

CAUSE¹ Views on the draft Local Plan proposals for Chippenham published Jan 2021

Introduction

Wiltshire Council have initiated **two** separate but related Public Consultations on future development of land in and adjacent to Chippenham:

1. The Local Plan Review consultation, concerning the next iteration of Local Plan for the period to 2036, which runs from Wednesday 13 January to Tuesday 9 March 2021; and
2. A Road Route Options consultation, on the route of a proposed distributor road to the South and East of Chippenham (referred to by Wiltshire Council as the 'Future Chippenham' consultation), which runs from Friday 15 January to Friday 12 March 2021.

There are 4 key documents:

- the Emerging Spatial Strategy report which sets out housing targets for Wiltshire and "Housing Market Areas" (HMAs);
- the Chippenham Site Selection report which sets out the results of considering the suitability of various potential development sites around Chippenham;
- the Planning for Chippenham report which provides concept plans for the chosen development sites; and
- the Future Chippenham consultation leaflet which sets out the route options for a distributor road through the chosen development sites.

The first three of these documents, along with more detailed supporting information, are available on the Wiltshire Council Local Plan Review website: <https://www.wiltshire.gov.uk/planning-policy-local-plan-reviewconsultation#Planning%20for%20Chippenham>

The last document, along with a video and more detailed road route assessments, is available on the Future Chippenham consultation website: <https://www.wiltshire.gov.uk/futurechippenham-consultation>

We set out below our initial views, so that residents are better informed prior to participating in the Public Consultation.

1. The housing need figures for Wiltshire are too high

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

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

¹ CAUSE = Campaign Against Urban Sprawl to the East (of Chippenham)

- **The “Standard Method” for allocating housing targets to councils is another spurious Government formula - for example, does it level up housing expansion between the North and South of England?**
- **Wiltshire Council has voluntarily increased its own baseline target by almost 5,000 additional houses without sound justification. This needs to be challenged.**
- **Rather than adding to the target Wiltshire Council should be pushing back on these numbers as other local authorities have done.**

2. The housing target allocated to Chippenham is far too high

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

- **The South and East of Chippenham contains high quality agricultural land and is surrounded by particularly beautiful countryside and river valleys - substantial natural assets - which would be destroyed by such enormous housing targets.**
- **Chippenham has already seen substantial growth with over 4,000 dwellings that have either been built (including Birds Marsh) or approved since 2016.**
- **Over 2,000 dwellings that were approved in the previous Chippenham Local Plan to 2026 (adopted in May 2017) have neither been built or even received planning permission, indicating that there may not be the need for further large scale developments. Wiltshire Council should focus on getting the existing approved sites built before allocating further sites for development.**
- **The allocated target for Chippenham has doubled since the last Local Plan from 4,510 to 9,225 homes. Prior to the Housing Infrastructure Fund (HIF) bid for road funding, the number being put forward for this Plan period was 3,000, which equates to predicted growth in the Chippenham Neighbourhood Plan Housing Needs Assessment report.**
- **Chippenham was chosen as a focus for development based on having existing infrastructure, but this is not the case as the proposed sites to the South and East require a massive investment in building a distributor road with 2 river bridges. The carbon footprint of creating such a road is huge.**
- **The draft Local Plan talks of promoting cycling over private cars to minimise the carbon footprint. Based on evidence to date this is not realistic (e.g. every new house at Birds Marsh seems to have at least 2 cars parked outside and the general trend is upwards).**
- **The draft Local Plan aspires to reduce out-commuting, and the associated carbon footprint, by matching increased housing with increased local employment. Currently 67% of workers who live in Chippenham commute to work outside Chippenham. Improvements to the A350 (dual carriageway), the mainline railway (enabling London to be reached in under 1 hour since electrification) and access to J17 on the M4 encourage out-commuting. The reality is that any new housing development at Chippenham will attract people who work in Bath, Bristol, Swindon, Reading and London, generating huge quantities of carbon emissions as a result. Wiltshire Council’s arguments about reducing carbon emissions simply don’t stand up.**

3. Chippenham could become the next Swindon

The Local Plan proposes “two new suburbs to Chippenham” to the East (Site 1) and South (Site 2) with an additional 5,586 houses to 2036. And a further 2,000 committed as part of the £75m funding for the new distributor road.

- **These are not “garden” villages but absolutely massive urban additions to Chippenham. The result is likely to be further deterioration of the town centre and commuter belt communities that have little relationship to Chippenham (as has happened around Swindon).**
- **Currently most people in Wiltshire live in rural settlements or small towns. This new policy of focussing development on large towns seems flawed, particularly in the post COVID world where around 30% more people are expected to work from home. Rural communities would benefit from more affordable housing, primary schools, surgeries, local shops and pubs. All these would reduce private car journeys from rural communities and allow people to work and live in their local area.**

4. The approach used to select development sites in and around Chippenham is flawed in numerous respects

The Site Selection report sets out the approach and results of considering the suitability of various potential development sites around Chippenham.

- **No mention is made of redeveloping the centre of Chippenham. It is an historic market town with much potential for improvement to restore its character and vibrancy. And post Covid, many offices and retail outlets in the town centre are likely to become available for redevelopment into domestic dwellings, thus maximising use of brown field sites. Such sites can be relatively high density, provide affordable homes and removing the need for yet more car ownership. This would reduce the need for greenfield sites and miles of tarmac.**
- **Individual development land parcels have been combined into very large potential development areas or “sites” and the overall assessment may not be sufficiently representative of their distinct areas (e.g. the river valleys). Indeed, creating such large areas for potential development may have been contrived to support the £75m Distributor road business case (i.e. a circular argument that the road is needed for 7,500 houses, which need the road)**
- **Each site has been scored against various criteria but the scores are all close, which does not provide a clear case for the chosen sites. Essentially any site could be justified by such subjective methodology.**
- **The selection criterion to “link the A4 to the A350” is unjustified and unfairly biases the selection of sites to those to the South and East of Chippenham. This criterion appears to have been included to justify the £75m distributor road. And there is absolutely no mention of the £75m cost.**
- **Including 2 large sites (i.e. the site to the East as well to the South) is simply not justified at this stage and increases the impact on climate change and destruction of the countryside. We can only assume they have both been included to justify the £75m distributor road.**

- **Site 1 (East of Chippenham) has been prioritised over Site 2 (South of Chippenham) but previous traffic analysis, indicated that a distributor road through Site 2 would be better at relieving congestion in Chippenham, because it provides a direct route for traffic on the A4 between the East and West of Chippenham. This would also avoid the problem of creating a new shortcut, attracting additional traffic, between the A4 East and M4 junction 17. This would seem to be further evidence of a biased approach.**

5. Site 1 (East Chippenham) should exclude any development between the North Rivers Cycle Path and the River Marden

Part of Site 1 (East of Chippenham) lies within Bremhill Parish. Bremhill Parish have a Neighbourhood Plan which was adopted in Feb 2018 and protects land between the North Rivers cycle path and the River Marden from development.

The Emerging Spatial Strategy promotes green infrastructure and access to the countryside.

- **The unspoilt countryside between the North Rivers cycle path and the River Marden is protected in the Bremhill Neighbourhood Plan and should not be developed.**
- **Over 5,000 people objected to the potential closure to the cycle path last year showing that it is much appreciated by the existing inhabitants of Chippenham for access to the countryside. The proposals would have development on both sides and a road crossing it, as well as destroying the countryside that people access around it.**

6. Public Consultation on the distributor road is premature and predetermines the outcome of the Local Plan

Wiltshire Council has secured £75m of government funding to build a distributor road between the A4 and the A350 to both the South and East of Chippenham. This has been justified as enabling 7,500 new homes. The grant needs to have been spent and the road built by 2024. The road project, called "Future Chippenham," is separate to the Local Plan.

- **Wiltshire Council's Future Chippenham project team is rushing through the design and approval of the distributor road, in order to meet the grant timescale conditions. But the need for 7,500 houses has not been demonstrated and the public consultation on route options should not proceed until the new Local Plan public consultation has been completed, and the plan reviewed.**
- **Consulting on the road route now, would seem to be an attempt to predetermine the outcome of the Local Plan by asking the public which route they would prefer a road to take, before asking about housing numbers and locations, which may not require such a road to be constructed.**

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