

## Wiltshire Local Plan Review CWPC Response to Draft Local Plan – Update to Council

### 1. Background

A Local Plan sets out a vision and a framework for the future development of an area. It is drawn up by a Local Planning Authority in consultation with its community, providing a platform for local people to shape their future surroundings. In Wiltshire, our current Local Plan is the Wiltshire Core Strategy (WCS), adopted in 2015 (<https://www.wiltshire.gov.uk/media/372/Wiltshire-Core-Strategy-adopted-2015/pdf/Wcs.pdf?m=637099399373530000>).

The Government requires every Local Plan to be reviewed at least once every five years. Wiltshire's Local Plan, the Wiltshire Core Strategy, was adopted in 2015, and is therefore being reviewed. This review is termed the 'Local Plan review'.

The Draft Local Plan was published for consultation on 27<sup>th</sup> September and is available here: [Current consultation \(Reg 19\) autumn 2023 - Wiltshire Council](#). We are now in an eight-week consultation period closing on Wednesday 22<sup>nd</sup> November.

Wiltshire Council are running a series of consultation events. These include a live webinar on Tuesday 10<sup>th</sup> October at 6:30pm and a drop-in at Calne Library on Monday 16<sup>th</sup> October from 3pm to 7pm. Details of these events are available here: [Current consultation \(Reg 19\) autumn 2023 events - Wiltshire Council](#).

At its meeting of 11<sup>th</sup> September Calne Without Parish Council established a small task and finish group to develop the Council's response to the local plan consultation.

The purpose of this paper is to outline the proposed structure and content of this response, ahead of providing a draft response for consideration at the Council's November meeting. The Council is asked to consider this document and provide feedback to the task and finish group.

### 2. Proposed response

The planned structure and content of the Council's response is set out as follows:

#### Positive Changes to Support:

We welcome and support the following aspects of the local plan:

- Policy 2 – Delivery Strategy – *support infill development in Small Village where it respects existing character and form of settlement.*
- Policy 70 – Sustainable Transport – *planning significant developments in locations accessible by sustainable transport modes, including walking and cycling.*
- Policy 75 – Strategic transport network – *Support for strategic bus network (55 and 33 routes in our area).*
- Policy 76 - Providing Affordable Homes – *increase in Affordable Housing Provision to 40%.*
- Policy 77 - Rural Exception Sites – *increase in maximum size from 10 to 20.*
- Policy 78 - Meeting Wiltshire's Housing Needs – *minimum standards for enhanced accessibility and adaptability.*
- Policy 81 – Community facilities – *support for existing community facilities.*

- Policy 85 - Sustainable Construction and low carbon energy – *new housing to be built to operational net-zero carbon standard.*
- Policy 89 – Biodiversity Net Gain – *requirement for developments increased from 10% to 20%.*
- Policy 91- Conserving and enhancing Wiltshire’s landscapes – *conserving and enhancing locally distinctive character of settlements and their landscapes and being of high quality design.*
- New policies for:
  - Addressing Climate Change (Policy 4)
  - First Homes Exception Sites (Policy 79)
  - Self and Custom Build Housing (Policy 80)
  - Health and Wellbeing (Policy 83)
  - Public Open Space and Play Facilities (Policy 84)
  - Conserving and enhancing dark skies (Policy 92)

#### Housing Allocation for Calne:

##### Context:

- 1,230 homes for plan period of 2020-2038 with 600 residual at 1<sup>st</sup> April 2022.
- Employment land of 5.1ha
- Neighbourhood designation of a further 100 homes in Calne area based on 10% of the overall requirement (plus 30 in Derry Hill and Studley).
- Site allocation of 2.7 ha employment land off Spitfire Road (Policy 10).
- Site allocation of 570 homes and 0.5ha employment land North of Spitfire Road (Policy 11).

##### Response:

- From the 2021 Draft Local Plan, the residual allocation for the Chippenham Housing Management Area has halved, from 9,860 residual from 1<sup>st</sup> April 2019 through to 2036, to 4,840 residual from 1<sup>st</sup> April 2022 through to 2038. At the same time, the residual housing allocation from Calne has almost doubled, from 360 to 600. Comparatively, Chippenham’s residual allocation has reduced by 59%, even though the Local Plan Policy 7 allocates sites for Chippenham in excess of the defined requirement (2,525 in Policy 7 v 2,090 residual allocation).
- Calne suffers from serious traffic congestion and air quality issues and is subject to an Air Quality Management Plan. Further development of housing in Calne is likely to exacerbate the problem, and, unless air quality impacts can be mitigated as per Policy 101, should be deferred until air quality is within acceptable limits.
- Calne has experienced significant development within recent years that has contributed little new infrastructure for the town. The developments proposed in policies 10 and 11 contribute no new social infrastructure (such as shops, community spaces, primary schools, nurseries or medical centres).

#### Housing Allocation for Derry Hill and Studley:

##### Context:

- Derry Hill and Studley designated as a large village.
- Housing requirement for Derry Hill and Studley for 2020 to 2038 was 69 minus 3 completions 66, which is then reduced to 30 (33 minus completions) due to environmental constraints. This is an increase in requirement from the 2021 Draft Plan, despite the overall reduction in Wiltshire and the Housing Management Area.

##### Response:

- Derry Hill and Studley constrained and lacking in suitable development sites. Neighbourhood Plan call for sites received two sites put forward, only one of which could accommodate further development of the scale proposed. This remaining site was itself dependent on access along an unlit narrow residential lane with no pedestrian footway.
- Both sites put forward for consideration depend for access on the congested arm of Studley Crossroads for access to the A4, which previous assessments have shown to be over-capacity. This will be made worse by both the addition of 30 further homes locally and the proposed development of 2,525 homes to the south of Chippenham, linking the A350 and the A4, which would be expected to increase traffic volumes along the A4.
- Derry Hill and Studley has had two significant developments in recent years: 49 homes with the Chapel Street development in 2009/10 and 54 homes with the Studley Gardens development in 2018/19. If further development is required in the local plan, then it should be phased to allow a similar period to elapse.

### Chippenham Housing Allocation

#### Context:

- 5,830 homes for plan period of 2020-2038 with 2,090 residual at 1<sup>st</sup> April 2022.
- Land South of Chippenham and East of Showell Farm is allocated in Policy 7 for mixed use development of approximately 2,525 dwellings, approximately 15ha employment land, a district and local centre, 12.4ha of land safeguarded for a 10 form entry secondary school, two 2ha sites for two 2 form entry primary schools incorporating two 60 place nurseries, and two 0.3ha sites to accommodate additional 80 place nurseries.

#### Response:

- Inappropriate criteria used for site selection:
  - Place Shaping Priority 3 is set as *“Improved access to the River Avon valley through Chippenham as an important green and blue infrastructure corridor for the town.”* If the River Avon valley is rightly viewed as an important green and blue infrastructure corridor, then why would developing land on either side of it be assessed as a positive.
  - Place Shaping Priority 5 is set as *“Linking the A4 to the A350 which will provide for a more resilient local network addressing traffic congestion within the town centre.”* The development 2,525 homes and a link road between the A350 and the A4 south of Chippenham is likely to lead to significant increases in traffic volumes taking the west-east route along the A4, through the centre of Derry Hill and Studley, and through the centre of Calne with its current Air Quality Management Area. Without an understanding of the wider impacts on traffic, congestion and air quality, it is difficult to see how this PSP can be applied as a positive factor.

### Other Areas to Comment On:

- The current practice of green spaces, communal spaces and play areas in new developments being the responsibility of residents to maintain through estate management companies is inefficient and places an added financial burden on residents, including affordable housing residents. This is iniquitous, as residents are simultaneously funding the upkeep of public spaces in established residential areas through their council tax. Wiltshire Council should instead be taking on the maintenance of open spaces in exchange for a contribution from the developer.
- Policy 76 on Affordable Homes should also make provision for the supply of homes for Social Rent, to ensure that homes remain within the reach of the poorest in society. (“Affordable” rents are linked to market value, whereas “Social” rents are linked to income.) It may be possible

to offer a reduction in the %age of overall “affordable” housing in a development, if a proportion is provided at social rental levels.

- The current unimaginative and generic design of new developments has led to Calne and surrounding areas losing its character and sense of place. The new Design Guide should be rigorously enforced to limit this in the future. Non-strategic bus routes, such as the 42 and 43 routes, should be supported and enhanced.
- Many new developments are not linked to sustainable transport networks (e.g. footpaths and cycleways), and are a considerable distance from public transport stops. This leads to an over-dependence on people using private cars.

### **3. Recommendation**

It is recommended that the Council considers the content of the above draft and provides feedback to enable the response to be further developed.

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