 20 units at Codford is that small scale developments will be delivered on a piecemeal basis and will not have the ability to deliver infrastructure improvements or substantive affordable housing.

██████████ support the approach of the Council adopting a Local Housing Needs Assessment (LHNA) which takes account of longer term migration and economic forecasts. Codford falls within the Trowbridge Housing Market Area and J M Stratton and Co understand that this approach takes into consideration the need to provide homes to support jobs and avoid net in-commuting, together with a contingency.

Whilst ██████████ recognise the value of redeveloping brownfield sites, it is of the view that this strategy should not be progressed in isolation, particularly where there is a risk that communities that do not have a supply of brownfield sites, such as Codford, will not stand to gain from the benefits that sustainable development brings and allow Codford to function as a community. There is a clear local need for affordable housing, which would go unmet if a spatial strategy is pursued that focuses primarily on four settlements.

Empowering Rural Communities

██████████ agree with the sentiments of paragraph 3 in that planning controls prevent sporadic development and manage widespread speculative pressures for new buildings. Codford is a 'Large Village' within the Trowbridge HMA and has been identified as having an indicative housing requirement (for 2016-2036) of 20 units. This figure, taking into account completions, should be viewed as a minimum requirement. Providing the development in a single allocation allows for the community benefits to be delivered that would not otherwise be realised through smaller, piecemeal, schemes.

██████████ is concerned that the strategy for empowering rural communities only supports:

- Infill development
- Rural exception affordable housing sites where they benefit from local support
- Neighbourhood Plan allocations

Infill developments can ensure the effective use of land however infill sites are unlikely to deliver wider public benefits in the form of infrastructure or affordable housing, particularly in a village such as Codford where much of the village is subject to flood risk, and or heritage constraints. ██████████

██████████ are concerned that the complicated metrics approach, which supresses the housing requirement in areas of constraint has led to an artificially low housing requirement for Codford that would not enable it to fulfil its potential.

Rural exceptions sites can provide a helpful mechanism to deliver affordable housing schemes and we are encouraged by the acknowledgement within the emerging strategy. However, by their very nature, the appetite and location of rural exceptions sites are hard to predict. We suspect that annual delivery through this route across the Housing Market Area is low.

Finally, it is notable that some areas, such as Codford do not benefit from a designated Neighbourhood Plan Area. Nor would there appear to be an appetite within the Parish Council to progress one. Where they are in train, Neighbourhood Plans have an important part to play in the delivery of new homes, but it should not be assumed that all areas will progress a Neighbourhood Plan. It is respectfully suggested that a new policy is required to fill the vacuum. Dorset Council is in the process of introducing a policy which seeks to allow speculative applications in villages to support their vitality. It is noteworthy that the Policy applies within the Dorset AONB. It reads:

OUTSIDE THE GREEN BELT, APPLICATIONS FOR RESIDENTIAL DEVELOPMENT WILL BE PERMITTED ON SITES ADJOINING THE SETTLEMENT BOUNDARIES OF TOWNS, KEY SERVICE VILLAGES, LOCAL SERVICE VILLAGES AND OTHER VILLAGES WITH A SETTLEMENT BOUNDARY (AS LISTED IN THE SETTLEMENT HIERARCHY), PROVIDED THAT:

A. THE SCALE OF PROPOSED DEVELOPMENT IS PROPORTIONATE TO THE SIZE AND CHARACTER OF THE EXISTING SETTLEMENT, UP TO A MAXIMUM OF;

I. 30 HOMES ON ANY SINGLE SMALL SITE ADJOINING A TOWN;

II. 20 HOMES ON ANY SINGLE SMALL SITE ADJOINING A KEY SERVICE VILLAGE;

III. 15 HOMES ON ANY SINGLE SMALL SITE ADJOINING A LOCAL SERVICE VILLAGE;

IV. 5 HOMES ON ANY SINGLE SMALL SITE ADJOINING OTHER VILLAGES WITH A SETTLEMENT BOUNDARY;

B. INDIVIDUALLY AND CUMULATIVELY, THE SIZE, APPEARANCE AND LAYOUT OF PROPOSED HOMES DOES NOT HARM THE CHARACTER AND VALUE OF ANY LANDSCAPE OR SETTLEMENTS POTENTIALLY AFFECTED BY THE PROPOSALS;

C. THE DEVELOPMENT WOULD CONTRIBUTE TO THE PROVISION OF A MIX OF DIFFERENT TYPES AND SIZES OF HOMES (INCLUDING AFFORDABLE HOMES) TO REFLECT THE COUNCIL'S EXPECTATIONS IN POLICIES H9 AND H11 OR, WHERE EXPRESSED IN A NEIGHBOURHOOD PLAN, THOSE OF THE RELEVANT LOCAL COMMUNITY;

D. THE SITE DOES NOT LIE WITHIN A NEIGHBOURHOOD PLAN AREA WHERE SMALL SITES HAVE BEEN ALLOCATED TO MEET IDENTIFIED HOUSING NEEDS IN A MADE NEIGHBOURHOOD PLAN; AND

E. THE IMPACT OF PROPOSED DEVELOPMENT ON EUROPEAN SITES, ALONE OR IN COMBINATION WITH OTHER EXISTING AND PROPOSED DEVELOPMENT, WILL BE SCREENED FOR LIKELY SIGNIFICANT EFFECTS UNDER THE CONSERVATION OF HABITATS AND SPECIES REGULATIONS (AMENDED) (EU EXIT), 2019. WHERE THIS IS FOUND TO BE THE CASE AN APPROPRIATE ASSESSMENT (TO INCLUDE ANY NECESSARY MITIGATION) WILL BE REQUIRED (TAKING INTO ACCOUNT THE LIFETIME OF THE DEVELOPMENT) TO SHOW HOW THE DEVELOPMENT WILL AVOID ADVERSE IMPACT ON THE INTEGRITY OF THE RELEVANT EUROPEAN SITE(S).

It is respectfully suggested that a similar policy could be adopted in Wiltshire, where Neighbourhood Plans are either absent or out of date.

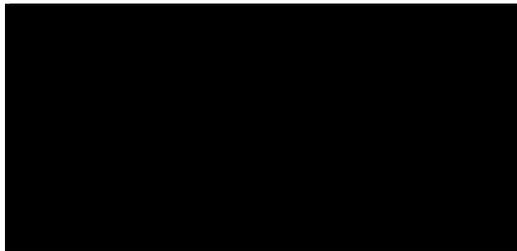
██████████ would wish to impress upon the Council the importance of allocating sufficient sites to ensure a rolling five-year supply on adoption of the plan, something that can be bolstered by small to medium-sized sites that can be built out quickly.

Conclusions

Through this representation, my client has put forward a credible argument in favour of allocating land at Chitterne Road, Codford as an omission site. The site, as identified in diagram 1, is well contained and its development for circa 20 homes plus open space would further enhance Codford's sustainability.

I trust that the above points will be aptly considered in the lead up to the pre-submission version of the emerging plan and will ultimately help to deliver a sound plan that meets future needs in a sustainable manner. My client is committed to constructive, on-going discussions with the Council to bring the site in a timely manner and looks forward to a positive dialogue.

Yours faithfully



RURAL 353

Wiltshire Local Plan Review Consultation (13 January to 9 March 2021)

Response on behalf of Castlewood Commercial
Properties

Wiltshire Local Plan Review Consultation (13 January to 9 March 2021)

Response on behalf of Castlewood Commercial Properties



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Project: South Pavenhill Farm, Purton
Client: Castlewood Commercial Properties
Job Number: 478102
Status: Open

Document Checking:

Prepared by: [REDACTED]

Checked by: [REDACTED]

1. Introduction

- 1.1. This response is submitted on behalf of Castlewood Commercial Properties ('Castlewood').
- 1.2. On behalf of the landowner, Castlewood is promoting land South Pavenhill Farm, Purton for residential allocation in this Local Plan Review. This site relates to land to the south of the road named Pavenhill and is located immediately adjoining the existing urban area. A location plan showing the site boundaries is provided at **Appendix 1**.
- 1.3. To support the response made to this consultation by Savills on behalf of Castlewood, this submission also includes the following information:
 - Completed Response Form: Emerging Spatial Strategy
 - Site Location Plan: Land at South Pavenhill Farm, Purton

2. Summary of Castlewood's Development Proposals

- 2.1. As part of this consultation response, Castlewood is promoting land South Pavenhill Farm, Purton for residential allocation in this Local Plan Review. This site relates to land to the south of the road named Pavenhill and is located immediately adjoining the existing urban area (see Site Location Plan at **Appendix 1**).
- 2.2. The site has previously been identified by the Council in its Strategic Housing and Economic Land Availability Assessment (SHELAA). The SHELAA identifies Castlewood's site as being Site 3469 (i.e. Land at South Pavenhill Farm). The SHELAA concludes in relation to Site 3469 that the site is suitable (i.e. no suitability constraints), available, achievable (i.e. for residential), deliverable and developable (i.e. in the short term). The SHELAA also states that the site area is 5.1501 hectares and the development capacity is 157 dwellings.
- 2.3. Castlewood agrees with the conclusions in the SHELAA that the site is available, achievable (i.e. for residential), deliverable and developable (i.e. in the short term).
- 2.4. In relation to the developable area of Castlewood's site which is identified in the SHELAA, Castlewood notes that it is only promoting the northern part of the site for residential development in the Local Plan Review (i.e. land parallel with Ringsbury Close). The rectangular southern part of the site is not proposed for built development and could be used for public open space and/or for Biodiversity Net Gain . As a result, the development capacity is not 157 dwellings, as stated in the SHELAA, but approximately 50 dwellings.
- 2.5. The Site Proforma which is included in the SHELAA for Site 3469 also refers to 'All Constraints'. This indicates that Castlewood's site is located within 2km of a SSSI, is within a Source Protection Zone (SPZ) and is within an area of Grade 1 Agricultural land. In this regard, Castlewood notes that all sites in Purton which have been identified in the SHLEAA are identified as being with the SPZ and comprising Grade 1 agricultural land. In addition, Castlewood notes and supports the conclusion reached in relation to its site in the SHELAA that there are no applicable suitability constraints to development at South Pavenhill Farm, Purton.

The Site

- 2.6. The site is an agricultural field, is in single ownership and extends to 5.1 hectares. It is located immediately to the west of the existing built up area of Purton, which includes a residential area at Ringsbury Close, and is located to the south of Pavenhill. Directly to the north of the site is South Pavenhill Farm House and a residential street (Upper Pavenhill). To the south and west of the site are agricultural fields.
- 2.7. The site is not subject of any statutory environmental or landscape designations.
- 2.8. The site is located entirely within Flood Zone 1. The site, along with the whole of Purton and the surrounding area, is also located within a Source Protection Area.
- 2.9. The site is also unlikely to be contaminated given its current agricultural use.
- 2.10. The site is flat and direct vehicular access can be made on to Pavenhill.

- 2.11. A Public Right of Way (PRoW) runs along the western edge of the site in a southwards direction from Pavenhill to Kingsbury Camp (PURT95). This PRoW connects to other public rights of way running to the west (namely PURT99, PURT100 and PURT101). PRoW PURT99 also runs along part of the site's southern boundary and provides eastward connection to Restrop Road. The two public rights of way that run inside the western and southern edges of the site will be retained along their current courses and incorporated into future development proposals for the site, which could include access to public open space within the southern part of Castlewood's proposed development.
- 2.12. Whilst an overhead powerline crosses the southern edge of the site, this part of the site is not proposed for built development. Land further to the south of the site includes a Scheduled Ancient Monument (Kingsbury Camp). To the south and west of Kingsbury Camp is a SSSI (including Brockhurst Wood). These heritage and ecological areas are separated from Castlewood's site by agricultural fields and the proposed development of land at South Pavenhill Farm is not considered likely to have an adverse effect on them.
- 2.13. As identified in Core Policy 19 of the adopted Wiltshire Core Strategy (2015), Purton is classified as a Large Village. In Core Policy 1, Large Villages are defined as "*settlements with a limited range of employment, services and facilities*", within which development "*will be limited to that needed to help meet the housing needs of settlements and to improve employment opportunities, services and facilities*". The site itself is located immediately outside of the defined settlement boundary of Purton, as defined on the Interactive Proposals Map.
- 2.14. The made Purton Neighbourhood Plan (2018) identifies Castlewood's site as being within an area of 'Escarment' which relates to land around the northern, western and south-western parts of Purton. This area is the subject of Purton Policy 5 in the Neighbourhood Plan which relates to "*an area in which locally important views are taken from the public footpath network, both to and from the escarpments to the north of the village, around Francombe Hill (known locally as High Hills), along the western side of the village up to and including the vista leading up to and around the ancient monument known as Ringsbury Camp. These views are shown on Map 5 which indicates sensitive public views related to the existing built areas. The area named as Purton Common also provides significant public views, as shown on Map 5. Any development in this designated area will be required to maintain the quality of these distinctive public views*". In this regard, Castlewood notes that its site is contained within existing and substantial treebelts along the western, southern and south-eastern boundaries which can contain and minimise views of the proposed development from views from outside of the site.
- 2.15. In view of the absence of significant environmental and landscape constraints, it is considered that Castlewood's site at South Pavenhill Farm, Purton is suitable for consideration as a residential allocation in the Local Plan Review.
- 2.16. No viability constraints are envisaged by Castlewood as part of the development of this site.

The Proposed Development

- 2.17. It is considered that the site is located in a sustainable location immediately adjoining the settlement boundary of Purton and that its proposed development could deliver the following:
- Approximately 50 dwellings (including affordable housing).
 - Public Open Space for the benefit of new and existing residents.
- 2.18. Castlewood also consider that the development of this site is capable of being commenced in the short term (i.e. from 2022).

3. The Emerging Spatial Strategy

Overarching Responses to the Wiltshire Local Plan Review

3.1. On behalf of Castlewood we wish to make the following overarching responses to the Local Plan Review Emerging Spatial Strategy (ESS) consultation:

1. The Plan period should be changed with the start date updated from 2016 to 2018 and the end date extended from 2036 to 2040.
2. The housing requirements for the Housing Market Areas should be increased through the inclusion of 4 additional years of housing development (i.e. from 2036 to 2040).
3. Land within the Swindon HMA should include an allocation of land at South Pavenhill Farm, Purton for approximately 50 dwellings and the minimum residual housing requirement for Purton should be increased from 0 dwellings to at least 100 dwellings.
4. Climate Change Outcomes: Development in Purton represents a sustainable location with good access to jobs and services, both within the town and in nearby settlements (i.e. Cirencester, Swindon, Cheltenham and Gloucester). New development in the town will also assist in further improving the self-containment in Purton.

Plan Period

- 3.2. The Plan period should be changed with the start date updated from 2016 to 2018 and the end date extended from 2036 to 2040.
- 3.3. Wiltshire Council proposes that the Plan period for the Local Plan Review should run from 2016 to 2036. We also note that the Council's Local Development Scheme (July 2020) indicates that the Local Plan Review will be adopted in Q2 2023 (i.e. May/June 2023).

Revised Start Date

- 3.4. If the Local Plan Review is adopted in 2023 (as indicated in the Local Development Scheme), the Plan's start date will be 7 years removed from the date of adoption. On the basis that this is a Local Plan Review, which should be carried out every 5 years, the start date of the Plan should – at the very least – be based on a date which is no less than 5 years from the date of adoption. In the case of this Local Plan Review the start date should therefore be 2018.
- 3.5. Without this proposed change to the Local Plan Review, in rural settlements like Purton, the result of maintaining the 2016 start date will be that there will either be very limited development or no development at all until the end of the Plan period. This is because, as identified in Tables 2.3 and 2.6 of the Empowering Rural Communities (ERC) consultation document, the baseline indicative housing requirements for the period 2016-2036, are already taken up by completions (2016-2019) and commitments (1st April 2019).
- 3.6. In the case of Purton, the baseline requirement is 140 dwellings and completions/commitments already total 140 dwellings. This leaves a residual housing requirement of 0 dwellings for the Plan period which Castlewood considers to be unacceptable.

- 3.7. By not enabling communities to grow, as a result of identifying new allocations in this Local Plan Review, the approach in the ESS and ERC consultation documents to the identification of a suitable start date runs contrary to National planning policy on rural housing. In paragraph 78 of the NPPF, the Government promotes sustainable development in rural areas and states that “*housing should be located where it will enhance or maintain the vitality of rural communities*”. The NPPF also states that “*Planning policies should identify opportunities for villages to grow and thrive, especially where this will encourage local services*”. This should include the allocation and development of suitable sites, including Castlewood’s site at South Pavenhill Farm, Purton.
- 3.8. In making this change to the period covered by the Local Plan Review, the Council should also change its calculations of the residual housing requirements for each HMA. The Local Plan Review’s residual requirements currently take into account housing completions for the period 2016-2019. This should be changed to only account for completions which have taken place from 2018-2019.

Extended End Date

- 3.9. If Wiltshire Council maintains its current position and adopts its Local Plan Review with an end date of 2036, the timeframe of the Plan will only be 13 years from the date of adoption. This is an unacceptably short timeframe and is contrary to Government planning policy, in particular Paragraph 22 of the NPPF which states 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*” (our emphasis).
- 3.10. Instead of the maximum 13 year timeframe, which could be the case if the Council adopts its Local Plan Review in 2023, we propose that the Plan period should – at the very least – cover a minimum of 15 years (post adoption). Indeed, we consider that it is important in the case of this Local Plan Review that the Plan period covers a longer period, as identified in Paragraph 22 of the NPPF. For example, in the case of Purton this would include the delivery of additional housing to accommodate local housing needs and which would also assist in supporting local facilities and services.
- 3.11. There is established precedent for having Local Plan timeframes which are a minimum of 15 years post adoption. **Table 1** below identifies all of the neighbouring districts around the Wiltshire Council administrative area and the timeframes associated with those adopted and emerging Local Plans. Of those authorities identified below, the following have or will have Local Plans with timeframes of 15 or more years: Vale of White Horse; West Berkshire; Test Valley; Dorset; Mendip; and South Gloucestershire.

Table 1: Neighbouring Authorities – Local Plan Timeframes		
District Adjoining Wiltshire	Adopted or Emerging Local Plans	Plan Period / LDS Information / Timeframe
Swindon	Local Plan (Proposed Submission Draft) (December 2019)	2018-2036 (LDS 9/20 identifies adoption as Q3 2022) (Timeframe of 14 years from adoption)
Vale of White Horse	Local Plan 2041 (Call for Sites stage April 2020)	2021-2041 (LDS 2/20 identifies July 2023 adoption) (Timeframe of 18 years from adoption)
West Berkshire	Local Plan Review (Draft December 2020)	2020-2037 (LDS 4/20 identifies December 2022 adoption) (Timeframe of 15 years from adoption)
Test Valley	Next Local Plan: Refined Issues and Options Consultation 2020 (June 2020)	To 2036 or up to 2040 (to be decided) (LDS 1/20 identifies Q3 2024 adoption) (Timeframe of 16 years from adoption in 2024)

Table 1: Neighbouring Authorities – Local Plan Timeframes		
District Adjoining Wiltshire	Adopted or Emerging Local Plans	Plan Period / LDS Information / Timeframe
New Forest	Local Plan (Adopted July 2020)	2016-2036 (No current LDS) (Timeframe of 16 years from adoption)
Dorset	Local Plan (Options Consultation January 2021)	2021-2038 (LDS 9/20 identifies 2023 adoption) (Timeframe of 15 years from adoption)
South Somerset	Local Plan Review (Preferred Options) (June 2019)	2016-2036 (LDS 4/17 adoption estimate is out of date, i.e. 12/20) (Timeframe of 13 years if adopted in 2023)
Mendip	Local Plan Review (No consultation undertaken to date)	2020-2040 (Cabinet confirmed in 1/20 to review Local Plan Part 1) (No current LDS) (Timeframe of 16 years if adopted in 2024)
Bath and North East Somerset	Local Plan (Partial Update Options Consultation) (January 2021)	2011-2029 (LDS identifies adoption in 3/22) (Timeframe unchanged because the consultation relates to a partial update of an adopted Local Plan)
South Gloucestershire	Local Plan 2020 (Phase 1 Issues and Approaches) (November 2020)	2023-2038 (Local Plan Delivery Programme 1/21 identifies adoption in 12/23) (Timeframe of 15 years from adoption)
Cotswold	District Local Plan (Adopted August 2018)	2011-2031 (Cabinet confirmed in 6/20 that a Partial Review would be undertaken with no change to the 2031 end date)

- 3.12. As identified in **Table 1**, six of the neighbouring authorities have or will adopt Local Plans with timescales of 15 or more years. There is also precedent for the Local Plans having a timescale which runs to 2040 and beyond. For example, the Vale of White Horse proposes a Plan end date of 2041, Test Valley proposes an end date of up to 2040 and Mendip proposes an end date of 2040.
- 3.13. We are also mindful that National Planning Policy is under review and that a new draft version of the NPPF is currently being consulted upon. In particular, we note that Government is proposing a change to Paragraph 22 of the NPPF which adds to the existing policy guidance and states that “*Where larger-scale development such as new settlements form part of the strategy for the area, policies should be set within a vision that looks further ahead (at least 30 years), to take into account the likely timescale for delivery*”.
- 3.14. We consider that this proposed change to National Planning Policy should be taken into consideration by the Council in the preparation and adoption of its Local Plan Review. This proposed change to the NPPF shows a clear direction of travel in Government Planning Policy which places emphasis on looking to the longer term, to sustainable development and the adoption of Local Plan Visions which will support them.
- 3.15. The proposed change to the NPPF also adds further weight to our argument that the Local Plan Review should have a timeframe to 2040. The extended timeframe of the Local Plan Review will enable sustainable development which supports rural communities to be planned for within their likely and deliverable timescales.

Overall Housing and Employment Requirements – Wiltshire and the Housing Market Areas

- 3.16. We support the general principle behind the Council's decision not to use the Standard Method calculation of additional dwellings but instead to base its calculation of housing requirements upon a Local Housing Need Assessment.

- 3.17. This is consistent with National Planning Policy Guidance which states that *“The standard method set out below identifies a minimum annual housing need figure. It does not produce a housing requirement figure”* (NPPG Paragraph: 002 Reference ID: 2a-002-20190220). We also note that NPPG states that *“Strategic policy-making authorities will need to calculate their local housing need figure at the start of the plan-making process. This number should be kept under review and revised where appropriate”* (Paragraph: 008 Reference ID: 2a-008-20190220).
- 3.18. In setting the overall housing requirement for the Local Plan Review period, we also note that NPPG states that *“The government is committed to ensuring that more homes are built and supports ambitious authorities who want to plan for growth. The standard method for assessing local housing need provides a minimum starting point in determining the number of homes needed in an area. It does not attempt to predict the impact that future government policies, changing economic circumstances or other factors might have on demographic behaviour. Therefore, there will be circumstances where it is appropriate to consider whether actual housing need is higher than the standard method indicates”* (Paragraph: 010 Reference ID: 2a-010-20201216).
- 3.19. However, we do not consider that the appropriate levels of housing requirement have been identified in the Local Plan Review, either in relation to the overall housing requirement for Wiltshire or in relation to the HMAs.
- 3.20. In relation to the Swindon HMA, which is of particular interest to Castlewood, we consider that the level of housing requirement identified in the Emerging Spatial Strategy is below what we consider to be appropriate for this location.
- 3.21. The level of housing identified for the Swindon HMA does not adequately take into consideration the sustainability of Purton to accommodate non-strategic levels of growth to meet future housing needs and to support existing facilities and services. Nor does it fully reflect the proximity of Purton to Swindon and its employment opportunities and higher order facilities, which can be shared with residents of Purton using sustainable modes of transport.
- 3.22. In view of this, we consider that the housing requirement for Wiltshire and the Swindon HMA should be increased, as outlined below.
- **Increase Housing Requirements to 2040 (4 Additional Years Supply)**
- 3.23. On the basis of extending the timeframe of the Local Plan Review from 2016-2036 to 2018-2040, we propose that that the overall housing requirement for Wiltshire is increased to take account of these additional 4 years.
- 3.24. This proposed increase in housing requirements for Wiltshire is identified in **Table 2** below.

Table 2: Proposed Changes to Housing Requirements – Wiltshire 2018-2040				
Housing Market Area	Local Plan Review: Local Housing Need Assessment (Additional dwellings 2016-2036)	LHNA (Additional dwellings annum)	Savills Proposal: 4 Years additional dwellings (2036-2040)	Savills Proposal: Housing Requirement (2018-2040)
TOTAL	45,630	2,282	9,128	50,204

3.25. The apportionment of the proposed additional 4 years of development should be a matter for further consideration. In relation to Purton, we consider that the minimum residual housing requirement for the town should take into consideration the opportunity to allocate Castlewood's site for the delivery of approximately 50 dwellings. As a result, the minimum residual housing requirement for Purton should be increased from 0 dwellings to at least 100 dwellings.

3.26. This proposed development by Castlewood and its allocation in the Local Plan Review is capable of being supported by the existing infrastructure, facilities and services which are available in Purton. In addition, the level of growth proposed by Castlewood would assist in supporting local facilities and services through increased patronage by new residents.

- **Conclusion: Housing Requirements for Wiltshire and the Swindon HMA**

3.27. On the basis of the arguments identified above, we consider that the overall housing requirement for Wiltshire should be increased from 45,630 dwellings to 50,204 dwellings for the period 2018-2040. In relation to Purton, we consider that the minimum residual housing requirement for the town should take into consideration the opportunity to allocate Castlewood's site for the delivery of approximately 50 dwellings. As a result, the minimum residual housing requirement for Purton should be increased from 0 dwellings to at least 100 dwellings.

3.28. This proposed development by Castlewood and its allocation in the Local Plan Review is capable of being supported by the existing infrastructure, facilities and services which are available in Purton. In addition, the level of growth proposed by Castlewood would assist in supporting local facilities and services through increased patronage by new residents.

Delivering the Spatial Strategy

- **Large Villages**

3.29. Castlewood notes that the hierarchy of settlements as set out in the Wiltshire Core Strategy (Core Policy 1: Settlement Strategy) will not be changed as a result of the Local Plan Review. As identified in Core Policy 19, Purton is classified as a Large Village. In Core Policy 1, Large Villages are defined as "*settlements with a limited range of employment, services and facilities*", within which development "*will be limited to that needed to help meet the housing needs of settlements and to improve employment opportunities, services and facilities*".

3.30. Castlewood supports the classification of Purton as a Large Village and considers that development in settlements like Purton should be allocated where it meets the housing needs of the settlement and improves services and facilities.

3.31. We also consider that development of the scale proposed by Castlewood at South Pavenhill Farm, Purton will meet local housing needs and will make an important contribution to supporting local facilities and services. In view of this, we consider that Castlewood's proposed development will assist in achieving greater self-containment for Purton and is of a sufficient scale that it should be allocated in this Local Plan Review and not left to be decided through the next Neighbourhood Plan.

- **Climate Change Outcomes**

- 3.32. We note the statement on Page 4 of the ESS that focusing new development within the County's main settlements reduces carbon in different ways. However, we request that the Council also makes reference to contribution that development in settlements which are classified as Large Villages can make to the achievement of sustainable development and the reduction in carbon.
- 3.33. Although the development of sites in Large Villages would be at a smaller scale than strategic developments in the main settlements, we consider that developments of approximately 50 dwellings in settlements like Purton can contribute towards supporting local facilities and services, be capable of being accessed by new residents by sustainable modes of transport.
- 3.34. In terms of the points made in the ESS in relation to climate change outcomes, we note the following in relation to Purton and the site at South Pavenhill Farm, which is being promoted by Castlewood for residential development:
- (i) New development at Purton, as proposed by Castlewood, will be within walkable and cycling distance of a range of existing facilities and services which are present in the settlement, including shops, community facilities and schools (i.e. primary and secondary). Purton is also connected to Swindon by a public transport corridor which provides access to employment and higher order services. As a result, the potential exists to encourage the use of sustainable modes of transport and to reduce the need to travel, in particular by private car.
 - (ii) It is anticipated that the development proposed by Castlewood at South Pavenhill Farm, Purton will also be capable of being served by existing energy networks.
 - (iii) An increase in the scale of development at Purton and population will also assist in supporting existing businesses in the settlement as a result of increased spending.

- **Delivery Principles**

- 3.35. We support the aims of the 5 delivery principles identified on Page 6 of the ESS. The Local Plan Review should be led by the 'place shaping priorities' in order to ensure that settlements such as Purton have the opportunity to become more sustainable and more attractive places to live, work and socialise.
- 3.36. These place shaping priorities should, in turn, focus upon the identification of development allocations in settlements like Purton that can deliver development which is needed by existing and new residents. In the case of Castlewood's site at South Pavenhill Farm, Purton, the proposed development would also be capable of delivering new public open space which can be used by new and existing residents.
- 3.37. With regard to the third delivery principle, we request that its emphasis is changed. The Local Plan Review's delivery principles should not be led by simply finding sites to meet the housing requirement which is currently identified in the Plan. Instead, the Local Plan Review should seek to enable the allocation of development which improves the sustainability of settlements like Purton and provides opportunities to deliver infrastructure (such as public open space) to serve existing and new residents.
- 3.38. We also request that the delivery principles should be clarified in order to state that the Local Plan will identify the allocation of sites which are of a scale similar to the land being proposed by Castlewood on land at South Pavenhill Farm, Purton, particularly because of the contribution that they can make to the establishment of more self-contained settlements and to the support that they can give to existing facilities and services.

- 3.39. In addition, we also restate our view that development of the scale proposed by Castlewood at South Pavenhill Farm, Purton, and the contribution which it can make to achieving greater self-containment for the settlement is of a sufficient scale that it should be allocated in this Local Plan Review and not left to be decided through the next Neighbourhood Plan.

Swindon Housing Market Area

- Alternative Development Strategies

- 3.40. On the basis that the overall housing requirement for Wiltshire and the HMAs is increased in line with our request, we consider that the allocation and development of land at Purton can form part of and be consistent with whichever development strategy is ultimately selected for the Swindon HMA. This includes the allocation of non-strategic sites to meet short term housing needs and strategic sites to meet medium to longer term housing and infrastructure needs.
- 3.41. In selecting the development strategy for the Swindon HMA, we request that further explanation is given in the Local Plan Review to the ability of Large Villages, like Purton, to deliver smaller scale levels of development which can improve their self-containment and sustainability.

Meeting the Residual Housing Requirement at Purton

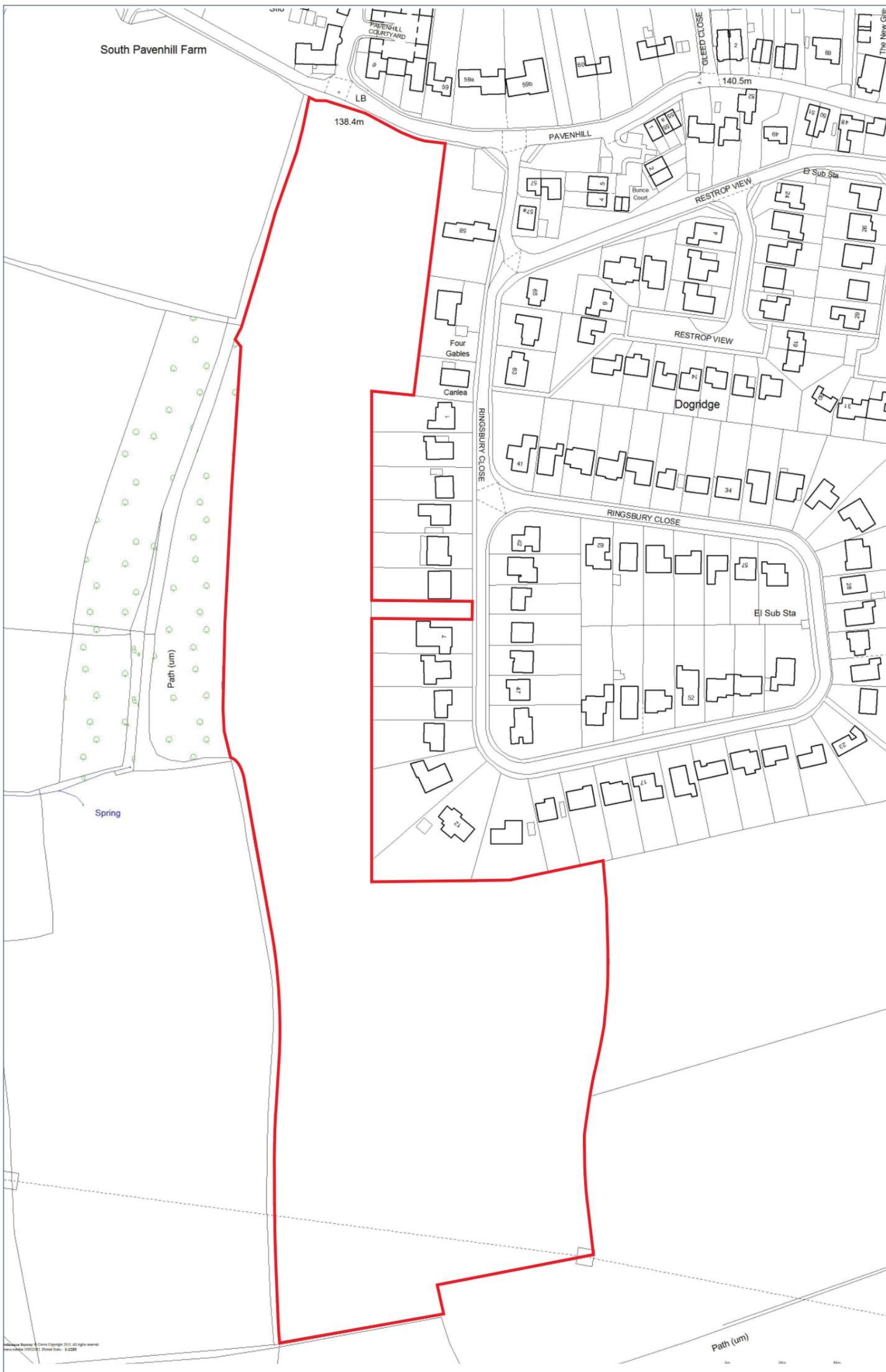
- 3.42. On the basis that the housing requirement for Wiltshire and the Swindon HMA is increased, as identified in our response to the Emerging Spatial Strategy, the housing requirement for the period up to 2040 will require the delivery of new housing allocations.
- 3.43. In order to accommodate the housing requirement which will be set for the Swindon HMA for the period up to 2040, Castlewood propose the allocation of its land at South Pavenhill Farm, Purton. The development of this site could deliver the following:
- Approximately 50 dwellings (including affordable housing).
 - Public Open Space for the benefit of new and existing residents.
- 3.44. The proposed development at South Pavenhill Farm, Purton will not result in significant impacts relating to landscape, ecology, heritage and transport. In addition, the proposed development is capable of being served by existing infrastructure in Purton, including schools (primary and secondary) and healthcare facilities, and be of a scale which can provide support to existing facilities and services, such as local shops.

Concluding Summary

- 3.45. On the basis of the responses made above to the Emerging Spatial Strategy, we request that the Plan period should be changed from 2016-2036 to 2018-2040. In doing so, the overall housing requirement for Wiltshire should be increased from 45,630 to 50,204 dwellings.
- 3.46. The residual housing requirements for the HMAs and towns identified in the Local Plan Review also require further consideration. The process of deciding the level of housing requirements for these areas should be based on place shaping principles and seeking to make settlements more sustainable and attractive places to live, work and socialise. In relation to Purton, we consider that the minimum residual housing requirement for the town should take into consideration the opportunity to allocate Castlewood's site at South Pavenhill Farm for the delivery of approximately 50 dwellings. As a result, the minimum residual housing requirement for Purton should be increased from 0 dwellings to at least 100 dwellings.
- 3.47. This proposed development by Castlewood and its allocation in the Local Plan Review is capable of being supported by existing infrastructure, facilities and services which are available in Purton. In addition, the level of growth proposed by Castlewood would assist in supporting local facilities and services through increased patronage by new residents.
- 3.48. In addition, we consider that development of the scale proposed by Castlewood at South Pavenhill Farm, Purton, and the contribution which it can make to achieving greater self-containment for the town is of a sufficient scale that it should be allocated in this Local Plan Review and not left to be decided through the next Neighbourhood Plan.

Appendices

Appendix 1
Site Location Plan: Land at South Pavenhill Farm, Purton



KEY

-  Existing development
-  Site boundary

Land at South Pavenhill Farm, Purton

on behalf of [REDACTED]

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drawing no.	SK01	drawing	Red line plan
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RURAL 354

9 March 2021

Spatial Planning
Economic Development and Planning
Wiltshire Council
County Hall
Trowbridge
Wiltshire
BA14 8JQ**BY E-MAIL ONLY**

Dear Sir/Madam,

**WILTSHIRE LOCAL PLAN REVIEW CONSULTATION
LAND NORTH OF PRESTON LANE, LYNEHAM**

I write on behalf of my clients Octavia Homes Ltd and M7 Planning Ltd (hereafter referred to as OHM7) in response to the current Local Plan Review consultation which closes on Tuesday 9th March 2021. OHM7 have a number of interests across Wiltshire, however these representations are prepared in connection with their land interest to the north of Preston Lane, Lyneham. A plan showing their land interest is appended to this letter for your reference.

APPENDIX 1 – SITE LOCATION PLAN

The current consultation considers a range of issues, however these representations will focus on the following matters only.

- How growth is to be distributed around the county (Emerging Spatial Strategy paper);
- Improving the framework for rural communities to meet housing needs (Empowering Rural Communities paper); and
- Land north of Preston Lane (taking account of all available evidence).

Accordingly, our representations are structured with the above headings in mind. After setting out our thoughts in respect of the current consultation we provide a brief overview of the land interest at Lyneham and how bringing it forward for residential development would accord with the emerging proposals.

Proposed distribution of growth*Local housing need*

OHM7 recognise that Wiltshire is planning for the delivery of between 40,840 and 45,630 new homes over the plan period 2016-2036. It is understood that the lower figure in the range (40,840) is the overall minimum local housing need as calculated by the Standard Methodology and then carried through a 20-year plan period. It is further understood that the 45,630 figure is based on analysis of the employment growth projections¹ which would require a larger number of homes to be provided to help ensure that there are sufficient workers to align with the forecast in job growth.

¹ Economic and Development Needs Assessment (2017)

It is also noted that Swindon have relatively recently consulted upon a Swindon Borough Local Plan Submission draft which plans for a minimum of 20,450 dwellings. Such a figure is marginally below the local housing need figure and would not account for any adjustment to meet the economic forecasts.

The National Planning Policy Framework (NPPF) via paragraph 24 still requires local planning authorities to co-operate with each other on strategic policy matters. Given the strategic importance of both housing and economic delivery we would suggest that proactive dialogue is needed now to understand the proportion of any uplift that Wiltshire will need to make to account for the economic evidence. This appears to be at direct odds with the summary provided at para 3.67 of the consultation document which suggests Swindon meets its fully needs.

It remains unclear from the evidence presented to date as to whether Wiltshire will need to consider whether there is any adjacent local authorities which will be unable to meet its local housing need and therefore would look to Wiltshire to help address any shortfall.

The key point to note is that OHM7 considers that as a minimum Wiltshire should be planning for the upper figure in order to deliver a sufficient level of homes to not only meet the minimum housing need as calculated by the Standard Method but also to deliver sufficient homes to meet the current economic forecasts. Positive decisions taken now should help enable prompt delivery.

Swindon HMA

Lyneham is located within the Royal Wootton Bassett Community Network Area which are both located within the Swindon Housing Market Area (HMA). It seems logical that should there be any unmet need from Swindon then this should be best delivered within the Wiltshire component of the Swindon HMA.

The Interim Sustainability Appraisal Report considered three alternative development strategies for the Swindon HMA:

1. SW-A – Roll forward the Core Strategy and reducing land requirements by 16%;
2. SW-B – Focus on Royal Wootton Bassett – the focus is at Royal Wootton Bassett in part due to existing constraints at Marlborough.
3. SW-C – Focus on the rest of the HMA – a greater level of growth within the rural communities.

These three scenarios were tested against the 11 Strategic Objectives with SW-B being considered to be the most sustainable option. It is recognised that the overall scores for this HMA are higher than the other HMA's because there are relatively fewer environmental constraints.

The preferred strategy for the Swindon HMA would see some 3,450 dwellings being delivered with the following split:

- Marlborough – 680 dwellings;
- Royal Wootton Bassett – 1,255 dwellings;
- West of Swindon – 435 dwellings;
- Remainder of HMA – 1,080 dwellings.

Irrespective of whether this mix changes slightly or not, it is evident that the settlements within the remainder of the HMA have an important role to play in helping to meet the strategic needs of the HMA.

Approach at rural communities

It is noted that that 'Empowering Rural Communities' consultation document proposes the introduction of a new Core Policy entitled 'Housing Requirements for Neighbourhood Area Designations in the Rural Area'. Such a policy seems to create a policy situation which is largely inflexible and is not based around sustainable development principles.

For example the Policy as worded seems to stick to a policy imperative of settlement boundaries i.e. line on a plan being a determining factor. This is fundamentally not the case and it is considered a policy wording which allowed for proportionate growth which was well related to the settlement would be a far better tool as it would allow land to come forward more quickly if it was needed, it would allow previously unpromoted land to come forward during a Plan period and would allow adaptation to boost numbers if other parts of the settlement strategy were failing to deliver.

It remains the case that for the majority of the current Plan period the various HMA's within Wiltshire have continually been unable to demonstrate a 5-year housing land supply. Indeed, the latest evidence (December 2020) shows that only East Wiltshire HMA has a demonstrable supply above 5.

OHM7 is supportive of the neighbourhood planning process and if done well it can help facilitate development. Whilst this is the case, it also true that with the adoption of a neighbourhood plan the application of a tilted balance is not engaged until supply dips below 3 years (subject to the other policy tests). As a result, a supply situation which has been propped up in part due to the application of a tilted balance will not be as available as it has been previously. This could result in development being targeted to communities which have, through no fault of their own, chosen not to pursue a neighbourhood plan.

It is our view that much of the pipeline within rural communities has come about on the back of deficiencies within the existing settlement strategy. It seems likely with this proposed policy that the same mistakes will only be reinforced and the already poor land supply position will continue to decline and the system less flexible as a result.

Accordingly, OHM7 are supportive of rural communities providing a supporting role to strategic delivery as is clearly likely to be the case given the level of expectation for delivery within the remainder of the HMA, as is the case in the Swindon HMA. However, we object to the inclusion of such a restrictive policy and would suggest it is replaced with a policy wording that allowed proportional growth, which was well related to settlements and sustainable and not purely based on a historical building line on a plan.

Lyneham

Lyneham is identified by the existing Core Strategy (Core Policy 19) as a Large Village alongside Purton and this is to be carried forward as part of the Local Plan Review. It is given an indicative baseline requirement of 80 dwellings of which 50 are already completed/committed.

Given Lyneham's location and proximity to Royal Wootton Bassett and Swindon as well as it being located outside of the AONB we would question why its indicative requirement is comparatively low when compared to some other large villages within the Swindon HMA.

It is also the case that the majority of the larger villages listed have not progressed significantly with neighbourhood plans and completions/commitments are also low. It is likely therefore that growth within existing settlement limits is likely to be minimal.

Accordingly, given its relative sustainability we consider that Lyneham, could and should be given a higher indicative housing requirement and this could be at the expense of other Large Villages within the HMA which are more constrained for example Aldbourne or Baydon.

Equally we are supportive of a wider policy presumption which allowed growth to flexibly be delivered at sustainable settlements such as large villages in order to assist in meeting the important strategic housing need.

Land north of Preston Lane

The OHM7 land interest is located to the north of Preston Lane as shown on the enclosed Site Location Plan. The Site is largely unconstrained in particular it is not within a protected landscape nor is it in close proximity to any historic environment designations. It is located wholly in Flood Zone 1 and is unlikely to be constrained ecologically. As part of the 2017 SHLAA, the Site (Ref:3406) it was considered to be available, achievable, suitable and deliverable.

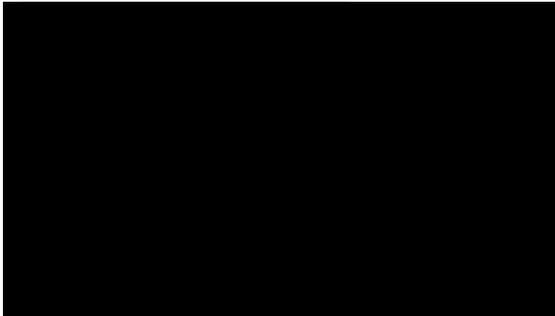
Existing services and facilities within Lynheam are easily accessible either on foot or by cycle as Preston Lane runs through to the village centre. Lynheam benefits from a very good bus service through to Swindon with the service available from the centre of the village.

The OHM7 land represents a logical location for the future expansion of the village and would compliment the existing residential development accessible off Victoria Drive with the intervening land capable of forming an attractive green space. Whilst all of the land within the red line on the attached Site Location Plan is available it is appreciated that given the current residual need a smaller parcel may be more appropriate in the short term.

It is noted that Lyneham and Bradenstoke are moving towards examination of a Neighbourhood Development Plan. We would note that this is based on the Wiltshire Core Strategy and whilst Lyneham's role is unlikely to change, the planned for quantum of development will and we would suggest should increase further. Accordingly, we are concerned that there will be a likely conflict which will result in a less flexible policy regime which will undoubtedly further hamper the effective delivery of residential development.

Given the suitability of the OHM7 land we consider strongly that Wiltshire should consider it for a strategic allocation as part of the Local Plan Review alongside the adoption of a more flexible policy to allow sustainable growth at Larger Villages and more rural settlements, particularly locations such as Lyneham.

Yours sincerely,



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Wiltshire Local Plan Review Consultation (13 January to 9 March 2021)

Response on behalf of Bellway Homes Limited

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Project: South Cricklade
Client: Bellway Homes Ltd

Document Checking:

Prepared by [REDACTED]

Checked by: [REDACTED]



1. Introduction

- 1.1. This response is submitted on behalf of Bellway Homes Limited ('Bellway').
- 1.2. On behalf of the landowner, Bellway is promoting land at South Cricklade for residential allocation in this Local Plan Review. This site relates to land to the west of the B4553 which is immediately adjoining the existing urban area. A location plan showing the site boundaries are provided at **Appendix 1**.
- 1.3. To support the response made to this consultation by Savills on behalf of Bellway, this submission also includes the following information:
- Completed Response Form: Emerging Spatial Strategy
 - Site Location Plan: Land at South Cricklade

Bellway Homes Limited

- 1.4. Bellway is an FTSE 250 major PLC housebuilder and the fourth largest in the UK. They are a five star housebuilder as a result of emphasis on build quality, customer care and health and safety, and build and sell high quality homes to suit local housing styles as well as providing social housing to housing associations.
- 1.5. Since their beginning over 70 years ago, Bellway now operate from 22 trading divisions which are located in the main population centres in England, Scotland and Wales. This structure enables their divisional management teams to use their locational knowledge and working relationships to buy land, design, build and sell homes which are attractive to their customers and help to build local communities.
- 1.6. Bellway also has a strong track record in terms of delivering sustainable development in the Wiltshire area (including the Wiltshire and Swindon Council areas). This includes the following sites:
- Wanborough (greenfield site): 380 homes
 - Rudloe, Corsham (brownfield site): 168 homes
 - Hilperton, Trowbridge (greenfield site): 150 homes
 - Melksham (greenfield site): 150 homes
 - Devizes (greenfield site): 125 homes
 - Corsham (brownfield site): 100 homes
 - Rudloe, Corsham (greenfield site): 70 homes
 - Bradford on Avon (greenfield site): 60 homes
- 1.7. Bellway control this sustainable site in Cricklade and their experienced consultant team have assessed the site and consider it is available, suitable and developable and can therefore provide a deliverable site of new homes including affordable housing and public open space. The landowners have carefully chosen Bellway as their development partner to ensure a positive legacy locally and seek to deliver community benefits too.

Wiltshire Local Plan Review Consultation (13 January to 9 March 2021)



Response on behalf of Bellway Homes Limited

- 1.8. Bellway are fully committed to building and delivering a sustainable development for Cricklade and would like to work with the Council in order to secure an allocation for the delivery of this sustainable development proposal.

2. Summary of Bellway's Development Proposals

- 2.1. As part of this consultation response, Bellway is promoting land at South Cricklade for residential allocation in this Local Plan Review. This site relates to land to the west of the B4553 which is immediately adjoining the existing urban area.
- 2.2. The site has previously been submitted to the Council by Bellway as part of the call for sites exercise relating preparation of the Strategic Housing and Economic Land Availability Assessment (SHELAA). The SHELAA identifies Bellway's site as being Site 3191 (i.e. Land West of the B4553). The SHELAA concludes in relation to Site 3191 that the site is suitable (i.e. no suitability constraints), available, achievable (i.e. for residential), deliverable and developable (i.e. in the short term). The SHELAA also states that the site area is 1.4836 hectares and the development capacity is 54 dwellings (based on the 1.4836 hectares site area).
- 2.3. Bellway agrees with the conclusions reached in the SHELAA that the site is available, achievable (i.e. for residential), deliverable and developable (i.e. in the short term), but notes that the site area is 2.2 hectares and the development capacity is approximately 60 dwellings.

The Site

- 2.4. The site is in single ownership and extends to 2.2 hectares. It is located immediately to the south of the built up area of Cricklade and located to west of the B4553. Directly to the north of the site is an area of new residential development at The Forty which is being built by Greensquare Homes for 70 dwellings. To the east of the site is a small enclave of buildings and access road which form part of Godbys Farm. To the south and east of the site are fields which are in agricultural use.
- 2.5. The site is an agricultural field and is not subject of any statutory environmental or landscape designations. The site is also located entirely within Flood Zone 1.
- 2.6. The site is also unlikely to be contaminated given its current agricultural use.
- 2.7. The site is flat and direct access can be made on to the B4553.
- 2.8. A Public Right of Way (PRoW) runs across the south-eastern corner of the site along a diagonal line from the B4553. This PRoW connects the B4553 to the line of the old canal which is located to the south west of the site. The route of the PRoW will be incorporated into the proposed development of the site by Bellway.
- 2.9. Whilst an overhead powerline crosses the south west corner of site, this can be diverted/undergrounded as part of future development proposals.
- 2.10. No viability constraints are envisaged by Bellway as part of the development of this site.
- 2.11. As identified in Core Policy 1 of the adopted Wiltshire Core Strategy (2015), Cricklade is classified as a Local Service Centre which is identified for "*modest levels of development in order to safeguard their role and to deliver affordable housing*". The site itself is located immediately outside of the defined settlement boundary of Cricklade, as defined on the Interactive Proposals Map.

Wiltshire Local Plan Review Consultation (13 January to 9 March 2021)



Response on behalf of Bellway Homes Limited

- 2.12. In view of the absence of significant constraints, it is considered that Bellway's site at South Cricklade is suitable for consideration as a residential allocation in the Local Plan Review.

The Proposed Development

- 2.13. It is considered that the site is located in a sustainable location immediately adjoining the settlement boundary of Cricklade and that its proposed development could deliver the following:
- Approximately 60 dwellings (including affordable housing).
 - Public Open Space for the benefit of new and existing residents.
- 2.14. Bellway also consider that the development of this site is capable of being commenced in the short term (i.e. from 2022).

3. The Emerging Spatial Strategy

Overarching Responses to the Wiltshire Local Plan Review

- 3.1. On behalf of Bellway we wish to make the following overarching responses to the Local Plan Review Emerging Spatial Strategy (ESS) consultation:
1. The Plan period should be changed with the start date updated from 2016 to 2018 and the end date extended from 2036 to 2040.
 2. The housing requirements for the Housing Market Areas should be increased through the inclusion of 4 additional years of housing development (i.e. from 2036 to 2040).
 3. Land within the Swindon HMA should include an allocation of land at South Cricklade for approximately 60 dwellings.
 4. Climate Change Outcomes: Development in Cricklade represents a sustainable location with good access to jobs and services, both within the town and in nearby settlements (i.e. Cirencester, Swindon, Cheltenham and Gloucester). New development in the town will also assist in further improving the self-containment in Cricklade.

Plan Period

- 3.2. The Plan period should be changed with the start date updated from 2016 to 2018 and the end date extended from 2036 to 2040.
- 3.3. Wiltshire Council proposes that the Plan period for the Local Plan Review should run from 2016 to 2036. We also note that the Council's Local Development Scheme (July 2020) indicates that the Local Plan Review will be adopted in Q2 2023 (i.e. May/June 2023).

Revised Start Date

- 3.4. If the Local Plan Review is adopted in 2023 (as indicated in the Local Development Scheme), the Plan's start date will be 7 years removed from the date of adoption. On the basis that this is a Local Plan Review, which should be carried out every 5 years, the start date of the Plan should – at the very least – be based on a date which is no less than 5 years from the date of adoption. In the case of this Local Plan Review the start date should therefore be 2018.
- 3.5. Without this proposed change to the Local Plan Review, in rural settlements like Cricklade, the result of maintaining the 2016 start date will be that there will either be very limited development or no development at all until the end of the Plan period. This is because, as identified in Tables 2.3 and 2.6 of the Empowering Rural Communities (ERC) consultation document, a significant element of the baseline indicative housing requirements for the period 2016-2036, are already taken up by completions (2016-2019) and commitments (1st April 2019).

Wiltshire Local Plan Review Consultation (13 January to 9 March 2021)



Response on behalf of Bellway Homes Limited

3.6. By not enabling communities to grow, as a result of identifying new allocations in this Local Plan Review, the approach in the ESS and ERC consultation documents to the identification of a suitable start date runs contrary to National planning policy on rural housing. In paragraph 78 of the NPPF, the Government promotes sustainable development in rural areas and states that “*housing should be located where it will enhance or maintain the vitality of rural communities*”. The NPPF also states that “*Planning policies should identify opportunities for villages to grow and thrive, especially where this will encourage local services*”. This should include the allocation and development of sufficient sites, including Bellway’s site at South Cricklade.

3.7. In making this change to the period covered by the Local Plan Review, the Council should also change its calculations of the residual housing requirements for each HMA. The Local Plan Review’s residual requirements currently take into account housing completions for the period 2016-2019. This should be changed to only account for completions which have taken place from 2018-2019.

Extended End Date

3.8. If Wiltshire Council maintains its current position and adopts its Local Plan Review with an end date of 2036, the timeframe of the Plan will only be 13 years from the date of adoption. This is an unacceptably short timeframe and is contrary to Government planning policy, in particular Paragraph 22 of the NPPF which states 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*” (our emphasis).

3.9. Instead of the maximum 13 year timeframe, which could be the case if the Council adopts its Local Plan Review in 2023, we propose that the Plan period should – at the very least – cover a minimum of 15 years (post adoption). Indeed, we consider that it is important in the case of this Local Plan Review that the Plan period covers a longer period, as identified in Paragraph 22 of the NPPF. For example, in the case of Cricklade this would include the delivery of additional housing to accommodate local housing needs and which would also assist in supporting local facilities and services.

3.10. There is established precedent for having Local Plan timeframes which are a minimum of 15 years post adoption. **Table 1** below identifies all of the neighbouring districts around the Wiltshire Council administrative area and the timeframes associated with those adopted and emerging Local Plans. Of those authorities identified below, the following have or will have Local Plans with timeframes of 15 or more years: Vale of White Horse; West Berkshire; Test Valley; Dorset; Mendip; and South Gloucestershire.

District Adjoining Wiltshire	Adopted or Emerging Local Plans	Plan Period / LDS Information / Timeframe
Swindon	Local Plan (Proposed Submission Draft) (December 2019)	2018-2036 (LDS 9/20 identifies adoption as Q3 2022) (Timeframe of 14 years from adoption)
Vale of White Horse	Local Plan 2041 (Call for Sites stage April 2020)	2021-2041 (LDS 2/20 identifies July 2023 adoption) (Timeframe of 18 years from adoption)
West Berkshire	Local Plan Review (Draft December 2020)	2020-2037 (LDS 4/20 identifies December 2022 adoption) (Timeframe of 15 years from adoption)

Wiltshire Local Plan Review Consultation (13 January to 9 March 2021)



Response on behalf of Bellway Homes Limited

Table 1: Neighbouring Authorities – Local Plan Timeframes		
District Adjoining Wiltshire	Adopted or Emerging Local Plans	Plan Period / LDS Information / Timeframe
Test Valley	Next Local Plan: Refined Issues and Options Consultation 2020 (June 2020)	To 2036 or up to 2040 (to be decided) (LDS 1/20 identifies Q3 2024 adoption) (Timeframe of 16 years from adoption in 2024)
New Forest	Local Plan (Adopted July 2020)	2016-2036 (No current LDS) (Timeframe of 16 years from adoption)
Dorset	Local Plan (Options Consultation January 2021)	2021-2038 (LDS 9/20 identifies 2023 adoption) (Timeframe of 15 years from adoption)
South Somerset	Local Plan Review (Preferred Options) (June 2019)	2016-2036 (LDS 4/17 adoption estimate is out of date, i.e. 12/20) (Timeframe of 13 years if adopted in 2023)
Mendip	Local Plan Review (No consultation undertaken to date)	2020-2040 (Cabinet confirmed in 1/20 to review Local Plan Part 1) (No current LDS) (Timeframe of 16 years if adopted in 2024)
Bath and North East Somerset	Local Plan (Partial Update Options Consultation) (January 2021)	2011-2029 (LDS identifies adoption in 3/22) (Timeframe unchanged because the consultation relates to a partial update of an adopted Local Plan)
South Gloucestershire	Local Plan 2020 (Phase 1 Issues and Approaches) (November 2020)	2023-2038 (Local Plan Delivery Programme 1/21 identifies adoption in 12/23) (Timeframe of 15 years from adoption)
Cotswold	District Local Plan (Adopted August 2018)	2011-2031 (Cabinet confirmed in 6/20 that a Partial Review would be undertaken with no change to the 2031 end date)

- 3.11. As identified in **Table 1**, six of the neighbouring authorities have or will adopt Local Plans with timescales of 15 or more years. There is also precedent for the Local Plans having a timescale which runs to 2040 and beyond. For example, the Vale of White Horse proposes a Plan end date of 2041, Test Valley proposes an end date of up to 2040 and Mendip proposes an end date of 2040.
- 3.12. We are also mindful that National Planning Policy is under review and that a new draft version of the NPPF is currently being consulted upon. In particular, we note that Government is proposing a change to Paragraph 22 of the NPPF which adds to the existing policy guidance and states that “*Where larger-scale development such as new settlements form part of the strategy for the area, policies should be set within a vision that looks further ahead (at least 30 years), to take into account the likely timescale for delivery*”.
- 3.13. We consider that this proposed change to National Planning Policy should be taken into consideration by the Council in the preparation and adoption of its Local Plan Review. This proposed change to the NPPF shows a clear direction of travel in Government Planning Policy which places emphasis on looking to the longer term, to sustainable development and the adoption of Local Plan Visions which will support them.
- 3.14. The proposed change to the NPPF also adds further weight to our argument that the Local Plan Review should have a timeframe to 2040. The extended timeframe of the Local Plan Review will enable sustainable development which supports rural communities to be planned for within their likely and deliverable timescales.

Overall Housing and Employment Requirements – Wiltshire and the Housing Market Areas

- 3.15. We support the general principle behind the Council's decision not to use the Standard Method calculation of additional dwellings but instead to base its calculation of housing requirements upon a Local Housing Need Assessment.
- 3.16. This is consistent with National Planning Policy Guidance which states that "*The standard method set out below identifies a minimum annual housing need figure. It does not produce a housing requirement figure*" (NPPG Paragraph: 002 Reference ID: 2a-002-20190220). We also note that NPPG states that "*Strategic policy-making authorities will need to calculate their local housing need figure at the start of the plan-making process. This number should be kept under review and revised where appropriate*" (Paragraph: 008 Reference ID: 2a-008-20190220).
- 3.17. In setting the overall housing requirement for the Local Plan Review period, we also note that NPPG states that "*The government is committed to ensuring that more homes are built and supports ambitious authorities who want to plan for growth. The standard method for assessing local housing need provides a minimum starting point in determining the number of homes needed in an area. It does not attempt to predict the impact that future government policies, changing economic circumstances or other factors might have on demographic behaviour. Therefore, there will be circumstances where it is appropriate to consider whether actual housing need is higher than the standard method indicates*" (Paragraph: 010 Reference ID: 2a-010-20201216).
- 3.18. However, we do not consider that the appropriate levels of housing requirement have been identified in the Local Plan Review, either in relation to the overall housing requirement for Wiltshire or in relation to the HMAs.
- 3.19. In relation to the Swindon HMA, which is of particular interest to Bellway, we consider that the level of housing requirement identified in the Emerging Spatial Strategy is below what we consider to be appropriate for this location.
- 3.20. The level of housing identified for the Swindon HMA does not adequately take into consideration the sustainability of Cricklade to accommodate non-strategic levels of growth to meet future housing needs and to support existing facilities and services. Nor does it fully reflect the proximity of Cricklade to Cirencester, Swindon, Cheltenham and Gloucester and their employment opportunities and higher order facilities, which can be shared with residents of Cricklade using sustainable modes of transport.
- 3.21. In view of this, we consider that the housing requirement for Wiltshire and the Swindon HMA should be increased, as outlined below.
- **Increase Housing Requirements to 2040 (4 Additional Years Supply)**
- 3.22. On the basis of extending the timeframe of the Local Plan Review from 2016-2036 to 2018-2040, we propose that that the overall housing requirement for Wiltshire is increased to take account of these additional 4 years.
- 3.23. This proposed increase in housing requirements for Wiltshire is identified in **Table 2** below.

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Response on behalf of Bellway Homes Limited

Housing Market Area	Local Plan Review: Local Housing Need Assessment (Additional dwellings 2016-2036)	LHNA (Additional dwellings annum) per	Savills Proposal: 4 Years additional dwellings (2036-2040)	Savills Proposal: Housing Requirement (2018-2040)
TOTAL	45,630	2,282	9,128	50,204

3.24. The apportionment of the proposed additional 4 years of development should be a matter for further consideration. In relation to Cricklade, we consider that the minimum residual housing requirement for the town should take into consideration the opportunity to allocate Bellway's site for the delivery of approximately 60 dwellings. The proposed development by Bellway and its allocation in the Local Plan Review is capable of being supported by the existing infrastructure, facilities and services which are available in Cricklade. In addition, the level of growth proposed by Bellway would assist in supporting local facilities and services through increased patronage by new residents.

- **Conclusion: Housing Requirements for Wiltshire and the Swindon HMA**

3.25. On the basis of the arguments identified above, we consider that the overall housing requirement for Wiltshire should be increased from 45,630 dwellings to 50,204 dwellings for the period 2018-2040. In relation to Cricklade, we consider that the minimum residual housing requirement for the town should take into consideration the opportunity to allocate Bellway's site for the delivery of approximately 60 dwellings.

3.26. This proposed development by Bellway and its allocation in the Local Plan Review is capable of being supported by the existing infrastructure, facilities and services which are available in Cricklade. In addition, the level of growth proposed by Bellway would assist in supporting local facilities and services through increased patronage by new residents.

Delivering the Spatial Strategy

- **Local Service Centres**

3.27. We note that the hierarchy of settlements as set out in the Wiltshire Core Strategy (Core Policy 1: Settlement Strategy) will not be changed as a result of the Local Plan Review. As identified in Core Policy 1, Cricklade is identified as a Local Service Centre (i.e. "defined as smaller towns and larger villages which serve a surrounding rural hinterland and possess a level of facilities and services that, together with improved local employment, provide the best opportunities outside the Market Towns for greater self-containment").

3.28. We support the identification of Cricklade as a Local Service Centre (ESS Page 3) and agree with the statement in Core Policy 1 of the Core Strategy that development in settlements like Cricklade provide opportunities for development which can result in greater self-containment.

3.29. We also consider that development of the scale proposed by Bellway at South Cricklade, and the contribution which it can make to achieving greater self-containment for the town, is of a sufficient scale that it should be allocated in this Local Plan Review and not left to be decided through the next Neighbourhood Plan.

- Climate Change Outcomes

- 3.30. We note the statement on Page 4 of the ESS that focusing new development within the County's main settlements reduces carbon in different ways. However, we request that the Council also makes reference to contribution that development in settlements which are classified as Local Service Centres can make to the achievement of sustainable development and the reduction in carbon.
- 3.31. Although the development of sites in Local Service Centres would be at a smaller scale than strategic developments in the main settlements, we consider that developments of between 50 and 100 dwellings in settlements like Cricklade can make significant contributions towards supporting local facilities and services, be capable of being accessed by new residents by sustainable modes of transport.
- 3.32. In terms of the points made in the ESS in relation to climate change outcomes, we note the following in relation to Cricklade and the site to the South of the town promoted by Bellway for residential development:
- (i) New development at Cricklade, as proposed by Bellway, will be within walkable and cycling distance of a range of existing facilities and services which are present in the town, including shops, community facilities and primary schools. The site being promoted by Bellway is also connected to the existing urban area of Cricklade and to Swindon and surrounding settlements (such as Cirencester, Cheltenham and Gloucester) by a public transport corridor which provides access to employment and higher order services. As a result, the potential exists to encourage the use of sustainable modes of transport and to reduce the need to travel, in particular by private car.
 - (ii) It is anticipated that the development proposed by Bellway at Cricklade will also be capable of being served by existing energy networks.
 - (iii) An increase in the scale of development at Cricklade and population will also assist in supporting existing businesses in the town as a result of increased spending.

- Delivery Principles

- 3.33. We support the aims of the 5 delivery principles identified on Page 6 of the ESS. The Local Plan Review should be led by the 'place shaping priorities' in order to ensure that settlements such as Cricklade have the opportunity to become more sustainable and more attractive places to live, work and socialise.
- 3.34. These place shaping priorities should, in turn, focus upon the identification of development allocations in settlements like Cricklade that can deliver development which is needed by existing and new residents. In the case of Bellway's site at South Cricklade, the proposed development would also be capable of delivering new public open space which can be used by new and existing residents.
- 3.35. With regard to the third delivery principle, we request that its emphasis is changed. The Local Plan Review's delivery principles should not be led by simply finding sites to meet the housing requirement which is currently identified in the Plan. Instead, the Local Plan Review should seek to enable the allocation of development which improves the sustainability of settlements like Cricklade and provides opportunities to deliver infrastructure (such as public open space) to serve existing and new residents.

Response on behalf of Bellway Homes Limited

- 3.36. We also request that the delivery principles should be clarified in order to state that the Local Plan will identify the allocation of sites which are of a scale similar to the land being proposed by Bellway on land at South Cricklade, particularly because of the contribution that they can make to the establishment of more self-contained settlements and to the support that they can give to existing facilities and services.
- 3.37. In addition, we also restate our view that development of the scale proposed by Bellway at South Cricklade, and the contribution which it can make to achieving greater self-containment for the town is of a sufficient scale that it should be allocated in this Local Plan Review and not left to be decided through the next Neighbourhood Plan.

Swindon Housing Market Area

- Alternative Development Strategies

- 3.38. On the basis that the overall housing requirement for Wiltshire and the HMAs is increased in line with our request, we consider that the allocation and development of land at Cricklade can form part of and be consistent with whichever development strategy is ultimately selected for the Swindon HMA. This includes the allocation of non-strategic sites to meet short term housing needs and strategic sites to meet medium to longer term housing and infrastructure needs.
- 3.39. In selecting the development strategy for the Swindon HMA, we request that further explanation is given in the Local Plan Review to the ability of Local Services Centres, like Cricklade, to deliver smaller scale levels of development which can improve their self-containment and sustainability.

Meeting the Residual Housing Requirement at Cricklade

- 3.40. On the basis that the housing requirement for Wiltshire and the Swindon HMA is increased, as identified in our response to the Emerging Spatial Strategy, the housing requirement for the period up to 2040 will require the delivery of new housing allocations.
- 3.41. In order to accommodate the housing requirement which will be set for the Swindon HMA for the period up to 2040, Bellway propose the allocation of its land at South Cricklade. The development of this site could deliver the following:
- Approximately 60 dwellings (including affordable housing).
 - Public Open Space for the benefit of new and existing residents.

- 3.42. The proposed development at South Cricklade will not result in significant impacts relating to landscape, ecology, heritage and transport. In addition, the proposed development is capable of being served by existing infrastructure in the town, including primary education and healthcare facilities, and be of a scale which can provide support to existing facilities and services, such as local shops.

Concluding Summary

- 3.43. On the basis of the responses made above to the Emerging Spatial Strategy, we request that the Plan period should be changed from 2016-2036 to 2018-2040. In doing so, the overall housing requirement for Wiltshire should be increased from 45,630 to 50,204 dwellings.

Wiltshire Local Plan Review Consultation (13 January to 9 March 2021)



Response on behalf of Bellway Homes Limited

- 3.44. The residual housing requirements for the HMAs and towns identified in the Local Plan Review also require further consideration. The process of deciding the level of housing requirements for these areas should be based on place shaping principles and seeking to make settlements more sustainable and attractive places to live, work and socialise. In relation to Cricklade, we consider that the minimum residual housing requirement for the town should take into consideration the opportunity to allocate Bellway's site for the delivery of approximately 60 dwellings.
- 3.45. This proposed development by Bellway at South Cricklade and its allocation in the Local Plan Review is capable of being supported by existing infrastructure, facilities and services which are available in Cricklade. In addition, the level of growth proposed by Bellway would assist in supporting local facilities and services through increased patronage by new residents.
- 3.46. In addition, we consider that development of the scale proposed by Bellway at South Cricklade, and the contribution which it can make to achieving greater self-containment for the town is of a sufficient scale that it should be allocated in this Local Plan Review and not left to be decided through the next Neighbourhood Plan.

Wiltshire Local Plan Review Consultation (13 January to 9 March 2021)

Response on behalf of Bellway Homes Limited



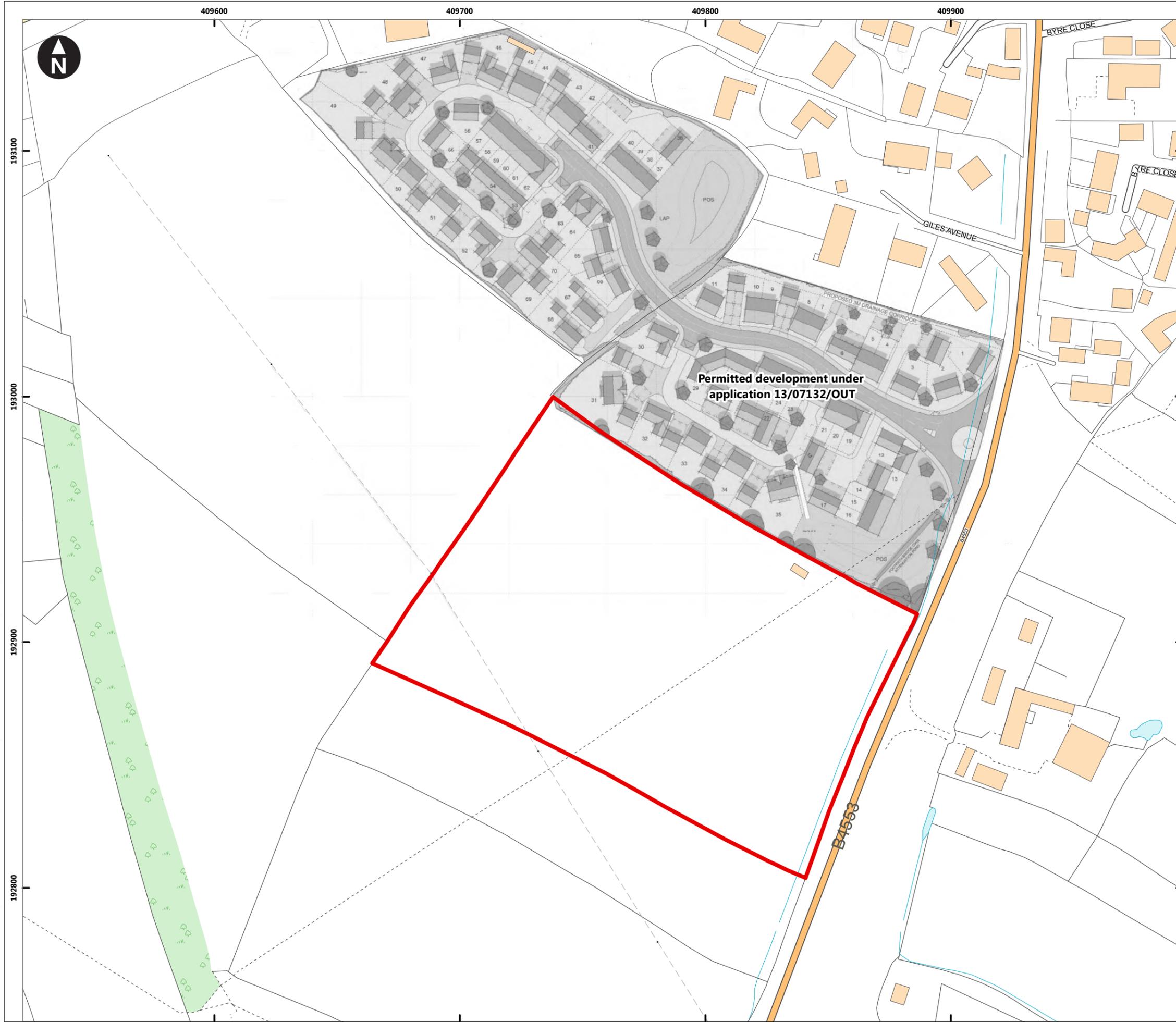
Appendices

Wiltshire Local Plan Review Consultation (13 January to 9 March 2021)

Response on behalf of Bellway Homes Limited



Appendix 1 Site Location Plan



Key

Boundary



Scale at A3: 1:1,500

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Cricklade

Land west of the B4533, south of Cricklade

June 2019



wood.

Wiltshire Local Plan Review Consultation (13 January to 9 March 2021)

Response on behalf of Bellway Homes Limited



RURAL 356



RIDGE

**REPRESENTATION FOR THE
WILTSHIRE LOCAL PLAN
REVIEW: EMERGING SPATIAL
STRATEGY**

**FOR MACTAGGART & MICKEL
GROUP (M&M)**

March 2021

REPRESENTATION FOR THE WILTSHIRE LOCAL PLAN REVIEW: EMERGING SPATIAL STRATEGY.

March 2021

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APPENDIX 1: 'THE PRY' CONCEPT DOCUMENT.

**APPENDIX 2: SUMMARY TABLE OF POTENTIAL ALLOCATIONS FOR DEVELOPMENT
AT ROYAL WOOTTON BASSETT.**

1. INTRODUCTION

- 1.1. This representation has been made by Ridge and Partners LLP on behalf of our client Mactaggart & Mickel Strategic Land in response to the Wiltshire Local Plan Review which is running between 13th January and 9th March 2021.
- 1.2. The following statement provides comments in respect of the Council's Emerging Spatial Strategy and offers suggestions to ensure the Council's housing target for the plan period can be achieved whilst assisting the District to become carbon neutral by 2030. In particular, it is recommending that a proportion of housing growth be directed toward the west of the District adjacent to Swindon, a sustainable location for development that has direct access to an extensive range of services and facilities as well as employment opportunities. Further, development in this area is considered to reduce the rate of commuter travel which as identified in the adopted Core Strategy and the Emerging Spatial Strategy is a 'key challenge' the District faces, being accessible to Swindon, Bath and Bristol where the majority of employment opportunities lie.
- 1.3. We note that this consultation is not an opportunity to promote specific site allocations in respect of the emerging Local Plan (LP). However, it should be noted our client has continued to promote the site known as 'The Pry' located immediately west of Swindon and within the Wiltshire District for circa 3,500 new homes, comprising a size of approximately 200 acres. **Appendix 1** provides proposed concepts of its development and Section 3 of this statement assesses the site's deliverability, being suitable, available and achievable for development. Providing this assessment demonstrates that the growth west of Swindon should be promoted through the emerging LP as it would accord with the Council's Emerging Spatial Strategy.

2. EMERGING SPATIAL STRATEGY

- 2.1 The Emerging Spatial Strategy (ESS) identifies between 40,840 and 45,630 new homes will need to be delivered in the plan period, 2016-2036. The lower figure uses the national standard method, equating to the minimum housing requirement needed whilst the higher figure is representative of the methodology used within the Council's Local Housing Need Assessment taking into account longer term migration and economic forecasts.
- 2.2 To help distribute this growth, the ESS makes reference to the existing settlement hierarchy contained at Core Policy 1 of the Wiltshire Core Strategy, proposing that the primary focus for growth should remain at Principal Settlements followed by Market Towns. This it says is to ensure that 'self-containment' is achieved across the District to reduce the rate of out-commuting, referenced as a key challenge within the current Core Strategy and the ESS. We agree that this key challenge is an important consideration for determining where development should be directed to, ensuring it is sustainably located, has good access to a wider range of services and facilities that encourages the use of sustainable modes of transport. However, there is some concern as to the level of growth both at the Principal Settlements and Market Towns. Will growth in these locations resolve the issue around the high levels of out-commuting? Ultimately the intention to focus growth in these locations has been the same strategy for a considerable period of time (i.e. over a number of plan periods) and the problem of out-commuting continues. In addition, sites which have been previously allocated as part of the Core Strategy have yet to come to fruition, questioning their deliverability. This is discussed below.

Directing Growth

- 2.3 As mentioned above, the Council consider their housing target can be met through directing growth toward Principal Settlements and Market Towns, an identical strategy to that proposed in the adopted Core Strategy. In doing so, significant growth is directed toward Chippenham, Salisbury and Trowbridge (albeit the latter two settlements are allocated less housing than as set out in the Core Strategy). These settlements have already received a significant amount of growth over the last 5/6 years. For example, the two mixed use allocations in Chippenham within the adopted Core Strategy (ref. CSAP – CH1 'Rowden Park Site') have subsequently received planning permission for its development and the more detailed design stages of each of those applications are being dealt with by the LPA. Together both allocations will seek to deliver up to 1,000 dwellings alongside 50,000 sq. metres of employment development. Further north, the site allocation 'Rawlings Green' (ref. CSAP-CH2) is proposed to deliver up to 650 dwellings and employment use. A planning application was submitted in 2015 for this but is still under consideration by the LPA. The Council also propose three sites toward the south east of the town as preferred options for development. It is noted the two larger allocations are partly contained within areas at risk of flooding (Flood Zones 2/3).
- 2.4 In Trowbridge and Salisbury, similar situations exist. The development of the Ashton Park allocation south east of Trowbridge has been significantly delayed, contributing toward a 1,297 shortfall in

housing for the District. This is further reflected in the Council's inability to demonstrate a five year housing land supply. As identified in the Wiltshire Housing Site Allocations Plan (adopted February 2020) other site options for development around Trowbridge are limited due to ecological constraints and the designation of the Green Belt. Equally, the delivery of 'Hampton Park' within Salisbury has been delayed, which proposed to deliver 500 new dwellings. Further, that settlement is heavily constrained by Flood Zone 2/3 areas limiting opportunities for development.

- 2.5 Notwithstanding the above, development at these settlements and also within Market Towns will still to an extent result in a level of out commuting toward Bristol, Bath and Swindon, particularly as some of the mixed-use development proposed has been delayed and will not be coming forward in the near future, resulting in less employment and commercial opportunities within these areas than planned and increasing the reliance in commuting toward the aforementioned settlements.
- 2.6 We consider there is ample opportunity to direct growth in other areas of the District which are in closer proximity to the popular destinations of out-commuters such as land west of Swindon. This is discussed below.

Swindon (the Wiltshire part) HMA

- 2.7 To achieve the Council's housing target, the ESS sets out five delivery principles, one of which requires the Council to *"allocate land for development through the Local Plan where it is necessary to do so. It will be necessary to do so to ensure the scale of the County's housing and employment needs are met and to ensure a supply of deliverable land"*.
- 2.8 Similar to the current Core Strategy, the emerging LP seeks to divide its growth target into housing market areas (HMA), namely Chippenham, Salisbury, Swindon (the Wiltshire part) and Trowbridge. Of those, the Swindon HMA under the standard methodology is set to deliver 2,935 additional dwellings up until the plan period and using the Local Housing Need Assessment methodology is targeted to deliver 3,255 additional dwellings. Clearly, there is an identified housing need to be met within this part of the District.
- 2.9 The ESS specifically considers the Swindon HMA and alternative development strategies in helping to deliver its housing target, including:
- Swindon A – Roll forward the core strategy pattern of distribution.
 - Swindon B – Focus on Royal Wootton Bassett.
 - Swindon C – Focus on the rest of the HMA.
- 2.10 Notably this assessment raised concerns regarding the development of land within the 'rest of the HMA' identifying likely landscape, heritage and transport impacts. This demonstrates common constraints to development opportunities within the District given its rural character. That being said, at the west of Swindon it should be noted that none of those constraints are present.

2.11 When considering west of Swindon, the ESS states *“it was agreed with Swindon Borough Council that there is no need to plan for additional development at this time on the edge of the urban area within Wiltshire. The Borough will fully meet its needs appropriate within its local authority area.”* Given the known constraints which apply to the HMA we question whether to it is appropriate to rule out development to the west of Swindon. It is worth acknowledging the following:

1. The delay in the deliverability of allocated sites in the principal settlements and market towns; and
2. Environmental and landscape constraints exist at those settlements which severely constrain growth opportunities where significant levels of development has only recently occurred or is planned to be delivered. Encouraging further development at those locations will place additional pressure on those constraints at those settlements.

2.12 These factors need to be weighed against opportunities to encourage development at the west of Swindon which is largely free of environmental constraints and is more accessible to shops, services and employment opportunities and ultimately contribute towards reducing the level of out-commuting to Swindon.

2.13 As an outcome of the sustainability appraisal respective of the Swindon HMA, the Council consider the favourable alternative development strategy to be 'Swindon B' focusing on development within Royal Bassett Wootton. As such, the ESS considers Royal Wootton Bassett as a key settlement to accommodate the amount of growth targeted toward the Swindon HMA. Whilst that settlement is located west of Swindon, we consider there are additional sites that are within closer proximity to Swindon that are more suitable, available and achievable for development. In coming to this conclusion, a review of the 'sites for assessment' within the 'Royal Wootton Bassett Site Selection Report' has been undertaken and it is noted that there are a number of environmental constraints associated with the majority of these sites (see summary table of **Appendix 2**). There are other sites within this HMA which are considered to be more suitable for development, such as our client's site 'The Pry'. Whilst we note that this consultation does not provide opportunity to promote specific sites for development, we consider it relevant to demonstrate the sustainability of that site to determine that the Council should not disregard sites immediately adjacent to Swindon that could contribute solely to Wiltshire's housing need whilst reducing commuter travel; a key aim of the ESS.

3. GROWTH AND CLIMATE CHANGE

3.1 The Council as part of the ESS also consider how to address the impact of climate change through the delivery of development. In doing so they refer to concentrating growth at main settlements as well some rural areas where existing services and facilities exist, promoting the use of sustainable modes of transport and consequently reducing carbon emissions. This is reflected in the Council's emerging paper 'Addressing Climate Change and Biodiversity Net Gain'. As such, the ESS lists possible outcomes in respect of this strategy, stating it will:

- *"make best use of existing infrastructure, such as energy networks, public buildings, services and local transport networks, reducing the need for additional infrastructure that would create more carbon;*
- *Better support existing businesses by growing local spending and supply chains. In particular, it can help each town centre to continue serving its local community;*
- *Reduce the need to travel, and travel by the private car in particular, by providing jobs, facilities and services locally and support active means of travel such as walking and cycling; and*
- *Provide opportunities on a scale to design new neighbourhoods for renewable energy supply, alternatives to the private and more energy efficient new buildings- opportunities that are likely to be more difficult to realise in rural areas."*

3.2 It is considered these outcomes can be achieved by directing development toward the west of Swindon where future occupiers of the development can utilise existing services and facilities via sustainable modes of transport. As such, we disagree with paragraph 3.73 of the ESS which considers that directing growth to the edge of Swindon *"would not have the same climate change outcomes, probably being of no pronounced benefit to Swindon services and no benefit to communities in Wiltshire."* Developing on sites adjacent to Swindon will benefit the communities of Wiltshire by delivering housing that helps meet the required need of the District in areas that are less constrained and more sustainably located. It will also provide the opportunity for those who live in Wiltshire but work in Swindon, which as recognised at paragraph 3.72 of the ESS is still the case where there are strong travel patterns between to the two local authority areas, to remain living in the Wiltshire District whilst reducing their travel to work, aiming to achieve healthier, inclusive and safer places as advocated at Chapter 8 of the NPPF. Further, directing development west of Swindon will benefit the existing services and facilities within the area.

3.3 Given the above, it is considered directing growth toward the west of Swindon and particularly at the site 'The Pry' accords with the Council's strategy in responding to climate change impacts, by locating development in areas that are near to a number of services, facilities and employment opportunities, resulting in more self-containment and a reduced level of out-commuting within the District.

4. ASSESSMENT OF SITE SUITABILITY FOR DEVELOPMENT

4.1 The following section assesses the suitability of the site 'The Pry' for development, demonstrating the site is a sustainable location for development that is achievable and available now.

Background Context

4.2 Mactaggart & Mickel Strategic Land (M&MSL) is the strategic promotional arm of the Group, responsible for the promotion of long-term land through the Development Plan system and bringing forward large scale development schemes through the planning application process. Locally, M&MSL have interests in strategic sites at:

- Hallow, Worcestershire;
- Standlake, Oxfordshire;
- Frampton Cotterell, South Gloucestershire;
- North Cheltenham, Gloucestershire;
- Twigworth, Gloucestershire;
- Chard, Somerset;
- Keynsham, Bath and North East Somerset;
- Mitton, north of Tewkesbury, Worcestershire;
- Comeytrowe, Taunton; and
- The Pry, west of Swindon.

4.3 M&MSL secured interests in some 214.74 hectares (530.6 acres) of land at The Pry, north west Swindon, by way of a promotional agreement in 2012 and have been responsible for strategic promotion of the site through the Development Planning process since that time, including engagement through the preparation of the Wiltshire Core Strategy and Swindon Borough Local Plan 2026.

4.4 M&MSL, through their consultant team, have been working collaboratively with other landowners and developers, working with Wiltshire Council, Swindon Borough Council and the Swindon and Wiltshire Local Enterprise Partnership (SWLEP) as well as other external agencies such as Thames Water and Highways England.

4.5 Evidently, the site benefits from an experienced promotor that has local interest in a number of sites aside from The Pry and therefore is experienced in delivering sites that are available, achievable and suitable for development.

Location of Development

- 4.6 The site 'The Pry' is located immediately west of Swindon and within Wiltshire's administrative boundary. It measures circa 200 acres comprising a mix of agricultural fields with several farmsteads including Pry Farm. The B4553 dissects the centre of the site with Collin Lane leading off it in a westerly direction from the centre of the site.
- 4.7 Bordering the site's south western boundary lies a railway line providing connections from Swindon to Cheltenham and Gloucester. Immediately south east lies land owned by Swindon Borough Council containing Mould Country Park. Immediately east of the site lies the Swindon and Cricklade Railway and beyond that lies existing development forming the western boundary of Swindon. Immediately north and west of the site lies open agricultural fields. A private railway line also sits adjacent to the site that could be utilised as part of proposed development.
- 4.8 The B4553 provides direct access to Swindon both northbound and southbound. In terms of distance, the site lies approximately 5.54 km from the centre of Swindon, a settlement which contains an extensive range of services, facilities and employment opportunities which are already being utilised frequently by those that reside within the Wiltshire District.
- 4.9 More closely, the site sits within proximity to the neighbourhood of Peatmoor located within Swindon that sits south of the site. That neighbourhood contains a number of services and facilities including a primary school, an academy, a veterinary practice, doctor's surgery, a Co-operative and restaurant, and several bus stops providing regular services to the centre of Swindon.
- 4.10 Further south, approximately 5.34 km in distance, lies Junction 16 of the M4 providing direct access to London eastbound and Bristol westbound. Further north is the A419, approximately 6.36 km in distance, providing access northbound to Gloucester and Cheltenham.
- 4.11 Given the above, the site is considered accessible to an extensive range of services, facilities and employment opportunities with opportunity to access these via sustainable modes of transport. Equally, with the intention that the site's delivery will provide housing respective of Wiltshire's housing need, and not Swindon, it is considered this site provides opportunity to deliver housing for the residents of Wiltshire whilst reducing commuter travel within the District, being in considerably close proximity to Swindon.

Site Constraints

- 4.12 The site does not comprise any statutory landscape or heritage related constraints and does not sit within the Green Belt. Further, the site is defined as Flood Zone 1 by the Environment Agency's mapping service and therefore is at the lowest risk of flooding.

Deliverability

4.13 Paragraph 59 of the NPPF states *“to support the Government’s objective of significantly boosting the supply of homes, it is important that a sufficient amount and variety of land can come forward where it is needed”* and *“that the needs of groups with specific housing requirements are addressed.”*

4.14 Paragraph 67 of the NPPF states strategic policy-making authorities should have a clear understanding of the land available in their area through the preparation of a strategic housing and employment land availability assessment. From this, planning policies should identify a sufficient supply and mix of sites, taking into account their availability, suitability and likely economic viability. Planning policies should identify a supply of:

- a) *“specific, deliverable sites for years one to five of the plan period; and*
- b) *Specific, developable sites or broad locations for growth, for years 6-10 and, where possible for years 11-15 of the plan.”*

4.15 Annex 2 within the NPPF defines ‘deliverable’ as the following:

“To be considered deliverable, sites for housing should be available now, offer a suitable location for development now, and be achievable with a realistic prospect that housing will be delivered on the Site within five years.”

4.16 The following demonstrates the deliverability of the site in its entirety as per the definition above.

Availability

4.17 The site comprises primarily agricultural land and is being actively promoted by a well-established land promotor. There are no known legal arrangements, complex land ownerships or significant constraints which would prevent the site coming forward in a timely manner. The site is therefore developable and available.

Suitable

4.18 The site has no physical constraints that would prevent or delay development coming forward. The site is suitable and sustainably located for residential development with good accessibility to local services and facilities. The site is clearly a suitable location for residential development.

Achievable

4.19 The site borders the western boundary of Swindon and is close proximity to good transportation links. Allocating the site for development would enhance those services and facilities and would reduce the rate of out-commuting within the District. Further, the site can be considered achievable within a 5-10 year period.

Concluding Comments

- 4.20 Taking into account the above and the proposed site allocations at Royal Wootton Bassett, summarised at **Appendix 2**, it is considered 'The Pry' constitutes a suitable location for development that contains limited constraints when compared to the proposed site allocations. Whilst it is not the intention of this exercise to question or dispute the deliverability of these sites, it is reasonable to suggest that 'The Pry' could offer a level of development that would make a meaningful contribution to Wiltshire's housing needs whilst reducing the rate of out-commuter travel, a key aim of the adopted Core Strategy and the proposed ESS as well as avoiding putting additional pressure on the landscape and environmental constraints that affects the potential growth of settlements within Wiltshire.
- 4.21 At this point it is worth noting the site was submitted as part of a previous call for sites consultation Wiltshire District Council held in 2017. Subsequently, the Council assessed that site as part of the Strategic Housing and Economic Land Availability Assessment (SHELAA) 2017, disregarding it as a site for development as the site was either more than 100 metres from a settlement boundary within the District; or more than 100 metres from a site that was less than 100 metres from a settlement boundary; conflicting with Policy CP1 of the adopted Core Strategy. No other constraints were identified by the Council that would preclude the site's development. Prior to that, the site was also considered by the Council in 2009 within the draft South West Regional Spatial Strategy which was promoting circa 3,000 new homes at the west of Swindon within the North Wiltshire area. 'Pry Farm' was proposed to deliver at least 2,000 of those dwellings, recognised as a suitable location for development with limited environmental constraints that could mitigated where necessary and would be connected to a number of services and facilities through the development of 'Ridgeway Farm' (which is now currently being built out).
- 4.22 Given the emerging Local Plan provides opportunity to amend the spatial strategy, then it is argued that there is no suitable reason for disregarding development at 'The Pry'; particularly as there are other sites that are proposed to be allocated in the Swindon HMA that are more constrained and will only add to the levels of out-commuting already evident in the County.
- 4.23 We therefore respectfully request that this site is looked upon favourably by the Council in identifying proposed site allocations for development to help meet the required housing need up until the plan period.

5. CONCLUSIONS

- 5.1 This representation has been made by Ridge and Partners LLP on behalf of Mactaggart & Mickel Strategic Land in response to the Wiltshire Local Plan Review which is running between 13th January and 9th March 2021. In particular, this response provides comments on the Council's Emerging Spatial Strategy and provides suggestions as to where the direction of growth could be accommodated.
- 5.2 Overall, we are in agreement with the objective which seeks to direct growth to ensure 'self-containment' and reduce levels of out-commuting, a key challenge the District has historically and continues to face as identified within the ESS and the adopted Core Strategy. We agree that this key challenge is an important factor to help ascertain where development should be directed to, ensuring it is sustainably located, has good access to a wider range of services and facilities that encourages the use of sustainable modes of transport. However, concerns are raised as to whether directing all growth toward the Principal Settlements and Market Towns will ensure that challenge is resolved particularly as the majority of those settlements have already received a significant amount of growth and there are some sites that continue to be identified as 'existing allocations' within the Core Strategy that are yet to come to fruition, which has had an impact on the Council's ability to achieve a five year housing land supply.
- 5.3 This representation has paid special attention to the Swindon (the Wiltshire Part) Housing Market Area and its ability to deliver its expected growth target. The Council prefer that the amount of growth targeted for that HMA is focused toward the town of Royal Wootton Bassett and in doing so have identified 8 sites for potential development. A summary of the Council's assessment of those sites can be found at **Appendix 2** of this statement. In providing this table, it is not the intention to dispute the deliverability of those sites but rather use the Council's assessment to help demonstrate other site's suitability for development, such as our client's site 'The Pry'.

As above, 'The Pry' is very well connected to Swindon and the extensive range of services, facilities and employment opportunities it contains, sitting directly adjacent to its western boundary. Moreover, the site has good transport links being in close proximity to a major highway network. With this, the site's development would ensure that part of the District is self-contained, a key aim of the emerging LP, reducing the level of out-commuting toward Swindon. In addition, the site does not contain any environmental constraints that would preclude its development and using the Council's assessment as indicated in **Appendix 2** it is considered 'The Pry' should be a potential allocation for residential development. Whilst it was disregarded as part of Wiltshire's SHELAA 2017, this was due to it not adjoining boundaries of settlements within the Wiltshire District, not that it was considered to be an unsustainable location. As the emerging LP presents a new opportunity for the Council to reconsider their spatial strategy and that there are limited constraints to the west of Swindon, we consider the suitability and deliverability for development in this area should be considered favourably by the Council.

- 5.4 Finally, in drawing all the above together, this representation has made reference to the Council's intention to address the impact of climate change within the District and how directing growth of development can assist with this. This, in part, refers to the Council's key aim to deliver self-containment across the District through directing development toward areas which are well served by existing services and facilities, negating the need to travel less. As such, the Council's ESS is similar to that of the Core Strategy by seeking to direct development to the Principal Settlements and Market Towns within the District. However, as recognised within the ESS, the rate of out-commuting is still high toward Swindon which questions the effectiveness of the Council's ESS and the strategies of previous Local Plans (which have taken a similar position to the currently adopted Core Strategy) in seeking to alleviate commuter travel.
- 5.5 The above provides reasoning for the Council to look for further sites, particularly in the Swindon HMA, to help deliver its predicted growth in areas that are sustainably located, being well-connected to a range of services, facilities and employment opportunities. We consider allocating 'The Pry' for residential development accords with the Council's aim in delivering growth that seeks to reduce the impact of climate change.
- 5.6 We respectfully request the above is given due consideration as the emerging LP gathers momentum.

RIDGE



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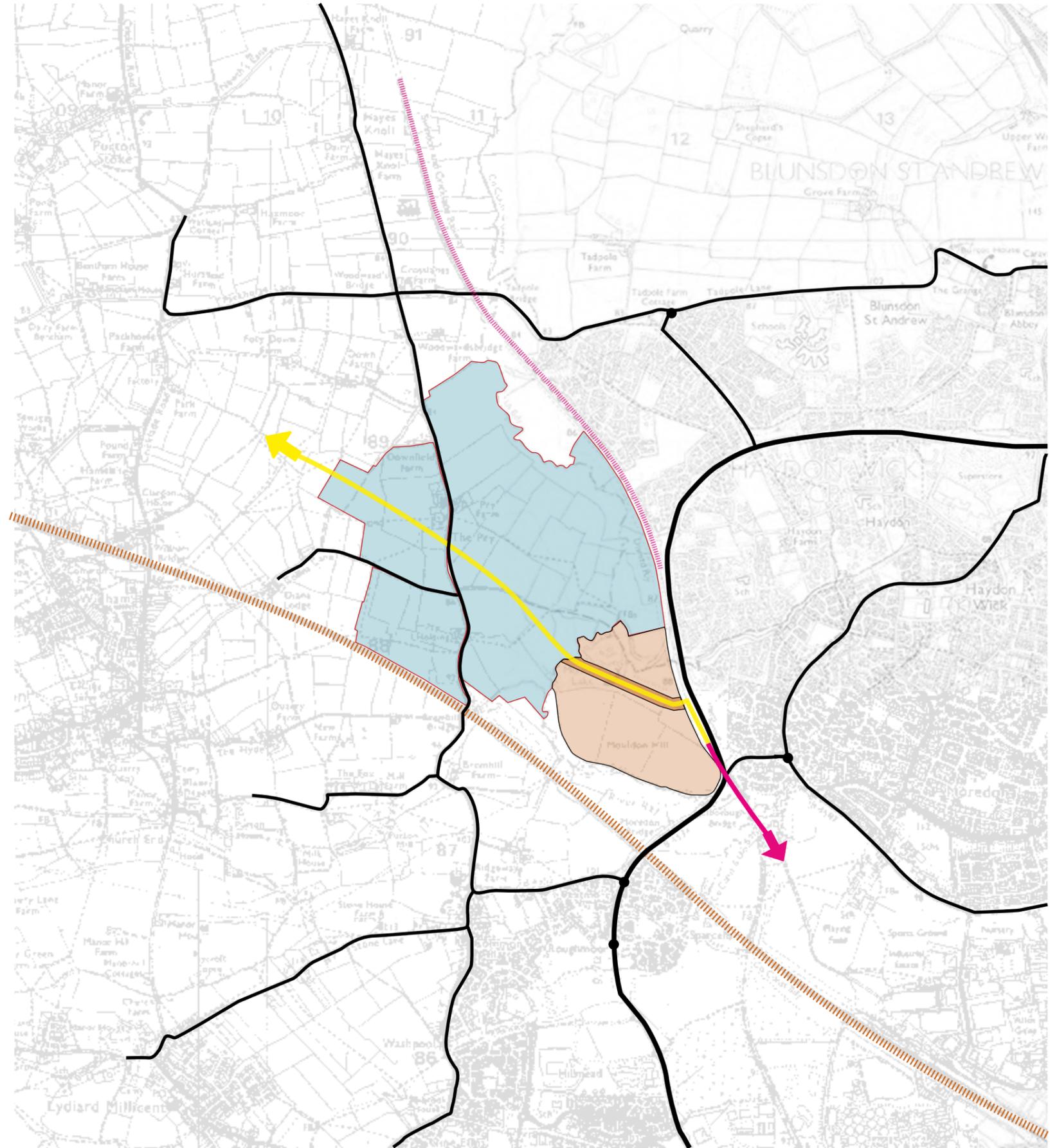
APPENDIX 1

'The Pry' Concept Document.

North West Swindon

The Pry: Land Ownership Plan

-  Roads
-  Extent Of Site
-  Mactaggart & Mickel Controlled Land
-  Council Owned Land
-  Land Required For Strategic Access
-  Proposed Access Link To Swindon Town Centre From New Planned Development
-  Gloucester / Cheltenham Railway
-  Swindon & Cricklade Railway
-  Proposed Thamesdown Drive Extension
-  Potential Access To Further Development Area



Scale: 1:25,000 @ A1

Drawing name: - Land Ownership Plan
Revision: -

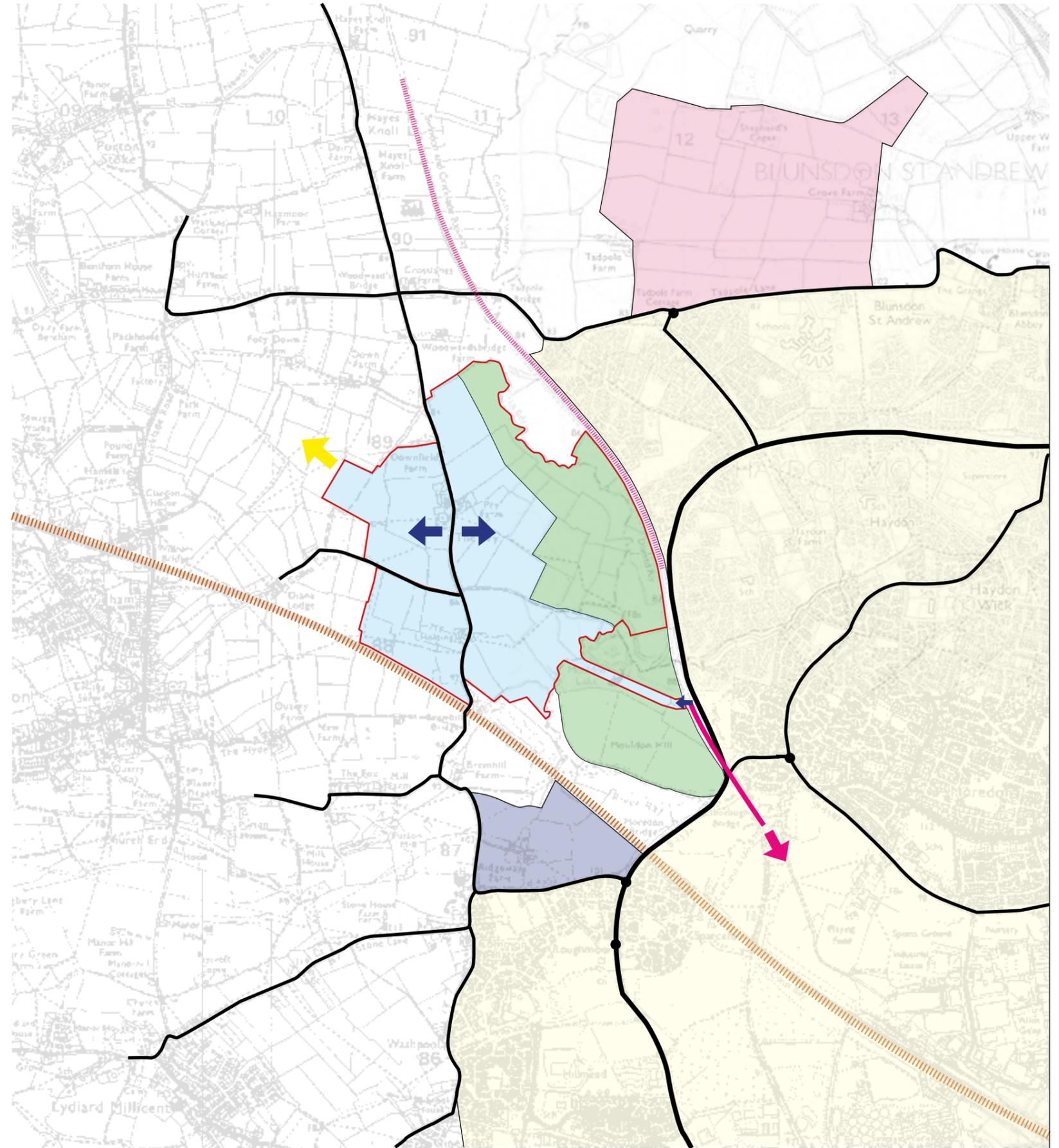
Drawing number: - C1994 - 15 - SK001
Project: - The Pry
Date: - 30/10/15



North West Swindon

The Pry: Concept Plan A

- Roads
- Extent Of Site
- Mactaggart & Mickel
3,500 Homes
- Green Space
- Existing Built Up Area
- Tadpole Farm Development
- Ridgeway Farm Development
- || Gloucester / Cheltenham Railway
- || Swindon & Cricklade Railway
- ➔ Proposed Thamesdown Drive Extension
- ➔ Possible Access Points
- ➔ Potential Access To Further Development Area



Scale: 1:25,000 @ A1

Drawing name: - Concept Plan A
Revision: -

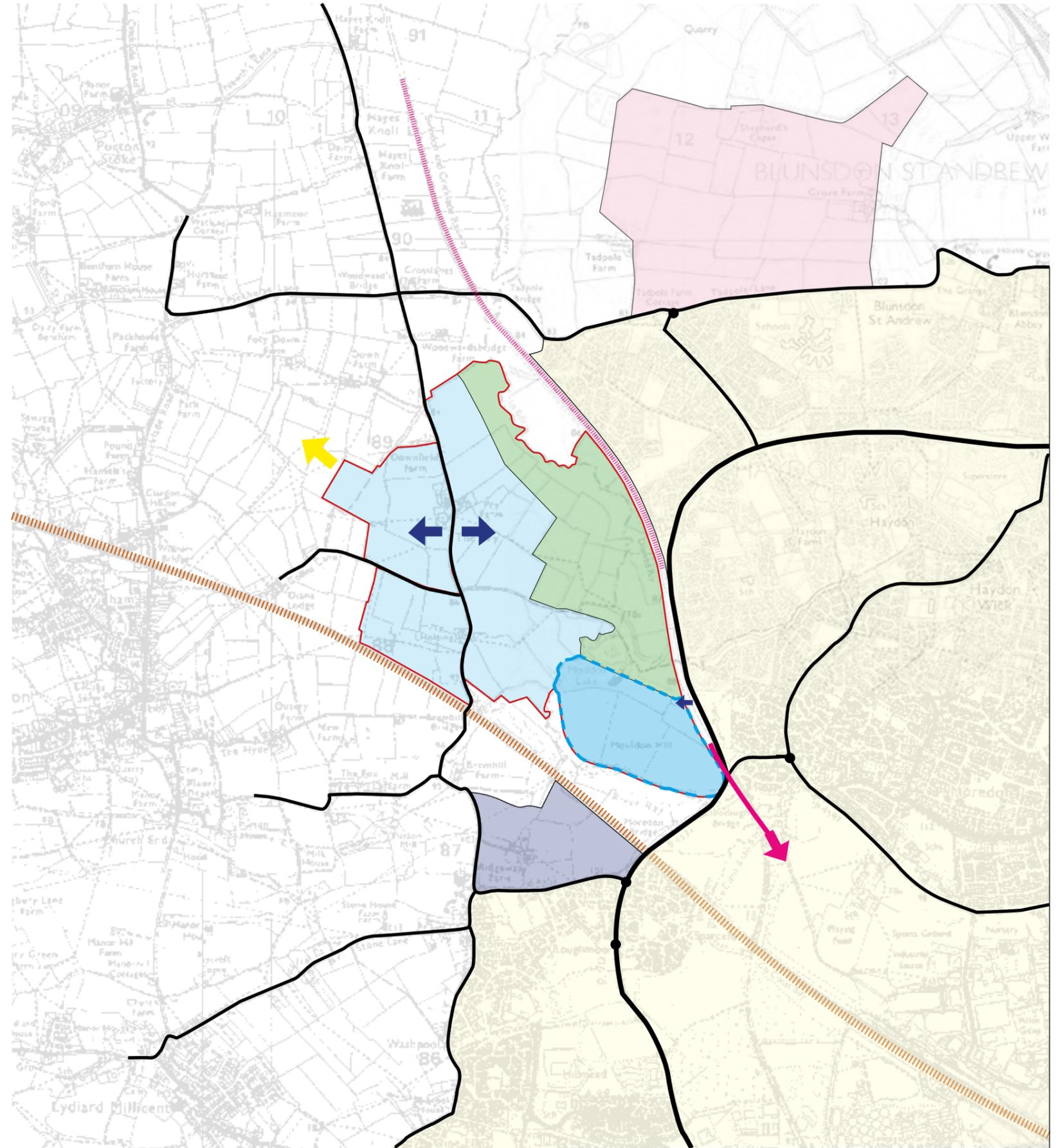
Drawing number: - C1994 - 15 - SK002
Project: - The Pry
Date: - 30/10/15



North West Swindon

The Pry: Concept Plan B

- Roads
- Extent Of Site
- Mactaggart & Mickel
3,500 Homes
- Swindon Borough Council
500 Homes
- Green Space
- Existing Built Up Area
- Tadpole Farm Development
- Ridgeway Farm Development
- Gloucester / Cheltenham Railway
- Swindon & Cricklade Railway
- ➔ Proposed Thamesdown Drive Extension
- ➔ Possible Access Points
- ➔ Potential Access To Further Development Area



Scale: 1:25,000 @ A1

Drawing name: - Concept Plan B
Revision: -

Drawing number: - C1994-15-SK003
Project: - The Pry
Date: - 30/10/15



APPENDIX 2

Summary table of potential allocations for development at Royal Wootton Bassett.

Summary table of potential allocations for development at Royal Wootton Bassett.

SHELAA REFERENCE AND SITE ADDRESS	ACCESSIBILITY	FLOOD RISK	HERITAGE	LANDSCAPE	TRAFFIC	COUNCIL'S COMMENTS
3357 (Site 8) – Land at Woodshaw						Site contains views over the countryside (including the North Wessex Downs AONB). Risk of coalescence between Royal Wootton Bassett and Swindon. Site is between 500 metres and 1,000 metres of congested corridor.
462 (Site 7) – Land South of Wootton Bassett (Part A)						Only a small section of land is considered developable with much of the site being taken up with an old canal green infrastructure corridor.
463 (Site 7) – Land South of Wootton Bassett (Part B)						The site is isolated from the existing settlement boundary and the outlying housing along Marlborough Road. Could be views from Brynards Hill onto the site which could be difficult to mitigate, creating an urban encroachment into the countryside and detract from the views to the AONB ridge line beyond. Development should be limited to avoid a new conspicuous urban edge.
498 (Site 6) – Templars Way Industrial Estate						Part of the site south is within Flood Zone 2/3. Site is considered accessible and not close to a congested corridor. Proposed route of the restored Wilts and Berks Canal should be respected.
3156 (Site 5) – Land South of Wootton Bassett						The site contains key views across to the skyline of Royal Wootton Bassett and surrounding countryside. Concerns over risk of coalescence with Wiltshire Crescent

						development near to Golf Course in a rural setting. No development south of the Brinkworth Brook for landscape reasons. Route of historic Wilts and Berks Canal should be respected. Site would remove the agricultural setting of Grade II Hunt Mill Farm.
3161 (Site 4) – Land at Whitehill Lane						Half the site is allocated as a town park as defined by the Royal Wootton Bassett NP. Whilst in a highly prominent location, and open to views, this site does offer the opportunity to create a gateway development into an urban settlement.
477 (Site 3) – Land West of Maple Drive						Site is within 1,500 metres of a congested corridor. Considered to be well located in accessibility terms. Limitations to the north of the site due to woodland. Potential views north and west.
3160 (Site 3) – Land West of Maple Drive						
3366 (Site 2) – Land adjoining Midge Hall Farm						Site highly visible from surrounding roads including M4. Development risks coalescence with Hook and Coped Hall and would contribute to coalescence with Swindon. Development would lead to loss of the setting of a Grade II listed farmstead. Large portion of site within 500 metres of a congested corridor. Landscape sensitivity toward the west of the site.
499 (Site 1) – Marsh Farm						Site highly visible from surrounding roads including M4. Risks coalescence with Ballard’s Ash, Hook and Coped Hall. Landscape sensitivity toward the south of the site. Possibility site contributes towards setting of Grade II listed The Marsh.

RURAL 358



BRATTON PARISH COUNCIL

Joint report by [REDACTED] (Neighbourhood Plan Steering Group)

Local Plan Review consultation

Purpose

1. To propose a response to Wiltshire Council

Background

2. The Wiltshire Local Plan review consultation is taking place from Wednesday 13 January to Tuesday 9 March 2021. Its purpose is to set out a positive vision for the future of Wiltshire for the period to 2036 and a framework for addressing housing needs and other economic, social and environmental policies.
3. The draft plan is due to be completed towards the end of 2021. The topics covered include:
 - How growth (additional new homes and employment land) is distributed around the county ('Emerging Spatial Strategy' paper)
 - Levels of growth, potential locations for development and place shaping priorities for each of the county's main settlements (documented in a series of 'Planning for' papers for each Market Town and Principal Settlement)
 - Improving the framework for rural communities to meet housing needs ('Empowering Rural Communities' paper)
 - The opportunity to inform proposals about how the council's planning policies can be shaped to address climate change and biodiversity net gain ('Addressing Climate Change and Biodiversity Net Gain through the Local Plan - raising the ambition' paper)
 - The consultation is supported by a set of supporting documents that have been prepared to inform the development of policy. These can be viewed via the link. [Local Plan Review consultation - Wiltshire Council](#). The two most relevant for the Parish Council's consideration are entitled 'Emerging Spatial Strategy' and 'Empowering Rural Communities'

Emerging Spatial Strategy

4. Forecasts predict Wiltshire will need between 40,840 and 45,630 new homes over the plan period of 2016 to 2036. The Local Plan must accommodate these scales of growth.
5. The Plan breaks down the whole of Wiltshire into four Housing Management Areas (HMAs). Bratton is in the Trowbridge HMA which consists of the Trowbridge, Melksham, Bradford on Avon, Westbury and Warminster community area. The table on page 22 identifies a requirement of 950 homes from the 'The rest of the HMA' i.e. outside the main settlements of the 5 towns of the Trowbridge HMA. This is reduced to a residual requirement of 550

when account is taken of all the currently allocated sites as of 1st April 2019.

Empowering Rural Communities

6. This document goes through a process of identifying the Housing requirements for each Large Village
7. Para 10 states: *Wherever possible, local communities should determine how their areas change. Neighbourhood Plans are the main vehicle for communities to allocate land for new housing development, but the Council also wants to try and ensure that new homes are built to match local needs as far as possible. This is not just about securing affordable dwellings but also about retaining a good range and mix of house types in the local stock. The Local Plan Review aims to set a framework that can support neighbourhood planning in doing so.*
8. It encourages local communities to carry out a Rural Housing Needs Survey to assess their needs for affordable housing and confirms that in the rural area, the Council will be seeking 40% affordable housing on all schemes of more than five dwellings.
9. Appendix 1 of the document explains how the Council propose to establish housing requirements for neighbourhood plans in rural areas, in line with the National Planning Policy Framework (NPPF), and explores how planning policies can continue to support development that meets the needs of local communities.
10. The methodology for the distribution of housing requirements to large villages and hence the remainder elsewhere in the HMA is not standardised. The methodology used by Wiltshire Council is outlined in Appendix 1 and it is worth noting that the figures are indicative and should not be taken as a ceiling.
11. Table 2.7 in Appendix 1 states that in Bratton the Baseline indicative housing requirement 2016-2036 is 40 houses which means the Annualised baseline housing requirement in dwellings per annum is 2 per year. It also states that the Completions (2016-19) & Commitments (1 April 2019) amount to 40.
12. Apart from this the document proposes a Revised Core Policy 44 for Rural Exceptions Sites and Community Led Housing Rural exceptions sites which is attached at Appendix A. This provides that at rural settlements, development proposals will be supported where their primary purpose is to provide affordable housing to meet local needs. A proposed new Core Strategy is set out in Appendix B proposing how Housing Requirements for Neighbourhood Area Designations in the Rural Area will be calculated.
13. There is a great deal of emphasis placed on the importance of preparing and reviewing Neighbourhood Plans in terms of site selection for housing.
14. Four specific questions are raised within the document
 - 1) 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?

Proposed response: - Yes

- 2) Do you think this approach is worth pursuing? What local evidence would be needed to justify applying restrictions like these? This relates to the proposals in paras 23 – 25.

Proposed response: - The Council would support the idea of specifically preventing new homes to be extended to ensure turnover of homes to first time-buyers. The sustainability of Bratton school and Pre-school is important to the village. Extensions to older properties in large plots of land that also need modernising should not be prevented and extensions to accommodate elderly parents should be excluded as this easing the burden on care home needs and could be seen as discriminatory.

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

Proposed response: - Yes

- 4) 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?

Proposed response: - (a) As there is no standardised methodology to apportion allocations the only possible comparison would appear to be against a Local Housing Needs Survey. In 2018 a survey was carried out for Bratton and concluded a housing need of 5, so an allocation of 40 far exceeds any actual requirement. If this case is repeated across the HMA then the allocations will see significant development at all Large Villages. What is particularly worrying is that the proposed figures are indicative and the document proposes that these should not be seen as a ceiling and also that a 100m buffer has been added to settlement boundaries to ensure that any surrounding constraints are captured in the determination of housing allocations.

Paragraph 87 states *This does not, however, mean that development in these areas outside of the defined limits of development are automatically considered acceptable*, however it does not explicitly exclude it and therefore developers are likely to apply pressure for sites within these buffers. The statement in the flow chart on Page 15, Step B *"Accepting that not all development will take place within the settlement boundaries a 100m buffer is added to capture constraints within the immediate vicinity"* is at direct odds with the previous statement.

On further enquiry we were told *the 100m buffer is not used as a means to allocate sites for development. It's used as a net cast around a settlement that makes sure we capture all the environmental constraints that we need to take into account when suggesting a housing requirement*. This is unconvincing and it will certainly imply to landowners or developers that the 100m buffer is available around settlement boundaries for development.

(b) There is little in this document that gives any confidence that, even with a Neighbourhood Plan, further speculative developments would not be delivered through the Wiltshire Housing Sites Allocation Plan (WHSAP) in order to meet government targets, with disastrous effects that such scale of development would have on the rural character of the village.

(c) The recently approved WHSAP has provided a site (within 100 metres of the current settlement boundary!) to substantially satisfy the allocation made in Table 2.7 (40 homes). Sites within the settlement boundary are available and recently three houses have just been

completed, one almost finished and an application supported by the Parish Council is pending for one more.

As a consequence the Council consider that on the basis of available evidence the Plan should record that no further allocations of sites in Bratton are appropriate.

Conclusion

15. The review documentation is complex and difficult to understand. The recent allocation of site 321 in the WHSAP, in contradiction of the policies in the current Core Strategy, demonstrates how national targets - in that case the allocation of sufficient sites to meet the theoretical housing target - can overrule the provisions of the Core Strategy. Having said that the allocation of this site means the proposals in the documentation can be met without the allocation of further sites.
16. *Empowering Rural Communities* demonstrates that it is important that the Parish Council moves forward with the development of a Neighbourhood Plan. However, the NPPF requires that all Neighbourhood Plans are less than two years old since adoption or review, (See paragraph 69) which means that this will become an almost continuous process of review. Resources must be found to do this as it is clear the complex process of developing a Plan needs professional input and leadership.

Recommendation

17. This report is forwarded to Wiltshire Council as Bratton's response to the Local Plan consultation. In particular:-
 - the Council would wish para 87 of *Empowering Local Communities* be deleted along with Step B identified in the Table in para 92. (see para 15 (4)(a))
 - the Plan incorporates a clear reference to the fact that the allocation of 40 houses to Bratton during the Plan period can be met by current allocated sites and identified opportunities to meet local need within the settlement boundary. (see 15(4)(c))



2 March 2021

Appendix A

Revised Core Policy 44

Rural Exceptions Sites and Community Led Housing Rural exceptions sites

At rural settlements, development proposals will be supported where their primary purpose is to provide affordable housing to meet local needs, provided:

- i. It has clear support from the local community through evidenced consultation.
- ii. The number, type, size and tenure of the affordable dwellings should reflect identified and genuine local needs as evidenced on the Homes4Wiltshire register and/or through a local housing needs survey
- iii. The proposal is within, adjoining or well related to the existing settlement without reliance on travel by private car
- iv. Environmental and landscape considerations will not be compromised
- v. The proposal consists of 20 dwellings or fewer and will be no greater than 5% of the size of the settlement

- vi. Its scale and type is appropriate to the nature of the settlement and will respect the character and setting of that settlement
 - vii. The affordable housing provided will always be available for defined local needs, both initially and on subsequent change of occupant.
- Proposals which include plots for self and custom build affordable homes will be supported where they meet the above criteria.

Cross-subsidy/Market Housing

Rural exception sites must primarily be led by an affordable housing proposal. The inclusion of up to 25% open market housing will only be considered where it can be demonstrated that the site would be unviable as an exception site without cross-subsidy, and/or where it is proven essential to provide a balanced and sustainable community, with evidence of support from a Community Land Trust or other community representation.

For rural exceptions site and community led housing developments, the number, type and size of open market homes will reflect the proven needs, and will be integrated throughout the development so as to be indistinguishable from the affordable housing.

Community Led Housing

At rural settlements, proposals brought forward by a Community Land Trust will be supported, provided Criteria (i) - (vii) above are complied with. The inclusion of up to 50% open market housing will be considered for this type of Community Led Housing, where it can be demonstrated that it would meet an identified local need.

The Council will secure nomination rights to the affordable homes in line with its adopted Allocations Policy.

Appendix B

New Core Policy

Housing Requirements for Neighbourhood Area Designations in the Rural Area

Meeting the needs of Local Service Centres and Large Villages Housing, housing requirements for neighbourhood area designations will be met by:

- Existing planning permissions and plan allocations that have not yet been implemented
- Small sites within settlement boundaries
- Exception and Community-led Schemes accordance with Core Policy 44
- Site allocations in the development plan

The general presumption against housing proposals outside a settlement will apply in accordance with Core Policy 2.

Site allocations will generally be made in neighbourhood plans. Where this is not the case, it may be necessary for the Council to allocate sites. This may be achieved by a review of the Wiltshire Housing Site Allocations Plan.