

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.