

CALNE WITHOUT PARISH COUNCIL RESPONSE TO WILTSHIRE LOCAL PLAN CONSULTATION

DRAFT V7 – 25th February 2021

1. Calne Without Parish Council is grateful for the opportunity to respond to the consultation initiated by Wiltshire Council initiated on 13th January 2021 about the Wiltshire Local Plan. These comments represent the views of the current Parish Council and could be subject to change following the election of a new Council in May 2021 and the emergence of further details as outlined in the next steps section of the consultation documents.
2. The requirement to provide comments by 9th March 2021, is a relatively short period of consultation for such significant and wide-ranging proposals with major implications for our area and residents. The very limited time and Covid restrictions has constrained our ability to consult widely within the Calne Without Parish community. This must therefore detract from the whole process and call into question the efficacy of the consultation process and the associated timetable. We are concerned that it does not meet the statutory requirements for consultation on a Local Plan, particularly in respect of publicity, notification and access for those with limited or no capability to participate through online media.
3. Notwithstanding our concerns about the process, which we are aware has been formally questioned, we acknowledge that this is a first stage in the process and that Wiltshire Council will review the emerging strategy in the light of all the comments that it receives to the consultation and that proposals could therefore change.
4. The commitment to draft and finalise place shaping priorities for each main settlement in consultation with the relevant Town and Parish Councils and that these will help to shape the form and location of development proposals in the draft plan is welcomed. The further consultation at the end of 2022 will allow this Council to engage further with its' community on the emerging proposals and modify, if appropriate, its response. Adequate time should be allowed for appropriate community consultation.
5. We consider the pledge to undertake further sustainability appraisals to develop effective mitigation measures to ensure the most benefits possible from the development of each site to be a key component of further work. As is the commitment to ensure they are delivered properly coordinated with the infrastructure necessary to support them. Assuming that infrastructure is considered in the broadest sense.
6. We recognise that this consultation (January 2021) requires responses to some specific questions, and these are addressed below. However, we would wish to offer some general comments as an introduction to each component.

SPATIAL STRATEGY

7. In considering the Spatial Strategy Calne Without Parish Council recognises the continuing requirement for housing and the need to plan for growth across Wiltshire as well as elsewhere in the country. As a rural based Parish, we welcome the commitment in the Spatial Strategy that the focus on development will continue to be on protecting the countryside and to only pursue development to meet local needs (para 1.3). We also welcome the statement that it is a priority to re-use previously developed land to limit countryside loss (para 1.4).
8. The Council also welcomes the delivery principle (4) that each community will be encouraged to determine for itself where additional development takes place. This is a welcome improvement. We also support the principle that consideration should be given to how Town Centres might be better used in future; a potentially underutilised resource for housing that could help regenerate areas where there is limited life beyond normal working hours.
9. To some degree the emphasis on housing detracts from other, equally important factors that are not given due priority. For example, the focus appears to be on how much should towns and villages grow and potential development sites, but with little regard for sustainable job creation and community development. Focusing on headline house building numbers and but not building a sense of cohesive community. Building many hundreds of very similar dormitory houses for people who work, shop, seek entertainment etc outside their immediate area does not help the people who live within that community. It just increases the volume of commuter traffic and vans delivering goods of all description from outside the area to isolated individuals and families who have no stake in their local communities and have no encouragement to be part of it.
10. The vague allocation of 'employment land' is insufficient; it emphasises a key component missing from the Local Plan to address the employment needs and an associated Industrial Strategy aimed at identifying which industries the county wishes to attract, how this will be achieved and how it ties into proposed housing development. If the aim is to minimise commuting, there should be a correlation between job creation and house building; one should not proceed without the other. This just results in speculative development. There needs to be clear incentives – on a risk and reward basis – for all developers to aid job creation. A key factor in this should be the necessary investment in the appropriate technological infrastructure for job creation.
11. A major omission is the inclusion of any modelling of the likely traffic impacts of the proposed developments across the county, within the immediate vicinity but just as importantly more broadly. There have been too many instances when this had been ignored or not planned for and the laws of unintended consequences result in congestion and rat running, blighting small villages and communities not associated with the original development proposals.

12. The challenges associated with meeting the ambitious target to make the county of Wiltshire carbon neutral by 2030 are not be underestimated. It is encouraging that the Local Plan is seeking to address climate change and biodiversity net gain. However, the concern of this council is a lack of coherence between the ambitious nature of measures to deliver the change necessary to address climate change and improve biodiversity whilst planning for significant urban growth and loss of countryside. We will monitor very carefully how these two elements develop in the next iterations but at present there appears to be a fundamental disconnect between the scale of development and the changes being sought to deliver improvements.

EMPOWERING LOCAL COMMUNITIES

13. As a predominantly rural parish this element of the plan has greater relevance to Calne Without Parish Council. Nevertheless, as the Parish is adjacent to both Chippenham and Calne the proposals for their development also have a significant impact on the Parish and are also of relevance for our communities.
14. Calne Without Parish Council is encouraged by the commitment in the proposals to empower local communities by establishing a scale of development to provide certainty whilst allowing those communities to allocate the land they want to see built on (9).
15. Involving the community in assessing Rural Housing Needs and providing the necessary support to conduct surveys to support this is a positive initiative. It is particularly important that such surveys address the broad interests of the community to ensure all housing needs are met – particularly those that provide accommodation for locally employed people, i.e. within the boundaries of the community as well as other sectors including entry level, elderly, key workers and sheltered accommodation.
16. The Council wishes to challenge the proposed housing allocation of 80 houses for Derry Hill and Studley, a 13% increase, identified at Table 2.4 (Chippenham HMA Large Village indicative housing requirements). This appears to be excessive and not meet the criteria of the overall spatial strategy of protecting the countryside and satisfying local needs; there has been no survey to demonstrate what these local needs are.
17. The proposed allocation of 80 houses is amongst the highest in Wiltshire and ignores the major constraint to the village being centred on a heavily trafficked crossroads. The main access road to the village is already operating at 120% of capacity with the resultant delays, congestion, safety issues with ‘rat running’ traffic levels recorded of up to 65%. There is no scope to address these problems and the consultation document makes no reference to these issues. There has been significant growth in Derry Hill and Studley over recent years of more than 100 residences. There should be a period of consolidation for these to be absorbed, particularly given the potential impact of the “Future Chippenham” proposals which could involve significant

development only a short distance along the A4.

18. A minimum allocation of 60 houses, much of which has already been met by the recently completed development at Studley Gardens, would still represent a 10% growth. But the residual part of such an allocation (minimum 4 houses) would be manageable within the existing boundaries of Derry Hill and Studley if we were, with appropriate community consultation, to develop a plan to satisfy this through developing gaps within the existing footprints of the villages to maintain the ribbon type nature of these. The commitment of Wiltshire to support such an approach, alongside the recognition of a need to protect the countryside through the core policy of developing existing sites within settlement boundaries is helpful in this regard.

19. Responses have been invited to a series of specific questions. The responses of Calne Without Parish Council are set out below:

- a. *Do you agree there should be a target of 40% affordable homes on all new schemes or more of five dwellings? What other approaches might there be (Page 5)?*

In responding we make the assumption that the definition applied to affordable homes is the standard government definition: **Affordable housing** is social rented, **affordable** rented and intermediate **housing**, provided to eligible households whose needs are not met by the market. Eligibility is determined by local incomes and local house prices.

The council supports the target of 40% (or 2 in 5) affordable homes on all new schemes or more of five dwellings. The council is particularly keen to ensure adequate housing is available to long standing residents and their families, particularly where they are employed locally and have no need of significant travel to work.

- b. *Do you think this approach (Page 5)– one policy and one point of reference for assessing planning proposals to meet local housing needs and potentially limiting development rights on smaller properties – is worth pursuing? What local evidence would be needed to justify applying restrictions like these.*

Simplifying and standardising the approach to assessing planning proposals for rural communities would be helpful as long as standards are maintained, and these are applied consistently. Should it be decided to apply restrictions on the expansion of small homes, consistent application of the rules would be required. It could encourage perverse behaviours where an expanding family employed within the community is forced to leave to meet their housing need and then commute back for work. This does not seem particularly sustainable.

- c. **Core Policy 44** (Page 6): *Do you agree with the approach set out in the suggested revised Core Policy 44? If not, why not? How could it be improved?*

The revised Core Policy 44 provides a good basis for the provision of Community Led Housing and designating Rural Exception Sites. One element of concern is bullet iii 'The proposal is within, adjoining or well related to the existing settlement without reliance on travel by car'. How will 'adjoining or well related to' be defined? This requires greater clarity. We support the 'without reliance on travel by car' requirement but suspect this is largely impossible for many rural communities given the poor public transport links.

- d. **New Core Policy** (Page 10): *What do you think to the housing requirements for Local Service Centres and Large Villages? Should requirements be higher or lower? If so which ones and why?*

The only large village within the parish of Calne Without designated for further development is Derry Hill and Studley. We have already commented on the allocation of some 80 dwellings and the incorrect premise on which this allocation has been made. A minimum allocation of 60 houses, much of which has already been met by the recently completed development at Studley Gardens, may be justified subject to clarification about the calculation of the needs based on the criteria to minimise environmental impact, reliance on commuting and satisfy the housing needs of those employed. Should the requirement be confirmed as justified the revised core policy does appear to provide a suitable basis for satisfying housing requirements. In particular, small sites within settlement boundaries would assist in retaining the character and style of the existing villages.

PLANNING FOR CALNE AND SITE SELECTION

20. Calne Without Parish encircles Calne and is keenly aware that any expansion to the boundaries of Calne will impact the Parish. It is for Calne Town Council to provide detailed responses to the questions asked about the potential development of Calne within the existing boundaries. A key concern of this council is that any growth should be sustainable and have minimal impact on the surrounding rural communities. To that end we would expect any further housing development to be supported by a comparable amount of employment land and opportunities to minimise, and ideally reduce, the significant levels of commuting that result from dormitory developments as is currently the case. Commuting has a major impact on the surrounding environment through ever increasing traffic. A significant omission is any credible modelling of the likely traffic impact of the proposed developments, not only in the immediate vicinity but more broadly.
21. There may be scope for some well-designed, very small-scale developments in the smaller villages. Many small villages lost housing stock in the last century, and there are potential brownfield sites where houses used to be located which could be

considered for development again. Any infill development in the small villages should be well designed and also of a size to meet local needs, smaller houses to tempt the children of villagers to stay within the community, ideally within easy reach of employment.

22. The site selection shows little consideration of how the proposed extra houses will fit into the whole. Some of the sites mentioned in Calne may have some merit as they pull together existing randomly positioned housing developments into something that looks more cohesive. But the work needs to be done through the Calne/Calne Without neighbourhood plan refresh before any firm proposals are made.
23. As mentioned in our views on the spatial strategy houses on their own are detrimental to a local area without associated employment opportunities and infrastructure, not limited to roads. There must be a clear deliverable plan to provide key components on community development with facilities and spaces to provide social development and interaction for both children and adults. As well as the key components for communication and the ability to support work from home e.g. 5G mobile services and very fast broadband services.
24. Air quality linked to traffic congestion, is an issue in Calne, which is somewhat counter-intuitive given its rural surroundings. Traffic volumes in the rural communities that are used more and more as 'rat-runs' is also an issue. Building more houses in and around Calne, including thousands in nearby Chippenham and Melksham will only add to the problem. If more road infrastructure is considered an answer to the problem, which it is difficult to accept given the associated environmental issues, and no evidence that more roads reduce congestion it should not come at the expense of more houses to pay for it.
25. The consultation document suggests (point 17) – "In Calne, the Town and Parish Councils may also be able to progress higher growth options through the neighbourhood plan that have local community support, for example, to deliver specific types of infrastructure". We consider that no decision on this should be made until the new version of the neighbourhood plan has been completed.
26. In terms of the specific questions related to Calne, Calne Without Parish Council would offer the following:

CA1 (Page 4) *What do you think to this scale of growth? Should there be a brownfield target? Should it be higher or lower?*

The scale of growth needs to be matched to deliverable employment opportunities underpinned by an Industrial Strategy to ensure coherence and evidence to support any proposed development. We agree there should be a brownfield target, ideally identified through the neighbourhood plan.

CA2 (Page 5). *Are these the right priorities? What priorities are missing? How might these place shaping priorities be achieved?*

The priorities should be determined in the neighbourhood plan. All of the items proposed seem relevant and should be included with the addition of technology infrastructure. Calne Town Centre development should be driven by deliverable funded plans.

CA3 (Page 6) *Is this the right pool of potential development sites?*

Not necessarily, the planned update of the local neighbourhood plan should not be tied by these sites. The target of 360 houses, if agreed, should be fed into the neighbourhood plan production process and the sites evaluated as part of this.

CA4 (Page 6) *What land do you think is the most appropriate upon which to build? What type and form of development should be brought forward at the town?*

It would seem appropriate to examine the feasibility of joining together the fragmented development that has already occurred expanding in new areas. In the villages very small-scale developments should be considered on the sites where housing used to be. Focus should be made on job creation in Calne and the villages before houses are built. The houses should be of a design that we will be proud of in the future. The houses should be of a size that local young families can afford. The county has aspirations to build and promote tourism based on existing heritage and wonderful countryside, this will not be achieved by having tightly packed villages and towns full of houses with no local character or distinction. Design considerations will be very important.

CA5 (page 6) *Are there important social, economic or environmental factors you think we have missed that need to be considered generally or in respect of individual sites?*

Yes. Calne and the surrounding villages are largely dormitories. Through the Local Plan we must develop the infrastructure, facilities and environment to encourage people to live, work and play where they live. We need to ensure that the technological infrastructure supports the development of industries that can exploit this and supports effective home working – both home-based businesses and working from home for a larger business; a likely post Covid norm. Environmental factors applied to house building techniques must be a key requirement and incentive, if we are to advance the carbon neutral agenda.

CA6 (Page 9) *Are there any issues or infrastructure requirements that should be identified?*

Although the report suggests adequate infrastructure exists or is planned to satisfy any development requirements in terms of education, health and leisure this council has concerns that it will not meet all the needs for the expansions planned.

A major omission is consideration of the impact on roads and the highway network, not just adjacent to the proposed developments but more broadly. This must be modelled so that key risks and issues can be identified, and mitigations planned and budgeted for so that delivery is coherent and sustainable.

PLANNING FOR CHIPPENHAM AND SITE SELECTION

27. The proposed significant expansion of Chippenham and the creation of a new suburb (Site 1 and to some degree Site 2) to the east and south east is a concern to Calne Without Parish Council given the inevitable impact on our communities from the resultant increase in traffic, loss of countryside and the associated habitat. The developments will create an urban sprawl reducing the delineation between the villages of Derry Hill, Studley and Chippenham which, when considered alongside the proposed Solar Farm at Forest Gate, will be reduced further resulting in Derry Hill and Studley becoming suburbs for an expanded Chippenham.
28. The proposed expansion of Chippenham and allocation of houses is far in excess of the requirement. Wiltshire Council has voluntarily increased its own baseline target for housing growth by nearly 5000 homes, many of which appear to be proposed for Chippenham. There needs to be greater clarity of the reasoning behind such a significant expansion; particularly given it will require infrastructure investment and need to attract major employment opportunities if the goal of encouraging people to live close to employment is to be realised, a major factor in reducing commuting and providing environmental benefits.
29. Answers to the specific questions arising from the consultation are set out below:

CP1 (Page 5) *What do you think to this scale of growth? Should there be a brownfield target? Should they be higher or lower?*

The scale of growth appears disproportionate to the requirement and appears to run counter to a strategy of providing housing to match employment to ensure the majority of the local population live where they work. This is clearly not the case and the allocation of land for employment within proposed developments will not meet this core requirement. The brownfield site target should be higher, ensuring brownfield land supply is exhausted before green field sites are considered.

CP2 (Page 6) Are these the right priorities? What priorities are missing? How might these place shaping priorities be achieved?

To a large degree yes. Development to provide new employment to redress the existing levels of net out-commuting must be the key priority before considering additional housing and this is supported. Although counter intuitive to the proposed expansion, improving access to Chippenham Railway Station and Cocklebury Road should be a priority to complement the proposed improvements and attract further investment in a location close to the Town Centre.

There is little evidence that linking the A4 to the A350 will provide a more resilient local network to address traffic congestion. The proposed link or distributor road (which this council does not support) will do nothing to stop those with local knowledge seeking to use the most direct routes through the town.

New roads increase traffic and do not decrease it. There is published evidence that new roads create more traffic rather than reducing congestion. In 1994 the Standing Advisory Committee on Trunk Road Assessment showed that average traffic flow on 151 improved roads was 10.4% higher than forecast and 16.4% higher than forecast on the 85 adjacent routes that the improvements had been intended to relieve. In a dozen more cases the increase in traffic ranged from 9% to 44% in the short run and 20% to 178% in the longer run. The conclusion was: 'An average road improvement...will see an additional 10% of base traffic in the short term and 20% in the long term'. This has been accepted by the Department of Transport and other reports from elsewhere have demonstrated similar results. Furthermore, studies of bypasses such as that in Newbury have shown that reductions in town centre traffic levels were less than originally forecast and the subsequent regrowth in traffic levels on the bypassed roads and the new road resulted in a considerable overall increase in traffic.

Any suggestion the proposed link road will reduce congestion is wrong and the opposite has been shown to be the case. As the consultation document makes clear, these houses will be marketed at people working along the M4 corridor and, as the stated aim of the road is to ease access to the M4, then it is obvious that the Council intends to increase traffic on this and surrounding roads as the residents' travel to their jobs; in direct conflict with the spatial strategy suggesting homes should be close to places of work. If any of the residents of the new houses wish to use the train to get to work then they will have to drive into town because many of these houses, especially in the south of the development, will be too far from the station to walk or cycle, particularly in our inclement climate. Thus, congestion in the town centre and especially on Station Hill/Cocklebury Road will be made worse.

CP3 (Page 7) *Do you agree these sites are most appropriate upon which to build? If not, why not?*

Calne Without Parish Council is concerned about Site 1 and to a degree Site 2 given both border the parish. We do not agree they are the most appropriate on which to build. The developments will create an urban sprawl reducing the delineation between the villages of Derry Hill, Studley and Chippenham which, when considered alongside the proposed Solar Farm at Forest Gate, will be reduced further resulting in Derry Hill and Studley becoming suburbs for an expanded Chippenham.

The site selection report acknowledges for both Site 1 and Site the proposed developments will impact the landscape setting of Derry Hill, we would contend that this would also apply to Studley for Site 1 and to the Pewsham Ward of Calne Without for Site 2.

Further arguments against the selection of these sites relate to loss of productive farmland at a time when we need to be focusing on improving sustainability, the environmental implications associated with such a major development and the loss of green space and the access to this.

Removing such a large amount of productive farmland reduces our capacity for sustainability in the light of the increasing requirement for domestic production of foodstuffs. There is an increasing desire for more UK produced rather than imported produce to reduce the reliance on imports and support a more sustainable environment; something that should contribute to the climate emergency declared by Wiltshire Council. Furthermore, there is still a lack of clarity on the effect that Brexit may have on imports and food security which may result in a requirement to increase UK food production.

A housing development on the scale proposed at Site 1 and Site 2 will also have a catastrophic effect on wildlife as habitats that will be totally lost – the plans make little or no provision for the retention of these or to ensure sustainability of the existing flora, fauna, pollinators or wildlife. There is little evidence that this has been considered in any detail. There are no clear plans for re-wilding or wildlife corridors.

The construction of a new town on this scale will have a massive effect on the water table. Water will not be able to soak into the farmland and will therefore exacerbate the flooding along Maud Heath's Causeway and at Langley Burrell. The flooding that occurs with increasing frequency at Westmead will worsen and is likely to be more far-reaching along the River Avon by this development, which it must be assumed will act as a surface water drain. In addition to causing additional flood risk to Chippenham the downstream impact for the proposed developments beyond Rowden and to the existing settlements at Reybridge, Lacock and Melksham is likely to be significant without major investment in flood defences and management.

A further concern with Site 1 is the impact on the Marden River Valley. The open character of the landscape and strong association with the rivers and floodplain are important characteristics to safeguard. Development in this area will reduce the separation between Tytherton Lucas and Chippenham and reduce its remote and tranquil character. In addition, development, as acknowledged in the consultation documents, would be visually prominent from surrounding high ground and will make this edge of Chippenham considerably more notable in the surrounding countryside. The options which broach the North Wiltshire Rivers Route have a higher potential to reduce separation between Chippenham and Tytherton Lucas.

The Marden River Valley can only be accessed from a public footpath and is an undisturbed site for a number of important species of mammals, birds, aquatic life, flora and fauna. It has been identified as a priority habitat in the Wiltshire and Swindon Bio-diversity action plan, protection also supported by Core Policy 50 Biodiversity and Geodiversity in the Wiltshire Core Strategy.

In addition to the loss of farmland, habitat and the increased flood risk the environmental impact of building so many new homes and the associated infrastructure will be significant, further undermining Wiltshire Council's effort to be carbon neutral by 2030. A new build home will release an average of 43 tonnes of CO₂e into the atmosphere, so the development at Site 1 would release over 300,000 tonnes of CO₂e into the environment which we would require 645 hectares of woodlands to absorb before the homes are even occupied. The effect of building on this scale could only be mitigated by ensuring that only the most environmentally friendly and insulating construction materials were used and that every house had solar panels and heat pumps. There is nothing in the plans about offsetting the carbon implications.

Covid 19 has shown how important green spaces are for our mental and physical health. People taking their daily exercise along the Sustrans cycle route and the Wilts & Berks Canal will find themselves not walking through a green space where the only sounds are those of the natural world but will find themselves walking under concrete flyovers with the resultant effects of air pollution, noise pollution, litter and dark water run-off. The views that users of these amenities will see once this development is completed will not be woodland and fields but congested roads and houses.

CP4 (Page 7) What are the most important aspects to consider if these sites are going to be built on?

The question starts with the premise that the sites will be built on. If that is the case, why is this being presented as a consultation?

The response provided to CP2 and CP3 set out the concerns of Calne Without Parish Council and identifies key considerations: the impact of the proposed

new link roads that will not reduce traffic, the loss of productive farmland, the environmental impact including loss of habitat and flooding, loss of amenity space, the impact on the delineation between Derry Hill, Studley, Pewsham and Chippenham resulting in a continuous urban sprawl.

Traffic is a key consideration. The consultation provides no evidence of the amount traffic generated by the proposed developments its distribution and assignment to routes in the network. It is not clear what traffic flows will be anywhere on the network or whether the wider area east of Chippenham including Calne has even been modelled in any detail. This is of huge concern to Calne Without Parish Council; there should be detailed information on the impact on the parish and the town of Calne where traffic conditions and air quality are poor. It should be remembered that Derry Hill and Studley are much nearer the proposed distributor road and the associated developments than Chippenham town centre and there are already have major capacity issues at Studley Crossroads.

A proposed development of 7500 houses, 1m square feet of employment provision and a major distributor road connecting to the A350 to both the north and south, will inevitably generate high levels of new traffic and attract rerouting of existing traffic to the A4 through Calne and our parish. The main junctions in Calne and on the A4 west of the town are already congested and operating close to or at their capacity. An example is Studley Crossroads where a relatively small development of 53 houses on the Studley side of the crossroads and which generated relatively low additional traffic movements on the Derry Hill side caused there to be significant queues and delays of over 8 minutes. The developers own traffic consultant showed that peak hour traffic flow on the Derry Hill arm of the junction is 120% of the capacity. This already exceeds all the junctions in Chippenham that have been analysed as part of the consultation and yet Studley Crossroads has not been considered. This and is a major omission for a junction so close to the proposed distributor road and a 7500-house development. Studley Crossroads already has traffic flows on the A4 of 16000 vehicles a day, any increase in A4 flows will reduce the ability of Derry Hill traffic to turn into the A4 with delays increasing exponentially.

These traffic issues and the impact of the development and new road on Studley Crossroads, Curzon St, Silver St in Calne and Sandy Lane must be analysed and properly considered as part of the consultation. Without this information the proposals should be rejected and not deferred to a later stage to consider mitigating measures. Mitigating improvements are likely to be considered and rejected as impractical or prohibitively expensive. Studley Crossroads for example has been developed on all sides so there is very little room for improvement and as mentioned earlier is now a major rat run for drivers avoiding congestion on the A3102 in Calne. The only factor suppressing demand for greater use the route as a rat run is the current difficulty in turning right onto the A4. Any improvement in capacity on the

Derry Hill arm at Studley Crossroads will attract a corresponding increase in rat running traffic to an unsuitable route with environmental and safety issues. Any delays introduced to the currently free flowing A4 traffic will create unacceptable noise and air pollution problems close to the new residential developments at Studley Gardens and Chapel Street.

Developments of the scale proposed require much more detailed examination of the wider area affected which must include Calne Without Parish, Bremhill Parish and Calne town centre and the area between Calne and Chippenham, including from the A3102 through Sandy Lane.

CP5 (Page 19) How can these concepts be improved?

Addressing Sites 1 and 2 and whilst in no way accepting the premise that development should go ahead for the reasons stated in response to questions CP2, CP3 and CP4. Constraining the development to be contained within a boundary created by the proposed link or distributor road would provide a natural boundary – as long as there was a long-term commitment to protect the land outside this boundary from further development – for say 50 years. In addition, the concepts should include further environmental mitigations through the planting of copses, the provision of wildlife corridors and re-wilding some of the area.

There must a comprehensive review of the traffic implications and a fully funded mitigation strategy developed to ensure there is no adverse impact on surrounding communities and roads.

CP6 (Page 19) Do you agree with the range of uses proposed, what other uses should be considered?

The land designated for employment seems inadequate to address the principal of providing housing to match employment to ensure the majority of the local population live where they work. It would seem most appropriate to locate employment land close to the A350 to allow ease of access to the M4 and reduce distributor road traffic given the proposed road is single carriageway, with many junctions and with speed restricted, potentially as low as 20mph in some sections.

CP7 (Page 19) Do you agree with the location of the proposed uses? What should be located where and why?

See the response to CP6.

CP8 (Page 19) Do you agree with the location and amount of employment provided on Sites 1 and 2?

No. See the response to CP6.

CP9 (Page 19) *Do you agree with the proposed locations for self-build and custom build housing? Would you prefer alternative locations?*

We have no view on the proposed locations but assume this is underpinned by research, which is not present in the consultation, that these would be desirable and marketable sites for such initiatives. It is surprising that the pockets are quite limited. Although for Site 1 these fall outside this council's suggestion for the boundary of development.

It is surprising there is no ambition stated to encourage the use of land in villages for self-build homes – particularly where this may encourage locally employed families to build close to places of work.

CP10 (Page 19) *Do you agree with the proposed sites for renewable energy? Is there a particular type of renewable energy that should be provided?*

The sites seem limited in size and scale when compared to the proposal currently being suggested for Forest Gate at Pewsham. Based on what this council has been advised about the Forest Gate site the proposed sites would not appear to be commercially viable. There is also the question of proximity to housing developments. We have sought, but not been provided with, details about such sites close to residential developments in connection with Forest Gate. We assume Wiltshire Council has looked at this for the proposed developments at Site 1 and Site 2. Whilst in principal provision for renewable energy must be considered a positive proposal, it is difficult to comment on the type.

CP11 (Page 19) Site 1 *Do you agree with the proposal for some housing to be located north of the North Rivers cycle path?*

No. Calne Without Parish Council is not in favour of the proposed development at Site 1 and Site 2. If it were to proceed, we would wish it constrained by the proposed link/distributor road and also not north of the existing cycle route.

Furthermore, the unspoilt countryside between the North Rivers cycle path and the River Marden is protected in the Bremhill Neighbourhood Plan. In 2020 over 5,000 people objected to the potential closure to the cycle path demonstrating that it is a much-appreciated asset 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.

CP12 (Page 19) Site 1 – *Are there any uses that would be most suitable for Hardens Farm and New Leazes Farm?*

Calne Without Parish Council starts from the position that it is opposed to the loss of productive farmland and the associated infrastructure. Re-wilding might be a potential proposition.

CP13 (Page 19) *Is there anything we have missed that needs to be considered in planning for Chippenham.*

As highlighted in comments on the spatial strategy there is a lack of balance between house numbers and industrial strategy to create employment opportunities to ensure any development is sustainable.

ADDRESSING CLIMATE CHANGE AND BIODIVERSITY NET GAIN

30. Calne Without Parish Council acknowledges the challenges arising from climate change and is supportive of the Wiltshire Council initiative to make the county of Wiltshire carbon neutral by 2030. But this support assumes this must be delivered through sustainable development designed to tackle and adapt to and mitigate the effects of our changing climate, whilst ensuring our communities are desirable and safe places to live and work.

31. Answers to the specific questions arising from the consultation are set out below:

A1 (Page 9) *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 trends before 2030?*

Not based on the scale and scope of development plans proposed. It is a sound assumption and reasonable to expect carbon reduction outcomes that are deliverable, given sustainable growth in the right locations. In fact, it is a requirement of planning legislation and the National Planning Policy Framework (NPPF) that local plans are aligned with the Climate Change Act and the Government's net zero carbon by 2050, and 68% reduction (on a 1990 emissions baseline) by 2030, national target. This is a clear legal duty under Section 19 of the 2004 Planning and Compulsory Purchase Act, as amended by the 2008 Planning Act, requiring that, taken as whole, Local Plan policy contributes to the mitigation of, and adaptation to, climate change. In other words, Wiltshire's Local Plan not only has to 'deliver outcomes that significantly reverse existing carbon emission trends before 2030' but needs to, as a minimum), align and demonstrate this alignment with these national targets.

A2 (Page 9) *What practical and achievable steps should the Local Plan take to significantly reduce carbon emissions by 2030?*

The plan should be employment led to radically reduce the need for additional commuting. This would mean abandoning the policy of unsustainable growth that simply attracts relocation from along the M3, M4

and A350 corridors, with its associated dependency on commuting. It would mean housing numbers that genuinely meet local need and are linked to local employment opportunities, so that more people can live near their place of employment without the necessity to commute long distances.

A plan with lower, sustainable housing numbers would not require the kind of extensive road infrastructure being proposed for example, in Chippenham with extended river crossings (up to 0.5km long each) across a flood plain, and bridges over the Wilts-Berks canal, all of which would have a huge associated carbon footprint. Neither would there be the need for extensive destruction of land that acts as a carbon sink, which would release huge quantities of carbon and remove the potential to capture carbon in future. Nor would the Plan thereby embed vast quantities of emissions for years to come as a result of the commuting that will inevitably result, as has happened with previous urban expansion, causing the current level of congestion and tailpipe emissions.

Appropriate and sustainable housing numbers supported by investment in attracting suitable employers, bringing skilled jobs into the area, will have the effect of reducing commuting and private car dependency

Any new housing and industrial development must be designed and constructed in compliance with the highest sustainable and environmental standards, and these must be enforced to ensure there are no emissions and potentially negative emissions, associated with all spatial development, which will have the added benefit of removing the need for costly retrofit later. This is likely to require the installation of heat exchange pumps, solar power generation capability coupled with efficient insulation.

Existing housing stock should be brought to a zero-carbon standard by providing financial incentives to encourage the installation of heat exchange pumps, solar power and insulation.

The reliance on use of carbon fuelled vehicles must be reduced, possibly by use of road pricing at peak times, and using the revenue to invest in low-cost sustainable public transport options with the necessary links and frequency that ensure high volume use. There should be major investment in the infrastructure necessary for charging of electric vehicles, which might attract a road pricing discount.

In short, to deliver outcomes that significantly reverse existing carbon emission trends, the planners need to radically change their approach to carbon fuelled vehicle dependency and ensure future development does not increase, and ultimately reduces carbon emissions (e.g. through renewable energy generation and carbon sequestration).

There is plenty of evidence for the viability of Local Plan net zero carbon or 'carbon neutral' development policies in other Local Authority plans that have adopted or are in the final stages of development and adoption.

Despite the intention outlined in the plan to address climate change and biodiversity, and the Climate Emergency declaration in which the Council commits to seek to decarbonise the county, the Local Plan proposals would substantially increase the county's carbon emissions and lock in emissions for years to come (i.e. precisely the opposite of the intention).

A3 (Page 9) How should these actions be delivered and measured?

See A2 – The Local Plan should include an industrial strategy to identify and attract suitable employment to minimise the requirements for commuting.

For any development the plan must provide sufficient incentives and controls to ensure developers deliver any new buildings (domestic and industrial) to the required zero carbon standards. Similarly, there will need to be appropriate incentives to motivate the community to switch to electric powered vehicles, with appropriate infrastructure providing convenient and accessible charging points. It may be necessary to make arrangements for the disposal of petrol/diesel vehicles at no cost to the public.

Support and incentives should be provided to help people convert existing buildings to be carbon neutral by installing heat exchange pumps, solar panels, efficient insulation and charging points. A review should be undertaken of current public transport (buses) to ensure rural communities can enjoy regular and reliable electric powered buses.

Carbon emissions should be measured widely by placing monitors in appropriate locations; with the readings regularly published so that the community is able to monitor the impact of the measures being introduced. Similarly, home-owners and tenants should be provided with means of monitoring carbon emissions; possibly using similar technology to that employed by Smart Meters to enable ease of collection and publication.

B1 (Page 16) If we are to successfully tackle flood risk and promote sustainable water management, would the measures set out above go far enough?

There must be a concern about committing to building in Flood Zone 1, even with flood resilient design methods. Is it practical to expect people to commit to purchase properties where a flood risk exists, or will the council be providing insurance to cover this risk that may not be available commercially at reasonable prices?

Flood risk will be exacerbated by projected climate change and whilst flood risk may be mitigatable for some sites, building on these sites can increase the risk elsewhere. It is therefore better to avoid building on low-lying land adjacent to existing flood plains (e.g. Site 1 to the East of Chippenham) in order to reduce the risk of future downstream flooding (e.g. of Chippenham and other communities such as Melksham, Bradford-on-Avon and Bath).

All new development must incorporate Sustainable Drainage Systems – where this is not technically feasible it should not be allowed to proceed, thus ensuring water run-off is fully managed. Providing a loophole for developers to claim a solution is not technically feasible is a licence for avoidance.

B2 (Page 16) *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?*

This is a reasonable statement of ambition, but the question appears to be based on a false premise since natural capital would generally not be enhanced by any proposed development, and would be spectacularly damaged by siting development, for example to the East of Chippenham in the Avon and Marden valley.

Any measures to incorporate 'nature' within the proposed urban conurbations would be tokenistic relative to the loss of natural capital caused. It is also far from clear what Wiltshire Council's Blue and Green Infrastructure Strategy is, or the nature-based solutions mentioned under Policy Theme 2 would actually comprise of, apart from statements about benefiting carbon sequestration, air quality improvements, passive cooling, health and wellbeing and biodiversity enhancement, which are precisely what the proposed development would destroy.

Final judgment should be reserved until the Green Blue Infrastructure (GBI) strategy is published.

B3 (Page 17) *If we are to successfully plan for net zero carbon future through sustainable design and construction, would the measures set out above go far enough?*

The measures are a reasonable baseline. However, there must be concern about the statement that '...standards would need to be clear, easily implemented and not put at risk the viability of the development'. This appears to be a charter for avoidance and an obvious loophole for developers to exploit. If it is not viable to build sustainable homes that have zero impact, planning should not be approved.

Furthermore, successfully enhancing natural capital requires it isn't destroyed in the first place. Hence the need to avoid building on valuable habitats and carbon sinks, such as the land to the East of Chippenham. High quality pasture and river valleys are finite and irreplaceable, and need to be protected and enhanced in their current state.

An estimate of the carbon emissions and the natural capital loss associated with the proposed sites would be a good starting point in being transparent about the damage to the climate and environment that would result.

A key omission is any clarity on how support might be afforded to low-income households who are unable to convert existing dwellings to achieve a zero-carbon rating. This issue is likely to be accentuated as a result of the current pandemic and the consequences for many low-income households.

B4 (Page 17) *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?*

Yes. 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 associated with compliance with zero carbon standards 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, and a net zero carbon policy needs to be adopted as soon as possible (i.e. from 2023 at the latest and preferably sooner).

B5 (Page 17) *Would a move to support the delivery of zero carbon new development materially affect scheme viability?*

It should not, the commitment to a carbon neutral environment requires it to be viable, otherwise why make the commitment. Commercial viability, as opposed to social viability, will be dependent on the developers and their appetite for risk and innovation. Potentially, a developer who can deliver to the necessary high standards to achieve a measurable zero-carbon result will be very well placed to secure further work in many locations. It would seem an ideal challenge and business opportunity.

There needs to be a balance between viability and acceptance of the need to change so the focus should be on:

- developing a carbon neutral spatial strategy;
- putting net zero carbon development policy in place;
- actively promoting renewable energy development;

- supporting the transition to ultra low emission vehicles (principally Electric Vehicles).

B6 (Page 17) *In terms of performance standards for new buildings, what method(s) should the Council aim to implement?*

The performance standards should be of the highest order with no compromises. Wiltshire might set itself a stretch target of delivering to standards higher than that dictated by central Government.

Targets might include, retrofit of insulation (including double glazing) and renewable energy generation devices (e.g. solar panels and ground source heat pumps) in conservation areas and listed buildings, subject to other relevant local planning requirements.

B7 (Page 17) *How should the Council support retrofitting and modernisation of existing buildings to achieve higher performance and reduce carbon emissions?*

By the introduction and use of incentivised schemes (cost and risk share). Provision will need to be made to support low-income households to meet the necessary standards.

B8 (Page 18) *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?*

This appears to be a relatively challenging list of goals. Wiltshire is a county that could benefit from energy produced by wind generators. This should be considered and researched as a viable alternative energy source. Where new buildings are being planned, they should be incorporating solar tiles in the design stage.

B9 (Page 18) *Should the Council set out policies that favour particular technologies, or should it encourage all technologies to provide green energy for Wiltshire?*

The key must be to encourage and support all technologies that reduce emissions and provide sustainable energy at a reasonable cost i.e. no greater than existing sources.

B10 (Page 18) *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, and these should be consistent with those suggested by the Committee on Climate Change i.e. between 30% and 45% by 2030.

B11 (Page 19) *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 with sensitive locations such as conservation areas and/or listed buildings?*

There should be support (financial, technical and practical) to retrofit and adapt existing buildings to accommodate ultra-low carbon or zero carbon forms of energy production and use. In conservation areas it may be sensible to look at providing incentives to incorporate such technologies in a sympathetic manner.

In listed buildings considerable care will be needed to ensure the character of the buildings is not changed. In some situations, in Wiltshire listed buildings will be thatched and solar panels will not be an option; so remote and discrete ground siting may be an option or by the use Air and Ground source pumps for heating. In all cases consultation must take place with the owners of older buildings to ensure a sensible and sensitive solution is achieved. Given the unique nature of some small villages in Wiltshire the local community will need to be consulted to ensure they are supportive of changes that could result in a significant change to the character of their community.

B12 (Page 19) *If we are to tackle issues associated with air quality would the measures set out above go far enough and be effective in improving air quality in Wiltshire? If not, what measures are we missing and how should they be framed in land-use planning policy?*

The paper states that “the Council considers that increasing the level of self-containment within Wiltshire’s settlements offers the best solution for tackling unsustainable, carbon-based travel patterns.” It further states that “to achieve this goal, the Local Plan will likely need to set out policies for reducing travel and the use of private carbon fuelled vehicles.”

Despite this, the spatial strategy promotes large urban commuter extensions, requiring climate damaging infrastructure and locking in tailpipe emissions and pollution for many years to come. The spatial strategy also promotes additional air pollution in Chippenham and neighbouring Calne by them becoming dormitory communities for people working in the M4 corridor. A licence to travel and pollute.

A more organic and local employment-led development approach, with supporting policies, would prevent large scale commuting and associated emissions/ air pollution. Sustainable (active and battery enhanced) travel options within sites would reduce the need to use cars for local journeys. Employment development should promote high skilled jobs in order to minimise out-commuting and allow people to live near their place of work.

Policies and incentives to reduce travel e.g. road or congestion charging, and the use of private carbon fuelled travel patterns may help achieve the goal. This should be allied with to a fundamental review of public provision. For many rural communities the bus service has been reduced to an absolute minimum. To support delivery of improved air quality and reliance on individual vehicles this will need to change, with more buses, extra bus routes serviced by a reliable and comfortable zero carbon service at competitive prices. Similarly, careful attention must be given to relieve certain areas of traffic congestion if we are to have any chance of reducing air pollution.

B13 (Page 19) *What practical policy steps should the Local Plan take to significantly increase modal shift to public active transport, and speed up the transition to greener fuelled vehicles?*

See B12. The provision of an appropriate accessible infrastructure (publicly and within homes) for greener fuelled vehicles coupled with disincentives – road charging for carbon fuelled vehicles.

B14 (Page 19) *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?*

All new developments should come with a levy on the developer to provide adequate access to the charging infrastructure necessary to support green vehicles. It should be a condition that no new site can be occupied until the developer has secured sustainable energy supplies to ensure that electric vehicles can be used and charged at that development. This should incentivise the developers to work with the Distribution Network Operators and Distribution Service Operators to provide the necessary supply. The responsibility should not necessarily fall to the council.

B15 (Page 20) *If all new development is to be future proof, promote zero carbon production and consumption terms, what impact would this have on the design and viability of schemes?*

There needs to be a fundamental re-think. Wiltshire Council needs to:

- develop a genuinely sustainable spatial strategy that is not dependent on commuting;

- take an employment led approach;
- reduce housing numbers to allow for more organic growth that will not cause the substantial harm associated with the current proposed strategy;
- measure the carbon emissions associated with the proposed spatial strategy options and prioritise minimising current and future emissions;
- develop a framework for aligning the Local Plan with the Government's and Wiltshire's carbon reduction targets;
- place proper value on natural capital and account for it in the Plan;
- develop and implement net zero carbon development policies and low carbon, sustainable construction policies;
- develop and implement supportive renewable energy development policies;
- develop and implement supportive Electric Vehicle infrastructure policies;
- develop and implement supportive integrated public transport and active/
- battery assisted travel infrastructure development policies.

In the end the viability of any scheme is a judgment to be made by the developer. The challenge is to ensure that there are sufficient incentives for the developer to meet the zero carbon requirements set by the council that provide a reasonable return for the investment made. It is likely that high environmental and sustainability standards, at least initially, will be more expensive. However, the broader adoption of such standards and new ways of working is likely to drive down costs in the long term. Therefore, the pursuit of the high standards necessary to achieve the Council's environmental and climate change goals should not be compromised in favour immediate results and profit.