



LAND ADJACENT TO LONDON ROAD AND PEWSHAM WAY, CHIPPENHAM – PUBLIC CONSULTATION

RESPONSE FROM DERRY HILL AND STUDLEY PARISH COUNCIL

Q1. The Council's recently withdrawn proposed Local Plan set out that this area should provide for mixed-use development including housing. Do you agree with the proposals for the site?

Derry Hill and Studley Parish Council objected to the allocation of this land for housing in Wiltshire Council's draft Local Plan Review (now withdrawn) and we remain opposed to it.

Our objection is based on the unsoundness of the process used to select the site for housing allocation. The process is detailed in Wiltshire Council's document "Planning for Chippenham" (July 2023).

This planning document identified seven potential development sites around the town and then used a process of multi-criteria decision-making to assess these sites against six "Place Shaping Priorities".

We contend that two of these six Place Shaping Priorities were unsound:

PSP3 the River Avon Corridor. "Improved access to the River Avon valley through Chippenham as an important green and blue infrastructure corridor for the town."

PSP5 New infrastructure. "Linking the A4 to the A350 which will provide for a more resilient local network addressing traffic congestion within the town centre."

Addressing each of these in turn:

PSP3 (River Avon corridor). Wiltshire Core Strategy (WCS) Policy 52 (Green Infrastructure) requires major development to retain and enhance Wiltshire's green infrastructure network. The River Avon is an important green infrastructure corridor for the area, so it would be logical for impact on the River Avon corridor to be treated as a negative criterion in the assessment, rather than as a positive.

PSP5 (New Infrastructure). The construction of a link from the A4 to the A350 is treated as an important place-shaping priority, without any supporting comparative impact assessment to determine whether this will be a good thing. We consider that this link is likely to result in a higher flow of traffic from west to east along the A4, having an adverse impact on congestion in the centre of Calne (which is currently covered by one of only 8 Air Quality Management Areas in the County due to vehicle emissions). This runs counter to WCS Core Policy 55 (Air Quality), which states: "*Development proposals, which by virtue of their scale, nature or location are likely to exacerbate existing areas of poor air quality, will need to demonstrate that measures can be taken to effectively mitigate emission levels in order to protect public health, environmental quality and amenity.*"

Increased west-east traffic flows along the A4 will also make the uncontrolled junctions at Old Derry Hill (with the A342) and Studley Crossroads extremely difficult for road users during busy periods, leading to long delays.

Wiltshire Council's own Transport Evidence Base (May 2023) identifies that growth from the Local Plan "*is likely to increase volume / capacity (V/C) above 85% or exacerbate links with high V/C on the A4 London Road through Calne*", indicating the potential for severe impact.

Given this, the inclusion of PSP5 (New Infrastructure) as a positive criterion within the decision-making process is not evidence-based.

We therefore assert that the assessment process used in the "Planning for Chippenham" document is based on two erroneous criteria, PSP3 and PSP5, which unreasonably skew the assessment to only favour this specific site for development. The site selection process was therefore unsound.

Links:

- Wiltshire Core Strategy: - https://www.wiltshire.gov.uk/media/372/Wiltshire-Core-Strategy-adopted-2015/pdf/Wiltshire_Core_Strategy_2015.pdf?m=1735555642237
- Planning for Chippenham - https://www.wiltshire.gov.uk/media/11443/Planning-for-Chippenham-July-2023/pdf/Planning_for_Chippenham_July2023.pdf?m=638241436602930000
- Transport Evidence Base: - https://www.wiltshire.gov.uk/media/12036/Wiltshire-Local-Plan-Review-Transport-Evidence-Base/pdf/Wiltshire_Local_Plan_Review_Transport_evidence.pdf?m=638314186489270000

Q2. Do you have a view on the type of homes you would like to see and/or that you or your family are in need of? If so, please indicate below

- ✓ Bungalows
- ✓ 1-bed
- ✓ 2-bed
- ✓ 3-bed
- ✓ 4-bed
- ✓ 5-bed
- ✓ Affordable homes

NB The consultation questionnaire only allows for a tick box response, so our reasoning is included under Q5 below.

Q3. The proposals include potential land for a new primary school, a local centre, recreation/ play areas, public open spaces and community allotments. Do you have any thoughts about these facilities or other community facilities?

Should the development go ahead, we would support the inclusion of these facilities.

In addition, the local centre should include a medical centre (with space for a GP Surgery and a Dental Surgery), as well as a pre-school nursery. All of these facilities are in short supply within the local area. (Constraints on GP provision in the town are outlined in “Planning for Chippenham”, which also details the need for pre-school nursery provision as part of the development.)

The proposals should also include the restoration of the Wilts & Berks Canal through the development area. This would provide an attractive place-shaping feature to the development and would be consistent with Wiltshire Core Strategy Policy 53 (Wiltshire’s Canals). The layout of the development must protect the line of the Chippenham spur of the Canal and there may be benefit to the development of restoring part of this spur as a facility for moorings. We would encourage the Developers to work closely with the Wilts & Berks Canal Trust to maximise this opportunity.

The green spaces and biodiversity planting provided within the development should be concentrated along the margins of the canal to maximise its potential as a green corridor in accordance with Policy GI4 of the Chippenham Neighbourhood Plan.

Q4. Do you have any comments on the proposed movement strategy for the site including proposed roads, public transport links, pedestrian and cycle routes?

The A4 London Road is already subject to congestion during peak periods: this will be adversely impacted by the additional traffic generated by the development. We anticipate that this will be made even worse by the future completion of a link road through to the A350.

This will result in long delays to traffic joining the A4 from the A342, and from the local roads at Studley Crossroads. These junctions are already hazardous and have a poor safety record. The development should therefore fund signal control at these two junctions as mitigation.

The Canal Restoration put forward in our response to Q3 should include the towpath as a shared use path, linking in with the Wilts & Berks Canal Trust’s plans to develop a continuous walking/wheeling/cycling route from the NCN403 at Stanley through to Reybridge, near Lacock.

We support the commitment made to maintain existing public rights of way through the development.

We would also support the provision of a bridge on the A4, over the route of the old canal, to unlock further canal restoration opportunity to the east of Forest Gate (or alternatively a culvert under the A4 for the canal).

Q5. Please use this section to leave any other comments you may have on the proposals.

To expand on our response to Q2 above, any development on this site should follow the housing mix set out in Policy H1 of the Chippenham Neighbourhood Plan.

The development should provide 40% affordable housing, within which:

- 70% affordable housing to rent.

- 25% first homes.
- 5% shared ownership.

The size mix should use the following guideline:

- One bedroom – 10%
- Two bedrooms – 30% (of which 10-15% should be bungalows)
- Three bedrooms – 40% (of which 10-15% should be bungalows)
- Four bedrooms – 5%
- Five or more bedrooms – 15%

Finally, we note our disappointment at the lack of public consultation with this pre-application. There has been no public meeting or drop-in exhibition, negligible engagement with stakeholders and the public consultation has only allowed just over two weeks for responses. We will respond further to the Outline Planning Application once it is submitted.