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**CHIPPENHAM
TOWN COUNCIL**

Improving the quality of town life

14 November 2023

To Councillors:

Desna Allen

Declan Baseley (Chair)

Matthew Bragg

Clare Cape

William Douglas

Gemma Grimes

Kathryn Macdermid

Nick Murry

David Poole

John Scragg

George Simmonds

Myla Watts

Liz Alstrom

James Bradbury

Jenny Budgell

Pete Cousins

Robert Giles

Angie Litvak-Watson

Conor Melvin (Vice-Chair)

Andy Phillips

Nic Puntis

Matthew Short

Adam Ward

Hayley Wilson

Extraordinary Meeting of Full Council - Monday 20 November 2023

Dear Councillor,

You are summoned to attend an extraordinary meeting of Full Council to be held in the Town Hall on Monday 20 November 2023 commencing at 7.00 pm for transaction of the business given in the Agenda attached.

Please note members of the public are invited to address the council at this meeting at 7pm. Members of the public are requested to send their public question to enquiries@chippenham.gov.uk by 12pm on the day before the meeting and confirm whether they will be in physical attendance or require an officer to read out the question on their behalf. Priority of physical attendance will be given to the press and those that have sent their public question in advance and will read it out, remaining seats will be allocated on a first come first served basis.

Alternatively, anyone who wishes to watch the meeting only can do so via this link: <http://youtube.com/channel/UCLhKQ0VMR7-mu7GvGYO3uGg/live>

Yours sincerely,

Councillor Declan Baseley, Mayor of Chippenham
pp.

Mark Smith MBA LLB (Hons) CMgr FCMI FSLCC
Chief Executive

All council meetings are open to the public and press

RECORDING OF PUBLIC COUNCIL MEETINGS

Recording and using social media is permitted at Council meetings which are open to the public. Please note that Chippenham Town Council will be streaming this meeting to YouTube, the video recording will be available in the public domain for six months.

7pm - PUBLIC QUESTION TIME (not to exceed 30 minutes)

The public are welcome to make representations, ask questions and give evidence at a meeting which they are entitled to attend in respect of the business on the agenda.

Any individual representation is limited to no more than 3 minutes. The Chair will call the representation from those who are indicating that they wish to speak; written representations can also be received in advance of the meeting. A record of any public participation session shall be included as an appendix to the Minutes.

Agenda

Extraordinary Full Council - Monday 20 November 2023

	Wards affected	Page no.
1. <u>APOLOGIES FOR ABSENCE</u>		
To receive any apologies for absence.		
2. <u>DECLARATION OF INTEREST</u>		
All Members of the Town Council are reminded to declare any pecuniary or non-pecuniary interests they may have in any business of the Council, its Committees or Sub-Committees, in accordance with the latest approved Code of Conduct. Councillors are reminded to declare any dispensation granted in relation to any relevant matter.		
3. <u>MAYOR'S ANNOUNCEMENTS</u>		
i. To receive any announcements from the Mayor.		
<u>To consider the following items:</u>		
4. <u>WILTSHIRE LOCAL PLAN REVIEW CONSULTATION</u>	All Wards	5 - 150
To receive and consider a report from the Head of Planning informing and advising Councillors on how to respond to Wiltshire Council's Local Plan Review consultation. It sets out representations to the Local Plan Review agreed at the Planning, Environment and Transport (PET) Committee Meeting of 8 November 2023 and seeks		

	Wards affected	Page no.
agreement from Full Council to these representations (copy attached).		
5. <u>COMMUNITY GOVERNANCE REVIEW (CGR) - SUGGESTED AMENDMENTS</u>	All Wards	151 - 164
To receive and consider a report from the Head of Democratic Services regarding two proposed amendments that have been submitted to Wiltshire Council as part of the ongoing Community Governance Review (CGR). To consider if there are any further anomalies in ward boundaries that Council would support to be submitted to be reviewed by Wiltshire Council's Electoral Review Committee as part of this process (copy attached).		
6. <u>ITEMS FOR COMMUNICATION</u>		
To consider any items for communication and any items to be consulted with the Youth Council.		
7. <u>DATE OF NEXT MEETING</u>		
The next meeting of Full Council will be held at 7pm on Wednesday 22 November 2023.		

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Meeting	Full Council
Date	20 November 2023
Report Title	Wiltshire Local Plan Review Consultation
Author	Andy Conroy, Head of Planning

1.0 PURPOSE OF REPORT

1.1 The purpose of this report is to inform and advise Councillors on how to respond to Wiltshire Council's Local Plan Review consultation. It sets out representations to the Local Plan Review agreed at the Planning, Environment and Transport (PET) Committee Meeting of 8 November 2023 and seeks agreement from Full Council to these representations.

2.0 INTRODUCTION AND BACKGROUND INFORMATION

2.1 The current Local Plan is the Wiltshire Core Strategy. The Government requires every Local Plan to be reviewed at least once every five years. The Core Strategy was adopted in 2015 and is therefore being reviewed.

2.2 The Wiltshire Local Plan Review has been informed by consultations that took place between 2017 and 2021 and is a review of the current Wiltshire Core Strategy, building on existing objectives and spatial strategy to address Wiltshire's need for new homes, jobs and infrastructure over the period 2020 to 2038. It includes proposals for new allocations for housing and employment. If adopted, the Plan will form part of the development plan for Wiltshire and guide decisions on future development in Chippenham.

2.3 In March 2021, as part of the Regulation 18 Wiltshire Local Plan Consultation, the Head of Planning and Neighbourhood Plan Steering Group Members formed some initial draft responses in so far as the Draft Local Plan affected the Draft Chippenham Neighbourhood Plan. These draft responses were forwarded on to the Planning, Environment & Transport (PET) Committee for agreement, and finally on to Full Council to be agreed as the Town Council response. The Town Council's Response to this Consultation is attached for reference at **APPENDIX A** of this report.

2.4 The process outlined in Paragraph 2.3 was effective for the Regulation 18 Consultation. It was considered effective to repeat the process to reach a Town Council response as part of the current Regulation 19 Consultation.

2.5 After the Regulation 18 Consultation, Wiltshire Council reviewed and responded to the comments received (including the Town Council's) and collected further, more up to date evidence on housing and employment amongst other things. The Plan period was also extended from 2016-2036 to 2020-2038.

- 2.6 The Wiltshire Local Plan has now reached what is known as the Regulation 19 stage (publications stage) and will enter an eight week consultation period running from 27 September 2023 - 22 November 2023. Further details about the Regulation 19 Consultation can be found [here](#).
- 2.7 The Regulation 19 Consultation is the final stage before the Plan, its accompanying evidence, and all submitted representations are sent to a government Planning Inspector for independent examination.
- 2.8 The Regulation 19 Consultation has a much narrower scope for making representations when compared to the Regulation 18 Consultation. The purpose of the Examination is to consider whether the Plan complies with the relevant legal requirements and is sound. The focus for this Consultation, as summarised by Wiltshire Council, relates to making representations which are limited to the following areas:
- **Legal Compliance** - does the plan meet the legal requirements made under various statutes?
 - **Soundness** - has the plan been positively prepared, is it justified, effective, and consistent with national policy?
 - **Meets the Duty to Cooperate** - has the council engaged and worked effectively with neighbouring authorities and statutory bodies?
- 2.9 Wiltshire Council has produced a guidance note which encourages representations to be made on a representation form. This will ensure that comments are related to the matters relevant to the subsequent examination by a Planning Inspector. Separate forms are required for each representation made. They advise that those wishing to make a representation seeking a modification to the Plan should set out clearly in what way they consider the Plan or part of the Plan is legally non-compliant or unsound. The representation should be supported by evidence wherever possible. They advise it would be helpful if representations also say precisely how the Plan should be modified. The guidance note is attached in **APPENDIX B** of this report.
- 2.10 The proposed submission documents for the Regulation 19 Consultation include the draft Local Plan, the draft Sustainability Appraisal report, the draft Habitat Regulations Assessment and other supporting documents. Of local relevance is the 'Planning for Chippenham' supporting document. Representations can only be made on the draft Local Plan and the draft Sustainability Appraisal.
- 2.11 The draft Local Plan can be viewed on the Wiltshire Council consultation portal which can be found [here](#).
- 2.12 The Neighbourhood Plan Steering Group met on 24 October 2023 to discuss the implications any draft Local Plan policies might have on draft Neighbourhood Plan policies. A set of representations to the Local Plan had been drafted by the Head of Planning prior to the meeting and were ratified by Steering Group Members. Some additional representations were subsequently drafted by the Head of Planning, capturing any agreed outcomes from this meeting and separate advice from the Centre for Sustainable Energy (CSE). These representations were then agreed by the Planning, Environment & Transport Committee at their meeting of 8 November 2023, with some minor additions to existing representations and a new representation drafted to modify Policy 68 (Managing Town Centres). The representations commencing at **APPENDIX C** now forms the basis for agreement by Councillors.

- 2.13 Councillors should note that each draft representation also includes a suggested indication of whether the Town Council wishes to attend a hearing as part of the Examination process, depending on the strength of its opposition or support. It is considered that the majority of representations can be adequately dealt with by way of written representations.

3.0 DRAFT REPRESENTATIONS ON WILTSHIRE LOCAL PLAN

- 3.1 The Spatial Vision for the Plan is considered to be generally sound. However, there are concerns that the Spatial Vision and/or supporting text do not place enough emphasis on the obligations of carbon emission reduction associated with the Climate Change Act and Wiltshire Council's own declared climate emergency. There is no evidence that the Local Plan as a whole has been carbon audited to confirm it aligns with the emission reduction required under the Climate Change Act and therefore it is unclear whether the Plan is legally compliant. Similarly, the Sustainability Appraisal does not include evidence of carbon auditing of Plan policies or information on carbon emissions of proposed site allocations. It is therefore considered that the evidence base for the site allocation selection process is not sound. A draft representation is made on the basis of the Spatial Vision and Sustainability Appraisal being unsound and is attached at **APPENDIX C**.
- 3.2 Policy 2 (Delivery Strategy) provides for 36,740 homes and 160ha of employment land in Wiltshire during the period 2020-2038. Housing figures have been calculated using the Government's standard method, as currently advised by the National Planning Policy Framework (NPPF).
- 3.3 This compares to a provision of between 40,840 and 45,630 homes, and 26ha of employment land, for the period 2016-2036 in the previous Regulation 18 Wiltshire Local Plan.
- 3.4 Policy 3 (Reserve Sites for Housing and Broad Locations for Growth) identifies Chippenham as one of three '*broad locations for growth, where additional urban extensions will be identified towards the end of the Plan period to meet longer-term strategic needs for housing and employment and ensure the co-ordinated delivery of major infrastructure*'. It states that these will be identified through policies within a subsequent development plan document.
- 3.5 The identification of Chippenham as a 'broad location for growth' would be in addition to its identification as a 'principal settlement' and the housing and employment growth already proposed for it through a new large site allocation. It is not considered justified, policy compliant or positively prepared to plan for additional housing development in Chippenham beyond the objectively assessed housing needs for the Plan period, which can be met by completions and commitments plus a new site allocation. Housing needs beyond the Plan period should be left to a future Wiltshire Local Plan.
- 3.6 The concept of Chippenham as a 'broad location for growth', with very little detail, could be taken advantage of by developers, undermining site allocations and resulting in speculative applications being submitted for unsustainable greenfield development in and around the town. It is therefore recommended that the section of Policy 3 and supporting text in Paragraphs 3.52-3.54 referring to 'broad locations for growth' be deleted and a draft representation is made on this basis and attached in **APPENDIX D**.

- 3.7 Policy 4 (Addressing Climate Change) is a broad overarching policy which provides a hook to other climate based policies. A draft representation in support of this policy, with some additional comments in respect of how this could be improved in relation to overheating, is attached in **APPENDIX E**.
- 3.8 Policy 5 (Securing Infrastructure Provision from New Development) sets out the circumstances where new development will require contributions towards ‘essential infrastructure’ and ‘place-shaping infrastructure’. It is recommended that the wording of Policy 5 be modified to ensure that greater emphasis is placed on the delivery of ‘place-shaping infrastructure’ in new communities, such as ‘community and cultural facilities’ without which the Policy would not be effective (in terms of soundness). A draft representation is made on this basis and attached in **APPENDIX F**.
- 3.9 Policy 6 sets out ‘place shaping priorities’ for the town. Place shaping Priority 5 is *‘Link the A4 to the A350 which will provide for a more resilient local network addressing traffic congestion within the town centre.’* The first bullet point of Policy 7 (Land South of Chippenham and East of Showell Farm) repeats this item of infrastructure for the proposed site allocation, stating *‘new road transport corridor from the A4 southwards connecting with the A350 via a new river bridge delivered in accordance with trigger point(s) determined by a transport assessment.’* The fourteenth bullet point of Policy 7 states the following infrastructure for the proposed site allocation: *‘a crossing over the River Avon allowing onward travel through Rowden Park to the Chippenham Community Hospital site.’*
- 3.10 Up to date evidence on transport modelling can be found in the supporting document ‘Wiltshire Local Plan Review Transport Evidence Base’. However, this appears to show future modelling at a Wiltshire wide level. What appears to be missing is more detailed, comparative evidence showing future traffic flows in and around Chippenham, including the town centre, with different scenarios. This should help to better understand the relationship between any site allocation (and the growth in road traffic this would generate), the link road (which may or may not generate additional traffic not related to the site allocation) and resulting traffic flows in and around Chippenham, including the town centre (which may or may not decrease as a result). At present there is not considered to be robust evidence for the assertion in Policy 6 that a link road would address traffic congestion in the town centre.
- 3.11 The evidence on the purpose and type of link road referred to in Policy 7 is also lacking.
- 3.12 Finally, the evidence for ‘a crossing’ allowing onward travel through Rowden Park to Chippenham Community Hospital is vague (and not effective) and not supported by evidence.
- 3.13 A draft representation is attached in **APPENDIX G** which recommends modifying or deleting those parts of Policies 6 and 7, and their supporting Paragraphs 4.29 and 4.32, in order to make the Plan sound.
- 3.14 Policy 6 sets out the quantum of development required in Chippenham over the Plan period. This is summarised in **Figure 1** overleaf and a comparison has been made with the requirements set out in the previous Regulation 18 Wiltshire Local Plan.

Figure 1 - Housing and Employment Requirements for Chippenham

	Overall Housing Required	Wiltshire Core Strategy Housing Required	Housing completions and commitments	Residual Housing Required	Neighbourhood Area Designation***	Employment land requirement (ha)
Reg. 19 WLPR	5850 (2020-2038)		3759* (2020-2022)	2090** (as at 1 April 2022)	200 (up to 2038)	42 (2020-2038)
Reg. 18 WLPR	9225 (2016-2036)	4510 (2006-2026)		5100 (as at 1 April 2019)	240 (2021-2031)	5 (2016-2036)

*includes major permissions post 1 April 2022, up to 31 May 2023

**rounded to the nearest ten dwellings

***referred to as 'brownfield land target' in Reg. 18 WLPR

- 3.15 Councillors will see the significant reduction (41%) in residual housing required for Chippenham over the Plan period in the Regulation 19 Wiltshire Local Plan when compared with the Regulation 18 Wiltshire Local Plan.
- 3.16 Policy 6 provides a new site allocation for approximately 2525 dwellings and 15ha of employment land on land to the south of Chippenham and east of Showell Farm (Site 2). The 2525 dwellings would be greater than the 2090 residual housing required for the Plan period, yet there does not appear to be sufficient justification for this contingency and oversupply beyond the Plan period.
- 3.17 The methodology for reaching a residual housing figure for Chippenham appears somewhat flawed because it does not take into account past windfall housing development in Chippenham. Rather the windfall allowance for the county is based on small windfall sites (less than 10 dwellings) for only seven 'constrained settlements'.
- 3.18 Policy 6 also provides a Neighbourhood Area Designation of 200 homes for Chippenham. Whilst the Chippenham Neighbourhood Plan is not specifically allocating any housing sites, it does support residential development as part of mixed use schemes on the Bath Road Car Park/Bridge Centre and Emery Gate Shopping Centre.
- 3.19 Whilst acknowledging that Chippenham does have less brownfield land available for housing development compared with other similar sized towns, there are likely to be small and medium-sized sites which become available on brownfield land for housing during the Plan period and which would be able to accommodate well in excess of the 200 homes target. These brownfield sites are listed as evidence in the accompanying representation.
- 3.20 The new site allocation housing figure should be reduced accordingly to account for a) the residual housing required for the Plan period only, which should in itself be reduced to take into account a) the additional windfall homes expected in Chippenham over the Plan period and b) the increase in development that could be accommodated on brownfield sites in Chippenham over the Plan period. This would then allow for the

greenfield site allocation to be reduced in size, making for a more sustainable Plan, which gives greater priority to brownfield development. A draft representation is made on this basis and attached in **APPENDIX H**. A similar such representation is made on the same issue where it arises in relation to Policy 7, and this is attached in **APPENDIX J**.

- 3.21 Figure 4.1, which accompanies Policy 6, shows a settlement boundary for Chippenham which does not accurately reflect the new areas of housing which have now been built and occupied, principally at Hunters Moon and Birds Marsh estates. It is recommended that the settlement boundary is updated and a draft representation is made and attached in **APPENDIX I**.
- 3.22 Policy 7 (Land South of Chippenham and East of Showell Farm) sets out one site allocation for mixed use development to deal with the residual housing required during the Plan period. This comprises of approximately 2,525 dwellings, approximately 15ha employment land, a district and local centre, 12.4ha of land safeguarded for a 10 form entry secondary school, two 2ha sites for two 2 form entry primary schools incorporating two 60 place nurseries, and two 0.3ha sites to accommodate additional 80 place nurseries.
- 3.23 Policy 7 sets out a list of infrastructure and mitigation requirements which would need to be included as part of the development of the new site allocation. A concept plan has been produced to show how the site may be developed. The site is similar in extent to Sites 2 & 3 of the Regulation 18 Wiltshire Local Plan, which have now been amalgamated. Employment land has generally replaced housing on the former Site 3. Site 1 (East Chippenham) in the Regulation 18 Wiltshire Local Plan has been deleted as a site allocation.
- 3.24 The concept plan at Figure 4.2 is not justified by a robust evidence base, including any ecological/environmental/landscape visual impact assessments, considering the level of detail shown (akin to a masterplan rather than a strategic concept plan). There are concerns around the lack of participation from the local community in its design; the impact of any new housing so close to the Wilts & Berks Canal (identified as a Strategic Green Corridor in Neighbourhood Plan Policy GI3); that it has not been designed to comply with design principles in both the draft Wiltshire Design Guide and the draft Chippenham Neighbourhood Plan Design Guide; that renewable energy sites are not identified; and that it includes areas of development for the 'Next Plan Period'.
- 3.25 It is recommended that the concept plan be omitted or simplified until a separate masterplan has been brought forward, to be developed in consultation with the Town Council and the local community. The boundaries of the site allocation, as shown on the concept plan, should be adjusted to meet the objectively assessed needs for the Plan period only. A draft representation is attached in **APPENDIX K** on the basis that the concept plan is not sound because it has not been positively prepared, is not justified and is not consistent with national policy.
- 3.26 Paragraphs 4.38, 4.39, 4.41 and 4.42 provide supporting text to Policy 8 (Chippenham Town Centre). Draft representations have been made that each paragraph (which deals with a different topic) as currently worded would be unsound. Draft representations are attached at **APPENDICES L-O** on the respective issues of lack of evidence/acknowledgement for the independent sector in Chippenham town centre; lack of reference to the Neighbourhood Plan's evidence base for a mixed-use scheme at the Bath Road Car Park/Bridge Centre Site; lack of reference to the Neighbourhood

Plan's proposals for the Upper Market Place; and vagueness around phrasing for leisure activities on the riverfront.

- 3.27 Figure 4.3 and Figure E2 show the location of both 'Primary Shopping Area' and 'Town Centre' boundaries for Chippenham, which would be used in conjunction with Policy 68 (managing town centres). The PET Committee considered that the Primary Shopping Area as proposed would not support many of the independent businesses located just outside of that area. They agreed that an additional representation be made to expand the southern and northern boundaries of the Primary Shopping Area to include Upper & Lower Market Places, Timber Street, Union Road, Old Road and Upper New Road. A draft representation is attached at **APPENDIX P** on the basis that the Plan is currently not effective in delivering a thriving, vibrant and prosperous town centre and therefore unsound.
- 3.28 Policy 8 sets out three opportunity sites where proposals for redevelopment, informed by masterplans prepared by the developer, in consultation with the local community and local planning authority, will be supported: 'Bath Road Car Park and Bridge Centre', 'Emery Gate Shopping Centre' and 'Chippenham railway station and Cocklebury Road area.'
- 3.29 Policy 8 broadly aligns with town centre policies in the Neighbourhood Plan in respect of the Bath Road Car Park/Bridge Centre Site and Emery Gate Shopping Centre and a draft representation is attached at **APPENDIX Q** in support. In reference to maximising active frontage on to the River Avon Corridor and to opening up development opportunities on the Emery Gate Car Park part of the site, additional wording is recommended that this should also be sympathetic to the existing environment and recognise and seek to protect and enhance the special characteristics of Island Park.
- 3.30 There are concerns around the vagueness of the 'Chippenham railway station and Cocklebury Road area' in respect of the type of inward business investment envisaged and the extent of its geographical area. This 'opportunity site' is not considered to be formed on the basis of sound evidence and it is recommended that this aspect is deleted or modified accordingly in the attached representation referred to above.
- 3.31 The 'development management' policies in the Wiltshire Local Plan Review comprise of new or updated policies. Many of the policies are considered to be an improvement on current policies in the Wiltshire Core Strategy and dovetail nicely with respective policies in the Neighbourhood Plan.
- 3.32 Policy 70 (Sustainable Transport) is generally a worthwhile policy. However, it would be more effective (from a soundness perspective) to include objective targets for the modal share of short journeys on foot and bike and what new strategic infrastructure is needed to achieve this level of modal shift. A draft representation is attached on this basis at **APPENDIX R**.
- 3.33 Policy 71 (Transport and New Development) would not be effective because it 'supports' new development where users can access a choice of sustainable transport modes, rather than this being a requirement. Without stronger wording new development will continue to be designed with a car-first approach. In addition, Policy 71 does not make any reference to a hierarchy or preference for transport modes, in effect ensuring that each transport mode is given equal consideration.

- 3.34 Policy 71 is not justified or positively prepared by having the relevant, up to date, supporting evidence on sustainable transport, which an aligned Local Transport Plan (LTP) would be able to provide.
- 3.35 It is recommended that either in the supporting text or Policy 71 itself reference should be made to the provision of safe and inclusive active travel infrastructure which reflects national guidance in LTN 1/20 on current best practice, standards and legal requirements for cycle infrastructure.
- 3.36 A draft representation to modify Policy 71 in order to make the Plan sound, is attached at **APPENDIX S**.
- 3.37 Policy 76 (Providing Affordable Homes), Policy 81 (Community Facilities), Policy 83 (Health and Wellbeing), Policy 84 (Public Open Space and Play Facilities), Policy 85 (Sustainable Construction and Low Carbon Energy), Policy 87 (Embodied Carbon), Policy 88 (Biodiversity and Geodiversity), Policy 89 (Biodiversity Net Gain), Policy 90 (Woodland, Hedgerow and Trees), Policy 96 (Water Resources), and Policy 98 (Ensuring High Quality Design and Place Shaping) are all welcomed and supported. Draft representations are attached to this effect at **APPENDICES T, U, V, W, X, Y, Z, ‘[’, ‘\’, ‘]’ and ‘^’** respectively.
- 3.38 Paragraph 5.107, the supporting text to Policy 86 (Renewable Energy) which specifically refers to wind energy installations, and Policy 86 itself, are not considered to be supportive enough to proposals for renewable energy development and would therefore not be effective or consistent with national policy. Draft representations to modify the text in order make it sound are attached at **APPENDICES ‘_’ and ‘`’** in this respect.

4.0 CONTRIBUTION TO CORPORATE PLAN PRIORITIES

- 4.1 Representations made to the Wiltshire Local Plan Review will contribute to the following corporate priorities:
- Play an active role in the future development of the town through collaboration with partners, stakeholders, and our community.
 - Help to create a future that is carbon neutral, environmentally sustainable and resilient to the impact of climate change.
 - Maintain and create opportunities to enhance our green spaces and provide a clean and safe environment.

5.0 STAFFING IMPLICATIONS

- 5.1 There are no staffing implications.

6.0 FINANCIAL IMPLICATIONS

- 6.1 There are no financial implications.

7.0 CLIMATE AND ECOLOGICAL IMPLICATIONS

- 7.1 The climate and ecological impacts of the Wiltshire Local Plan Review are set out in the accompanying Sustainability Assessment and other supporting documents.

8.0 RECOMMENDATION

- i) That Councillors agree the draft representations commencing at **APPENDIX C** of this Report to be submitted to Wiltshire Council as the Town Council's formal representations on the Wiltshire Local Plan Review Regulation 19 Consultation.
- ii) That Councillors agree to delegate to the Chief Executive the submission of the representations agreed in i) to Wiltshire Council and to ensure that the Town Council is represented at any Examination hearings, where a wish to participate at a hearing has been indicated on the respective representation form.

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APPENDIX A

ITEM 4 APPENDIX A

Suggested Responses to Wiltshire Council Local Plan Review

The Emerging Spatial Strategy

Housing Figures:

It is not clear whether the housing figures set out in Paragraph 1.1 of the document are up to date and have been amended to reflect the changes to the Government's Standard Method in December 2020, or the impact of the COVID-19 pandemic and economic recession on population and migration figures.

We do not agree that there should be two housing figures (a lower and higher figure) as this confuses things. The Government has provided a Standard Method to calculate a housing figure for an area and this should be the only figure that is used.

The higher figure is questionable particularly since the 2019 Local Housing Needs Assessment, from which this figure is derived, is based on even earlier projections of economic growth taken from the 2017 Economic Development Needs Assessment. Given the subsequent economic recession due to the COVID-19 pandemic, together with the fact that Wiltshire Council have not justified using a higher figure in aid of Paragraph 73 of the NPPF, **there appears to be no justification for setting a higher figure of 45,630, and the Standard Method figure of 40,840 should be used.** We object to the use of the higher figure when the Standard Method will be challenging enough to meet given the downward economic trend.

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

Wiltshire Council has not provided sufficient evidence to justify the housing numbers for Chippenham. The ONS growth rate, cited in the Housing Needs Assessment for the Chippenham Neighbourhood Plan, equates to a need for approximately 2500 new dwellings for Chippenham.

The Chippenham housing numbers, and their location, should not be dictated by a grant application for a distributor road, which did not

undergo any public consultation, and which serves to predetermine the **Spatial Strategy**. The decision to run the Local Plan Review consultation and the Future Chippenham consultation side by side has created confusion amongst the general public.

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

Brownfield Target:

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

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

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

The Local Plan Review proposes that the Local Plan allocates no land for brownfield development in Chippenham in the period up to 2036. The

brownfield target figure is derived from past windfall figures and is in addition to the housing requirement figure for the area. It is then taken off the housing requirement for future Local Plan reviews.

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

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

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

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

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

Addressing Climate Change & Biodiversity Net Gain

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

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

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

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

A3: How should these actions be delivered and measured?

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

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

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

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

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

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

We would endorse the UKGBC approach and use of sustainability statements suggested, which we are looking to adopt in our Neighbourhood Plan Carbon Neutral Development policy.

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

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

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

Please refer to the answer given to B4

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

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

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

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

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

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

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

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

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

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

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

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

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

A local employment-led development approach, and supporting policies, would prevent large scale commuting and sustainable travel options within sites, and would reduce the need to use cars for local journeys. Employment development should be for high quality attractive jobs in order to minimise out-commuting and deliver the best value for our communities. Policies to control the use of wood burning stoves/heating in densely built-up areas would help reduce non-vehicular air pollution.

Increasing modal shift to public and active transport will not be achieved with the 'business as usual' approach to delivering cycling infrastructure or bus improvements as previously seen in Chippenham. A comprehensive strategy for cycling, walking and public transport is needed to fully analyse current, future and potential demands, and to set out how continuous networks will be delivered. Even if this can only be delivered at the cost of the loss of on-street parking or vehicle access. Unless sustainable transport networks can be established which are as quick and safe as routes for motor vehicles, modal shift will not occur.

Whilst the shift to greener fuelled vehicles will in part improve local air quality through the reduction of emissions, it is not an all-encompassing solution to our problems. More than half of the UK's electricity is produced through non-renewable sources, and if electric vehicle uptake expands too quickly demand for power will in the short to medium term likely come from coal and gas. Electric cars still take up as much road space as petrol cars - meaning they will still cause congestion thereby making bus travel slower and less reliable. Electric vehicles will still sit idle in parking spaces on the side of roads for most of the day, limiting highway space which could be transferred to walking and cycling infrastructure, and results in severance for pedestrians and reduces the perception of safety for cyclists.

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

Install on-street EV charging infrastructure throughout Chippenham and in other parts of the county (particularly larger market towns) as soon as possible.

Whilst sustainable transport infrastructure can encourage some modal shift, it has to be complemented with travel demand management. Inexpensive and plentiful parking results in the use of private car being the easiest mode choice, even for basic trips. A policy is therefore required to seek a reduction in parking supply and an increase in the cost of parking.

Should the distributor road that will serve the proposed development in the south and east of Chippenham be formally proposed in the Local Plan then supporting policies will be required which limit through-traffic within Chippenham by implementing restrictions to private cars, and to transfer existing highway space to cycle, walking and bus infrastructure.

Consideration should be given to transport hubs at strategic locations, intercepting longer distance trips by private vehicle and providing sustainable means of onward travel to employment, retail, leisure and education.

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

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

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

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

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

We have heard concerns from the general public that the questions asked in this document are far too technical in nature, and difficult for them to understand and constructively respond to. Disappointingly, there may be a

low level of public engagement on this topic for this reason. Whilst we appreciate the situation with lockdown, it could have been possible to engage with the public more imaginatively and interactively through online workshops/sessions or surveys etc.

Planning for Chippenham

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

Scale of growth:

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

Wiltshire Council has not provided sufficient evidence to justify their housing numbers for Chippenham. The ONS growth rate, cited in the Housing Needs Assessment for the Chippenham Neighbourhood Plan, equates to a need for approx. 2500 new dwellings for Chippenham.

Over 2,000 houses approved in the previous Local Plan have yet to be built or receive planning permission, casting further doubt on the need for such large-scale development.

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

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

Brownfield target:

See above response in Emerging Spatial Strategy

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

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

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

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

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

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

- *“ij) Improving the resilience of the town centre by...”*

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

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

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

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

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

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

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

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

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

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

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

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

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

We consider the most important aspects to be:

- **ACCESS TO INFRASTRUCTURE**
Access to existing and new public transport (including bus route provision to the town centre and railway station), employment, community infrastructure, schools and surgeries is very important. Our Neighbourhood Plan Pre-Vision Survey found that the second most important thing that the local community wanted to see in a 'future

Chippenham' was the 'expansion of leisure, sport and recreation facilities'.

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

- **LAND ALLOCATION FOR RENEWABLE ENERGY**
Our Neighbourhood Plan, together with the Centre for Sustainable Energy (CSE), carried out a community workshop in 2020 on Future Energy Needs. It found that Chippenham was poor in covering its carbon footprint, and even if renewable energy measures were implemented as per the community's hypothetical energy plan it would only have provided 24% of Chippenham's annual electricity demand and 7% of its annual heat demand. Suitably sized land within the development needs to be allocated for renewable energy that can generate electricity for the development to make it self-sufficient, and also generate it for the wider town.
- **GREEN BUFFER**
It is important that green buffers to the surrounding countryside are substantially planted with trees, in line with our Neighbourhood Plan policy. We recommend that new development boundaries are final (i.e. not to be changed in the next review of the Local Plan).
- **GREEN CORRIDORS & LOCAL GREEN SPACES**
Impact on access, amenity and biodiversity of existing Green Corridors and Local Green Spaces are identified as important by our Neighbourhood Plan, i.e. River Avon corridor, Wilts & Berks Canal, Chippenham-Calne cycle path. Existing green corridors which cross Pewsham Way need to be improved, both for human travel and wildlife. Existing green spaces and parks were the second most popular item that the local community liked about living in Chippenham, according to the results of the Neighbourhood Plan Pre-Vision Survey.
- **WALKING AND CYCLE PATHS**
It is important that new development ties into the existing footpath and cycle path network, the adjacent urban area, the countryside, and key nodes such as the town centre and railway station. Without modification, Pewsham Way, in its current form, would present a barrier to any development on Site 2 linking into the existing urban area e.g. Pewsham to the north. Such roads should be incorporated within the 'development sites' to ensure that they are upgraded to provide for pedestrian and cycle friendly infrastructure and linkages (plus the incorporation of wildlife crossings across main roads where

green corridors have been identified). With regard to Site 2 there would also need to be improved linkages to the south to Lacock.

- **LANDSCAPE & VISUAL IMPACT**
The landscape and visual impact of any development from the countryside, and surrounding villages such as Tytherton Lucas, Pewsham village & Derry Hill is important. Our Neighbourhood Plan seeks to avoid coalescence with neighbouring villages, and this was something that was highlighted as an issue in early discussions with neighbouring parishes, and repeated within the Pre-Vision Survey results.
- **CARBON NEUTRAL DEVELOPMENT & SUSTAINABLE BUILDING CONSTRUCTION**
All new development should be carbon neutral and be sustainably constructed
- **BIODIVERSITY NET GAIN**
All new development should demonstrate biodiversity net gain
- **DESIGN PRINCIPLES**
 - Our Neighbourhood Plan has worked up a Design Guide for new housing based on community consultation from three housing workshops held for the general public in 2020. Wiltshire Council's design principles are not borne out of any community consultation and are detailed (rather than strategic) principles that are better suited to our Neighbourhood Plan to incorporate.
 - Key views between the town and countryside shown on Figure 8 of the Chippenham Landscape Setting Assessment Report for the Chippenham Site Allocations Plan DPD, and restated in the draft Neighbourhood Plan Design Guide, do not appear to be reflected in the concept plans.
 - Our Neighbourhood Plan Design Guide includes a main park at the local centre. The concept plans do not align with this. This should be reflected as a design principle.
 - Housing needs to be designed to provide high quality living conditions e.g. to National Technical Standards, bin storage, bike storage, balconies for apartments.
 - New tree-lined main streets within the development must not act as a barrier to pedestrians or wildlife.

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

CP5. How can these concept plans be improved?

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

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

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

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

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

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

A local employment-led development approach and supporting policies to reduce car dependency should dictate the location of employment land and prevent large scale commuting, whilst sustainable travel options within sites would reduce the need to use cars for local journeys.

Green space along the development site boundaries should not be left as farmland and there should be substantial tree belts planted to offset carbon, increase biodiversity, prevent future urban sprawl, and screen views of new development from the countryside.

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

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

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

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

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

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

No comments to make.

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

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

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

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

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

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

Agriculture/food production.

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

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

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

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Planning and Compulsory Purchase Act 2004 (as amended)

Town and Country Planning (Local Planning) (England) Regulations 2012 (Reg. 19)

Wiltshire Local Plan Pre-Submission Draft 2020-2038 (September 2023)

Statement of the Representations Procedure and availability of documents

If you have a comment to make about the Wiltshire Local Plan ('the Plan'), it is important that we hear from you. To those not familiar with the planning system, the consultation and representation form can appear complicated and technical, so we have prepared this guide to provide explanation of the process and terms used alongside information on how to comment and where to find information.

This guidance document sets out the items described in 1) – 9) below:

1) Title of document

Title of the development plan document published for consultation.

2) Subject matter

What the document plan document published for consultation is about.

3) Period for submission of representations

When the period of consultation starts and closes.

4) Where to view the plan and supporting documents (statement of fact)

Webpage link and list of locations where consultation documents can be found.

5) Things to consider when making a representation

Regarding 'soundness' and legal compliance.

6) How to submit your representation

Online, by email or by post.

7) Notification of next stages and what happens next

Tell us if you want to be notified.

8) Contact for more information

Email, phone, and postal address of the spatial planning policy team.

9) Representation form

Explanation and example of representation form.

1) Title of document

Wiltshire Local Plan 2020-2038 (September 2023)

This is the pre-submission draft published for the Regulation 19 consultation.

2) Subject matter

The Plan has been informed by consultations that took place between 2017 and 2021 and is a review of the current Wiltshire Core Strategy, building on existing objectives and spatial strategy to address Wiltshire's need for new homes, jobs and infrastructure over the period 2020 to 2038. It includes proposals for new allocations for housing and employment. In preparing the draft Plan, the following has also been considered:

- updating of existing Wiltshire Core Strategy development management policies, used to inform planning applications for development, to ensure their continued consistency with national policy;
- the introduction of further detailed development management policies, for instance to help tackle climate change and achieve biodiversity net gain, as part of a review of the saved development management policies not replaced by the Wiltshire Core Strategy; and
- developing additional locally distinctive policies to plan positively for all town centres in Wiltshire consistent with national policy.

If adopted, the Plan will form part of the development plan for Wiltshire and guide decisions on future development.

The proposed submission documents include: the draft Plan, the draft Sustainability Appraisal report (incorporating requirements of the Environmental Assessment of Plans and Programmes Regulations 2004), the draft Habitat Regulations Assessment and other supporting documents. In line with the council's Statement of Community Involvement, the consultation period allows for comments to also be made on the draft Sustainability Appraisal report.

The role of this consultation is to provide the opportunity for representations to be made on the 'soundness' and legal compliance of the plan before it is submitted to the Secretary of State for Examination. See Item 5 below for more information.

3) Period for submission of representations

The period for submitting representations relating to the draft Plan begins **9am Wednesday 27 September 2023** and lasts for 8 weeks, closing at **5pm on Wednesday 22 November 2023**. Representations received beyond this date may not be considered.

4) Where to view the plan and supporting documents (statement of fact)

You can view and download the Plan and the supporting documents on the council's website here: www.wiltshire.gov.uk/local-plan

Hard copied of the Plan and supporting documents will be available to view during normal office hours at the Council's main offices:

- Monkton Park, Chippenham, Wiltshire, SN15 1ER (9am to 5pm, Monday to Friday)
- Bourne Hill, The Council House, Bourne Hill, Salisbury, Wiltshire, SP1 3UZ (9am to 5pm, Monday to Friday)
- County Hall, Bythesea Road, Trowbridge, Wiltshire, BA14 8JN (9am to 5pm Monday to Friday)

The following documents: the draft Plan; the draft Sustainability Appraisal Report (incorporating requirements of the Environmental Assessment of Plans and Programmes Regulations 2004) and the draft Habitat Regulations Assessment, will be made available to view at the following libraries during normal opening hours:

- Amesbury Library, Smithfield Street, Amesbury, Wiltshire, SP4 7AL
- Bradford On Avon Library, Bridge Street, Bradford On Avon, Wiltshire, BA15 1BY
- Calne Library, The Strand, Calne, Wiltshire, SN11 0JU
- Chippenham Library, Timber Street, Chippenham, Wiltshire, SN15 3EJ
- Springfield Community Campus, Beechfield Road, Corsham, Wiltshire, SN13 9DN
- Devizes Library, Sheep Street, Devizes, Wiltshire, SN10 1DL
- Malmesbury Library, 24 Cross Hayes, Malmesbury, Wiltshire, SN16 9BG
- Marlborough Library, 91 High Street, Marlborough, Wiltshire, SN8 1HD
- Melksham Community Campus, Market Place, Melksham, Wiltshire, SN12 6ES
- Pewsey Library, Aston Close, Pewsey, Wiltshire, SN9 5EQ
- Royal Wootton Bassett Library, Borough Fields, Royal Wootton Bassett, Wiltshire, SN4 7AX
- Salisbury Library, Market Walk, Salisbury, Wiltshire, SP1 1BL
- Tidworth Library, Nadder Road, Tidworth, Wiltshire, SP9 7QA
- Tisbury Library, Nadder Community Campus, Weaveland Road, Tisbury, Wiltshire, SP3 6HJ
- Trowbridge Library, County Hall, Bythesea Road, Trowbridge, Wiltshire, BA14 8JN
- Warminster Library, Three Horseshoes Walk, Warminster, Wiltshire, BA12 9BT
- Westbury Library, Westbury House, 15 Edward Street, Westbury, Wiltshire, BA13 3BD

Information on library opening times can be found at:

<https://apps.wiltshire.gov.uk/librariesinformation>

Electronic access to all submission documents will be available at all Wiltshire Council libraries.

If you require the consultation documents in an alternative format, please contact spatialplanningpolicy@wiltshire.gov.uk.

Physical copies of documents can be provided to individuals if requested. The printing and postage costs will be incurred by those requesting additional copies. If you wish to make a purchase, please contact spatialplanningpolicy@wiltshire.gov.uk.

There will be a live webinar on Tuesday 10 October at 6:30pm to 8pm and 16 drop-in events held around the county where you can ask questions and gain further information about the consultation. More information on these events can be found at: www.wiltshire.gov.uk/local-plan.

5) Things to consider when making a representation

The Plan has been published by the Local Planning Authority (LPA) (Wiltshire Council) for representations to be made on it before it is submitted for examination by a Planning Inspector. The Planning and Compulsory Purchase Act 2004, as amended, states that the purpose of the examination is to consider whether the plan complies with the relevant legal requirements, including the duty to co-operate, and is sound. The Inspector will consider all representations on the plan that are made within the consultation period set by the LPA.

Specifically, we are asking people to consider the following when making representations:

i) Legal compliance.

This encompasses whether the Plan complies with the relevant legislation and regulations in the way it has been prepared and its content. Things to consider include the following before making a representation of legal compliance:

- The Plan should comply with all relevant requirements of the Planning and Compulsory Purchase Act 2004 (as amended) and the Town and Country Planning (Local Planning) (England) Regulations 2012, as amended.
- The plan should be included in the LPA's current Local Development Scheme¹ (LDS) and the key stages set out in the LDS should have been followed. The LDS is effectively a programme of work prepared by the LPA, setting out the plans it proposes to produce. It will set out the key stages in the production of any plans which the LPA proposes to bring forward for examination.

¹ Wiltshire Local Development Scheme (LDS), Wiltshire Council. For the latest Wiltshire local development scheme please visit: [Local Development Scheme - Wiltshire Council](#).

- The process of community involvement for the plan in question should be in general accordance with the LPA's Statement of Community Involvement² (SCI). The SCI sets out the LPA's strategy for involving the community in the preparation and revision of plans and the consideration of planning applications.
- The LPA is also required to provide a Sustainability Appraisal (SA) report when it publishes a plan. This should identify the process by which SA has been carried out, and the baseline information used to inform the process and the outcomes of that process. SA is a tool for assessing the extent to which the plan, when judged against reasonable alternatives, will help to achieve relevant environmental, economic and social objectives.
- The Habitats Regulations Assessment (HRA) will also be available and needs to be carried out for the Plan, in order to protect the integrity of internationally important nature conservation sites.

To access these documents, alongside other supporting documents, please go to: www.wiltshire.gov.uk/local-plan.

ii) Soundness.

The tests of soundness are set out in national policy (National Planning Policy Framework). Plans are sound if they are:

- (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 authorities 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 the NPPF.

If you think the content of the plan is not sound because it does not include a policy on a particular issue, you should go through the following steps before making representations:

- o Is the issue with which you are concerned already covered specifically by national planning policy?

² Wiltshire Statement of Community Involvement, Wiltshire Council. For the latest Wiltshire statement of community involvement please visit: [Statement of Community Involvement - Wiltshire Council](#).

- Is the issue with which you are concerned already covered by another policy in the plan?
 - If the policy is not covered elsewhere, in what way is the Plan unsound without the policy?
 - If the Plan is unsound without the policy, what should the policy say?
- iii) Complies with the Duty to co-operate.
Section 33A of the PCPA requires the LPA to engage constructively, actively and on an ongoing basis with neighbouring authorities and certain other bodies over strategic matters during the preparation of the Plan. The LPA will be expected to provide evidence of how they have complied with the duty.

6) How to submit your representation

Representations can be submitted via the following means:

- Online via the council's consultation portal accessible via this link: www.wiltshire.gov.uk/local-plan
- By email using the form available at: www.wiltshire.gov.uk/local-plan and returned to spatialplanningpolicy@wiltshire.gov.uk; or
- By post in writing by using the form and sending this to: Spatial Planning, Planning Directorate, Wiltshire Council, County Hall, Bythesea Road, Trowbridge, Wiltshire, BA14 8JN.

Representations should be made on the representation form. The use of the standard representation form is strongly recommended as this will ensure that comments are related to the matters relevant to the subsequent examination by a planning inspector. Further information on the representation form can be found in section 9 below.

If you wish to make a representation seeking a modification to the Plan you should set out clearly in what way you consider the Plan or part of the Plan is legally non-compliant or unsound, having regard as appropriate to the soundness criteria in section 5(ii) above. Your representation should be supported by evidence wherever possible. It will be helpful if you also say precisely how you think the Plan should be modified.

You should provide succinctly all the evidence and supporting information necessary to support your representation and your suggested modification. You should not assume that you will have a further opportunity to make submissions. Any further submissions after the plan has been submitted for examination may only be made if invited by the Inspector, based on the matters and issues they identify.

Where groups or individuals share a common view on the plan, it would be very helpful if they would make a single representation which represents that view, rather a large number of separate representations repeating the same points. In such cases the group should indicate how many people it is representing and how the representation has been authorised.

Please consider carefully how you would like your representation to be dealt with in the examination: whether you are content to rely on your written representation, or whether you wish to take part in hearing session(s). Only representors who are seeking a change to the plan have a right to be heard at the hearing session(s), if they so request. In considering this, please note that written and oral representations carry the same weight and will be given equal consideration in the examination process.

Please note: all submitted representations will be made publicly available.

To ensure an effective and fair examination, it is important that the Inspector and all other participants in the examination process are able to know who has made representations on the plan. The LPA will therefore ensure that the names of those making representations can be made available (including publication on the LPA's website) and taken into account by the Inspector.

The council therefore cannot accept anonymous representations – you must provide us with your name and contact details. Address details will not be made publicly available. All personal data will be handled in line with the council's Spatial Planning privacy policy. You can view the Council's privacy notice at <https://www.wiltshire.gov.uk/planning-privacy-notice>.

7) Notification of next stages and what happens next

When making your representations using the representation form you will have the option to request to be notified via email, or at a postal address, of any of the following stages of the Plan's process:

- the submission of the Wiltshire Local Plan for independent examination;
- the publication of the planning inspector's report following examination of the Wiltshire Local Plan; and
- the adoption of the Wiltshire Local Plan.

If you wish to be kept informed of the above stages please double check that the contact details you include with your representation are correct so we can contact you regarding this.

Once the Regulation 19 representation period has closed, updates regarding the status of the Plan will be published on the council's planning policy webpages.

Any person who makes a submission during the Regulation 19 representation period who wishes to be kept informed of its progress will automatically be added to the spatial planning team's database and will be provided with updates on the progress of the Plan. If you wish to be removed from this database, please contact SpatialPlanningPolicy@wiltshire.gov.uk.

Following the end of the consultation period, the council will summarise the main issues raised and submit the Plan, accompanying evidence and all submitted representations to the Secretary of State, who will appoint an Inspector to undertake an independent examination. The Inspector will assess whether the Plan meets the relevant legal requirements, complies with the Duty to Cooperate, and is sound. This submission is anticipated to take place in quarter two 2024 with the examination and hearings anticipated to take place following this.

8) Contact for more information

If you would like any further information on the Plan, proposed submission documents, or any of the supporting documents, please contact us via

- Telephone: 01225 713223
- Email: SpatialPlanningPolicy@wiltshire.gov.uk.
- Post: Spatial Planning, Planning Directorate, Wiltshire Council, County Hall, Bythesea Road, Trowbridge, Wiltshire, BA14 8JN.

9) Representation form

The representation form is split into two parts. Part A (personal details) of the form is where you provide your personal details. Please fill out as many parts of this section of the form as you can. We need this information to ensure that we can keep you informed about the next stages in the Plan's preparation. When the Plan is examined, the government-appointed Inspector may also wish to ask you for more information relating to your comments, or invite you to attend hearing sessions - where you will be given the opportunity to put your views to the Inspector and contribute to the discussion on the issues that you have raised.

Part B of the form is where you provide details of the representation you are making. This should identify which Local Plan policy/section/paragraph and/or proposed submission document section/paragraph the representation refers to.

Wherever possible it is encouraged that you submit comments online via the council's consultation portal accessible via this link: www.wiltshire.gov.uk/local-plan. The representation form can also be downloaded from the council's website www.wiltshire.gov.uk/local-plan.

A copy of the representation form can be found overleaf.

Wiltshire Local Plan

Publication Stage Representation Form

Ref:

(For official use only)

Please return to Wiltshire Council, by 5pm on Wednesday 22nd November 2023.

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

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

For further information please visit: www.wiltshire.gov.uk/local-plan or **Tel:** 01225 713223

This form has two parts:

Part A – Personal details

Part B – Your representation(s). Please use a separate sheet for each representation.

Part A – Personal details

Please note the following:

- We cannot register your representation without your details.
- Representations cannot be kept confidential and will be available for public scrutiny, however, your contact details will not be published.
- All information will be sent for examination by an independent inspector.
- All personal data will be handled in line with the Council's Privacy Policy on Spatial Planning matters. You can view the Spatial Planning privacy notice at <https://www.wiltshire.gov.uk/planning-privacy-notice>.

**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		

Part B – Please use a separate sheet for each representation.

Please note, in your representation you should provide succinctly all the evidence and supporting information necessary to support your representation and your suggested modification(s). You should not assume that you will have a further opportunity to make submissions.

After this stage, further submissions may only be made if invited by the Inspector, based on the matters and issues he or she identifies for examination.

3. To which part of the Wiltshire Local Plan does this representation relate?

Policy:	Paragraph:	Table:	Figure:
Site:	Other:		

4. Do you consider the Wiltshire Local Plan is:

(i) Legally compliant	Yes:		No:	
(ii) Sound	Yes:		No:	
(iii) Complies with the duty to co-operate	Yes:		No:	
<i>Please indicate with an 'X' as appropriate</i>				

4b. If you think the Wiltshire Local Plan is not sound, please indicate the reason(s) why:

(1) Not positively prepared	
(2) Not justified	
(3) Not effective	
(4) Not consistent with national policy	
<i>Please indicate with an 'X' as appropriate</i>	

See separate statement of representation procedure (guidance note) for further information on 'soundness'.

5. Please give details of why you consider the Wiltshire Local Plan is not legally compliant or is unsound or fails to comply with the duty to co-operate. Please be as precise as possible. If you wish to support the legal compliance or soundness of the Wiltshire Local Plan or its compliance with the duty to co-operate, please also use this box to set out your comments.

(Continue on a separate sheet/expand box if necessary)

5a. If you wish to make a separate representation, relating to legal compliance, soundness or the duty to cooperate in relation to the accompanying Sustainability Appraisal (SA), please make them here.

(Continue on a separate sheet/expand box if necessary)

6. Please set out the modification(s) you consider necessary to make the Wiltshire Local Plan legally compliant and sound, in respect of any legal compliance or soundness matters you have identified at 5 above. (Please note that non-compliance with the duty to co-operate is incapable of modification at examination). You will need to say why each modification will make the Wiltshire Local Plan legally compliant or sound. It will be helpful if you are able to put forward your suggested revised wording of any policy or text. Please be as precise as possible.

(Continue on a separate sheet/expand box if necessary)

7. If your representation is seeking a modification to the plan, do you consider it necessary to participate in examination hearing session(s)?

	No , I do not wish to participate in hearing session(s)		Yes , I wish to participate in hearing session(s)
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8. If you wish to participate in the hearing session(s), please outline why you consider this to be necessary:

(Continue on a separate sheet/ expand box if necessary)

Please note the Inspector will determine the most appropriate procedure to adopt to hear those who have indicated that they wish to participate in hearing session(s). You may be asked to confirm your wish to participate when the Inspector has identified the matters and issues for examination.

9. Do you wish to be notified of any of the following?

Please tick all that apply.

The submission of the Wiltshire Local Plan Review for Independent Examination	
The publication of the report of the Inspector appointed to carry out the examination	
The adoption of the Local Plan Review	

Please ensure that we have either an up-to-date email address or postal address at which we can contact you.

Signature:		Date:	
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Wiltshire Local Plan

Publication Stage Representation Form

Ref:	(For official use only)
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Part B – Please use a separate sheet for each representation.

Please note, in your representation you should provide succinctly all the evidence and supporting information necessary to support your representation and your suggested modification(s). You should not assume that you will have a further opportunity to make submissions.

After this stage, further submissions may only be made if invited by the Inspector, based on the matters and issues he or she identifies for examination.

3. To which part of the Wiltshire Local Plan does this representation relate?

Policy:	Paragraph:	Table:	Figure:
Site:		Other: Spatial Vision & Sustainability Appraisal	

4. Do you consider the Wiltshire Local Plan is:

(i) Legally compliant	Yes:		No:	X
(ii) Sound	Yes:		No:	X
(iii) Complies with the duty to co-operate	Yes:	X	No:	
<i>Please indicate with an 'X' as appropriate</i>				

4b. If you think the Wiltshire Local Plan is not sound, please indicate the reason(s) why:

(1) Not positively prepared	
(2) Not justified	X
(3) Not effective	X
(4) Not consistent with national policy	X
<i>Please indicate with an 'X' as appropriate</i>	

See separate statement of representation procedure (guidance note) for further information on 'soundness'.

5. Please give details of why you consider the Wiltshire Local Plan is not legally compliant or is unsound or fails to comply with the duty to co-operate. Please be as precise as possible. If you wish to support the legal compliance or soundness of the Wiltshire Local Plan or its compliance with the duty to co-operate, please also use this box to set out your comments.

The 2004 Planning and Compulsory Purchase Act (as amended by the Planning Act 2008) states *'Development plan documents must (taken as a whole) include policies designed to secure that the development and use of land in the local planning authority's area contribute to the mitigation of, and adaptation to, climate change.'*

Paragraph 152 of the NPPF states that planning should help to *'shape places in ways that contribute to radical reductions in greenhouses gas.'* Paragraph 153 of the NPPF (including footnote 53) goes on to explain *'plans should take a proactive approach to mitigating and adapting to climate change'* and that this should be *'in line with the objectives and provisions of the Climate Change Act 2008'*. The Climate Change Act 2008 sets a legal duty for the Secretary of State to ensure that the net UK carbon account for the year 2050 is at least 100% lower than the 1990 baseline.

The Wiltshire Carbon Emissions Baselines and Reduction Pathways Report, March 2022 by Anthesis states *'Planning will largely dictate the connectivity of new developments to core services and the possible reduction in required travel distances, through Local Plan site allocations.'*

Whilst the spatial vision in the Plan seems relatively sound, it is evasive on the scale of emission reductions to be achieved and whether the Plan would/should be in alignment with the Climate Change Act. Furthermore, there seems to be no obvious link between the Plan and Wiltshire Council's climate emergency declaration (which is only mentioned once in paragraph 5.110).

The Town Council considers that Plan documents need to include an audit of the predicted carbon emissions over the lifetime of the Plan (including impact of new development and baseline emissions) to enable the LPA to demonstrate that the Plan policies will contribute to achieving the carbon emission reductions required by the Climate Change Act.

Furthermore, the revised plan covers the period from 2020 to 2038. Under the Climate Change Act, the Government sets falling five yearly carbon budgets (recommended by the Climate Change Committee) to the ultimate net zero commitment in 2050. Because of the 18-year plan period, the local plan overlaps with carbon budgets 3, 4, 5 and 6. The 6th Carbon Budget commits the UK to achieving a 77% reduction in carbon emissions by 2037 from 1990 levels.

Carbon budgets are not mentioned. Nor is there an evidence base assessing the carbon emissions the Plan's strategy will give rise to, or whether the Plan policies are consistent with Wiltshire Council's climate emergency declaration (net zero by 2030), the UK-wide target (net zero by 2050), and/or the 6th carbon budget.

It is therefore unclear whether the Plan is legally compliant and whether the policies within the Plan are robust enough to achieve the emissions reductions Wiltshire Council and the UK as a whole has committed to. A Plan which cannot demonstrate this cannot, reasonably, pass the NPPF soundness test.

(Continue on a separate sheet/expand box if necessary)

5a. If you wish to make a separate representation, relating to legal compliance, soundness or the duty to cooperate in relation to the accompanying Sustainability Appraisal (SA), please make them here.

The Sustainability Appraisal fails to include any carbon emissions auditing of either Local Plan policies, or allocated sites and how this was then taken into account in the process of site selection.

The Town Council is aware of other LPA's using carbon emissions modelling/testing to assist in Local Plan making, and considers that further work and evidence on carbon emissions is required in order to test the adequacy of the Plan in relation to minimising the impact on climate change. Without this evidence the Sustainability Appraisal is not considered to be justified (in terms of soundness).

(Continue on a separate sheet/expand box if necessary)

6. Please set out the modification(s) you consider necessary to make the Wiltshire Local Plan legally compliant and sound, in respect of any legal compliance or soundness matters you have identified at 5 above. (Please note that non-compliance with the duty to co-operate is incapable of modification at examination). You will need to say why each modification will make the Wiltshire Local Plan legally compliant or sound. It will be helpful if you are able to put forward your suggested revised wording of any policy or text. Please be as precise as possible.

In order to make the Plan sound, the Town Council recommends further wording be added to the Spatial Vision or its supporting text to reinforce obligations under the Climate Change Act 2008 and the climate emergency that Wiltshire Council has declared.

It is recommended that the LPA develops further evidence, working up from the analysis already carried out for Wiltshire Council's climate emergency declaration, both to test the adequacy of the Plan approach and to strengthen their defence of the positive climate based policies they have already developed. This evidence should include an audit of the predicted carbon emissions over the lifetime of the Plan, including the impact of new development and baseline emissions.

The further evidence collected on carbon emissions should be used to inform a revised Sustainability Appraisal. This should include auditing of carbon emissions associated with site allocations, which can then be used to re-assess the sustainability of these allocations and assist in the process of site selection using a much stronger, quantitative evidence base.

(Continue on a separate sheet/expand box if necessary)

7. If your representation is seeking a modification to the plan, do you consider it necessary to participate in examination hearing session(s)?

No , I do not wish to participate in hearing session(s)	X	Yes , I wish to participate in hearing session(s)
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8. If you wish to participate in the hearing session(s), please outline why you consider this to be necessary:

This topic is complicated and technical and therefore may be more appropriate for a hearing.

(Continue on a separate sheet/ expand box if necessary)

Please note the Inspector will determine the most appropriate procedure to adopt to hear those who have indicated that they wish to participate in hearing session(s). You may be asked to confirm your wish to participate when the Inspector has identified the matters and issues for examination.

9. Do you wish to be notified of any of the following?

Please tick all that apply.

The submission of the Wiltshire Local Plan Review for Independent Examination	X
The publication of the report of the Inspector appointed to carry out the examination	X
The adoption of the Local Plan Review	X

Please ensure that we have either an up-to-date email address or postal address at which we can contact you.

Signature:		Date:	
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Wiltshire Local Plan

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Part B – Please use a separate sheet for each representation.

Please note, in your representation you should provide succinctly all the evidence and supporting information necessary to support your representation and your suggested modification(s). You should not assume that you will have a further opportunity to make submissions.

After this stage, further submissions may only be made if invited by the Inspector, based on the matters and issues he or she identifies for examination.

3. To which part of the Wiltshire Local Plan does this representation relate?

Policy: 3	Paragraph: 3.52-3.54	Table:	Figure:
Site:		Other:	

4. Do you consider the Wiltshire Local Plan is:

(i) Legally compliant	Yes:	X	No:	
(ii) Sound	Yes:		No:	X
(iii) Complies with the duty to co-operate	Yes:	X	No:	
<i>Please indicate with an 'X' as appropriate</i>				

4b. If you think the Wiltshire Local Plan is not sound, please indicate the reason(s) why:

(1) Not positively prepared	X
(2) Not justified	X
(3) Not effective	
(4) Not consistent with national policy	X
<i>Please indicate with an 'X' as appropriate</i>	

See separate statement of representation procedure (guidance note) for further information on 'soundness'.

5. Please give details of why you consider the Wiltshire Local Plan is not legally compliant or is unsound or fails to comply with the duty to co-operate. Please be as precise as possible. If you wish to support the legal compliance or soundness of the Wiltshire Local Plan or its compliance with the duty to co-operate, please also use this box to set out your comments.

Policy 3 identifies Chippenham as a 'broad location for growth'. This is already in addition to its identification as a 'principal settlement' being the 'primary focus for development' and the housing and employment growth already proposed via a large strategic site allocation towards the end of the Plan period under Policy 6.

This section of Policy 3 and the supporting text in Paras. 3.52-3.54 is not considered to be positively prepared, justified by robust evidence or consistent with national policy in Paras. 22 and 66 of the NPPF because it plans for additional housing development in Chippenham beyond the objectively assessed housing needs for the town for the Plan period, which can be met by completions/commitments plus a new site allocation.

Housing needs to be accommodated beyond the Plan period should be left to a future Wiltshire Local Plan or Review and should not be prematurely assessed decades in advance.

In addition, there is a danger that by including the vague concept of a 'broad location for growth' without any further details or evidence of why this is required, this could give the wrong signals to developers and result in speculative applications being submitted on unsustainable greenfield sites around Chippenham, contrary to any properly masterplanned development on allocated sites in the Wiltshire Local Plan. This situation could be exacerbated until such time as Wiltshire Council regain a 5 year housing land supply.

Therefore Policy 3 is not considered to be sound.

(Continue on a separate sheet/expand box if necessary)

5a. If you wish to make a separate representation, relating to legal compliance, soundness or the duty to cooperate in relation to the accompanying Sustainability Appraisal (SA), please make them here.

(Continue on a separate sheet/expand box if necessary)

6. Please set out the modification(s) you consider necessary to make the Wiltshire Local Plan legally compliant and sound, in respect of any legal compliance or soundness matters you have identified at 5 above. (Please note that non-compliance with the duty to co-operate is incapable of modification at examination). You will need to say why each modification will make the Wiltshire Local Plan legally compliant or sound. It will be helpful if you are able to put forward your suggested revised wording of any policy or text. Please be as precise as possible.

The Town Council considers it necessary, in order for the Plan to be sound, that the section of Policy 3 referring to 'broad locations for growth' and Paragraphs 3.52-3.54 are deleted.

(Continue on a separate sheet/expand box if necessary)

7. If your representation is seeking a modification to the plan, do you consider it necessary to participate in examination hearing session(s)?

No , I do not wish to participate in hearing session(s)	X	Yes , I wish to participate in hearing session(s)
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8. If you wish to participate in the hearing session(s), please outline why you consider this to be necessary:

Other parish/town councils are likely to object to Policy 3 because and the Town Council would like to be involved in those discussions if the Inspector considers it necessary to hold a hearing.

(Continue on a separate sheet/ expand box if necessary)

Please note the Inspector will determine the most appropriate procedure to adopt to hear those who have indicated that they wish to participate in hearing session(s). You may be asked to confirm your wish to participate when the Inspector has identified the matters and issues for examination.

9. Do you wish to be notified of any of the following?

Please tick all that apply.

The submission of the Wiltshire Local Plan Review for Independent Examination	X
The publication of the report of the Inspector appointed to carry out the examination	X
The adoption of the Local Plan Review	X

Please ensure that we have either an up-to-date email address or postal address at which we can contact you.

Signature:		Date:	
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Wiltshire Local Plan

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Part B – Please use a separate sheet for each representation.

Please note, in your representation you should provide succinctly all the evidence and supporting information necessary to support your representation and your suggested modification(s). You should not assume that you will have a further opportunity to make submissions.

After this stage, further submissions may only be made if invited by the Inspector, based on the matters and issues he or she identifies for examination.

3. To which part of the Wiltshire Local Plan does this representation relate?

Policy: 4	Paragraph:	Table:	Figure:
Site:	Other:		

4. Do you consider the Wiltshire Local Plan is:

(i) Legally compliant	Yes:	X	No:	
(ii) Sound	Yes:	X	No:	
(iii) Complies with the duty to co-operate	Yes:	X	No:	
<i>Please indicate with an 'X' as appropriate</i>				

4b. If you think the Wiltshire Local Plan is not sound, please indicate the reason(s) why:

(1) Not positively prepared	
(2) Not justified	
(3) Not effective	
(4) Not consistent with national policy	
<i>Please indicate with an 'X' as appropriate</i>	

See separate statement of representation procedure (guidance note) for further information on 'soundness'.

5. Please give details of why you consider the Wiltshire Local Plan is not legally compliant or is unsound or fails to comply with the duty to co-operate. Please be as precise as possible. If you wish to support the legal compliance or soundness of the Wiltshire Local Plan or its compliance with the duty to co-operate, please also use this box to set out your comments.

The Town Council supports Policy 4 on Addressing Climate Change which sets the strategic tone for other Plan policies, but is also written in way which ensures it can be a key policy consideration in its own right in the decision making process.

The one area where Policy 4 could be improved is in relation to overheating of buildings. Criteria C iii and C v provide introductory text on the issue of climate adaptation and touch briefly on overheating, but there is not much text to support a case officer in assessing acceptability as and when a planning application is submitted, or any objective standards against which to assess proposals. Other plans have addressed this more robustly. For example Draft Policy CCS3 of the emerging Bristol Local Plan requires the provision of an adaptation strategy requiring detail of site and building level adaptations to climate impacts including overheating, plus technical modelling.

(Continue on a separate sheet/expand box if necessary)

5a. If you wish to make a separate representation, relating to legal compliance, soundness or the duty to cooperate in relation to the accompanying Sustainability Appraisal (SA), please make them here.

(Continue on a separate sheet/expand box if necessary)

6. Please set out the modification(s) you consider necessary to make the Wiltshire Local Plan legally compliant and sound, in respect of any legal compliance or soundness matters you have identified at 5 above. (Please note that non-compliance with the duty to co-operate is incapable of modification at examination). You will need to say why each modification will make the Wiltshire Local Plan legally compliant or sound. It will be helpful if you are able to put forward your suggested revised wording of any policy or text. Please be as precise as possible.

(Continue on a separate sheet/expand box if necessary)

7. If your representation is seeking a modification to the plan, do you consider it necessary to participate in examination hearing session(s)?

X	No , I do not wish to participate in hearing session(s)		Yes , I wish to participate in hearing session(s)
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8. If you wish to participate in the hearing session(s), please outline why you consider this to be necessary:

(Continue on a separate sheet/ expand box if necessary)

Please note the Inspector will determine the most appropriate procedure to adopt to hear those who have indicated that they wish to participate in hearing session(s). You may be asked to confirm your wish to participate when the Inspector has identified the matters and issues for examination.

9. Do you wish to be notified of any of the following?

Please tick all that apply.

The submission of the Wiltshire Local Plan Review for Independent Examination	X
The publication of the report of the Inspector appointed to carry out the examination	X
The adoption of the Local Plan Review	X

Please ensure that we have either an up-to-date email address or postal address at which we can contact you.

Signature:		Date:	
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Wiltshire Local Plan

Publication Stage Representation Form

Ref:	(For official use only)
-------------	--------------------------------

Part B – Please use a separate sheet for each representation.

Please note, in your representation you should provide succinctly all the evidence and supporting information necessary to support your representation and your suggested modification(s). You should not assume that you will have a further opportunity to make submissions.

After this stage, further submissions may only be made if invited by the Inspector, based on the matters and issues he or she identifies for examination.

3. To which part of the Wiltshire Local Plan does this representation relate?

Policy: 5	Paragraph: 3.71	Table:	Figure:
Site:		Other:	

4. Do you consider the Wiltshire Local Plan is:

(i) Legally compliant	Yes:	X	No:	
(ii) Sound	Yes:		No:	X
(iii) Complies with the duty to co-operate	Yes:	X	No:	
<i>Please indicate with an 'X' as appropriate</i>				

4b. If you think the Wiltshire Local Plan is not sound, please indicate the reason(s) why:

(1) Not positively prepared	
(2) Not justified	
(3) Not effective	X
(4) Not consistent with national policy	
<i>Please indicate with an 'X' as appropriate</i>	

See separate statement of representation procedure (guidance note) for further information on 'soundness'.

5. Please give details of why you consider the Wiltshire Local Plan is not legally compliant or is unsound or fails to comply with the duty to co-operate. Please be as precise as possible. If you wish to support the legal compliance or soundness of the Wiltshire Local Plan or its compliance with the duty to co-operate, please also use this box to set out your comments.

Paragraph 3.71, the supporting text to Policy 5, confirms that *'the broad prioritisation of infrastructure provision has been designed to ensure that development proposals present solutions to address essential requirements first and then place shaping items next. This should not be taken to imply that place shaping infrastructure is of lesser importance, rather that the precise timing of providing it is not critical to the phasing of development'*.

On reading Policy 5 the nuance in Paragraph 3.71 about prioritising the delivery of certain types of infrastructure as opposed to simply prioritising different types of infrastructure is missing: *'In the event of competing demands for infrastructure provision, developer contributions will be sought in the following order of priority: 1. essential infrastructure 2. place-shaping infrastructure'*

The Town Council considers that 'place-shaping infrastructure' such as 'cultural and community facilities' and 'leisure and recreation provision' should really be 'essential infrastructure' if new communities are to be sustainable, thrive and be cohesive. Too often there has not been enough money left in the pot at the end of the process to deliver such facilities in new communities, resulting in those communities being deprived of, and having to access by car, other such facilities in the town.

It is considered that Policy 5 as currently written would not be effective in providing some of the place-shaping infrastructure which is essential to sustainable, thriving communities and the Plan is currently not sound in this respect.

(Continue on a separate sheet/expand box if necessary)

5a. If you wish to make a separate representation, relating to legal compliance, soundness or the duty to cooperate in relation to the accompanying Sustainability Appraisal (SA), please make them here.

(Continue on a separate sheet/expand box if necessary)

6. Please set out the modification(s) you consider necessary to make the Wiltshire Local Plan legally compliant and sound, in respect of any legal compliance or soundness matters you have identified at 5 above. (Please note that non-compliance with the duty to co-operate is incapable of modification at examination). You will need to say why each modification will make the Wiltshire Local Plan legally compliant or sound. It will be helpful if you are able to put forward your suggested revised wording of any policy or text. Please be as precise as possible.

The Town Council considers that Policy 5 needs to be modified more in line with Paragraph 3.71 to make it clear that the provision of some of the 'place shaping infrastructure' is just as important as some of the 'essential infrastructure' if new communities are to thrive and be sustainable. Without these modifications Policy 5 would not be effective in delivering 'place shaping infrastructure' and the Plan would not be sound.

(Continue on a separate sheet/expand box if necessary)

7. If your representation is seeking a modification to the plan, do you consider it necessary to participate in examination hearing session(s)?

X	No , I do not wish to participate in hearing session(s)	Yes , I wish to participate in hearing session(s)
---	--	--

8. If you wish to participate in the hearing session(s), please outline why you consider this to be necessary:

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(Continue on a separate sheet/ expand box if necessary)

Please note the Inspector will determine the most appropriate procedure to adopt to hear those who have indicated that they wish to participate in hearing session(s). You may be asked to confirm your wish to participate when the Inspector has identified the matters and issues for examination.

9. Do you wish to be notified of any of the following?

Please tick all that apply.

The submission of the Wiltshire Local Plan Review for Independent Examination	X
The publication of the report of the Inspector appointed to carry out the examination	X
The adoption of the Local Plan Review	X

Please ensure that we have either an up-to-date email address or postal address at which we can contact you.

Signature:		Date:	
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Wiltshire Local Plan

Publication Stage Representation Form

Ref:

(For official use only)

Part B – Please use a separate sheet for each representation.

Please note, in your representation you should provide succinctly all the evidence and supporting information necessary to support your representation and your suggested modification(s). You should not assume that you will have a further opportunity to make submissions.

After this stage, further submissions may only be made if invited by the Inspector, based on the matters and issues he or she identifies for examination.

3. To which part of the Wiltshire Local Plan does this representation relate?

Policy: 6 & 7	Paragraph: 4.29 & 4.32	Table:	Figure:
Site:		Other:	

4. Do you consider the Wiltshire Local Plan is:

(i) Legally compliant	Yes:	X	No:	
(ii) Sound	Yes:		No:	X
(iii) Complies with the duty to co-operate	Yes:	X	No:	
<i>Please indicate with an 'X' as appropriate</i>				

4b. If you think the Wiltshire Local Plan is not sound, please indicate the reason(s) why:

(1) Not positively prepared	
(2) Not justified	X
(3) Not effective	X
(4) Not consistent with national policy	
<i>Please indicate with an 'X' as appropriate</i>	

See separate statement of representation procedure (guidance note) for further information on 'soundness'.

5. Please give details of why you consider the Wiltshire Local Plan is not legally compliant or is unsound or fails to comply with the duty to co-operate. Please be as precise as possible. If you wish to support the legal compliance or soundness of the Wiltshire Local Plan or its compliance with the duty to co-operate, please also use this box to set out your comments.

Paragraph 4.29 states that for Chippenham *'The scale of growth being proposed will exacerbate traffic congestion in and around the town. A new road to link the A4 with the A350 will therefore be required as part of a wider strategy to alleviate congestion and encourage sustainable travel.'* Point 5 of Policy 6 asserts that a new link road *'will provide for a more resilient local network addressing traffic congestion within the town centre'*.

The Town Council have reviewed the 'Wiltshire Local Plan Review 2022 - Transport Evidence Base, May 2023' which shows traffic modelling at a Wiltshire-wide level with all Local Plan site allocations. However, there does not appear to be any specific traffic modelling included for the proposed new Chippenham site allocation alone, in terms of how this development might affect road capacity in Chippenham either with or without a new link road.

It is considered that evidence of future traffic modelling for Chippenham is necessary in order to justify a link road. For example, future traffic modelling could show: a) no site allocations or link road (baseline), b) with the site allocation and link road, and c) with the site allocation but no link road. This should help to better understand the relationship between the site allocation (and the growth in road traffic this would generate), the link road (which may or may not generate additional traffic not related to the site allocation) and resulting traffic flows in and around Chippenham, including the town centre (which may or may not decrease as a result).

At present the assertions in Policy 6 and Paragraph 4.29 that a link road would address traffic congestion in the town centre do not appear to be supported by robust evidence and cannot be justified (in terms of soundness).

Turning to the nature and purpose of the proposed link road, Paragraph 4.32 states *'The allocation will require a new road transport corridor linking the A4, south-east of Abbeyfield School, southwards to link with the A350 via a new river bridge.'* The first bullet point of Policy 7 also refers to a *'new road transport corridor from the A4 southwards connecting with the A350 via a new river bridge delivered in accordance with trigger point(s) determined by a transport assessment.'*

Three options for the route of this road were previously rejected by the community in Chippenham when it was put forward as part of a 'distributor road' for two sites (south of Chippenham and east of Chippenham) in the Regulation 18 version of the Local Plan Review. Now it is being described as a 'new road transport corridor'. There is not enough evidence and traffic modelling to understand its purpose: Is this to bypass the town, to provide 'distributor' access to the development, or both?

The route of an un-defined road should not be prescribed in the Local Plan without the purpose being defined; and if required in order to be able to access the proposed site allocation should take the shortest practical and acceptable route that would deliver that purpose. Therefore, the impact on traffic elsewhere in the town from this undefined road cannot be evaluated. Once all this is known there would need to be further consultation with the local community.

The fourteenth bullet point of Policy 7 refers to *'a crossing over the River Avon allowing onward travel through Rowden Park to the Chippenham Community Hospital site'*. It is not understood what is meant by the vague term 'a crossing'. Would this be a road (and what type) or a pedestrian/cycle route? There would need to be greater clarity for any requirement to be effective. No evidence is presented as to why direct access to a community hospital site is required specifically from the site and through Rowden Park.

(Continue on a separate sheet/expand box if necessary)

5a. If you wish to make a separate representation, relating to legal compliance, soundness or the duty to cooperate in relation to the accompanying Sustainability Appraisal (SA), please make them here.

(Continue on a separate sheet/expand box if necessary)

6. Please set out the modification(s) you consider necessary to make the Wiltshire Local Plan legally compliant and sound, in respect of any legal compliance or soundness matters you have identified at 5 above. (Please note that non-compliance with the duty to co-operate is incapable of modification at examination). You will need to say why each modification will make the Wiltshire Local Plan legally compliant or sound. It will be helpful if you are able to put forward your suggested revised wording of any policy or text. Please be as precise as possible.

The Town Council has not seen robust evidence on traffic modelling which justifies the assertions made in Point 5 of Policy 6 and Paragraph 4.29 about the link road easing traffic congestion elsewhere in Chippenham, in particular the town centre.

The traffic modelling evidence is not sufficient to fully understand the relationship between any link road and the proposed site allocation and their interdependency if that is the case. There is insufficient evidence to be able to understand the purpose and type of new link road that is being proposed and Paragraph 4.32 and the first bullet point of Policy 7 are not considered to be justified (in terms of soundness).

The fourteenth bullet point of Policy 7, referring to new links to Chippenham Community Hospital from the site, is also not considered to be justified or effective (in terms of soundness)

In order to make the Plan sound it is recommended that Paragraphs 4.29 and 4.32, Point 5 of Policy 6, the first bullet point of Policy 7, and the fourteenth bullet point of Policy 7, are modified with the appropriate evidence to support the assertions, or deleted accordingly.

(Continue on a separate sheet/expand box if necessary)

7. If your representation is seeking a modification to the plan, do you consider it necessary to participate in examination hearing session(s)?

No , I do not wish to participate in hearing session(s)	X	Yes , I wish to participate in hearing session(s)
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8. If you wish to participate in the hearing session(s), please outline why you consider this to be necessary:

The issue of whether a link road is required, and if so the type of link road, is likely to be complex and technical and may be better suited to a hearing.

(Continue on a separate sheet/ expand box if necessary)

Please note the Inspector will determine the most appropriate procedure to adopt to hear those who have indicated that they wish to participate in hearing session(s). You may be asked to confirm your wish to participate when the Inspector has identified the matters and issues for examination.

9. Do you wish to be notified of any of the following?

Please tick all that apply.

The submission of the Wiltshire Local Plan Review for Independent Examination	X
The publication of the report of the Inspector appointed to carry out the examination	X
The adoption of the Local Plan Review	X

Please ensure that we have either an up-to-date email address or postal address at which we can contact you.

Signature:		Date:	
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Wiltshire Local Plan

Publication Stage Representation Form

Ref:	(For official use only)
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Part B – Please use a separate sheet for each representation.

Please note, in your representation you should provide succinctly all the evidence and supporting information necessary to support your representation and your suggested modification(s). You should not assume that you will have a further opportunity to make submissions.

After this stage, further submissions may only be made if invited by the Inspector, based on the matters and issues he or she identifies for examination.

3. To which part of the Wiltshire Local Plan does this representation relate?

Policy: 6	Paragraph:	Table:	Figure:
Site:		Other:	

4. Do you consider the Wiltshire Local Plan is:

(i) Legally compliant	Yes:	X	No:	
(ii) Sound	Yes:		No:	X
(iii) Complies with the duty to co-operate	Yes:	X	No:	
<i>Please indicate with an 'X' as appropriate</i>				

4b. If you think the Wiltshire Local Plan is not sound, please indicate the reason(s) why:

(1) Not positively prepared	X
(2) Not justified	X
(3) Not effective	
(4) Not consistent with national policy	X
<i>Please indicate with an 'X' as appropriate</i>	

See separate statement of representation procedure (guidance note) for further information on 'soundness'.

5. Please give details of why you consider the Wiltshire Local Plan is not legally compliant or is unsound or fails to comply with the duty to co-operate. Please be as precise as possible. If you wish to support the legal compliance or soundness of the Wiltshire Local Plan or its compliance with the duty to co-operate, please also use this box to set out your comments.

Housing Need in Chippenham

The latest household projection-based estimate of need in the Wiltshire Local Housing Needs Assessment advises of the need for a total of 25,455 new homes in Wiltshire over the Plan Period. This is notably less than the 36,738 figure generated using the standard method. The Town Council considers the latest household projection-based estimate of need to be more reflective of Wiltshire's true housing needs and would prefer this to be starting point used to calculate housing need in Chippenham.

The Town Council also notes that the Written Ministerial Statement from Michael Gove of December 2022 states that an amended method for calculating housing need will be introduced, within a revised NPPF, currently expected before the end of 2023. This new housing method will be advisory. The Town Council recommends that if this new housing method is introduced a figure of housing need should be generated using this new approach in preference to the existing standard method.

If the Inspector considers that there is no possibility of using an alternative to the standard method to best calculate housing need in Wiltshire then the comments below are based on the housing figures generated via this method and which are set out in the current version of the Plan.

Site Allocation Housing Figure

Policy 6 sets out a site allocation for housing in Chippenham of 2525 dwellings. This would be significantly more than the 2090 residual homes required for the Plan period. Paragraph 65 of the Planning for Chippenham document justifies this by stating *'The overall amount of land earmarked for development will exceed residual requirements but will provide a good degree of contingency and flexibility, as well as a wider choice, to best ensure development needs are met.'*

The Town Council considers that a contingency, beyond the objectively assessed needs, is not positively prepared, fully justified and would not be consistent with national housing policy in Paragraphs 11(b), 20, 61, 66 and 119 of the NPPF. Accordingly, it recommends that the new housing figure for this site allocation be reduced to reflect that required during the Plan period only.

Windfall Allowance

Whilst the Town Council supports the inclusion of a windfall figure to be taken off the overall housing need figure, the figure of 930 dwellings grossly underrepresents the true windfall figure likely to come forward during the Plan period.

Firstly, the windfall figure of 930 dwellings does not include any windfall likely to come forward on major development sites (10 or more dwellings) across the county. Based on past evidence there are likely to be a number of major windfall sites that come forward over the Plan period and these should be included in the windfall allowance.

Secondly, the windfall allowance figure only includes small windfall sites (less than 10 dwellings) at seven 'constrained settlements'. By not including any small windfall sites at Chippenham, Trowbridge or other settlements this cannot give a true or accurate windfall allowance figure for Wiltshire. The Town Council considers this approach to be flawed, using settlements like Chippenham to provide a contingency.

The Town Council does not agree that providing windfall figures for each settlement (including both small and major sites) would constitute 'a one size fits all' approach because each settlement would have different windfall amounts, arguably give a good illustration as to how constrained each settlement actually is or is not. This approach of providing a windfall allowance figure for each settlement would be fair, transparent and more accurate than the current flawed approach. The windfall allowance figure should then be subtracted off the housing need figure to arrive at a more accurate 'residual requirement' for each settlement. At Chippenham the residual requirement figure of 2090 dwellings should be further reduced to take into account windfall allowance in Chippenham over the Plan period.

Expected Delivery on Brownfield Land

Paragraph 119 of the NPPF states that *'Planning policies and decisions should promote an effective use of land in meeting the need for homes and other uses, while safeguarding and improving the environment and ensuring safe and healthy living conditions. 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'.

Policy 6 provides a neighbourhood area designation of 200 homes for Chippenham. The figure of 200 homes does not appear to be justified by any quantitative evidence. Past windfall housing data for Chippenham is not published as supporting evidence, so it is difficult to understand how a figure of 200 homes has been arrived at. Whilst acknowledging that Chippenham may have less brownfield land available for housing development compared with other similar sized towns, there is likely to be a number of small and medium-sized brownfield sites which have either not been taken into account yet in the figures, or are likely to become available for housing during the Plan period. These include the following sites below which the Town Council are aware of.

- a) Where permission has been granted since 31 May 2023:
 - Former Technical School, Cocklebury Rd - 44 dwellings
 - 25 Rowden Hill – 3 dwellings
 - 1 Market Place – 7 dwellings
 - 56-57 Market Place, first floor – 3 dwellings
- b) Where a planning application is currently lodged:
 - Former Ambulance Station – 95 dwellings
 - 90-92 Wood Lane – 7 dwellings
 - Sir Audley Arms – 7 dwellings
- c) Where the site/building is vacant and which is likely to come forward for residential use during the Plan period:
 - Land next to Sadlers Mead Car Park – approx. 50 dwellings
 - Former Vauxhall Garage, A4 – approx. 15 dwellings
 - Leonara Care Home – approx. 25 dwellings
 - ATS, Cocklebury Rd – approx. 15 dwellings
 - Part of Wiltshire Tyres site, London Rd – approx. 15 dwellings
 - Pines Hotel, Marshfield Rd – approx. 20 dwellings
 - St Paul's House, Marshfield Rd – approx. 30 dwellings
 - 53 Rowden Hill – approx. 15 dwellings
 - 44-45 Market Place, first floor – approx. 6 dwellings

If the Bath Road Car Park/Bridge Centre site (where Wiltshire Council envisage 52 dwellings could be accommodated) and Emery Gate Shopping Centre site (where Wiltshire Council envisage 34 dwellings could be accommodated) are added to the above list then a total of at least approximately 443 dwellings are expected to be delivered on brownfield land over the Plan period. This is well in excess of the 200 dwellings expected in Chippenham on brownfield land during the Plan period.

The increase in dwellings to be accommodated on brownfield land in Chippenham during the Plan period should be subtracted from the overall housing need figure to arrive at a more accurate residual requirement figure for Chippenham. The resulting reduction in the housing figure for the site allocation on greenfield land would allow for the size of this site to be reduced accordingly, making for a more sustainable Plan, which gives priority to brownfield development over greenfield development in accordance with national policy at Paragraph 119 of the NPPF.

Summary

Both the site allocation housing figure, the residual requirement figure and the Neighbourhood Area Designation figure produced for Chippenham are not fully justified by supporting evidence and are not consistent with national policy in the NPPF for the reasons give above. The site allocation housing figure goes beyond Chippenham's objectively assessed needs and has not been positively prepared. Therefore Policy 6 is not considered to be sound.

If the standard housing method is to be pursued then the Town Council recommends that the site allocation housing figure should be reduced to more closely reflect the 'residual requirement'. The 'residual requirement' figure should then be further reduced by a) taking into account a windfall allowance figure for Chippenham over the Plan period, and b) the increased amount of brownfield land likely to come forward for residential development in Chippenham over the Plan period.

(Continue on a separate sheet/expand box if necessary)

5a. If you wish to make a separate representation, relating to legal compliance, soundness or the duty to cooperate in relation to the accompanying Sustainability Appraisal (SA), please make them here.

(Continue on a separate sheet/expand box if necessary)

6. Please set out the modification(s) you consider necessary to make the Wiltshire Local Plan legally compliant and sound, in respect of any legal compliance or soundness matters you have identified at 5 above. (Please note that non-compliance with the duty to co-operate is incapable of modification at examination). You will need to say why each modification will make the Wiltshire Local Plan legally compliant or sound. It will be helpful if you are able to put forward your suggested revised wording of any policy or text. Please be as precise as possible.

If the Inspector is minded to support the use of the standard method for calculating housing need, then it is recommended that the number of dwellings for the new site allocation in the second bullet point of Policy 6 should be reduced to a figure which:

- a) More closely reflects the residual housing required for Chippenham over the Plan period;
- b) Minus a windfall allowance figure for Chippenham
- c) Minus the additional homes expected on brownfield land in Chippenham over the Plan period

This would ensure that the Plan is sound.

(Continue on a separate sheet/expand box if necessary)

7. If your representation is seeking a modification to the plan, do you consider it necessary to participate in examination hearing session(s)?

No , I do not wish to participate in hearing session(s)	X	Yes , I wish to participate in hearing session(s)
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8. If you wish to participate in the hearing session(s), please outline why you consider this to be necessary:

The issue of housing needs in Chippenham may not be straight forward enough topic to be dealt with adequately through written reps.

(Continue on a separate sheet/ expand box if necessary)

Please note the Inspector will determine the most appropriate procedure to adopt to hear those who have indicated that they wish to participate in hearing session(s). You may be asked to confirm your wish to participate when the Inspector has identified the matters and issues for examination.

9. Do you wish to be notified of any of the following?

Please tick all that apply.

The submission of the Wiltshire Local Plan Review for Independent Examination	X
The publication of the report of the Inspector appointed to carry out the examination	X
The adoption of the Local Plan Review	X

Please ensure that we have either an up-to-date email address or postal address at which we can contact you.

Signature:		Date:	
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Wiltshire Local Plan

Publication Stage Representation Form

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Part B – Please use a separate sheet for each representation.

Please note, in your representation you should provide succinctly all the evidence and supporting information necessary to support your representation and your suggested modification(s). You should not assume that you will have a further opportunity to make submissions.

After this stage, further submissions may only be made if invited by the Inspector, based on the matters and issues he or she identifies for examination.

3. To which part of the Wiltshire Local Plan does this representation relate?

Policy:	Paragraph:	Table:	Figure: 4.1
Site:		Other:	

4. Do you consider the Wiltshire Local Plan is:

(i) Legally compliant	Yes:	X	No:	
(ii) Sound	Yes:		No:	X
(iii) Complies with the duty to co-operate	Yes:	X	No:	
<i>Please indicate with an 'X' as appropriate</i>				

4b. If you think the Wiltshire Local Plan is not sound, please indicate the reason(s) why:

(1) Not positively prepared	
(2) Not justified	
(3) Not effective	X
(4) Not consistent with national policy	
<i>Please indicate with an 'X' as appropriate</i>	

See separate statement of representation procedure (guidance note) for further information on 'soundness'.

5. Please give details of why you consider the Wiltshire Local Plan is not legally compliant or is unsound or fails to comply with the duty to co-operate. Please be as precise as possible. If you wish to support the legal compliance or soundness of the Wiltshire Local Plan or its compliance with the duty to co-operate, please also use this box to set out your comments.

The settlement boundary for Chippenham should be updated to accurately reflect the new areas of housing which have now been built and occupied, principally at Hunters Moon and Birds Marsh estates. Policies 1 and 2 of the Wiltshire Local Plan will not be effective if the settlement boundary for Chippenham is not accurate and areas of housing are deemed to be 'countryside' in policy terms because they are located outside the settlement boundary.

(Continue on a separate sheet/expand box if necessary)

5a. If you wish to make a separate representation, relating to legal compliance, soundness or the duty to cooperate in relation to the accompanying Sustainability Appraisal (SA), please make them here.

(Continue on a separate sheet/expand box if necessary)

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In order to make the Plan sound the settlement boundary for Chippenham should be adjusted to reflect the new areas of housing which have now been built and occupied, principally at Hunters Moon and Birds Marsh estates.

(Continue on a separate sheet/expand box if necessary)

7. If your representation is seeking a modification to the plan, do you consider it necessary to participate in examination hearing session(s)?

X	No , I do not wish to participate in hearing session(s)		Yes , I wish to participate in hearing session(s)
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8. If you wish to participate in the hearing session(s), please outline why you consider this to be necessary:

(Continue on a separate sheet/ expand box if necessary)

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9. Do you wish to be notified of any of the following?

Please tick all that apply.

The submission of the Wiltshire Local Plan Review for Independent Examination	X
The publication of the report of the Inspector appointed to carry out the examination	X
The adoption of the Local Plan Review	X

Please ensure that we have either an up-to-date email address or postal address at which we can contact you.

Signature:		Date:	
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Wiltshire Local Plan

Publication Stage Representation Form

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Part B – Please use a separate sheet for each representation.

Please note, in your representation you should provide succinctly all the evidence and supporting information necessary to support your representation and your suggested modification(s). You should not assume that you will have a further opportunity to make submissions.

After this stage, further submissions may only be made if invited by the Inspector, based on the matters and issues he or she identifies for examination.

3. To which part of the Wiltshire Local Plan does this representation relate?

Policy: 7	Paragraph:	Table:	Figure:
Site:	Other:		

4. Do you consider the Wiltshire Local Plan is:

(i) Legally compliant	Yes:	X	No:	
(ii) Sound	Yes:		No:	X
(iii) Complies with the duty to co-operate	Yes:	X	No:	
<i>Please indicate with an 'X' as appropriate</i>				

4b. If you think the Wiltshire Local Plan is not sound, please indicate the reason(s) why:

(1) Not positively prepared	X
(2) Not justified	X
(3) Not effective	
(4) Not consistent with national policy	X
<i>Please indicate with an 'X' as appropriate</i>	

See separate statement of representation procedure (guidance note) for further information on 'soundness'.

5. Please give details of why you consider the Wiltshire Local Plan is not legally compliant or is unsound or fails to comply with the duty to co-operate. Please be as precise as possible. If you wish to support the legal compliance or soundness of the Wiltshire Local Plan or its compliance with the duty to co-operate, please also use this box to set out your comments.

Housing Need in Chippenham

The latest household projection-based estimate of need in the Wiltshire Local Housing Needs Assessment advises of the need for a total of 25,455 new homes in Wiltshire over the Plan Period. This is notably less than the 36,738 figure generated using the standard method. The Town Council considers the latest household projection-based estimate of need to be more reflective of Wiltshire's true housing needs and would prefer this to be starting point used to calculate housing need in Chippenham.

The Town Council also notes that the Written Ministerial Statement from Michael Gove of December 2022 states that an amended method for calculating housing need will be introduced, within a revised NPPF, currently expected before the end of 2023. This new housing method will be advisory. The Town Council recommends that if this new housing method is introduced a figure of housing need should be generated using this new approach in preference to the existing standard method.

If the Inspector considers that there is no possibility of using an alternative to the standard method to best calculate housing need in Wiltshire then the comments below are based on the housing figures generated via this method and which are set out in the current version of the Plan.

Site Allocation Housing Figure

Policy 7 sets out a new site allocation for housing in Chippenham of 2525 dwellings. This would be significantly more than the 2090 residual homes required for the Plan period. Paragraph 65 of the Planning for Chippenham document justifies this by stating '*The overall amount of land earmarked for development will exceed residual requirements but will provide a good degree of contingency and flexibility, as well as a wider choice, to best ensure development needs are met.*'

The Town Council considers that a contingency, beyond the objectively assessed needs, is not positively prepared, fully justified and would not be consistent with national housing policy in Paragraphs 11(b), 20, 61, 66 and 119 of the NPPF. Accordingly, it recommends that the new allocation housing figure be reduced to reflect that required during the Plan period only.

Windfall Allowance and Delivery on Brownfield Land

Please refer to the Town Council's representations made to Policy 6 which justifies why it considers the residual housing requirement for Chippenham should be further reduced from 2090 dwellings in order to reflect both a windfall allowance for Chippenham and an increase in brownfield residential development in Chippenham during the Plan period. The reduction in residual housing requirement provides further justification for reducing the site allocation housing figure accordingly to meet the objectively assessed housing needs for Chippenham over the Plan period.

Summary

If the standard housing method is to be pursued then the Town Council recommends that the site allocation housing figure should be reduced to more closely reflect the 'residual requirement'. The 'residual requirement' figure should then be further reduced by a) taking into account a windfall allowance figure for Chippenham over the Plan period, and b) the increased amount of brownfield land likely to come forward for residential development in Chippenham over the Plan period.

The site allocation housing figure is not fully justified by supporting evidence and is not consistent with national policy in the NPPF for the reasons given above. It goes beyond Chippenham's objectively assessed needs and has not been positively prepared. Therefore Policy 7 is not considered to be sound.

The reduction in the site allocation housing figure would allow for the size of this site, on greenfield land, to be reduced accordingly, making for a more sustainable Plan, which gives priority to brownfield development over greenfield development in accordance with national policy for delivering development on brownfield land first at Paragraph 119 of the NPPF.

A reduced housing figure for this new site allocation would likely affect the list of infrastructure and mitigation requirements accordingly. For example a new link road may not be necessary.

(Continue on a separate sheet/expand box if necessary)

5a. If you wish to make a separate representation, relating to legal compliance, soundness or the duty to cooperate in relation to the accompanying Sustainability Appraisal (SA), please make them here.

(Continue on a separate sheet/expand box if necessary)

6. Please set out the modification(s) you consider necessary to make the Wiltshire Local Plan legally compliant and sound, in respect of any legal compliance or soundness matters you have identified at 5 above. (Please note that non-compliance with the duty to co-operate is incapable of modification at examination). You will need to say why each modification will make the Wiltshire Local Plan legally compliant or sound. It will be helpful if you are able to put forward your suggested revised wording of any policy or text. Please be as precise as possible.

If the Inspector is minded to support the use of the standard method for calculating housing need, then in order to make the Plan sound it is recommended that the site allocation housing figure referred to in Policy 7 should be reduced to a figure which more closely reflects the residual housing required for Chippenham over the Plan period. The size of the site allocation should also be reduced accordingly.

(Continue on a separate sheet/expand box if necessary)

7. If your representation is seeking a modification to the plan, do you consider it necessary to participate in examination hearing session(s)?

No , I do not wish to participate in hearing session(s)	X	Yes , I wish to participate in hearing session(s)
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8. If you wish to participate in the hearing session(s), please outline why you consider this to be necessary:

The issue of housing needs in Chippenham and the site allocation may not be straight forward enough topic to be dealt with adequately through written reps.

(Continue on a separate sheet/ expand box if necessary)

Please note the Inspector will determine the most appropriate procedure to adopt to hear those who have indicated that they wish to participate in hearing session(s). You may be asked to confirm your wish to participate when the Inspector has identified the matters and issues for examination.

9. Do you wish to be notified of any of the following?

Please tick all that apply.

The submission of the Wiltshire Local Plan Review for Independent Examination	X
The publication of the report of the Inspector appointed to carry out the examination	X
The adoption of the Local Plan Review	X

Please ensure that we have either an up-to-date email address or postal address at which we can contact you.

Signature:		Date:	
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Wiltshire Local Plan

Publication Stage Representation Form

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Part B – Please use a separate sheet for each representation.

Please note, in your representation you should provide succinctly all the evidence and supporting information necessary to support your representation and your suggested modification(s). You should not assume that you will have a further opportunity to make submissions.

After this stage, further submissions may only be made if invited by the Inspector, based on the matters and issues he or she identifies for examination.

3. To which part of the Wiltshire Local Plan does this representation relate?

Policy: 7	Paragraph: 4.31-4.33	Table:	Figure: 4.2
Site:		Other:	

4. Do you consider the Wiltshire Local Plan is:

(i) Legally compliant	Yes:	X	No:	
(ii) Sound	Yes:		No:	X
(iii) Complies with the duty to co-operate	Yes:	X	No:	
<i>Please indicate with an 'X' as appropriate</i>				

4b. If you think the Wiltshire Local Plan is not sound, please indicate the reason(s) why:

(1) Not positively prepared	X
(2) Not justified	X
(3) Not effective	
(4) Not consistent with national policy	X
<i>Please indicate with an 'X' as appropriate</i>	

See separate statement of representation procedure (guidance note) for further information on 'soundness'.

5. Please give details of why you consider the Wiltshire Local Plan is not legally compliant or is unsound or fails to comply with the duty to co-operate. Please be as precise as possible. If you wish to support the legal compliance or soundness of the Wiltshire Local Plan or its compliance with the duty to co-operate, please also use this box to set out your comments.

The Town Council considers that the concept plan at Figure 4.2 is not justified by a robust and credible evidence base considering the level of detail shown, which is akin to a masterplan rather than a strategic concept plan.

There are no references in Paragraphs 4.31-4.33 or Policy 7 to the concept plan having been, or any future masterplan having to be, designed in accordance with either the draft Wiltshire Design Guide or the draft Chippenham Neighbourhood Plan, including the Chippenham Design Guide. For example the Chippenham Design Guide contains design principles for new communities which includes provision of a main park at the local centre. The concept plan does not align with this.

Unlike the Chippenham Design Guide, which has already been consulted upon and is therefore material, there is no evidence of local community participation, and others having a stake in the area, being involved in the design of the concept plan. The Town Council has tried hard to engage with Wiltshire Council/Future Chippenham on the design of the site allocation but has not been included in any meaningful dialogue regarding the design outcomes proposed. There is a danger that the concept plan will be used as a base for any future masterplan without there having been any participation from the local community in its design and the Plan is not considered to be justified in this respect.

There is no robust evidence base to explain the rationale and design choices of the concept plan, taking into consideration existing site constraints and the findings of any environmental/ecological/landscape visual impact assessments. For example, the concept plan shows that future residential development would be located within only 44m of the Wilts & Berks Canal. This is a reduction in buffer width from 100m to the Canal in the previous iteration of the concept plan at Regulation 18 yet without any explanation as to why the buffer has been reduced. The draft Chippenham Neighbourhood Plan (Policy G13) identifies the Wilts and Berks Canal as a 'Strategic Green Corridor' – a key route for the movement of wildlife. Without any environmental/ecological assessment evidence to clarify what may be an appropriate green buffer width to the Canal, the nearness of residential uses has the potential to have a significant impact upon the wildlife that uses this Corridor through increased noise, artificial light, air and water pollution, and the enjoyment of people using this Canal Corridor as a walking and cycling route through the countryside.

Of particular concern is the fact that the concept plan includes areas of development for the 'Next Plan Period'. It does not specify what uses would be accommodated in these areas, but it is assumed by the colour shading that this would be additional housing. In order for the Plan to be positively prepared and justified these areas should not be shown. The boundaries of the site allocation should be reduced accordingly in size to reflect the area where development is proposed to be delivered to meet the objectively assessed needs identified for Chippenham during the Plan period only.

The concept plan for the Regulation 18 Wiltshire Local Plan indicated possible renewable energy sites. These have been omitted from the Regulation 19 version of the concept plan without any explanation. Paragraph 155 (b) of the NPPF explains that plans should consider identifying suitable areas for renewable and low carbon energy sources, and supporting infrastructure where this would help secure their development. It is expected that a new urban extension as proposed under this site allocation should be identifying such suitable areas for renewable energy and the concept plan is therefore not in accordance with national policy in creating sustainable new urban extensions.

(Continue on a separate sheet/expand box if necessary)

5a. If you wish to make a separate representation, relating to legal compliance, soundness or the duty to cooperate in relation to the accompanying Sustainability Appraisal (SA), please make them here.

(Continue on a separate sheet/expand box if necessary)

6. Please set out the modification(s) you consider necessary to make the Wiltshire Local Plan legally compliant and sound, in respect of any legal compliance or soundness matters you have identified at 5 above. (Please note that non-compliance with the duty to co-operate is incapable of modification at examination). You will need to say why each modification will make the Wiltshire Local Plan legally compliant or sound. It will be helpful if you are able to put forward your suggested revised wording of any policy or text. Please be as precise as possible.

In order to make the Plan sound, the concept plan should be omitted or simplified due to a lack of robust and credible evidence for underpinning such a detailed concept plan, and lack of any community input in to its design.

The boundaries of the site allocation, as shown on the concept plan, should be adjusted to meet the objectively assessed needs for the Plan period only.

A requirement should be added to the second paragraph of Policy 7 that any future masterplan takes account of the Chippenham Neighbourhood Plan (including the Chippenham Design Guide) and the Wiltshire Design Guide and is agreed through a process of public consultation with the local community, including with the Town Council, in advance of any planning applications being submitted.

(Continue on a separate sheet/expand box if necessary)

7. If your representation is seeking a modification to the plan, do you consider it necessary to participate in examination hearing session(s)?

No , I do not wish to participate in hearing session(s)	X	Yes , I wish to participate in hearing session(s)
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8. If you wish to participate in the hearing session(s), please outline why you consider this to be necessary:

There are a number of different issues and failings with the Concept Plan, which would be best explored at a hearing.

(Continue on a separate sheet/ expand box if necessary)

Please note the Inspector will determine the most appropriate procedure to adopt to hear those who have indicated that they wish to participate in hearing session(s). You may be asked to confirm your wish to participate when the Inspector has identified the matters and issues for examination.

9. Do you wish to be notified of any of the following?

Please tick all that apply.

The submission of the Wiltshire Local Plan Review for Independent Examination	X
The publication of the report of the Inspector appointed to carry out the examination	X
The adoption of the Local Plan Review	X

Please ensure that we have either an up-to-date email address or postal address at which we can contact you.

Signature:		Date:	
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Wiltshire Local Plan

Publication Stage Representation Form

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Part B – Please use a separate sheet for each representation.

Please note, in your representation you should provide succinctly all the evidence and supporting information necessary to support your representation and your suggested modification(s). You should not assume that you will have a further opportunity to make submissions.

After this stage, further submissions may only be made if invited by the Inspector, based on the matters and issues he or she identifies for examination.

3. To which part of the Wiltshire Local Plan does this representation relate?

Policy:	Paragraph:4.38	Table:	Figure:
Site:	Other:		

4. Do you consider the Wiltshire Local Plan is:

(i) Legally compliant	Yes:	X	No:	
(ii) Sound	Yes:		No:	X
(iii) Complies with the duty to co-operate	Yes:	X	No:	
<i>Please indicate with an 'X' as appropriate</i>				

4b. If you think the Wiltshire Local Plan is not sound, please indicate the reason(s) why:

(1) Not positively prepared	
(2) Not justified	X
(3) Not effective	X
(4) Not consistent with national policy	
<i>Please indicate with an 'X' as appropriate</i>	

See separate statement of representation procedure (guidance note) for further information on 'soundness'.

5. Please give details of why you consider the Wiltshire Local Plan is not legally compliant or is unsound or fails to comply with the duty to co-operate. Please be as precise as possible. If you wish to support the legal compliance or soundness of the Wiltshire Local Plan or its compliance with the duty to co-operate, please also use this box to set out your comments.

Paragraph 4.38 is not justified because it does not make any reference to evidence or support for the independent sector in Chippenham in relation to comparison goods. According to the latest evidence from Springboard (July 2023) around 50% of retailers in the town centre are independent and it is considered important to recognise this.

Paragraph 4.38 does not recognise the renaissance of independent businesses on New Road and Union Road and the formation of the Town Quarters, even though they are shown on Figure 4.3.

Place Shaping Priority 2 of Policy 6 states: *'Development at Chippenham will ensure the town centre will be a vibrant meeting place for the community to shop, interact and enjoy their leisure time, and a visitor destination in its own right by:*

servng as a centre for sub-regional public services; and retaining a mix of national traders and attracting independent traders whose presence will embed its Market Town character'.

Place Shaping Priority 2 will not be effective unless the independent sector is acknowledged and supported in Paragraph 4.38.

Paragraph 4.38 should be made sound by reflecting the importance of the independent sector, with up to date evidence.

(Continue on a separate sheet/expand box if necessary)

5a. If you wish to make a separate representation, relating to legal compliance, soundness or the duty to cooperate in relation to the accompanying Sustainability Appraisal (SA), please make them here.

(Continue on a separate sheet/expand box if necessary)

6. Please set out the modification(s) you consider necessary to make the Wiltshire Local Plan legally compliant and sound, in respect of any legal compliance or soundness matters you have identified at 5 above. (Please note that non-compliance with the duty to co-operate is incapable of modification at examination). You will need to say why each modification will make the Wiltshire Local Plan legally compliant or sound. It will be helpful if you are able to put forward your suggested revised wording of any policy or text. Please be as precise as possible.

In order to make Paragraph 4.38 sound, the importance of the independent sector for the future of Chippenham town centre should be acknowledged and supported. Reference should also be added to the Town Quarters and independent businesses on New Road and Union Road.

(Continue on a separate sheet/expand box if necessary)

7. If your representation is seeking a modification to the plan, do you consider it necessary to participate in examination hearing session(s)?

X	No , I do not wish to participate in hearing session(s)		Yes , I wish to participate in hearing session(s)
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8. If you wish to participate in the hearing session(s), please outline why you consider this to be necessary:

(Continue on a separate sheet/ expand box if necessary)

Please note the Inspector will determine the most appropriate procedure to adopt to hear those who have indicated that they wish to participate in hearing session(s). You may be asked to confirm your wish to participate when the Inspector has identified the matters and issues for examination.

9. Do you wish to be notified of any of the following?

Please tick all that apply.

The submission of the Wiltshire Local Plan Review for Independent Examination	X
The publication of the report of the Inspector appointed to carry out the examination	X
The adoption of the Local Plan Review	X

Please ensure that we have either an up-to-date email address or postal address at which we can contact you.

Signature:		Date:	
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Wiltshire Local Plan

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Part B – Please use a separate sheet for each representation.

Please note, in your representation you should provide succinctly all the evidence and supporting information necessary to support your representation and your suggested modification(s). You should not assume that you will have a further opportunity to make submissions.

After this stage, further submissions may only be made if invited by the Inspector, based on the matters and issues he or she identifies for examination.

3. To which part of the Wiltshire Local Plan does this representation relate?

Policy:	Paragraph:4.39	Table:	Figure:
Site:	Other:		

4. Do you consider the Wiltshire Local Plan is:

(i) Legally compliant	Yes:	X	No:	
(ii) Sound	Yes:		No:	X
(iii) Complies with the duty to co-operate	Yes:	X	No:	
<i>Please indicate with an 'X' as appropriate</i>				

4b. If you think the Wiltshire Local Plan is not sound, please indicate the reason(s) why:

(1) Not positively prepared	
(2) Not justified	X
(3) Not effective	
(4) Not consistent with national policy	
<i>Please indicate with an 'X' as appropriate</i>	

See separate statement of representation procedure (guidance note) for further information on 'soundness'.

5. Please give details of why you consider the Wiltshire Local Plan is not legally compliant or is unsound or fails to comply with the duty to co-operate. Please be as precise as possible. If you wish to support the legal compliance or soundness of the Wiltshire Local Plan or its compliance with the duty to co-operate, please also use this box to set out your comments.

Paragraph 4.39 does not make any reference to the evidence for a mixed use scheme for the Bath Road Car Park/Bridge Centre Site, which comes from the evidence base collected in order to inform the Draft Chippenham Neighbourhood Plan and from Wiltshire Council's own 'Market Assessment; Bridge Centre, Bath Road, Chippenham by Cushman & Wakefield, 2019'. In addition, Para. 4.30 does not refer to the parameters plan for this site which forms the basis for Policy TC1 of the Neighbourhood Plan. Reference to the evidence base is required in order to make Paragraph 4.39 justified and therefore sound.

(Continue on a separate sheet/expand box if necessary)

5a. If you wish to make a separate representation, relating to legal compliance, soundness or the duty to cooperate in relation to the accompanying Sustainability Appraisal (SA), please make them here.

(Continue on a separate sheet/expand box if necessary)

6. Please set out the modification(s) you consider necessary to make the Wiltshire Local Plan legally compliant and sound, in respect of any legal compliance or soundness matters you have identified at 5 above. (Please note that non-compliance with the duty to co-operate is incapable of modification at examination). You will need to say why each modification will make the Wiltshire Local Plan legally compliant or sound. It will be helpful if you are able to put forward your suggested revised wording of any policy or text. Please be as precise as possible.

In order to make Paragraph 4.39 sound, reference should be made to the Draft Chippenham Neighbourhood Plan evidence base for a mixed use scheme at the Bath Road Car Park/Bridge Centre Site. The Neighbourhood Plan's parameters plan for the site's development should also be cross-referenced.

(Continue on a separate sheet/expand box if necessary)

7. If your representation is seeking a modification to the plan, do you consider it necessary to participate in examination hearing session(s)?

X	No , I do not wish to participate in hearing session(s)	Yes , I wish to participate in hearing session(s)
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8. If you wish to participate in the hearing session(s), please outline why you consider this to be necessary:

(Continue on a separate sheet/ expand box if necessary)

Please note the Inspector will determine the most appropriate procedure to adopt to hear those who have indicated that they wish to participate in hearing session(s). You may be asked to confirm your wish to participate when the Inspector has identified the matters and issues for examination.

9. Do you wish to be notified of any of the following?

Please tick all that apply.

The submission of the Wiltshire Local Plan Review for Independent Examination	X
The publication of the report of the Inspector appointed to carry out the examination	X
The adoption of the Local Plan Review	X

Please ensure that we have either an up-to-date email address or postal address at which we can contact you.

Signature:		Date:	
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Wiltshire Local Plan

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Part B – Please use a separate sheet for each representation.

Please note, in your representation you should provide succinctly all the evidence and supporting information necessary to support your representation and your suggested modification(s). You should not assume that you will have a further opportunity to make submissions.

After this stage, further submissions may only be made if invited by the Inspector, based on the matters and issues he or she identifies for examination.

3. To which part of the Wiltshire Local Plan does this representation relate?

Policy:	Paragraph:4.41	Table:	Figure:
Site:	Other:		

4. Do you consider the Wiltshire Local Plan is:

(i) Legally compliant	Yes:	X	No:	
(ii) Sound	Yes:		No:	X
(iii) Complies with the duty to co-operate	Yes:	X	No:	
<i>Please indicate with an 'X' as appropriate</i>				

4b. If you think the Wiltshire Local Plan is not sound, please indicate the reason(s) why:

(1) Not positively prepared	
(2) Not justified	
(3) Not effective	X
(4) Not consistent with national policy	
<i>Please indicate with an 'X' as appropriate</i>	

See separate statement of representation procedure (guidance note) for further information on 'soundness'.

5. Please give details of why you consider the Wiltshire Local Plan is not legally compliant or is unsound or fails to comply with the duty to co-operate. Please be as precise as possible. If you wish to support the legal compliance or soundness of the Wiltshire Local Plan or its compliance with the duty to co-operate, please also use this box to set out your comments.

Paragraph 4.41 states ‘Other changes to the town centre include making it a more pleasant space for people by reducing the dominance of cars, providing more seating and using different paving surfaces and planting.’ This appears to be referencing the draft Chippenham Neighbourhood Plan’s proposals for the Upper Market Place (set out in Policy TC3 and the accompanying parameters plan). However, there is no reference to this, even though the Upper Market Place is specifically identified in Figure 4.3 and not referred to anywhere else in the Plan. In order to make Paragraph 4.41 effective reference should be made to the Upper Market Place proposals.

(Continue on a separate sheet/expand box if necessary)

5a. If you wish to make a separate representation, relating to legal compliance, soundness or the duty to cooperate in relation to the accompanying Sustainability Appraisal (SA), please make them here.

(Continue on a separate sheet/expand box if necessary)

6. Please set out the modification(s) you consider necessary to make the Wiltshire Local Plan legally compliant and sound, in respect of any legal compliance or soundness matters you have identified at 5 above. (Please note that non-compliance with the duty to co-operate is incapable of modification at examination). You will need to say why each modification will make the Wiltshire Local Plan legally compliant or sound. It will be helpful if you are able to put forward your suggested revised wording of any policy or text. Please be as precise as possible.

In order to make Paragraph 4.41 effective, and therefore sound, the following modification is suggested:

4.41 Other changes to the town centre include making it a more pleasant space for people by reducing the dominance of cars, providing more seating and using different paving surfaces and planting, for example at the Upper Market Place as per the proposals in the Chippenham Neighbourhood Plan.

(Continue on a separate sheet/expand box if necessary)

7. If your representation is seeking a modification to the plan, do you consider it necessary to participate in examination hearing session(s)?

X	No , I do not wish to participate in hearing session(s)		Yes , I wish to participate in hearing session(s)
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8. If you wish to participate in the hearing session(s), please outline why you consider this to be necessary:

(Continue on a separate sheet/ expand box if necessary)

Please note the Inspector will determine the most appropriate procedure to adopt to hear those who have indicated that they wish to participate in hearing session(s). You may be asked to confirm your wish to participate when the Inspector has identified the matters and issues for examination.

9. Do you wish to be notified of any of the following?

Please tick all that apply.

The submission of the Wiltshire Local Plan Review for Independent Examination	X
The publication of the report of the Inspector appointed to carry out the examination	X
The adoption of the Local Plan Review	X

Please ensure that we have either an up-to-date email address or postal address at which we can contact you.

Signature:		Date:	
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Wiltshire Local Plan

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Part B – Please use a separate sheet for each representation.

Please note, in your representation you should provide succinctly all the evidence and supporting information necessary to support your representation and your suggested modification(s). You should not assume that you will have a further opportunity to make submissions.

After this stage, further submissions may only be made if invited by the Inspector, based on the matters and issues he or she identifies for examination.

3. To which part of the Wiltshire Local Plan does this representation relate?

Policy:	Paragraph:4.42	Table:	Figure:
Site:	Other:		

4. Do you consider the Wiltshire Local Plan is:

(i) Legally compliant	Yes:	X	No:	
(ii) Sound	Yes:		No:	X
(iii) Complies with the duty to co-operate	Yes:	X	No:	
<i>Please indicate with an 'X' as appropriate</i>				

4b. If you think the Wiltshire Local Plan is not sound, please indicate the reason(s) why:

(1) Not positively prepared	
(2) Not justified	X
(3) Not effective	X
(4) Not consistent with national policy	
<i>Please indicate with an 'X' as appropriate</i>	

See separate statement of representation procedure (guidance note) for further information on 'soundness'.

5. Please give details of why you consider the Wiltshire Local Plan is not legally compliant or is unsound or fails to comply with the duty to co-operate. Please be as precise as possible. If you wish to support the legal compliance or soundness of the Wiltshire Local Plan or its compliance with the duty to co-operate, please also use this box to set out your comments.

Paragraph 4.42 makes reference to the riverfront area including Monkton Park *'which could be adapted to allow for more leisure activities on the riverfront'* It is considered that this statement is too vague and does not have an evidence base. There is a danger that under the current wording inappropriate 'leisure activities' may be supported on part of the riverfront where this is not appropriate, for example because of environmental, ecological or heritage impacts.

The draft Chippenham Neighbourhood Plan has a masterplan for the River-Green Corridor at Policy TC2 which sets out more specifically those areas of the riverfront which may be acceptable for retail and leisure, this being at Island Park. Paragraph 4.42 should therefore either be deleted or made more specific to align with the Neighbourhood Plan's proposals and its evidence base so that the Plan is justified and effective.

(Continue on a separate sheet/expand box if necessary)

5a. If you wish to make a separate representation, relating to legal compliance, soundness or the duty to cooperate in relation to the accompanying Sustainability Appraisal (SA), please make them here.

(Continue on a separate sheet/expand box if necessary)

6. Please set out the modification(s) you consider necessary to make the Wiltshire Local Plan legally compliant and sound, in respect of any legal compliance or soundness matters you have identified at 5 above. (Please note that non-compliance with the duty to co-operate is incapable of modification at examination). You will need to say why each modification will make the Wiltshire Local Plan legally compliant or sound. It will be helpful if you are able to put forward your suggested revised wording of any policy or text. Please be as precise as possible.

In order to make the Plan sound it is recommended that Paragraph 4.42 either be deleted, or be modified to be more specific about the types of leisure activities that may be acceptable and in which parts of the riverfront in accordance with the proposals in the Chippenham Neighbourhood Plan.

(Continue on a separate sheet/expand box if necessary)

7. If your representation is seeking a modification to the plan, do you consider it necessary to participate in examination hearing session(s)?

X	No , I do not wish to participate in hearing session(s)	Yes , I wish to participate in hearing session(s)
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8. If you wish to participate in the hearing session(s), please outline why you consider this to be necessary:

<p><i>(Continue on a separate sheet/ expand box if necessary)</i></p>
<p><i>Please note the Inspector will determine the most appropriate procedure to adopt to hear those who have indicated that they wish to participate in hearing session(s). You may be asked to confirm your wish to participate when the Inspector has identified the matters and issues for examination.</i></p>

9. Do you wish to be notified of any of the following?

Please tick all that apply.

The submission of the Wiltshire Local Plan Review for Independent Examination	X
The publication of the report of the Inspector appointed to carry out the examination	X
The adoption of the Local Plan Review	X

Please ensure that we have either an up-to-date email address or postal address at which we can contact you.

Signature:		Date:	
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Wiltshire Local Plan

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Part B – Please use a separate sheet for each representation.

Please note, in your representation you should provide succinctly all the evidence and supporting information necessary to support your representation and your suggested modification(s). You should not assume that you will have a further opportunity to make submissions.

After this stage, further submissions may only be made if invited by the Inspector, based on the matters and issues he or she identifies for examination.

3. To which part of the Wiltshire Local Plan does this representation relate?

Policy:	Paragraph:	Table:	Figure: 4.3 & E2
Site:		Other: Appendix E	

4. Do you consider the Wiltshire Local Plan is:

(i) Legally compliant	Yes:	X	No:	
(ii) Sound	Yes:		No:	X
(iii) Complies with the duty to co-operate	Yes:	X	No:	
<i>Please indicate with an 'X' as appropriate</i>				

4b. If you think the Wiltshire Local Plan is not sound, please indicate the reason(s) why:

(1) Not positively prepared	
(2) Not justified	
(3) Not effective	X
(4) Not consistent with national policy	
<i>Please indicate with an 'X' as appropriate</i>	

See separate statement of representation procedure (guidance note) for further information on 'soundness'.

5. Please give details of why you consider the Wiltshire Local Plan is not legally compliant or is unsound or fails to comply with the duty to co-operate. Please be as precise as possible. If you wish to support the legal compliance or soundness of the Wiltshire Local Plan or its compliance with the duty to co-operate, please also use this box to set out your comments.

The first paragraph of Policy 8 is welcomed and supported. This explains:
'Proposals which contribute to the delivery of a thriving, vibrant and prosperous town centre will be supported. Significant development proposals within the town centre should contribute to its regeneration and repurposing to support its role as a resilient service centre and a primary location for services and facilities to meet the day to day needs of communities in north Wiltshire.'

However, the Town Council does not consider that the Primary Shopping Area, as shown on Figure 4.3 and Figure E2 in Appendix E, adequately reflects the vitality and viability of the present town centre nor that of a town centre which should continue to grow as long as the town continues to grow, in order to be able to meet the needs of its residents.

The regular Town Team surveys that have been undertaken over the last few years demonstrate that streets that are just outside of the existing designated Primary Shopping Area, these being Upper & Lower Market Place, Timber Street, Union Road, Old Road and Upper New Road contain many independent businesses which contribute significantly to the vibrancy and sustainability of the town centre. Units on these streets are more affordable than those on the High Street and are therefore attractive to the independent and 'start-up' sector, which help widen retail choice in the town centre. The Town Council considers that these streets should also be included in the Primary Shopping Area.

The current southern boundary of the Primary Shopping Area as proposed makes little sense, cutting right across the Lower Market Place (for example not including those Class E units at Nos. 12-14 which front on to the Lower Market Place), whilst also not including the many Class E uses which front on to the Upper Market Place, a key area where town centre public realm improvements are being proposed in the Chippenham Neighbourhood Plan (Policy TC3) in order to try and regenerate the area and attract increased footfall and vibrancy.

There is a direct link from Chippenham Railway Station to Upper New Road, Union Road and Old Road which makes independent units in the Artisan Quarter easily accessible to tourists and shoppers visiting the town centre.

With our changing shopping needs over the next 15 years an expanded Primary Shopping Area would additionally support Chippenham's role to provide a resilient service centre and a primary location for services and facilities to meet the day to day needs of communities in north Wiltshire. Results from the town Quarters Survey carried out by the Town Team (June – Oct 2023) show that 55% of the Artisan Quarter are independents, 55% of the River and Rail Quarter are independents, 53% of the Heritage Quarter are independents, yet only 19% of the High Street Quarter are independents. If the Primary Shopping Area is not widened out to recognise the aforementioned areas which support independent stores this could have a negative impact on future retail choice and availability in Chippenham.

It is considered that the Primary Shopping Area as currently identified on Figures 4.2 and E2 would not be effective in delivering a thriving, vibrant and prosperous town centre, and would therefore be unsound.

(Continue on a separate sheet/expand box if necessary)

5a. If you wish to make a separate representation, relating to legal compliance, soundness or the duty to cooperate in relation to the accompanying Sustainability Appraisal (SA), please make them here.

(Continue on a separate sheet/expand box if necessary)

6. Please set out the modification(s) you consider necessary to make the Wiltshire Local Plan legally compliant and sound, in respect of any legal compliance or soundness matters you have identified at 5 above. (Please note that non-compliance with the duty to co-operate is incapable of modification at examination). You will need to say why each modification will make the Wiltshire Local Plan legally

compliant or sound. It will be helpful if you are able to put forward your suggested revised wording of any policy or text. Please be as precise as possible.

In order to make the Plan sound, the Primary Shopping Area in Figure 4.3 and E2 should be expanded to the north and south to include Upper & Lower Market Places, Timber Street, Union Road, Old Road and Upper New Road.

(Continue on a separate sheet/expand box if necessary)

7. If your representation is seeking a modification to the plan, do you consider it necessary to participate in examination hearing session(s)?

X	No , I do not wish to participate in hearing session(s)		Yes , I wish to participate in hearing session(s)
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8. If you wish to participate in the hearing session(s), please outline why you consider this to be necessary:

There are a number of different issues and failings with the Concept Plan, which would be best explored at a hearing.

(Continue on a separate sheet/ expand box if necessary)

Please note the Inspector will determine the most appropriate procedure to adopt to hear those who have indicated that they wish to participate in hearing session(s). You may be asked to confirm your wish to participate when the Inspector has identified the matters and issues for examination.

9. Do you wish to be notified of any of the following?

Please tick all that apply.

The submission of the Wiltshire Local Plan Review for Independent Examination	X
The publication of the report of the Inspector appointed to carry out the examination	X
The adoption of the Local Plan Review	X

Please ensure that we have either an up-to-date email address or postal address at which we can contact you.

Signature:		Date:	
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Wiltshire Local Plan

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Part B – Please use a separate sheet for each representation.

Please note, in your representation you should provide succinctly all the evidence and supporting information necessary to support your representation and your suggested modification(s). You should not assume that you will have a further opportunity to make submissions.

After this stage, further submissions may only be made if invited by the Inspector, based on the matters and issues he or she identifies for examination.

3. To which part of the Wiltshire Local Plan does this representation relate?

Policy: 8	Paragraph:	Table:	Figure: 4.3
Site:	Other:		

4. Do you consider the Wiltshire Local Plan is:

(i) Legally compliant	Yes:	X	No:	
(ii) Sound	Yes:		No:	X
(iii) Complies with the duty to co-operate	Yes:	X	No:	
<i>Please indicate with an 'X' as appropriate</i>				

4b. If you think the Wiltshire Local Plan is not sound, please indicate the reason(s) why:

(1) Not positively prepared	
(2) Not justified	X
(3) Not effective	X
(4) Not consistent with national policy	
<i>Please indicate with an 'X' as appropriate</i>	

See separate statement of representation procedure (guidance note) for further information on 'soundness'.

5. Please give details of why you consider the Wiltshire Local Plan is not legally compliant or is unsound or fails to comply with the duty to co-operate. Please be as precise as possible. If you wish to support the legal compliance or soundness of the Wiltshire Local Plan or its compliance with the duty to co-operate, please also use this box to set out your comments.

The Town Council welcomes several aspects of Policy 8, which include:

- Support for Policy 8 in particular on pedestrian links to the town centre and River Avon corridor improvement and reviewing Bath Road car park so as to open up development opportunities for the site.
- Support for reviewing car parking requirements at Emery Gate Car Parks where this could open Island Park frontage development opportunities.
- Support for improved pedestrian and cycling links to/from the railway station, nearby residential areas and the town centre.

However, with any redevelopment of Emery Gate Shopping Centre due weight should be given to protecting and enhancing Island Park in accordance with Policy 93 (Green and blue infrastructure) and the Chippenham Neighbourhood Plan Policies GI3 (Green Corridors) and TC2 (River-Green Corridor Masterplan) which recognise the River Avon as important for the movement of wildlife. For Policy 8 to be effective in protecting and enhancing this green corridor it is recommended that the wording of bullet points 3 and 5 under 'Emery Gate Shopping Centre' heading be added to, with caveat that any redevelopment is sympathetic to the existing environment and recognises, and seeks to protect and enhance, the special characteristics of Island Park.

Chippenham railway station and Cocklebury Road area

The Town Council considers that the sentence '*Proposals for further inward business investment in this area, as identified on the Policies Map, will be supported*' is too vague and would not be effective (what type of investment is being proposed and where?). In addition, it is not justified because there does not appear to be an evidence base for this.

The Policies Map at Figure 4.3 shows 'Chippenham railway station and Cocklebury Road area' as a geographically large 'inward business investment' area covering multiple uses at the Olympiad, Old College, History Centre etc. It is not clear how inward business investment in this area would sit alongside existing uses in this area such as leisure uses at the Olympiad (which need to be retained and are referenced as being retained in the draft Chippenham Neighbourhood Plan, Policy TC2); Wiltshire College (expansion needs); the History Centre; residential premises on Market Mead, Nos. 6-8 Monkton Hill (Grade II Listed properties) and Nos. 2-4 Cocklebury Road; existing car parks (what are the parking requirements in this area? which car parks are required and which could be developed upon?); the Chippenham Conservation Area; and Monkton Park; nor how it would sit alongside adjoining uses at Sadlers Mead Retirement Home (recent planning permission) or other existing residential areas including the former Cattle Market estate.

(Continue on a separate sheet/expand box if necessary)

5a. If you wish to make a separate representation, relating to legal compliance, soundness or the duty to cooperate in relation to the accompanying Sustainability Appraisal (SA), please make them here.

(Continue on a separate sheet/expand box if necessary)

6. Please set out the modification(s) you consider necessary to make the Wiltshire Local Plan legally compliant and sound, in respect of any legal compliance or soundness matters you have identified at 5 above. (Please note that non-compliance with the duty to co-operate is incapable of modification at examination). You will need to say why each modification will make the Wiltshire Local Plan legally compliant or sound. It will be helpful if you are able to put forward your suggested revised wording of any policy or text. Please be as precise as possible.

In order to make the Plan sound it is recommended that:

- a) Additional wording be added to bullet point 3 under the 'Emery Gate Shopping Centre' heading to read '*active frontage onto the River Avon is maximised, **whilst being sympathetic to the existing environment and seeking to protect and enhance the special characteristics of Island Park***'
- b) Additional wording be added to bullet point 5 under the 'Emery Gate Shopping Centre' heading to read '*a review is carried out of car parking requirements at the Emery Gate Car Parks to consolidate that use where possible and open up development opportunities on the site, **whilst being sympathetic to the existing environment and seeking to protect and enhance the special characteristics of Island Park***'
- c) Either the section of Policy 8 referring to 'Chippenham railway station and Cocklebury Road area' is deleted, or it is modified to be more specific about what inward business investment would look like, and on which sites this may be acceptable.
- d) The boundary of the 'Chippenham railway station and Cocklebury Road area', as shown on Figure 4.3, should be modified accordingly to include only those individual sites where 'inward business investment' may be acceptable, rather than a large area which includes residential properties.

(Continue on a separate sheet/expand box if necessary)

7. If your representation is seeking a modification to the plan, do you consider it necessary to participate in examination hearing session(s)?

X	No , I do not wish to participate in hearing session(s)		Yes , I wish to participate in hearing session(s)
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8. If you wish to participate in the hearing session(s), please outline why you consider this to be necessary:

(Continue on a separate sheet/ expand box if necessary)

Please note the Inspector will determine the most appropriate procedure to adopt to hear those who have indicated that they wish to participate in hearing session(s). You may be asked to confirm your wish to participate when the Inspector has identified the matters and issues for examination.

9. Do you wish to be notified of any of the following?

Please tick all that apply.

The submission of the Wiltshire Local Plan Review for Independent Examination	X
The publication of the report of the Inspector appointed to carry out the examination	X
The adoption of the Local Plan Review	X

Please ensure that we have either an up-to-date email address or postal address at which we can contact you.

Signature:		Date:	
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Part B – Please use a separate sheet for each representation.

Please note, in your representation you should provide succinctly all the evidence and supporting information necessary to support your representation and your suggested modification(s). You should not assume that you will have a further opportunity to make submissions.

After this stage, further submissions may only be made if invited by the Inspector, based on the matters and issues he or she identifies for examination.

3. To which part of the Wiltshire Local Plan does this representation relate?

Policy: 70	Paragraph:	Table:	Figure:
Site:	Other:		

4. Do you consider the Wiltshire Local Plan is:

(i) Legally compliant	Yes:	X	No:	
(ii) Sound	Yes:		No:	X
(iii) Complies with the duty to co-operate	Yes:	X	No:	
<i>Please indicate with an 'X' as appropriate</i>				

4b. If you think the Wiltshire Local Plan is not sound, please indicate the reason(s) why:

(1) Not positively prepared	
(2) Not justified	
(3) Not effective	X
(4) Not consistent with national policy	
<i>Please indicate with an 'X' as appropriate</i>	

See separate statement of representation procedure (guidance note) for further information on 'soundness'.

5. Please give details of why you consider the Wiltshire Local Plan is not legally compliant or is unsound or fails to comply with the duty to co-operate. Please be as precise as possible. If you wish to support the legal compliance or soundness of the Wiltshire Local Plan or its compliance with the duty to co-operate, please also use this box to set out your comments.

The Town Council is generally supportive of Policy 70. However, it considers the Policy would be more effective (from a soundness perspective) if it included objective targets for the modal share of short journeys on foot and bike and set out the new strategic infrastructure needed to achieve this level of modal shift.

(Continue on a separate sheet/expand box if necessary)

5a. If you wish to make a separate representation, relating to legal compliance, soundness or the duty to cooperate in relation to the accompanying Sustainability Appraisal (SA), please make them here.

(Continue on a separate sheet/expand box if necessary)

6. Please set out the modification(s) you consider necessary to make the Wiltshire Local Plan legally compliant and sound, in respect of any legal compliance or soundness matters you have identified at 5 above. (Please note that non-compliance with the duty to co-operate is incapable of modification at examination). You will need to say why each modification will make the Wiltshire Local Plan legally compliant or sound. It will be helpful if you are able to put forward your suggested revised wording of any policy or text. Please be as precise as possible.

In order for the Plan to be sound Policy 70 should be modified to include objective targets for the modal share of short journeys on foot and bike and it should set out the new strategic infrastructure needed to achieve this level of modal shift.

(Continue on a separate sheet/expand box if necessary)

7. If your representation is seeking a modification to the plan, do you consider it necessary to participate in examination hearing session(s)?

X	No , I do not wish to participate in hearing session(s)		Yes , I wish to participate in hearing session(s)
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8. If you wish to participate in the hearing session(s), please outline why you consider this to be necessary:

(Continue on a separate sheet/ expand box if necessary)

Please note the Inspector will determine the most appropriate procedure to adopt to hear those who have indicated that they wish to participate in hearing session(s). You may be asked to confirm your wish to participate when the Inspector has identified the matters and issues for examination.

9. Do you wish to be notified of any of the following?

Please tick all that apply.

The submission of the Wiltshire Local Plan Review for Independent Examination	X
The publication of the report of the Inspector appointed to carry out the examination	X
The adoption of the Local Plan Review	X

Please ensure that we have either an up-to-date email address or postal address at which we can contact you.

Signature:		Date:	
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Part B – Please use a separate sheet for each representation.

Please note, in your representation you should provide succinctly all the evidence and supporting information necessary to support your representation and your suggested modification(s). You should not assume that you will have a further opportunity to make submissions.

After this stage, further submissions may only be made if invited by the Inspector, based on the matters and issues he or she identifies for examination.

3. To which part of the Wiltshire Local Plan does this representation relate?

Policy: 71	Paragraph:	Table:	Figure:
Site:	Other:		

4. Do you consider the Wiltshire Local Plan is:

(i) Legally compliant	Yes:	X	No:	
(ii) Sound	Yes:		No:	X
(iii) Complies with the duty to co-operate	Yes:	X	No:	
<i>Please indicate with an 'X' as appropriate</i>				

4b. If you think the Wiltshire Local Plan is not sound, please indicate the reason(s) why:

(1) Not positively prepared	X
(2) Not justified	X
(3) Not effective	X
(4) Not consistent with national policy	X
<i>Please indicate with an 'X' as appropriate</i>	

See separate statement of representation procedure (guidance note) for further information on 'soundness'.

5. Please give details of why you consider the Wiltshire Local Plan is not legally compliant or is unsound or fails to comply with the duty to co-operate. Please be as precise as possible. If you wish to support the legal compliance or soundness of the Wiltshire Local Plan or its compliance with the duty to co-operate, please also use this box to set out your comments.

Policy 71 states *'In urban areas, new development will be supported where users can access a choice of sustainable transport modes and opportunities are provided to make improvements.'*

The Town Council considers that simply 'supporting' new development where users can access sustainable transport modes rather than 'requiring' new development where users can access these modes would mean Policy 71 is not effective. It does not go far enough to ensure that new developments would provide sustainable transport infrastructure such as new or enhanced cycle paths or pedestrian routes, without which new development will continue to be designed with a car-first approach. Current major housing development in Chippenham is still being designed around the car, with any pedestrian and cycle infrastructure being of a limited nature. A much bolder policy intention is required in order to ensure an effective shift to sustainable transport modes.

The Policy as currently written would not be consistent with national policy at Paragraph 112(a) of the NPPF which requires that *'applications for development should give priority first to pedestrian and cycle movements, both within the scheme and with neighbouring areas...'* Policy 61 of the Wiltshire Core Strategy sets out a hierarchy of transport users, where 'private cars' are located at the bottom of the hierarchy. Yet, this list of transport users has been repeated in Policy 71 without any reference being made to a hierarchy or preference, in effect ensuring that each transport user is given equal consideration. Policy 71 is therefore weaker than existing Local Plan policy on designing for sustainable transport modes.

Paragraph 106(b) of the NPPF states *'Planning policies should be prepared with the active involvement of local highways authorities, other transport infrastructure providers and operators and neighbouring councils, so that strategies and investments for supporting sustainable transport and development patterns are aligned.'* Wiltshire Council's existing Local Transport Plan 3 is many years old and Policy 71 is not justified by having the relevant, up to date, supporting evidence on sustainable transport, which an aligned Local Transport Plan and adopted Local Walking and Cycling Infrastructure Plan (LCWIP) would have. Nor is the Policy positively prepared because it is not known whether it meets the area's objectively assessed needs given there is not an up to date Local Transport Plan or adopted LCWIP to underpin it. In the absence of evidence it is not known how developers are meant to understand what Wiltshire's transport requirements are.

Finally, it is recommended that reference should be made in Policy 71 to the provision of safe and inclusive active travel infrastructure as this will be key to any modal shift. In terms of cycle infrastructure, the Plan is currently not consistent with national policy guidance in that developers could provide cycle infrastructure that does not reflect national guidance in LTN 1/20 on current best practice, standards and legal requirements for cycle infrastructure. It is recommended that reference to cycle infrastructure being designed in accordance with LTN 1/20 is explicitly stated.

(Continue on a separate sheet/expand box if necessary)

5a. If you wish to make a separate representation, relating to legal compliance, soundness or the duty to cooperate in relation to the accompanying Sustainability Appraisal (SA), please make them here.

(Continue on a separate sheet/expand box if necessary)

6. Please set out the modification(s) you consider necessary to make the Wiltshire Local Plan legally compliant and sound, in respect of any legal compliance or soundness matters you have identified at 5 above. (Please note that non-compliance with the duty to co-operate is incapable of modification at examination). You will need to say why each modification will make the Wiltshire Local Plan legally compliant or sound. It will be helpful if you are able to put forward your suggested revised wording of any policy or text. Please be as precise as possible.

The following modifications are proposed in order to make Policy 71 sound:

a) Modify the first sentence to require sustainable transport infrastructure in new development:

*'In urban areas, **major** new development will be supported where users can access a choice of required to demonstrate that it has been designed with sustainable transport modes being given preference over private vehicles and opportunities are provided to make improvements to the existing active travel and public transport infrastructure.'*

b) Modify the list of users to set out a hierarchy of users, with more vulnerable users and more sustainable modes (walking, cycling and public transport) considered ahead of private car users and freight.

c) Add reference to the provision of safe and inclusive active travel infrastructure and that new cycle infrastructure be designed in accordance with LTN 1/20.

(Continue on a separate sheet/expand box if necessary)

7. If your representation is seeking a modification to the plan, do you consider it necessary to participate in examination hearing session(s)?

No , I do not wish to participate in hearing session(s)	X	Yes , I wish to participate in hearing session(s)
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8. If you wish to participate in the hearing session(s), please outline why you consider this to be necessary:

The Town Council considers sustainable transport to be an important topic and wishes to be involved in any discussions that might best be dealt with by way of a hearing.

(Continue on a separate sheet/ expand box if necessary)

Please note the Inspector will determine the most appropriate procedure to adopt to hear those who have indicated that they wish to participate in hearing session(s). You may be asked to confirm your wish to participate when the Inspector has identified the matters and issues for examination.

9. Do you wish to be notified of any of the following?

Please tick all that apply.

The submission of the Wiltshire Local Plan Review for Independent Examination	X
The publication of the report of the Inspector appointed to carry out the examination	X
The adoption of the Local Plan Review	X

Please ensure that we have either an up-to-date email address or postal address at which we can contact you.

Signature:		Date:	
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Wiltshire Local Plan

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Part B – Please use a separate sheet for each representation.

Please note, in your representation you should provide succinctly all the evidence and supporting information necessary to support your representation and your suggested modification(s). You should not assume that you will have a further opportunity to make submissions.

After this stage, further submissions may only be made if invited by the Inspector, based on the matters and issues he or she identifies for examination.

3. To which part of the Wiltshire Local Plan does this representation relate?

Policy: 76	Paragraph:	Table:	Figure:
Site:	Other:		

4. Do you consider the Wiltshire Local Plan is:

(i) Legally compliant	Yes:	X	No:	
(ii) Sound	Yes:	X	No:	
(iii) Complies with the duty to co-operate	Yes:	X	No:	
<i>Please indicate with an 'X' as appropriate</i>				

4b. If you think the Wiltshire Local Plan is not sound, please indicate the reason(s) why:

(1) Not positively prepared	
(2) Not justified	
(3) Not effective	
(4) Not consistent with national policy	
<i>Please indicate with an 'X' as appropriate</i>	

See separate statement of representation procedure (guidance note) for further information on 'soundness'.

5. Please give details of why you consider the Wiltshire Local Plan is not legally compliant or is unsound or fails to comply with the duty to co-operate. Please be as precise as possible. If you wish to support the legal compliance or soundness of the Wiltshire Local Plan or its compliance with the duty to co-operate, please also use this box to set out your comments.

The Town Council supports Policy 76 which sets an affordable housing provision of at least 40% on development sites of 10 or more houses in Chippenham. Work on our own Neighbourhood Plan demonstrated that in most circumstances this would be viable and deliverable in Chippenham.

(Continue on a separate sheet/expand box if necessary)

5a. If you wish to make a separate representation, relating to legal compliance, soundness or the duty to cooperate in relation to the accompanying Sustainability Appraisal (SA), please make them here.

(Continue on a separate sheet/expand box if necessary)

6. Please set out the modification(s) you consider necessary to make the Wiltshire Local Plan legally compliant and sound, in respect of any legal compliance or soundness matters you have identified at 5 above. (Please note that non-compliance with the duty to co-operate is incapable of modification at examination). You will need to say why each modification will make the Wiltshire Local Plan legally compliant or sound. It will be helpful if you are able to put forward your suggested revised wording of any policy or text. Please be as precise as possible.

(Continue on a separate sheet/expand box if necessary)

7. If your representation is seeking a modification to the plan, do you consider it necessary to participate in examination hearing session(s)?

X	No , I do not wish to participate in hearing session(s)		Yes , I wish to participate in hearing session(s)
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8. If you wish to participate in the hearing session(s), please outline why you consider this to be necessary:

(Continue on a separate sheet/ expand box if necessary)

Please note the Inspector will determine the most appropriate procedure to adopt to hear those who have indicated that they wish to participate in hearing session(s). You may be asked to confirm your wish to participate when the Inspector has identified the matters and issues for examination.

9. Do you wish to be notified of any of the following?

Please tick all that apply.

The submission of the Wiltshire Local Plan Review for Independent Examination	X
The publication of the report of the Inspector appointed to carry out the examination	X
The adoption of the Local Plan Review	X

Please ensure that we have either an up-to-date email address or postal address at which we can contact you.

Signature:		Date:	
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Wiltshire Local Plan

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Part B – Please use a separate sheet for each representation.

Please note, in your representation you should provide succinctly all the evidence and supporting information necessary to support your representation and your suggested modification(s). You should not assume that you will have a further opportunity to make submissions.

After this stage, further submissions may only be made if invited by the Inspector, based on the matters and issues he or she identifies for examination.

3. To which part of the Wiltshire Local Plan does this representation relate?

Policy: 81	Paragraph:	Table:	Figure:
Site:		Other:	

4. Do you consider the Wiltshire Local Plan is:

(i) Legally compliant	Yes:	X	No:	
(ii) Sound	Yes:	X	No:	
(iii) Complies with the duty to co-operate	Yes:	X	No:	
<i>Please indicate with an 'X' as appropriate</i>				

4b. If you think the Wiltshire Local Plan is not sound, please indicate the reason(s) why:

(1) Not positively prepared	
(2) Not justified	
(3) Not effective	
(4) Not consistent with national policy	
<i>Please indicate with an 'X' as appropriate</i>	

See separate statement of representation procedure (guidance note) for further information on 'soundness'.

5. Please give details of why you consider the Wiltshire Local Plan is not legally compliant or is unsound or fails to comply with the duty to co-operate. Please be as precise as possible. If you wish to support the legal compliance or soundness of the Wiltshire Local Plan or its compliance with the duty to co-operate, please also use this box to set out your comments.

The Town Council welcomes and supports Policy 81 on Community Facilities which recognises the importance of protecting existing community facilities at risk of being lost, and the importance of providing new facilities in new housing estates, which are essential for the success and cohesion of future communities in Chippenham.

(Continue on a separate sheet/expand box if necessary)

5a. If you wish to make a separate representation, relating to legal compliance, soundness or the duty to cooperate in relation to the accompanying Sustainability Appraisal (SA), please make them here.

(Continue on a separate sheet/expand box if necessary)

6. Please set out the modification(s) you consider necessary to make the Wiltshire Local Plan legally compliant and sound, in respect of any legal compliance or soundness matters you have identified at 5 above. (Please note that non-compliance with the duty to co-operate is incapable of modification at examination). You will need to say why each modification will make the Wiltshire Local Plan legally compliant or sound. It will be helpful if you are able to put forward your suggested revised wording of any policy or text. Please be as precise as possible.

(Continue on a separate sheet/expand box if necessary)

7. If your representation is seeking a modification to the plan, do you consider it necessary to participate in examination hearing session(s)?

X	No , I do not wish to participate in hearing session(s)		Yes , I wish to participate in hearing session(s)
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8. If you wish to participate in the hearing session(s), please outline why you consider this to be necessary:

(Continue on a separate sheet/ expand box if necessary)

Please note the Inspector will determine the most appropriate procedure to adopt to hear those who have indicated that they wish to participate in hearing session(s). You may be asked to confirm your wish to participate when the Inspector has identified the matters and issues for examination.

9. Do you wish to be notified of any of the following?

Please tick all that apply.

The submission of the Wiltshire Local Plan Review for Independent Examination	X
The publication of the report of the Inspector appointed to carry out the examination	X
The adoption of the Local Plan Review	X

Please ensure that we have either an up-to-date email address or postal address at which we can contact you.

Signature:		Date:	
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Part B – Please use a separate sheet for each representation.

Please note, in your representation you should provide succinctly all the evidence and supporting information necessary to support your representation and your suggested modification(s). You should not assume that you will have a further opportunity to make submissions.

After this stage, further submissions may only be made if invited by the Inspector, based on the matters and issues he or she identifies for examination.

3. To which part of the Wiltshire Local Plan does this representation relate?

Policy: 83	Paragraph:	Table:	Figure:
Site:		Other:	

4. Do you consider the Wiltshire Local Plan is:

(i) Legally compliant	Yes:	X	No:	
(ii) Sound	Yes:	X	No:	
(iii) Complies with the duty to co-operate	Yes:	X	No:	
<i>Please indicate with an 'X' as appropriate</i>				

4b. If you think the Wiltshire Local Plan is not sound, please indicate the reason(s) why:

(1) Not positively prepared	
(2) Not justified	
(3) Not effective	
(4) Not consistent with national policy	
<i>Please indicate with an 'X' as appropriate</i>	

See separate statement of representation procedure (guidance note) for further information on 'soundness'.

5. Please give details of why you consider the Wiltshire Local Plan is not legally compliant or is unsound or fails to comply with the duty to co-operate. Please be as precise as possible. If you wish to support the legal compliance or soundness of the Wiltshire Local Plan or its compliance with the duty to co-operate, please also use this box to set out your comments.

The Town Council supports Policy 83 on Health and Wellbeing, in particular the requirement for a Health Impact Assessment to be submitted on large schemes.

(Continue on a separate sheet/expand box if necessary)

5a. If you wish to make a separate representation, relating to legal compliance, soundness or the duty to cooperate in relation to the accompanying Sustainability Appraisal (SA), please make them here.

(Continue on a separate sheet/expand box if necessary)

6. Please set out the modification(s) you consider necessary to make the Wiltshire Local Plan legally compliant and sound, in respect of any legal compliance or soundness matters you have identified at 5 above. (Please note that non-compliance with the duty to co-operate is incapable of modification at examination). You will need to say why each modification will make the Wiltshire Local Plan legally compliant or sound. It will be helpful if you are able to put forward your suggested revised wording of any policy or text. Please be as precise as possible.

(Continue on a separate sheet/expand box if necessary)

7. If your representation is seeking a modification to the plan, do you consider it necessary to participate in examination hearing session(s)?

X	No , I do not wish to participate in hearing session(s)		Yes , I wish to participate in hearing session(s)
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8. If you wish to participate in the hearing session(s), please outline why you consider this to be necessary:

(Continue on a separate sheet/ expand box if necessary)

Please note the Inspector will determine the most appropriate procedure to adopt to hear those who have indicated that they wish to participate in hearing session(s). You may be asked to confirm your wish to participate when the Inspector has identified the matters and issues for examination.

9. Do you wish to be notified of any of the following?

Please tick all that apply.

The submission of the Wiltshire Local Plan Review for Independent Examination	X
The publication of the report of the Inspector appointed to carry out the examination	X
The adoption of the Local Plan Review	X

Please ensure that we have either an up-to-date email address or postal address at which we can contact you.

Signature:		Date:	
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Wiltshire Local Plan

Publication Stage Representation Form

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Part B – Please use a separate sheet for each representation.

Please note, in your representation you should provide succinctly all the evidence and supporting information necessary to support your representation and your suggested modification(s). You should not assume that you will have a further opportunity to make submissions.

After this stage, further submissions may only be made if invited by the Inspector, based on the matters and issues he or she identifies for examination.

3. To which part of the Wiltshire Local Plan does this representation relate?

Policy: 84	Paragraph:	Table:	Figure:
Site:	Other:		

4. Do you consider the Wiltshire Local Plan is:

(i) Legally compliant	Yes:	X	No:	
(ii) Sound	Yes:	X	No:	
(iii) Complies with the duty to co-operate	Yes:	X	No:	
<i>Please indicate with an 'X' as appropriate</i>				

4b. If you think the Wiltshire Local Plan is not sound, please indicate the reason(s) why:

(1) Not positively prepared	
(2) Not justified	
(3) Not effective	
(4) Not consistent with national policy	
<i>Please indicate with an 'X' as appropriate</i>	

See separate statement of representation procedure (guidance note) for further information on 'soundness'.

5. Please give details of why you consider the Wiltshire Local Plan is not legally compliant or is unsound or fails to comply with the duty to co-operate. Please be as precise as possible. If you wish to support the legal compliance or soundness of the Wiltshire Local Plan or its compliance with the duty to co-operate, please also use this box to set out your comments.

The Town Council supports Policy 84 on Public Open Space and Play Facilities, recognising the importance of providing for public open space and play facilities in major new development and supporting the requirement to provide an open space assessment where there are any adverse impacts upon the existing quantity, quality and accessibility of and to public open space as a result of development.

(Continue on a separate sheet/expand box if necessary)

5a. If you wish to make a separate representation, relating to legal compliance, soundness or the duty to cooperate in relation to the accompanying Sustainability Appraisal (SA), please make them here.

(Continue on a separate sheet/expand box if necessary)

6. Please set out the modification(s) you consider necessary to make the Wiltshire Local Plan legally compliant and sound, in respect of any legal compliance or soundness matters you have identified at 5 above. (Please note that non-compliance with the duty to co-operate is incapable of modification at examination). You will need to say why each modification will make the Wiltshire Local Plan legally compliant or sound. It will be helpful if you are able to put forward your suggested revised wording of any policy or text. Please be as precise as possible.

(Continue on a separate sheet/expand box if necessary)

7. If your representation is seeking a modification to the plan, do you consider it necessary to participate in examination hearing session(s)?

X	No , I do not wish to participate in hearing session(s)		Yes , I wish to participate in hearing session(s)
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8. If you wish to participate in the hearing session(s), please outline why you consider this to be necessary:

(Continue on a separate sheet/ expand box if necessary)

Please note the Inspector will determine the most appropriate procedure to adopt to hear those who have indicated that they wish to participate in hearing session(s). You may be asked to confirm your wish to participate when the Inspector has identified the matters and issues for examination.

9. Do you wish to be notified of any of the following?

Please tick all that apply.

The submission of the Wiltshire Local Plan Review for Independent Examination	X
The publication of the report of the Inspector appointed to carry out the examination	X
The adoption of the Local Plan Review	X

Please ensure that we have either an up-to-date email address or postal address at which we can contact you.

Signature:		Date:	
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Wiltshire Local Plan

Publication Stage Representation Form

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Part B – Please use a separate sheet for each representation.

Please note, in your representation you should provide succinctly all the evidence and supporting information necessary to support your representation and your suggested modification(s). You should not assume that you will have a further opportunity to make submissions.

After this stage, further submissions may only be made if invited by the Inspector, based on the matters and issues he or she identifies for examination.

3. To which part of the Wiltshire Local Plan does this representation relate?

Policy: 85	Paragraph:	Table:	Figure:
Site:		Other:	

4. Do you consider the Wiltshire Local Plan is:

(i) Legally compliant	Yes:	X	No:	
(ii) Sound	Yes:	X	No:	
(iii) Complies with the duty to co-operate	Yes:	X	No:	
<i>Please indicate with an 'X' as appropriate</i>				

4b. If you think the Wiltshire Local Plan is not sound, please indicate the reason(s) why:

(1) Not positively prepared	
(2) Not justified	
(3) Not effective	
(4) Not consistent with national policy	
<i>Please indicate with an 'X' as appropriate</i>	

See separate statement of representation procedure (guidance note) for further information on 'soundness'.

5. Please give details of why you consider the Wiltshire Local Plan is not legally compliant or is unsound or fails to comply with the duty to co-operate. Please be as precise as possible. If you wish to support the legal compliance or soundness of the Wiltshire Local Plan or its compliance with the duty to co-operate, please also use this box to set out your comments.

The Town Council welcomes and strongly supports Policy 85 which will help to ensure that new buildings are built to net zero carbon standards and meet the climate emergencies declared by Wiltshire Council and the Town Council. Policy 85 is excellent and replicates many of the features of the most ambitious zero carbon policies in the country, developed by Cornwall Council and Bath and North East Somerset Council. Policy 85 dovetails nicely with the draft Chippenham Neighbourhood Plan policy (SCC1) also seeking net zero carbon development, which an independent viability assessment carried out for the Neighbourhood Plan demonstrated would not make development unviable.

(Continue on a separate sheet/expand box if necessary)

5a. If you wish to make a separate representation, relating to legal compliance, soundness or the duty to cooperate in relation to the accompanying Sustainability Appraisal (SA), please make them here.

(Continue on a separate sheet/expand box if necessary)

6. Please set out the modification(s) you consider necessary to make the Wiltshire Local Plan legally compliant and sound, in respect of any legal compliance or soundness matters you have identified at 5 above. (Please note that non-compliance with the duty to co-operate is incapable of modification at examination). You will need to say why each modification will make the Wiltshire Local Plan legally compliant or sound. It will be helpful if you are able to put forward your suggested revised wording of any policy or text. Please be as precise as possible.

(Continue on a separate sheet/expand box if necessary)

7. If your representation is seeking a modification to the plan, do you consider it necessary to participate in examination hearing session(s)?

No , I do not wish to participate in hearing session(s)	X	Yes , I wish to participate in hearing session(s)
--	---	--

8. If you wish to participate in the hearing session(s), please outline why you consider this to be necessary:

We would like to support the LPA on this Policy in the face of what may be a number of developer objections. We have our own evidence base collected for our own net zero carbon policy (SCC1) in our Neighbourhood Plan and it would be useful to share this with the Inspector at any hearing.

(Continue on a separate sheet/ expand box if necessary)

Please note the Inspector will determine the most appropriate procedure to adopt to hear those who have indicated that they wish to participate in hearing session(s). You may be asked to confirm your wish to participate when the Inspector has identified the matters and issues for examination.

9. Do you wish to be notified of any of the following?

Please tick all that apply.

The submission of the Wiltshire Local Plan Review for Independent Examination	X
The publication of the report of the Inspector appointed to carry out the examination	X
The adoption of the Local Plan Review	X

Please ensure that we have either an up-to-date email address or postal address at which we can contact you.

Signature:		Date:	
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Wiltshire Local Plan

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Part B – Please use a separate sheet for each representation.

Please note, in your representation you should provide succinctly all the evidence and supporting information necessary to support your representation and your suggested modification(s). You should not assume that you will have a further opportunity to make submissions.

After this stage, further submissions may only be made if invited by the Inspector, based on the matters and issues he or she identifies for examination.

3. To which part of the Wiltshire Local Plan does this representation relate?

Policy: 87	Paragraph:	Table:	Figure:
Site:	Other:		

4. Do you consider the Wiltshire Local Plan is:

(i) Legally compliant	Yes:	X	No:	
(ii) Sound	Yes:	X	No:	
(iii) Complies with the duty to co-operate	Yes:	X	No:	
<i>Please indicate with an 'X' as appropriate</i>				

4b. If you think the Wiltshire Local Plan is not sound, please indicate the reason(s) why:

(1) Not positively prepared	
(2) Not justified	
(3) Not effective	
(4) Not consistent with national policy	
<i>Please indicate with an 'X' as appropriate</i>	

See separate statement of representation procedure (guidance note) for further information on 'soundness'.

5. Please give details of why you consider the Wiltshire Local Plan is not legally compliant or is unsound or fails to comply with the duty to co-operate. Please be as precise as possible. If you wish to support the legal compliance or soundness of the Wiltshire Local Plan or its compliance with the duty to co-operate, please also use this box to set out your comments.

The Town Council welcomes and supports Policy 87 on Embodied Carbon. The Local Plan is forward thinking by including such a policy which addresses embodied carbon emissions resulting from major developments within Wiltshire, and which can illustrate a complete picture of any development's carbon impact on the environment.

If possible, the Town Council considers that the wording of Policy 87 could be further improved by referencing support for applications that use innovative materials and design approaches that significantly reduce embodied carbon emissions.

(Continue on a separate sheet/expand box if necessary)

5a. If you wish to make a separate representation, relating to legal compliance, soundness or the duty to cooperate in relation to the accompanying Sustainability Appraisal (SA), please make them here.

(Continue on a separate sheet/expand box if necessary)

6. Please set out the modification(s) you consider necessary to make the Wiltshire Local Plan legally compliant and sound, in respect of any legal compliance or soundness matters you have identified at 5 above. (Please note that non-compliance with the duty to co-operate is incapable of modification at examination). You will need to say why each modification will make the Wiltshire Local Plan legally compliant or sound. It will be helpful if you are able to put forward your suggested revised wording of any policy or text. Please be as precise as possible.

(Continue on a separate sheet/expand box if necessary)

7. If your representation is seeking a modification to the plan, do you consider it necessary to participate in examination hearing session(s)?

X	No , I do not wish to participate in hearing session(s)		Yes , I wish to participate in hearing session(s)
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8. If you wish to participate in the hearing session(s), please outline why you consider this to be necessary:

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(Continue on a separate sheet/ expand box if necessary)

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9. Do you wish to be notified of any of the following?

Please tick all that apply.

The submission of the Wiltshire Local Plan Review for Independent Examination	X
The publication of the report of the Inspector appointed to carry out the examination	X
The adoption of the Local Plan Review	X

Please ensure that we have either an up-to-date email address or postal address at which we can contact you.

Signature:		Date:	
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Wiltshire Local Plan

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Part B – Please use a separate sheet for each representation.

Please note, in your representation you should provide succinctly all the evidence and supporting information necessary to support your representation and your suggested modification(s). You should not assume that you will have a further opportunity to make submissions.

After this stage, further submissions may only be made if invited by the Inspector, based on the matters and issues he or she identifies for examination.

3. To which part of the Wiltshire Local Plan does this representation relate?

Policy: 88	Paragraph:	Table:	Figure:
Site:	Other:		

4. Do you consider the Wiltshire Local Plan is:

(i) Legally compliant	Yes:	X	No:	
(ii) Sound	Yes:	X	No:	
(iii) Complies with the duty to co-operate	Yes:	X	No:	
<i>Please indicate with an 'X' as appropriate</i>				

4b. If you think the Wiltshire Local Plan is not sound, please indicate the reason(s) why:

(1) Not positively prepared	
(2) Not justified	
(3) Not effective	
(4) Not consistent with national policy	
<i>Please indicate with an 'X' as appropriate</i>	

See separate statement of representation procedure (guidance note) for further information on 'soundness'.

5. Please give details of why you consider the Wiltshire Local Plan is not legally compliant or is unsound or fails to comply with the duty to co-operate. Please be as precise as possible. If you wish to support the legal compliance or soundness of the Wiltshire Local Plan or its compliance with the duty to co-operate, please also use this box to set out your comments.

The Town Council welcome and supports Policy 88 on Biodiversity and Geodiversity, in particular the section on 'Biodiversity in the built environment' which would result in low cost, easy wins for biodiversity in new development and includes amongst other things the requirement for integral bird nest bricks (e.g., swift bricks) at a minimum of two per dwelling; provision of integrated bat boxes; provision of overhanging eaves suitable for nesting house martins, supplemented by the provision of nest cups; and hedgehog highways.

(Continue on a separate sheet/expand box if necessary)

5a. If you wish to make a separate representation, relating to legal compliance, soundness or the duty to cooperate in relation to the accompanying Sustainability Appraisal (SA), please make them here.

<i>(Continue on a separate sheet/expand box if necessary)</i>

6. Please set out the modification(s) you consider necessary to make the Wiltshire Local Plan legally compliant and sound, in respect of any legal compliance or soundness matters you have identified at 5 above. (Please note that non-compliance with the duty to co-operate is incapable of modification at examination). You will need to say why each modification will make the Wiltshire Local Plan legally compliant or sound. It will be helpful if you are able to put forward your suggested revised wording of any policy or text. Please be as precise as possible.

<i>(Continue on a separate sheet/expand box if necessary)</i>

7. If your representation is seeking a modification to the plan, do you consider it necessary to participate in examination hearing session(s)?

X	No, I do not wish to participate in hearing session(s)			Yes, I wish to participate in hearing session(s)
---	--	--	--	--

8. If you wish to participate in the hearing session(s), please outline why you consider this to be necessary:

<i>(Continue on a separate sheet/ expand box if necessary)</i>
<i>Please note the Inspector will determine the most appropriate procedure to adopt to hear those who have indicated that they wish to participate in hearing session(s). You may be asked to confirm your wish to participate when the Inspector has identified the matters and issues for examination.</i>

9. Do you wish to be notified of any of the following?

Please tick all that apply.

The submission of the Wiltshire Local Plan Review for Independent Examination	X
The publication of the report of the Inspector appointed to carry out the examination	X
The adoption of the Local Plan Review	X

Please ensure that we have either an up-to-date email address or postal address at which we can contact you.

Signature:		Date:	
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Wiltshire Local Plan

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Part B – Please use a separate sheet for each representation.

Please note, in your representation you should provide succinctly all the evidence and supporting information necessary to support your representation and your suggested modification(s). You should not assume that you will have a further opportunity to make submissions.

After this stage, further submissions may only be made if invited by the Inspector, based on the matters and issues he or she identifies for examination.

3. To which part of the Wiltshire Local Plan does this representation relate?

Policy: 89	Paragraph:	Table:	Figure:
Site:		Other:	

4. Do you consider the Wiltshire Local Plan is:

(i) Legally compliant	Yes:	X	No:	
(ii) Sound	Yes:	X	No:	
(iii) Complies with the duty to co-operate	Yes:	X	No:	
<i>Please indicate with an 'X' as appropriate</i>				

4b. If you think the Wiltshire Local Plan is not sound, please indicate the reason(s) why:

(1) Not positively prepared	
(2) Not justified	
(3) Not effective	
(4) Not consistent with national policy	
<i>Please indicate with an 'X' as appropriate</i>	

See separate statement of representation procedure (guidance note) for further information on 'soundness'.

5. Please give details of why you consider the Wiltshire Local Plan is not legally compliant or is unsound or fails to comply with the duty to co-operate. Please be as precise as possible. If you wish to support the legal compliance or soundness of the Wiltshire Local Plan or its compliance with the duty to co-operate, please also use this box to set out your comments.

The Town Council welcomes Policy 89 on Biodiversity Net Gain. In particular it strongly supports the requirement for development to achieve a minimum of 20% biodiversity net gain.

(Continue on a separate sheet/expand box if necessary)

5a. If you wish to make a separate representation, relating to legal compliance, soundness or the duty to cooperate in relation to the accompanying Sustainability Appraisal (SA), please make them here.

(Continue on a separate sheet/expand box if necessary)

6. Please set out the modification(s) you consider necessary to make the Wiltshire Local Plan legally compliant and sound, in respect of any legal compliance or soundness matters you have identified at 5 above. (Please note that non-compliance with the duty to co-operate is incapable of modification at examination). You will need to say why each modification will make the Wiltshire Local Plan legally compliant or sound. It will be helpful if you are able to put forward your suggested revised wording of any policy or text. Please be as precise as possible.

(Continue on a separate sheet/expand box if necessary)

7. If your representation is seeking a modification to the plan, do you consider it necessary to participate in examination hearing session(s)?

X	No , I do not wish to participate in hearing session(s)		Yes , I wish to participate in hearing session(s)
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8. If you wish to participate in the hearing session(s), please outline why you consider this to be necessary:

(Continue on a separate sheet/ expand box if necessary)

Please note the Inspector will determine the most appropriate procedure to adopt to hear those who have indicated that they wish to participate in hearing session(s). You may be asked to confirm your wish to participate when the Inspector has identified the matters and issues for examination.

9. Do you wish to be notified of any of the following?

Please tick all that apply.

The submission of the Wiltshire Local Plan Review for Independent Examination	X
The publication of the report of the Inspector appointed to carry out the examination	X
The adoption of the Local Plan Review	X

Please ensure that we have either an up-to-date email address or postal address at which we can contact you.

Signature:		Date:	
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Part B – Please use a separate sheet for each representation.

Please note, in your representation you should provide succinctly all the evidence and supporting information necessary to support your representation and your suggested modification(s). You should not assume that you will have a further opportunity to make submissions.

After this stage, further submissions may only be made if invited by the Inspector, based on the matters and issues he or she identifies for examination.

3. To which part of the Wiltshire Local Plan does this representation relate?

Policy: 90	Paragraph:	Table:	Figure:
Site:	Other:		

4. Do you consider the Wiltshire Local Plan is:

(i) Legally compliant	Yes:	X	No:	
(ii) Sound	Yes:	X	No:	
(iii) Complies with the duty to co-operate	Yes:	X	No:	
<i>Please indicate with an 'X' as appropriate</i>				

4b. If you think the Wiltshire Local Plan is not sound, please indicate the reason(s) why:

(1) Not positively prepared	
(2) Not justified	
(3) Not effective	
(4) Not consistent with national policy	
<i>Please indicate with an 'X' as appropriate</i>	

See separate statement of representation procedure (guidance note) for further information on 'soundness'.

5. Please give details of why you consider the Wiltshire Local Plan is not legally compliant or is unsound or fails to comply with the duty to co-operate. Please be as precise as possible. If you wish to support the legal compliance or soundness of the Wiltshire Local Plan or its compliance with the duty to co-operate, please also use this box to set out your comments.

The Town Council supports Policy 90 on Woodland, Hedgerows and Trees and welcomes the introduction of such a policy that raises the importance of retaining and enhancing existing woodland, trees and hedgerows which have a whole myriad of environmental, health and wellbeing benefits.

(Continue on a separate sheet/expand box if necessary)

5a. If you wish to make a separate representation, relating to legal compliance, soundness or the duty to cooperate in relation to the accompanying Sustainability Appraisal (SA), please make them here.

(Continue on a separate sheet/expand box if necessary)

6. Please set out the modification(s) you consider necessary to make the Wiltshire Local Plan legally compliant and sound, in respect of any legal compliance or soundness matters you have identified at 5 above. (Please note that non-compliance with the duty to co-operate is incapable of modification at examination). You will need to say why each modification will make the Wiltshire Local Plan legally compliant or sound. It will be helpful if you are able to put forward your suggested revised wording of any policy or text. Please be as precise as possible.

(Continue on a separate sheet/expand box if necessary)

7. If your representation is seeking a modification to the plan, do you consider it necessary to participate in examination hearing session(s)?

X	No , I do not wish to participate in hearing session(s)		Yes , I wish to participate in hearing session(s)
---	--	--	--

8. If you wish to participate in the hearing session(s), please outline why you consider this to be necessary:

(Continue on a separate sheet/ expand box if necessary)

Please note the Inspector will determine the most appropriate procedure to adopt to hear those who have indicated that they wish to participate in hearing session(s). You may be asked to confirm your wish to participate when the Inspector has identified the matters and issues for examination.

9. Do you wish to be notified of any of the following?

Please tick all that apply.

The submission of the Wiltshire Local Plan Review for Independent Examination	X
The publication of the report of the Inspector appointed to carry out the examination	X
The adoption of the Local Plan Review	X

Please ensure that we have either an up-to-date email address or postal address at which we can contact you.

Signature:		Date:	
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Part B – Please use a separate sheet for each representation.

Please note, in your representation you should provide succinctly all the evidence and supporting information necessary to support your representation and your suggested modification(s). You should not assume that you will have a further opportunity to make submissions.

After this stage, further submissions may only be made if invited by the Inspector, based on the matters and issues he or she identifies for examination.

3. To which part of the Wiltshire Local Plan does this representation relate?

Policy: 96	Paragraph:	Table:	Figure:
Site:	Other:		

4. Do you consider the Wiltshire Local Plan is:

(i) Legally compliant	Yes:	X	No:	
(ii) Sound	Yes:	X	No:	
(iii) Complies with the duty to co-operate	Yes:	X	No:	
<i>Please indicate with an 'X' as appropriate</i>				

4b. If you think the Wiltshire Local Plan is not sound, please indicate the reason(s) why:

(1) Not positively prepared	
(2) Not justified	
(3) Not effective	
(4) Not consistent with national policy	
<i>Please indicate with an 'X' as appropriate</i>	

See separate statement of representation procedure (guidance note) for further information on 'soundness'.

5. Please give details of why you consider the Wiltshire Local Plan is not legally compliant or is unsound or fails to comply with the duty to co-operate. Please be as precise as possible. If you wish to support the legal compliance or soundness of the Wiltshire Local Plan or its compliance with the duty to co-operate, please also use this box to set out your comments.

The Town Council welcomes and supports Policy 96 on Water Resources, which recognises Wiltshire has been identified as a 'seriously water stressed area'. It supports the water efficiency requirements of new development as set out in Policy 96.

(Continue on a separate sheet/expand box if necessary)

5a. If you wish to make a separate representation, relating to legal compliance, soundness or the duty to cooperate in relation to the accompanying Sustainability Appraisal (SA), please make them here.

(Continue on a separate sheet/expand box if necessary)

6. Please set out the modification(s) you consider necessary to make the Wiltshire Local Plan legally compliant and sound, in respect of any legal compliance or soundness matters you have identified at 5 above. (Please note that non-compliance with the duty to co-operate is incapable of modification at examination). You will need to say why each modification will make the Wiltshire Local Plan legally compliant or sound. It will be helpful if you are able to put forward your suggested revised wording of any policy or text. Please be as precise as possible.

(Continue on a separate sheet/expand box if necessary)

7. If your representation is seeking a modification to the plan, do you consider it necessary to participate in examination hearing session(s)?

X	No , I do not wish to participate in hearing session(s)		Yes , I wish to participate in hearing session(s)
---	--	--	--

8. If you wish to participate in the hearing session(s), please outline why you consider this to be necessary:

(Continue on a separate sheet/ expand box if necessary)

Please note the Inspector will determine the most appropriate procedure to adopt to hear those who have indicated that they wish to participate in hearing session(s). You may be asked to confirm your wish to participate when the Inspector has identified the matters and issues for examination.

9. Do you wish to be notified of any of the following?

Please tick all that apply.

The submission of the Wiltshire Local Plan Review for Independent Examination	X
The publication of the report of the Inspector appointed to carry out the examination	X
The adoption of the Local Plan Review	X

Please ensure that we have either an up-to-date email address or postal address at which we can contact you.

Signature:		Date:	
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Part B – Please use a separate sheet for each representation.

Please note, in your representation you should provide succinctly all the evidence and supporting information necessary to support your representation and your suggested modification(s). You should not assume that you will have a further opportunity to make submissions.

After this stage, further submissions may only be made if invited by the Inspector, based on the matters and issues he or she identifies for examination.

3. To which part of the Wiltshire Local Plan does this representation relate?

Policy: 98	Paragraph:	Table:	Figure:
Site:		Other:	

4. Do you consider the Wiltshire Local Plan is:

(i) Legally compliant	Yes:	X	No:	
(ii) Sound	Yes:	X	No:	
(iii) Complies with the duty to co-operate	Yes:	X	No:	
<i>Please indicate with an 'X' as appropriate</i>				

4b. If you think the Wiltshire Local Plan is not sound, please indicate the reason(s) why:

(1) Not positively prepared	
(2) Not justified	
(3) Not effective	
(4) Not consistent with national policy	
<i>Please indicate with an 'X' as appropriate</i>	

See separate statement of representation procedure (guidance note) for further information on 'soundness'.

5. Please give details of why you consider the Wiltshire Local Plan is not legally compliant or is unsound or fails to comply with the duty to co-operate. Please be as precise as possible. If you wish to support the legal compliance or soundness of the Wiltshire Local Plan or its compliance with the duty to co-operate, please also use this box to set out your comments.

The Town Council welcomes and supports Policy 98 on Ensuring high quality design and place shaping and Paragraph 5.235 which recognises that proposals will need to have regard to the design requirements in neighbourhood plans.

Criteria v. sets out a relatively good introductory policy text in respect of sustainable design, energy efficiency and maximising renewable energy generation.

At viii of Policy 98 reference is made to 'vehicle parking'. The Town Council considers that Policy 98 could be improved if reference is also added to 'cycle parking'.

At xiii, the Town Council considers that Policy 98 could be further strengthened by adding reference to the use of high standards of materials and finishes for buildings, recognising the evolution of building materials and design needed to reach net zero embodied carbon, climate mitigation and adaptation. Alternatively, cross-reference to Policy 87 (Embodied carbon) could be made.

(Continue on a separate sheet/expand box if necessary)

5a. If you wish to make a separate representation, relating to legal compliance, soundness or the duty to cooperate in relation to the accompanying Sustainability Appraisal (SA), please make them here.

(Continue on a separate sheet/expand box if necessary)

6. Please set out the modification(s) you consider necessary to make the Wiltshire Local Plan legally compliant and sound, in respect of any legal compliance or soundness matters you have identified at 5 above. (Please note that non-compliance with the duty to co-operate is incapable of modification at examination). You will need to say why each modification will make the Wiltshire Local Plan legally compliant or sound. It will be helpful if you are able to put forward your suggested revised wording of any policy or text. Please be as precise as possible.

(Continue on a separate sheet/expand box if necessary)

7. If your representation is seeking a modification to the plan, do you consider it necessary to participate in examination hearing session(s)?

X	No , I do not wish to participate in hearing session(s)		Yes , I wish to participate in hearing session(s)
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8. If you wish to participate in the hearing session(s), please outline why you consider this to be necessary:

(Continue on a separate sheet/ expand box if necessary)

Please note the Inspector will determine the most appropriate procedure to adopt to hear those who have indicated that they wish to participate in hearing session(s). You may be asked to confirm your wish to participate when the Inspector has identified the matters and issues for examination.

9. Do you wish to be notified of any of the following?

Please tick all that apply.

The submission of the Wiltshire Local Plan Review for Independent Examination	X
The publication of the report of the Inspector appointed to carry out the examination	X
The adoption of the Local Plan Review	X

Please ensure that we have either an up-to-date email address or postal address at which we can contact you.

Signature:		Date:	
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Wiltshire Local Plan

Publication Stage Representation Form

Ref:	(For official use only)
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Part B – Please use a separate sheet for each representation.

Please note, in your representation you should provide succinctly all the evidence and supporting information necessary to support your representation and your suggested modification(s). You should not assume that you will have a further opportunity to make submissions.

After this stage, further submissions may only be made if invited by the Inspector, based on the matters and issues he or she identifies for examination.

3. To which part of the Wiltshire Local Plan does this representation relate?

Policy:	Paragraph: 5.107	Table:	Figure:
Site:	Other:		

4. Do you consider the Wiltshire Local Plan is:

(i) Legally compliant	Yes:	X	No:	
(ii) Sound	Yes:		No:	X
(iii) Complies with the duty to co-operate	Yes:	X	No:	
<i>Please indicate with an 'X' as appropriate</i>				

4b. If you think the Wiltshire Local Plan is not sound, please indicate the reason(s) why:

(1) Not positively prepared	
(2) Not justified	X
(3) Not effective	
(4) Not consistent with national policy	
<i>Please indicate with an 'X' as appropriate</i>	

See separate statement of representation procedure (guidance note) for further information on 'soundness'.

5. Please give details of why you consider the Wiltshire Local Plan is not legally compliant or is unsound or fails to comply with the duty to co-operate. Please be as precise as possible. If you wish to support the legal compliance or soundness of the Wiltshire Local Plan or its compliance with the duty to co-operate, please also use this box to set out your comments.

The Town Council considers that the wording of Paragraph 5.107 is not positive/supportive enough of wind energy installations in order to be able to increase the use and supply of renewable energy over the Plan period, in accordance with Paragraph 155 of the NPPF.

250 metres is an exceptionally tall onshore wind turbine; the largest onshore wind turbine in the UK (located at Avonmouth in Bristol) is 150 metres tall from its base to the tip of its blade. Therefore, by scoping out commercial scale turbines below 250 metres as unviable, the policy may be artificially understating the true potential within Wiltshire. There are wind energy installations below 250m in height and which can still be viable, whilst also being less intrusive than taller such installations but Paragraph 5.107 makes no reference to these.

The Town Council questions the evidence on wind energy used to arrive at the assertions in Paragraph 5.107. It is difficult to believe that there are no deliverable wind sites in the whole of Wiltshire, particularly as commercial scale wind projects have already been developed, for instance the Westmill Windfarm. It is suggested that time is dedicated to critically reviewing the LPA's evidence to see if this paragraph is supported by the evidence and if necessary seeking input from the wind sector to support this.

(Continue on a separate sheet/expand box if necessary)

5a. If you wish to make a separate representation, relating to legal compliance, soundness or the duty to cooperate in relation to the accompanying Sustainability Appraisal (SA), please make them here.

(Continue on a separate sheet/expand box if necessary)

6. Please set out the modification(s) you consider necessary to make the Wiltshire Local Plan legally compliant and sound, in respect of any legal compliance or soundness matters you have identified at 5 above. (Please note that non-compliance with the duty to co-operate is incapable of modification at examination). You will need to say why each modification will make the Wiltshire Local Plan legally compliant or sound. It will be helpful if you are able to put forward your suggested revised wording of any policy or text. Please be as precise as possible.

In order that the Plan is justified (in terms of soundness) it is recommended that Paragraph 5.107 be modified to show greater support for wind energy installations, specifically for those installations that are less than 250m in height.

(Continue on a separate sheet/expand box if necessary)

7. If your representation is seeking a modification to the plan, do you consider it necessary to participate in examination hearing session(s)?

X	No , I do not wish to participate in hearing session(s)	Yes , I wish to participate in hearing session(s)
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8. If you wish to participate in the hearing session(s), please outline why you consider this to be necessary:

(Continue on a separate sheet/ expand box if necessary)

Please note the Inspector will determine the most appropriate procedure to adopt to hear those who have indicated that they wish to participate in hearing session(s). You may be asked to confirm your wish to participate when the Inspector has identified the matters and issues for examination.

9. Do you wish to be notified of any of the following?

Please tick all that apply.

The submission of the Wiltshire Local Plan Review for Independent Examination	X
The publication of the report of the Inspector appointed to carry out the examination	X
The adoption of the Local Plan Review	X

Please ensure that we have either an up-to-date email address or postal address at which we can contact you.

Signature:		Date:	
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Wiltshire Local Plan

Publication Stage Representation Form

Ref:	(For official use only)
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Part B – Please use a separate sheet for each representation.

Please note, in your representation you should provide succinctly all the evidence and supporting information necessary to support your representation and your suggested modification(s). You should not assume that you will have a further opportunity to make submissions.

After this stage, further submissions may only be made if invited by the Inspector, based on the matters and issues he or she identifies for examination.

3. To which part of the Wiltshire Local Plan does this representation relate?

Policy: 86	Paragraph:	Table:	Figure:
Site:	Other:		

4. Do you consider the Wiltshire Local Plan is:

(i) Legally compliant	Yes:	X	No:	
(ii) Sound	Yes:		No:	X
(iii) Complies with the duty to co-operate	Yes:	X	No:	
<i>Please indicate with an 'X' as appropriate</i>				

4b. If you think the Wiltshire Local Plan is not sound, please indicate the reason(s) why:

(1) Not positively prepared	
(2) Not justified	
(3) Not effective	X
(4) Not consistent with national policy	X
<i>Please indicate with an 'X' as appropriate</i>	

See separate statement of representation procedure (guidance note) for further information on 'soundness'.

5. Please give details of why you consider the Wiltshire Local Plan is not legally compliant or is unsound or fails to comply with the duty to co-operate. Please be as precise as possible. If you wish to support the legal compliance or soundness of the Wiltshire Local Plan or its compliance with the duty to co-operate, please also use this box to set out your comments.

The NPPF at Paragraph 155 states that plans should provide a positive strategy for energy from renewable sources, that maximises the potential for suitable development. Plans should consider identifying suitable areas for renewable and low carbon energy sources, and supporting infrastructure, where this would help secure their development.

Whilst the Town Council supports having a Renewable Energy policy, it considers that Policy 86 as currently worded would neither be effective, or consistent with national policy because it is insufficiently positive towards, and does not give enough support to, renewable energy development. Most of Policy 86 focuses on a list of considerations which need to be met for a development to be in compliance with the Policy. These are sensible and helpful considerations but should not form the main focus of the Policy.

Policy 86 as currently worded leaves would-be renewable energy developers none the wiser as to where schemes might come forward with LPA support. It is therefore considered that the Policy is not effective or consistent with national policy in soundness terms in its current form.

Policy 86 could go much further to encourage and maximise renewable energy generation, could set out suitable areas for the development of solar farms, wind energy projects and other deployable renewable energy technologies, and set out specific targets for renewables generation.

The supporting text to Policy 86 does not set out the over-riding importance of increasing renewable energy generation. The UK is legally committed to reducing emissions to net zero by 2050. Decarbonisation can only occur if the electricity system is first decarbonised and the amount of renewable energy generated is significantly increased to meet these demands.

The changes to the planning regime for onshore wind (now incorporated into the NPPF) have slightly opened up the opportunities for onshore wind developments to come forward, introducing new routes through which communities can bring forward their own community energy projects, but such projects will tend to be small scale. Apart from this exception, the NPPF still states that wind projects should only be considered acceptable if proposed in an area identified as suitable for wind energy development in the development plan. The lack of any suitable areas identified within Policy 86 means that apart from small community energy projects, wind development cannot go ahead in Wiltshire.

(Continue on a separate sheet/expand box if necessary)

5a. If you wish to make a separate representation, relating to legal compliance, soundness or the duty to cooperate in relation to the accompanying Sustainability Appraisal (SA), please make them here.

(Continue on a separate sheet/expand box if necessary)

6. Please set out the modification(s) you consider necessary to make the Wiltshire Local Plan legally compliant and sound, in respect of any legal compliance or soundness matters you have identified at 5 above. (Please note that non-compliance with the duty to co-operate is incapable of modification at examination). You will need to say why each modification will make the Wiltshire Local Plan legally compliant or sound. It will be helpful if you are able to put forward your suggested revised wording of any policy or text. Please be as precise as possible.

In order for the Plan to be effective and consistent with national policy it is recommended that the wording of Policy 86 be modified so that it is more positively worded giving greater support for renewable energy installations, including wind.

(Continue on a separate sheet/expand box if necessary)

7. If your representation is seeking a modification to the plan, do you consider it necessary to participate in examination hearing session(s)?

X	No , I do not wish to participate in hearing session(s)		Yes , I wish to participate in hearing session(s)
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8. If you wish to participate in the hearing session(s), please outline why you consider this to be necessary:

(Continue on a separate sheet/ expand box if necessary)

Please note the Inspector will determine the most appropriate procedure to adopt to hear those who have indicated that they wish to participate in hearing session(s). You may be asked to confirm your wish to participate when the Inspector has identified the matters and issues for examination.

9. Do you wish to be notified of any of the following?

Please tick all that apply.

The submission of the Wiltshire Local Plan Review for Independent Examination	X
The publication of the report of the Inspector appointed to carry out the examination	X
The adoption of the Local Plan Review	X

Please ensure that we have either an up-to-date email address or postal address at which we can contact you.

Signature:		Date:	
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Meeting	Extraordinary Full Council
Date	20 November 2023
Report Title	Community Governance Review (CGR) - Suggested Amendments
Author	Heather Rae, Head of Democratic Services

1.0 PURPOSE OF REPORT

- 1.1 To consider two proposed amendments that have been submitted to Wiltshire Council as part of their ongoing Community Governance Review (CGR).
- 1.2 To consider if there are any further anomalies in ward boundaries that Council would support to be submitted to be reviewed by Wiltshire Councils' Electoral Review Committee as part of this process.

2.0 INTRODUCTION AND BACKGROUND INFORMATION

- 2.1 A CGR is a process to review and make changes to governance arrangements for town and parish councils and parish areas. This is to ensure that they continue to be reflective of the identity and interest of local communities, and that they are as efficient and effective in their governance as can be.
- 2.2 A CGR can make a number of changes to parish governance when there is clear evidence to do so:
 - i. it can make changes to parish areas - including changes to boundaries between parishes, mergers of two or more parishes, creating a new parish out of part of one or more existing parishes.
 - ii. it can make changes to electoral arrangements within parish areas - including changes to the number of parish councillors, introducing or changing parish warding arrangements.
 - iii. it can accommodate changing the name of a parish (though this can also be undertaken through a process under S75 of the Local Government Act 1972)
 - iv. it can accommodate the grouping together of parishes under a common parish council.
- 2.3 A review is undertaken for reasons including changes in population, housing growth and anomalous boundaries. The last CGR for Chippenham took place in 2019/20.
- 2.4 CGR decisions must ensure that arrangements reflect the identity and interests of local communities and ensure effective and convenient local governance. Any other factors such as level of precept cannot be considered.

- 2.5 The Town Council were contacted as there are two schemes which impact Chippenham. The Head of Planning and the Head of Democratic Services met with representatives from Wiltshire Council to go through the current proposals and the CGR process. A timetable of the process is available at **APPENDIX A**.

3.0 PROPOSALS FOR CHIPPENHAM

- 3.1 Wiltshire Council do not require a formal Town Council view at this stage, these suggestions will be considered by the Electoral Committee. However, Council is asked to consider the proposals outlined below and consider whether these are supported or if there are any additional comments to be taken into consideration. The Electoral Review Committee to decide whether to take additional submissions forward or not.

- 3.2 **Amendment 1: Ref: LAC01, Lacock/Chippenham, identified as anomalous during the 2019/20 review, (Rowden Lane).** Further information is attached at **APPENDIX B**.

Boundary changes

As part of the 2019/2020 Review involving Chippenham and Lacock parishes, the Electoral Review Committee recommended, and it was agreed, to transfer an area of land containing new housing within the new Chippenham Lowden and Rowden Division from Lacock to Chippenham. The area also included the small area of Rowden Lane, a rural hamlet accessed through the town. The review of Rowden Lane is to explore whether the previously agreed new boundary line is best placed where it currently is. This boundary change was given a temporary 'approval' under the previous CGR review, Councillors are being asked to consider whether the temporary change should become permanent. A map of the previous ward boundary between Chippenham and Lacock in this area is attached at **APPENDIX C**.

Reason for Request

A review to look at the precise boundary around Rowden Lane, to see if it is possible to adjust to improve local governance and community cohesion for the communities concerned.

- 3.3 **Amendment 2: Ref: CHI01, Chippenham, raised by Ward Wiltshire Councillor, (Ray Close).** Further information is attached at **APPENDIX D**.

Anomaly - Minor changes to a boundary

To review an area where a discrepancy has been identified, with some properties being in the wrong electoral division. A review has been requested by the divisional member for Chippenham Pewsham division, to look at several properties in Ray Close, Chippenham, which currently sit in the Hardens and central division. The request is for a boundary change to incorporate the properties within the Pewsham division.

Reason for Request

To carry out a review of an area where a minor boundary or other anomalous arrangement has been identified.

- 3.4 Councillors are asked to make any further suggestions for minor amendments or anomalies that they would like to be forwarded to Wiltshire Council to consider as part of the review. The Electoral Review Committee will discuss and determine whether they will be progressed or not and this will be followed by draft recommendations in late December and a public consultation in the New Year.

4.0 CONTRIBUTION TO CORPORATE PLAN PRIORITIES

4.1 Responding to the CGR will contribute to the following corporate priorities;

- Play an active role in the future development of the town through collaboration with partners, stakeholders, and our community.
- Maintain effective and efficient governance and management of resources.

5.0 STAFFING IMPLICATIONS

5.1 There are no staffing implications.

6.0 FINANCIAL IMPLICATIONS

6.1 Any changes made could result in a financial implication on the precept due to changes in the tax base.

7.0 CLIMATE AND ECOLOGICAL IMPLICATIONS

7.1 This report is administrative and does not have any known direct Climate and Ecological impact.

8.0 LEGAL IMPLICATIONS

8.1 CGRs are undertaken by Wiltshire Council in accordance with the Local Government and Public Involvement in Health Act 2007.

9.0 RECOMMENDATIONS

9.1 That Council consider whether there are any additional comments to be submitted to Wiltshire Council in relation to the following two schemes:

- i) Ref: LAC01, Lacock/Chippenham, Rowden Lane, identified as anomalous during the 2019/20 review.
- ii) Ref: CHI01, Chippenham, Ray Close, raised by Ward Wiltshire Councillor.

9.2 That Council consider whether there are any further minor anomalies that would be supported by Council to be forwarded to Wiltshire Council for them to take into consideration as part of this review process.

9.3 That authority be delegated to the Chief Executive to submit comments to Wiltshire Council accordingly.

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APPENDIX A

Timetable

Stage	Action	Date
Stage one	Commencement of CGR - Terms of Reference Published	11 September 2023
	Schemes uploaded to public portal for any initial comments, to be updated with any relevant additional information. To include any further schemes received which fall within the scope of the Review.	11 September to 13 October 2023
Stage two	Consideration of submissions received in relation to proposed schemes. Local briefings and meetings as appropriate with unitary councillors and/or parish representatives.	16 October - 31 December 2023
	Pre-consultation surveying (if appropriate)	31 October - 26 November 2023
	Draft Recommendations prepared	December 2023 - January 2024
Stage three	Draft Recommendations consultation	24 January - 1 March 2024 (estimate)
Stage four	Consideration of submissions received.	March 2024
	Additional Consultations (if appropriate)	April - May 2024
	Final Recommendations prepared	April - June 2024
Decision	Final Recommendations submitted to Full Council	May - July 2024

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Information Sheet 04

Area Name – Lacock / Chippenham

[Community Governance Review Terms of Reference and LGBCE Guidance](#)

Proposed Schemes

Ref: LAC01

Boundary changes

As part of the 2019/2020 Review involving Chippenham and Lacock parishes, the Electoral Review Committee recommended, and it was agreed, to transfer an area of land containing new housing within the new Chippenham Lowden and Rowden Division from Lacock to Chippenham. The area also included the small area of Rowden Lane, a rural hamlet accessed through the town.

Reason for Request

A review to look at the precise boundary around Rowden Lane, to see if it is possible to adjust to improve local governance and community cohesion for the communities concerned.

Background Information

Parish Electorates - August 2023

Lacock – 797 Electorate

Chippenham – 27,744 (total) Electorate (ward breakdown below)

- Lowden & Rowden - 2748
- Pewsham - 3813
- Hardenhuish - 3876
- Cepen Park & Hunters Moon - 3893
- Sheldon - 4043
- Cepen Park & Derriads - 3028
- Monkton - 2287
- Hardens & Central - 4056

Projected Electorate for 2026 (including any known planned large development)

Lacock – 825 Projected

Chippenham – 30,126 Projected

- Lowden & Rowden - 4062
- Pewsham - 3946
- Hardenhuish - 4012
- Cepen Park & Hunters Moon - 4029
- Sheldon - 4185
- Cepen Park & Derriads - 3134
- Monkton - 2560
- Hardens & Central - 4198

Community Governance Review 2023-2024

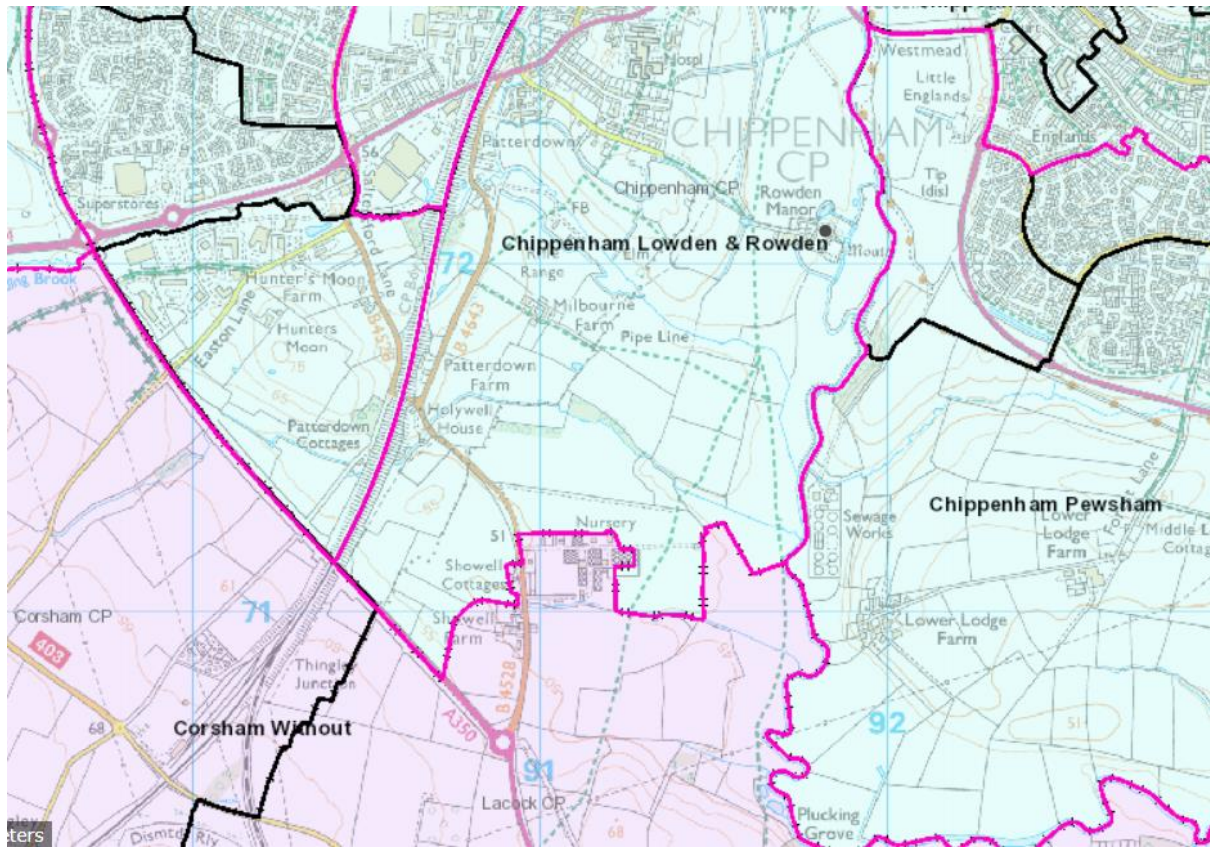
cgr@wiltshire.gov.uk

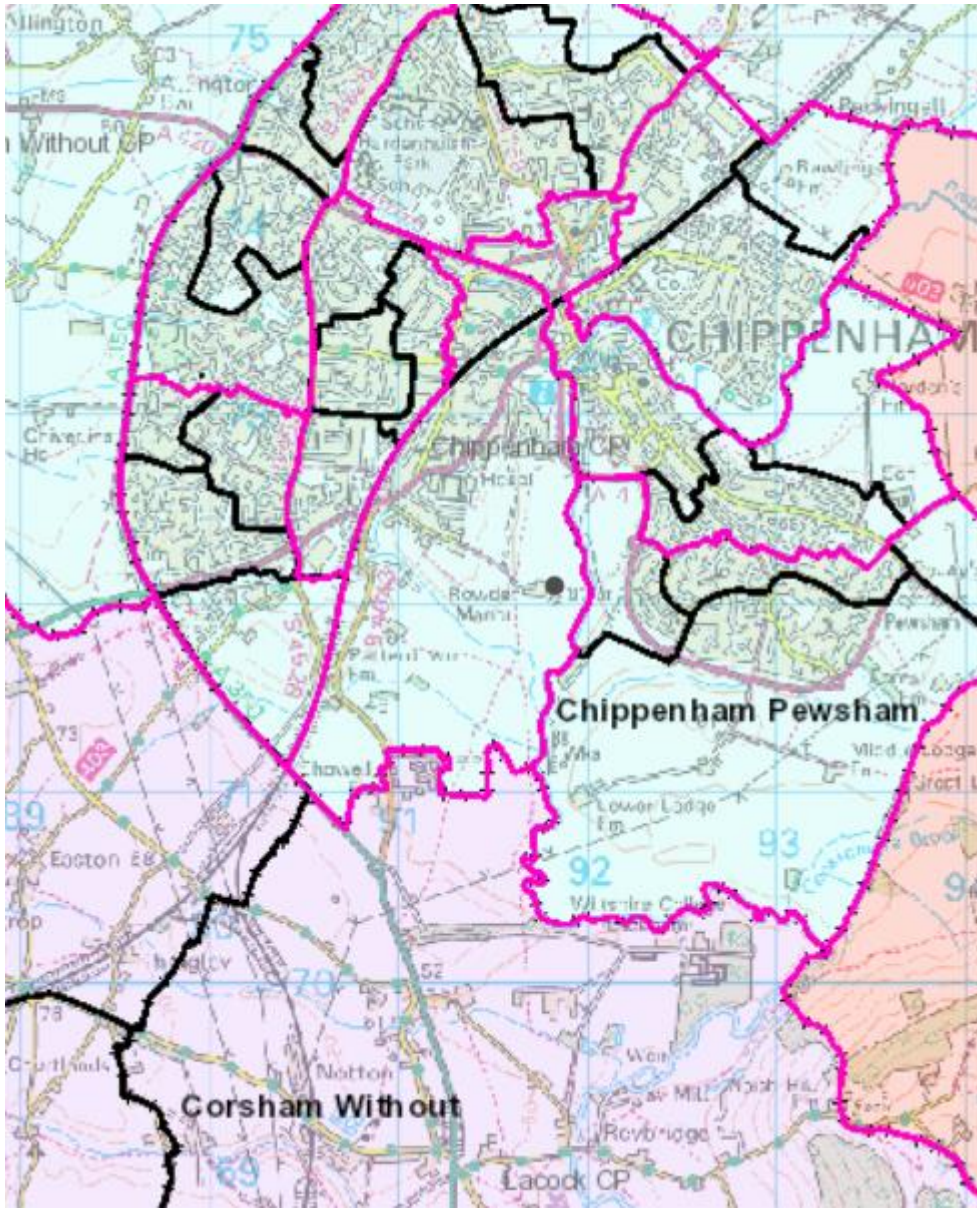
Council Tax by Parish, including Police and Fire Precepts

This data is provided for information, however please note that Community Governance Reviews cannot use the level of precept in affected areas as justification to approve or disapprove of a scheme.

Council Tax Schedule 2023/24 (annually)	Band A (£)	Band B (£)	Band C (£)	Band D (£)	Band E (£)	Band F (£)	Band G (£)	Band H (£)
Lacock PC	49.47	57.71	65.96	74.20	90.69	107.18	123.67	148.40
Chippenham TC	199.09	232.28	265.46	298.64	365.00	431.37	497.73	597.28

Maps





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APPENDIX C

Chippenham Town Council

The Town Hall, High Street, Chippenham SN15 3ER
Tel: (01249) 446699
Web: www.chippenham.gov.uk

Town Boundary & Wards Map

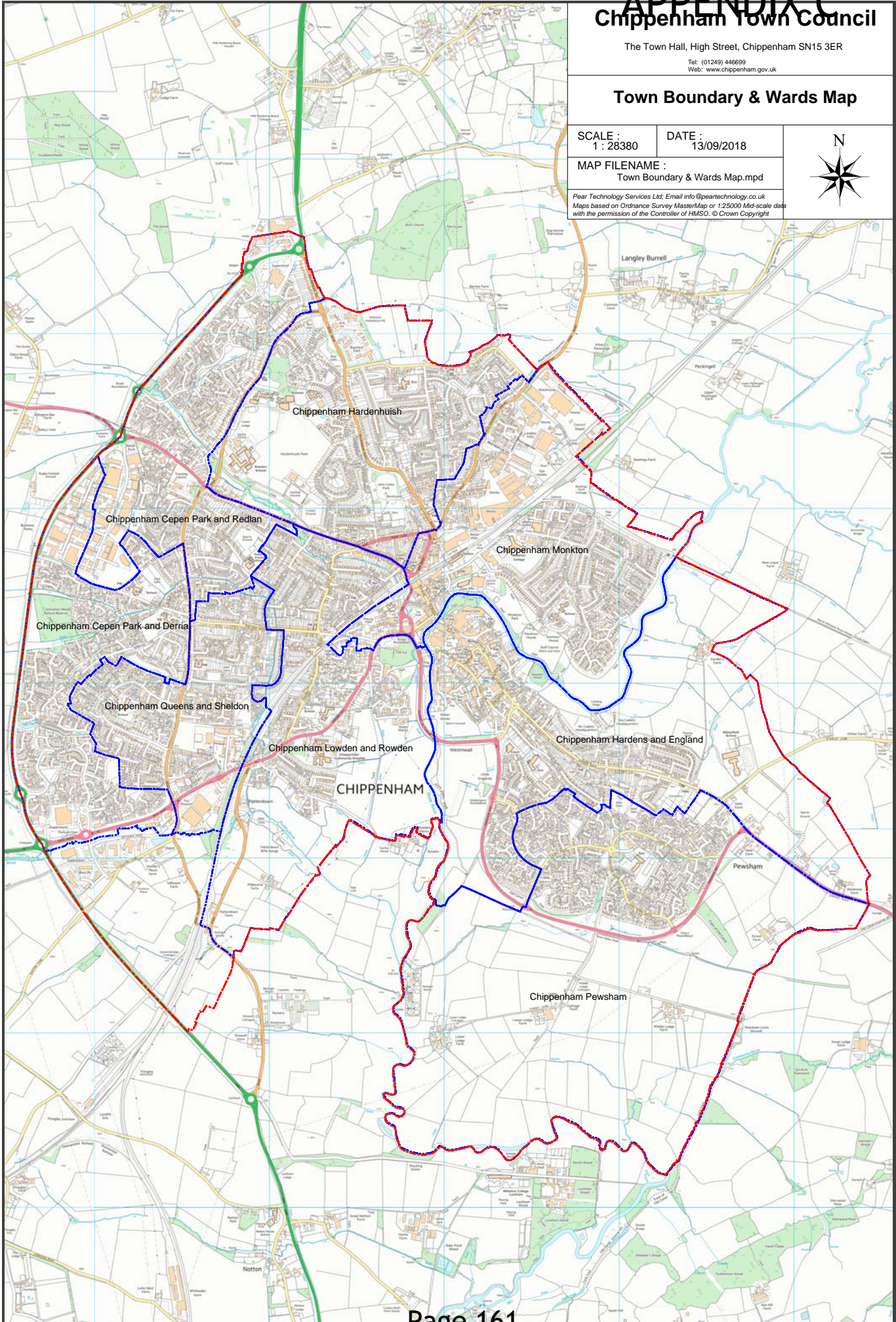
SCALE :
1 : 28380

DATE :
13/09/2018

MAP FILENAME :
Town Boundary & Wards Map.mpd



Pear Technology Services Ltd; Email info@pearstechnology.co.uk
Maps based on Ordnance Survey MasterMap or 1:25000 Mid-scale data
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cgr@wiltshire.gov.uk**Information Sheet 07****Area Name – Chippenham**

[Community Governance Review Terms of Reference and LGBCE Guidance](#)

Proposed Schemes**Ref: CHI01****Proposed by: Division Member**Anomaly – Minor changes to a boundary

To review an area where a discrepancy has been identified, with some properties being in the wrong electoral division.

A review has been requested by the divisional member for Chippenham Pewsham division, to look at several properties in Ray Close, Chippenham, which currently sit in the Hardens and central division. The request is for a boundary change to incorporate the properties within the Pewsham division.

Reason for Request

To carry out a review of an area where a minor boundary or other anomalous arrangement has been identified.

Background InformationParish Electorates - August 2023

Chippenham – 27,744 (total) Electorate (ward breakdown below)

- Lowden & Rowden ward - 2748
- Pewsham ward - 3813
- Hardenhuish & Central ward - 3876
- Cepen Park & Hunters Moon ward - 3893
- Sheldon ward - 4043
- Cepen Park & Derriads ward - 3028
- Monkton ward - 2287
- Hardens & Central ward - 4056

Projected Electorate for 2026 (including any known planned large development)

Chippenham – 30,126 Projected

- Lowden & Rowden - 4062
- Pewsham - 3946
- Hardenhuish & Central - 4012
- Cepen Park & Hunters Moon - 4029
- Sheldon - 4185
- Cepen Park & Derriads - 3134

Community Governance Review 2023-2024

cgr@wiltshire.gov.uk

- Monkton - 2560
- Hardens & Central - 4198

Council Tax by Parish, including Police and Fire Precepts

This data is provided for information, however please note that Community Governance Reviews cannot use the level of precept in affected areas as justification to approve or disapprove of a scheme.

Council Tax Schedule 2023/24 (annually)	Band A (£)	Band B (£)	Band C (£)	Band D (£)	Band E (£)	Band F (£)	Band G (£)	Band H (£)
Chippenham TC	199.09	232.28	265.46	298.64	365.00	431.37	497.73	597.28

Maps

Houses in Ray Close, Chippenham, with current division boundary.

