

## General Comments

Ref. No.	Name	Comment	Response
S/GEN/1	Wiltshire Council Strategic Planning	<p><u>Policy Context</u></p> <p>The draft CNP is planning to cover the period 2023 – 2036 and is being prepared alongside the review of the Wiltshire Core Strategy (known as the Wiltshire Local Plan Review). It therefore needs to take into consideration not only the adopted Wiltshire Core Strategy (WCS) but also work undertaken thus far on the emerging Wiltshire Local Plan Review (LPR) which is at the Regulation 18 stage. It is noted that there is no mention within Section 1 of the draft CNP that the Wiltshire Core Strategy is being reviewed, although it is mentioned later on in the document.</p>	<p>The Neighbourhood Plan time period has been updated to align with the Emerging Wiltshire Local Plan time period, now covering the period up to 2038.</p> <p>Work undertaken thus far on the Wiltshire Local Plan Review has been referred to in the Neighbourhood Plan, and a new paragraph added in Section 1 to specifically refer to the Local Plan Review.</p>
S/GEN/2		<p><u>Policy Scope and Wording</u></p> <p>Several of the policies are quite lengthy and detailed. It is not always evident how a decision maker should respond to development proposals in the light of relevant policies. A number of policies delegate details to guidance or standards held outside the plan. The CNP should aim to be as self-contained as possible, but aside from this, at a practical level these external references may be replaced or become out of date. They may also represent good practice that would be followed in any event. They are also by nature more generic in content and may not respond easily or appropriately to local circumstances.</p> <p>It is usually preferable for the plan to set out directly the outcome being sought or state a clear test that applies. This way policies can reflect and respond to the unique characteristics and planning context of the area for which it is being prepared. Policy wording should be clear, precise, positive, relevant, and capable of being delivered. They should relate to matters that are within planning control and do not repeat policies that already exist nationally or in the WCS or Local Transport Plan. Some policies refer to changes to traffic management, public realm works or services that do not need planning permission. Parts or whole policies may be better stated in plain text.</p> <p>A review of the plan with these issues in mind would make the document more accessible and concise.</p>	<p>The Steering Group have reviewed the policies with this comment in mind and have simplified a number of the revised policies, and tried to make them less prescriptive/detailed where able to do so. They have revised policies where planning permission is not required.</p>
S/GEN/3		<p><u>The relationship of the CNP to the Local Plan Review</u></p> <p>The CNP is being prepared to be in general conformity with the WCS. It has, however, a proposed plan period ending in 2036 and so is looking beyond the WCS period that ends in 2026. The full strategic context of the CNP will only be complete once the Wiltshire Local Plan Review, that will look beyond 2026, has been published. The CNP is therefore being prepared having to anticipate changes to strategic policies and the likelihood is that the plan will need to be reviewed in due course.</p>	<p>The Steering Group are acutely aware that the Neighbourhood Plan may have to go straight into review to align with any newly adopted Wiltshire Local Plan in the future.</p>
S/GEN/4	Lacock Parish Council	<p>There are two issues which it is felt the Plan should deal with.</p> <p>With all the new housing developments proposed close to the River Avon, Lacock Parish Council is most concerned that with the replacement of greenfield areas with hard surfacing for these developments it will increase the level of run off and, at times of heavy rainfall, increase the volume of water going into the river with the risk of increased flooding downstream. The concern of the Council is that such a situation could have an adverse effect on Lacock. It is felt the Plan should make reference to this issue.</p>	<p>Whilst the concerns are agreed with, the Neighbourhood Plan is not allocating any housing sites. In allocating any strategic housing sites close to the River Avon the LPA should establish the effects of such allocations on runoff to the River Avon. Notwithstanding, Policy G13 of the Neighbourhood Plan seeks to establish the River Avon Strategic Green Corridor where housing development would not be permitted.</p>
S/GEN/5		<p>The other issue relates to the proposed Chippenham Distributor road between the Lackham roundabout, on the A350, and the A4. Associated with this is the proposal to have significant new housing to the south of Chippenham. The Council appreciates that all of the proposed road and housing may not lie in the Neighbourhood Plan area, but it nevertheless could have significant implications for Chippenham. It feels that these issues should be dealt with in the Plan.</p>	<p>The Housing Infrastructure Fund bid has now been withdrawn by Wiltshire Council. This will have some impact on the potential for strategic housing to be delivered on land south of Chippenham but until the Regulation 19 Draft of the Emerging Wiltshire Local Plan is released the Neighbourhood Plan cannot say with any certainty whether there would be significant implications for Chippenham or not. In any case the Neighbourhood Plan can only deal with non-strategic issues, and this would be a strategic issue.</p>
S/GEN/6	Canal & River Trust	<p>Based on the information available our substantive response as required by the Town &amp; Country Planning (Development Management Procedure) (England) Order 2015 (as amended) is that the Trust has <b>no comment</b> to make on the proposed Neighbourhood Plan as we do not own or maintain any canals within the plan area.</p>	<p>Noted.</p>
S/GEN/7	The Coal Authority	<p>Thank you for your notification below regarding the Pre-Submission Draft Chippenham Neighbourhood Plan Consultation.</p> <p>The Coal Authority is only a statutory consultee for coalfield Local Authorities. As Wiltshire Council lies outside the coalfield, there is no requirement for you to consult us and / or notify us of any emerging neighbourhood plans.</p> <p>This email can be used as evidence for the legal and procedural consultation requirements at examination, if necessary.</p>	<p>Noted.</p>

S/GEN/8	Gallagher Developments	<p><u>Conclusion</u></p> <p>Whilst we are in support of the Chippenham Neighbourhood Plan, we consider that there are a number of areas where the draft Plan does not meet the basic conditions. It is important to address these now to progress the Neighbourhood Plan towards adoption, but also to avoid the Neighbourhood Plan becoming out of date when the Wiltshire Local Plan Review is adopted.</p> <p>We are in support of policies to address and respond to climate change, but the draft Plan needs to be supported by robust evidence to demonstrate the policies are deliverable if they are to deviate from national policy and technical standards.</p> <p>It is also important that policies protecting green buffers do not come into conflict with draft strategic policies which will facilitate much needed growth in the town.</p> <p>In terms of affordable housing and housing mix policy, it is crucial that the evidence is properly set out to support the deviation from the existing housing evidence. Again, given the forthcoming Local Plan Review, it may be better to ensure these matters are left to the strategic plan to avoid the Neighbourhood Plan becoming out of date.</p>	<p>Support for the Plan noted.</p> <p>It is considered that the Plan as revised does meet the basic conditions.</p> <p>Complete comment on climate change following receipt of viability assessment.</p> <p>Policy GI5 on Green Buffers has been substantially resolved to ensure that it is not a strategic policy and relates to a single, small area of land within the Neighbourhood Area.</p> <p>The evidence on affordable housing and housing mix is clearly set out in the Chippenham Housing Needs Assessment carried out by AECOM in 2019. This evidence used the most up to date evidence available from Wiltshire Council on housing. If, and when, the Emerging Wiltshire Local Plan is adopted, it is appreciated that the Neighbourhood Plan would have to be reviewed to align with any new Local Plan.</p>
	Robert Hitchens	<p><u>2. Plan Period</u></p> <p>2.1 The CNP has a plan period 2023 – 2036. The proposed end date of the CNP coincides with the proposed end date of the WLPR as stated in the WLPR Reg 18 consultation, however it is likely that the WLPR plan period will be extended as it will not have a life span of 15 years from adoption as required by the National Planning Policy Framework at paragraph 22 which states that;</p> <p><i>"Strategic policies should look ahead over a minimum 15 year period from adoption, to anticipate and respond to long-term requirements and opportunities, such as those arising from major improvements in infrastructure. Where larger scale developments such as new settlements or significant extensions to existing villages and towns form part of the strategy for the area, policies should be set within a vision that looks further ahead (at least 30 years), to take into account the likely timescale for delivery."</i></p> <p>2.2. It is suggested therefore that the CNP should extend its plan period to take account of any extension to the plan period of the WLPR as identified in the forthcoming Regulation 19 public consultation prior to being submitted to Wiltshire Council for a Regulation 16 public consultation.</p>	<p>The Neighbourhood Plan period has been updated to align with the Emerging Wiltshire Local Plan time period, now covering the period up to 2038.</p>
S/GEN/9	Waddeton Park	<p><u>The Absence of a Housing Requirement and Insufficient Housing Allocations</u></p> <p>3.2 We have concerns at the outset that this draft NP does not include a housing requirement, especially for its full plan period up to 2036. It therefore does not include any policies or allocations to meet that housing requirement. In reviewing the supporting evidence, it appears that the NP group have both ignored the indicative housing requirement at a Wiltshire Council plan-level and have decided against preparing an up to date independent housing needs assessment.</p> <p>3.3 This approach is contrary to the NPPF and PPG provisions which require a housing requirement to be identified in drafting plans and allocating sites.</p>	<p>There is no requirement by the NPPF or PPG that a neighbourhood plan identify a housing requirement or allocate housing sites, and many neighbourhood plans do not. Paragraph 104 of PPG on Neighbourhood Planning explicitly states:</p> <p><i>"The scope of neighbourhood plans is up to the neighbourhood planning body. Where strategic policies set out a housing requirement figure for a designated neighbourhood area, the neighbourhood planning body does not have to make specific provision for housing, or seek to allocate sites to accommodate the requirement (which may have already been done through the strategic policies or through non-strategic policies produced by the local planning authority)."</i></p> <p>The reason for the Steering Group deciding not to allocate housing sites in the Neighbourhood Plan is that any future housing likely to be delivered in Chippenham under the Reviewed Wiltshire Local Plan will be of a large scale strategic nature - as envisaged in the Regulation 18 Emerging Local Plan. Such housing is likely to be on greenfield land and extend beyond the Neighbourhood Area.</p> <p>What the Neighbourhood Plan does do through its policies is to ensure that any future strategic housing within the Neighbourhood Area is sustainable by virtue of its design and housing mix amongst other things.</p>

S/GEN/10	<p>3.4 The absence of a housing requirement and spatial strategy is therefore a fundamental flaw of the current draft NP in our view. The PPG explicitly states:</p> <ul style="list-style-type: none"> <li>• the “reasoning and evidence informing the local plan process is likely to be relevant to the consideration of the basic conditions against which a neighbourhood plan is tested. For example, up-to-date housing need evidence is relevant to the question of whether a housing supply policy in a neighbourhood plan or Order contributes to the achievement of sustainable development”.</li> <li>• where Draft Neighbourhood Plans “contain policies relevant to housing supply, these policies should take account of latest and up-to-date evidence of housing need” and</li> <li>• “where neighbourhood planning bodies have decided to make provision for housing in their plan, the housing requirement figure and its origin are expected to be set out in the neighbourhood plan as a basis for their housing policies and any allocations that they wish to make”</li> </ul>	<p>These PPG quotes only relate to where a housing supply policy is being proposed in a neighbourhood plan. The Neighbourhood Plan does not contain any housing supply policies and is not required to do so.</p>
S/GEN/11	<p>3.5 Turning to the Wiltshire spatial strategy and plan making level, between January and March 2021 Wiltshire Council consulted on an ‘Emerging Strategy’ intended to inform the Wiltshire Local Plan Review prior to the preparation of the Regulation 19 version of the plan. Quoting a Local Housing Needs Assessment from 2019, the consultation confirmed that Wiltshire Council was working to a district-wide housing requirement for up to 45,630 homes.</p> <p>3.6 During this consultation, it was confirmed that the provision of an expanded community at Chippenham was the most suitable strategy for future growth. The draft strategy states that the overall housing requirement for Chippenham is 9,225 dwellings over the 20-year plan period to 2036, with a residual of 5,100 dwellings over the same period. The draft NP acknowledges the residual requirement set out in the Emerging Strategy consultation.</p> <p>3.7 Notwithstanding the above findings, the Chippenham Housing Needs Assessment (HNA, May 2020), prepared by Aecom, sets out that there is a need for some 2,643 affordable homes over the same period.</p> <p>3.8 In April 2022 Wiltshire Council published an updated Housing Land Supply Statement with a base date of April 2021. The report identifies that the Council is unable to demonstrate a five year housing land supply, with 4.72 years’ deliverable supply across the local authority area, and only 4.16 years in the North and West Wiltshire Housing Market Area.</p> <p>3.9 Overall, we have significant concerns that if the NP group proceed with the draft NP in its current form this will result in a plan for a settlement area of over 35,000 people, for a 13-year period (2023-2036), which only includes a single allocation, at a time when Wiltshire Council’s own Local Plan Review (“LPR”) identifies the housing requirement for Chippenham up to 2036 as over 9,000 dwellings.</p>	<p>This comment incorrectly refers to the Neighbourhood Plan including a single allocation. To be clear the Neighbourhood Plan is not allocating any sites. A parameters plan has been produced for the Bath Road Car Park/Bridge Centre site but this is not the same as an allocation.</p> <p>In the main the issues raised in this comment are strategic housing issues relating to the Wiltshire Local Plan Review and not to the non-strategic issues which should be the focus of the Neighbourhood Plan. The Neighbourhood Plan has rightly acknowledged the housing figure for Chippenham produced in the 2021 Regulation 18 Emerging Wiltshire Local Plan, but this figure will more than likely change as the Emerging Local Plan progresses from its early stages and new evidence on housing figures being sought by the LPA in order to underpin its housing requirements in the Emerging Local Plan is made publicly available.</p>
S/GEN/12	<p>3.10 Furthermore, not only does the draft NP include reference to the ‘Bath Road Car Park/Bridge Centre Site’ as the sole site identified for development in the plan, it also does not specify a quantum of development so it is unclear what scale of housing this site could accommodate.</p> <p>Indeed, there is a clear lack of supporting information relating to this site which raises a number of questions over its achievability and deliverability, and its potential contribution to the plan.</p>	<p>This is not the sole site identified for development in the Plan, there are two further town centre sites where development is being promoted, which are the River Green Corridor area (Policy TC2) and Upper Market Place (Policy TC3). The Bath Road Car Park/Bridge Centre Site (Policy TC1) is not a site allocation and therefore does not specify a quantum of housing development. The parameters plan envisages a mixed-use scheme, and the parameters are deliberately flexible to ensure market attractiveness and deliverability in the longer term. Policy TC1 is underpinned by the evidence of a Topic Paper (Appendix 14) and findings of a report on the market assessment of this site by Cushman and Wakefield for Wiltshire Council (Wiltshire Council have advised that the report not be made available in the public realm because it contains sensitive financial information). The Steering Group consider this supporting information is clear and proportionate evidence on which to produce a neighbourhood plan policy for the site.</p>
S/GEN/13	<p>3.11 We therefore have significant concerns over how the Steering Group have proceeded on the basis of a fundamental misunderstanding of what the Neighbourhood Plan must deliver, to meet the basic conditions. The absence of a housing requirement based on up to date evidence and the inclusion of a single allocation for mixed use development (including housing), for a town the size of Chippenham, is not an appropriate basis in which to allow a 13-year plan to proceed.</p> <p>3.12 As a result of these identified fundamental flaws in the current draft NP, the draft NP should be put on hold until further information is published by Wiltshire Council later this year which will set out the more detailed spatial strategy and housing requirement, including the planned housing requirement for Chippenham and proposed housing allocations. Only by waiting for this information from Wiltshire Council can the Steering Group ensure that the draft NP is aligned with the strategic policies of the emerging Wiltshire Local Plan. This in turn will ensure that housing to meet local need is correctly planned for.</p>	<p>The Steering Group are clear that the Neighbourhood Plan is not allocating sites for housing, and neither is it required to do so. The suggestion that it does not meet the basic conditions for this reason is misconstrued.</p> <p>The Steering Group do not agree that there are fundamental flaws with the Neighbourhood Plan. There have already been delays in the production of the Emerging Wiltshire Local Plan and the Town Council have already invested too much time and money simply to put their Neighbourhood Plan on hold and wait indefinitely until a new Wiltshire Local Plan is adopted, which could still be two years away.</p>

## Executive Summary, Preface and Chapter 1

Ref. No.	Page No. / Para. No. / Policy No.	Name	Comment	Response
S/EXEC/1	p. 3	Wiltshire Council	The text of the plan needs correcting, since Wiltshire Council has not formally declared an 'ecological emergency', this is first referred to in the Executive Summary.	Text amended to refer to Wiltshire Council only declaring a climate emergency
S/PRE/1	p. 4	Strategic Planning	For clarity, the CNP says: <i>"Once adopted its policies will carry equal weight to those in the Wiltshire Local Plan"</i>  The CNP will be a part of the development plan once made, but the text might also clarify the relationship between the CNP, Wiltshire Local Plan (Wiltshire Core Strategy, Chippenham Site Allocations Plan) and any new or revised strategic policies through the Wiltshire Local Plan Review.  A basic condition and legal requirement of the CNP is that it must be in general conformity with strategic policies set out in the Local Plan.  The Council is also preparing a Local Plan Review and strategic policies are likely to change. Therefore, the content of the CNP may also need to be reviewed.	Second para. of Preface on p. 4 amended to reflect comments.  Para. 1.2 expanded to reflect comments.  Para. 1.8, which refers to development plan documents, relocated to form new para. 1.3 to create a more logical sequence of text and make reference to the individual documents which form the Local Plan.  New para. 1.4 (previously 1.3) created to explain relationship to Local Plan Review
S/PRE/2	p. 4		For clarity, an examination of the CNP is not carried out by a planning inspector on behalf of the Secretary of State, but an independent examiner appointed by Wiltshire Council.	Fourth para. of Preface amended on p. 4 to refer to 'independent examiner' rather than 'planning inspector'.
S/PRE/3	p. 8-9		The inclusion of the visions on page 8 and 9 without the wider context covered in the Executive Summary and in Chapter 4 would benefit from review.	Agree. Visions removed on pages 8-9. Will assist in making for a more slimline Plan. Non-Technical Summary already includes prominent positioning of Visions.
S/1/1	p. 10 para. 1.2		For clarity, the text might say that the CNP becomes part of the development plan and all planning applications are determined in accordance with the development plan unless material considerations indicate otherwise.	Para. 1.2 expanded to reflect comments.  Para. 1.8, which refers to development plan documents, relocated to form new para. 1.3 to create a more logical sequence of text and make reference to the individual documents which form the Local Plan.  New para. 1.4 (previously 1.3) created to explain relationship to Local Plan Review
S/1/2	p. 11 paras. 1.6-1.7		For clarity, see comment on page 3 above, regarding the CNP relationship with WCS and Local Plan Review.	Para. 1.2 expanded to reflect comments.  Para. 1.8, which refers to development plan documents, relocated to form new para. 1.3 to create a more logical sequence of text and make reference to the individual documents which form the Local Plan.  New para. 1.4 (previously 1.3) created to explain relationship to Local Plan Review
S/1/3	p. 13 para 1.12		For clarity, see comment on page 3 above, regarding the CNP relationship with WCS and Local Plan Review.  It should be noted that this version of the CNP is being prepared to be in general conformity with the WCS. This has an end date of 2026. Policies of the CNP will need to be reviewed in due course as they will need to take account of changes to strategic policies once these are set out in the Local Plan Review.	It is reasonable for the Neighbourhood Plan period to be 2023-2038 to cover both the adopted Local Plan and Emerging Local Plan. However, it understood that the Neighbourhood Plan would have to be reviewed at the point at which the Emerging Local Plan is adopted to remain in conformity with strategic policies.

### Chapter 3

Ref. No.	Page No. / Para. No. / Policy No.	Name	Comment	Response
S/3/1	p. 22 & 25  Paras. 3.18-3.24  Paras. 3.37-3.42	Wiltshire Council Strategic Planning	<p>Suggestion: The content of this section might make reference to evidence provided by the Local Economic Partnership and commissioned by Wiltshire Council, notably an Employment Land Review (<a href="#">link here</a>). The content refers to the economic strengths and weaknesses of the town and reports considerable interest in future investment.</p> <p>The section might also refer to the town's positive advantages due to its M4 and London main line corridor location, (its 'excellent transport links' – CNP objective 2) beyond the negative implication of 'out-commuting'.</p>	<p>New para. added after 3.22 to reference findings of Employment Land Review as related to Chippenham.</p> <p>Paras. 3.21 and 3.40 amended to add reference to the town's excellent transport links and locational advantages.</p>
S/3/2	Para. 3.25		Omission: There is no reference to the functioning of and issues revolving around local transport infrastructure, to include what opportunities might exist for decarbonisation of networks and encouraging active travel.	New 'Transport Infrastructure' section inserted to explain local transport infrastructure, its constraints and opportunities.
S/3/3	Para. 3.5		It is pleasing to see that the rich archaeological heritage of Chippenham is referenced in Section 3 and the built heritage of the town is referenced in Section 8 when discussing development in Chippenham Conservation area	Noted

## Vision & Objectives

Ref. No.	Page No. / Para. No. / Policy No.	Name	Comment	Response
S/V/1	p. 26-29 Vision & Objectives	BoKlok	BoKlok (Skanska & IKEA) modular home builders do agree in in part with the visions of the plan in respect of zero carbon and sustainable development. However, we are seeking to partner with Summix who own the land to the North of Rawlings Farm and wish to see a degree of leniency to allow for a sustainable, energy efficient, modular housing development to be promoted on part of the land to the North of Rawlings Green housing allocation. We believe this form of development will address some of the <del>key Zero Carbon initiatives that the CNP seeks to promote</del>	Support noted for the Vision in terms of zero carbon and sustainable development. Development is welcomed which addresses some of the key zero carbon initiatives that the Neighbourhood Plan seeks to promote. The LPA would determine the weight attached to the relevant Neighbourhood Plan policies in any housing development that comes forward on this site.
S/V/2	p. 26-29 Vision & Objectives	Friends of Monkton Park	As there seems to be no other place to record it, this return is made by me as the Chair of the Friends of Monkton park. I also represented Monkton for 10 years as a District and then Wiltshire Councillor.	Noted. Future surveys will include separate box to record name of organisation.
S/V/3	p. 26-29 Vision & Objectives		Firstly, my real answer to this is yes and no, and its a serious methodological weakness in this process that there is only the binary yes/no offer.	Comment made in relation to the question 'Do you agree with the Vision and Objectives for the Neighbourhood Plan?' The approach taken was to find out whether or not people supported each of the Plan policies. A comments section below each policy was included to allow respondents to qualify or expand upon their selection, enabling them to provide a more nuanced explanation of why they either 'supported' or 'didn't support' the policy.
S/V/4	p. 26 Chippenham Identity Vision & Objectives  p. 27 Green Infrastructure Vision & Objectives  p. 29 Economy Vision & Objectives		Secondly there is no other opportunity for this so I wish to clarify here that though I live outside Chippenham I am a former District and Wiltshire Councillor for Monkton, and I have a longstanding campaigning interest in the farmland that makes up something like a third of the Chippenham Neighbourhood (Fig. 1.1) . almost completely ignored. My 'No' to these otherwise welcome Vision and Objectives is that they talk about a market town, the text recognises the past shaping effect of the farms around the town. But then the farms are ignored though they undeniably form a core part of the town's 'peri-urban' green infrastructure. They provide employment and could provide more but they are missing from the Employment Objective. A significant amount of local farming is in public ownership and the ability of local farming connect to the urban community, to help shape the future of he town, to move towards and agro-ecology model, to engage with the local community, contribute to health and well being, employment and training, to help meet the increasing need for local farm produce. In other words to shape the future of the town as they have in the past. All this overlooked from the start of the Neighbourhood Plan by its failure to engage with a crucial part of its neighbourhood. Major change is needed to 2 and 3 in the Identity section and to the Green Infrastructure and Employment texts.	Agree that the Neighbourhood Plan should provide a greater emphasis on the role of farming in its Vision & Objectives, recognising that farmland surrounds the town.  New para. added after Para. 3.1 explaining that farmland surrounds the town. Reference to farmland added in paras. 3.3 and 3.18, and new para. added after 3.38 to explain the importance of agricultural land for employment, green infrastructure and sustainable food production.  Objectives 2 and 3 of the Chippenham Identity Vision retained, but new Objective 5 added to Chippenham Identity Vision to recognise the importance of farming in shaping the future of the town.  Reference added to agro-ecological model in Green Infrastructure Vision.  Recognition of agricultural sector added to Economy Vision text. New Objective 5 added to Economy Vision to reference support to the agricultural sector in the Parish as a provider of local employment and training opportunities, and local farm
S/V/5	p. 26-29 Vision & Objectives	Summix Capital	Summix and BoKlok are working in partnership together in respect of land north of Rawlings Green, Chippenham. Summix support the approach to development that BoKlok adopt.  For example, BoKlok (Skanska & IKEA) modular home builders do agree in general with the visions of the plan in respect of zero carbon and sustainable development. However, as BoKlok and Summix are seeking to partner we wish to see a degree of leniency to allow for a sustainable, energy efficient, modular housing development to be promoted on part of the land to the North of Rawlings Green housing allocation. We believe this form of development will address some of the key Zero Carbon initiatives that the CNP seeks to promote.	Support noted for the Vision in terms of zero carbon and sustainable development. The LPA would determine the weight attached to the relevant Neighbourhood Plan policies in any housing development that comes forward on this site, but development is welcomed which addresses some of the key zero carbon initiatives that the Neighbourhood Plan seeks to promote.
S/V/6	p. 29 Community Infrastructure Vision & Objectives  p. 28 Transport Vision & Objectives	Chippenham Youth Council	We believe that each vision is important for the town. The Chippenham Youth Council would like to highlight its particular commitment to the visions outlined for Community Infrastructure and Transport. At current, there is a noticeable lack of facilities for young people and we welcome the type of facilities the Plan suggests such as festivals. In terms of Transport, we have a growing concern about the levels of air pollution, the effects of which disproportionately affect young people as explained in our Climate Conversation which can be found on Chippenham Town Council's YouTube channel and therefore welcome any ways in which air pollution and carbon emissions can be minimised. We believe that the objectives for each area will address the visions.	Support noted for Vision, in particular the Community Infrastructure, and Transport, Vision & Objectives

S/V/7	p. 27 Housing Vision & Objectives	Barratt David Wilson South West	<p>Many of the aims of the vision are supported provided that the policies that see to achieve it address the above points. However, parts of the Vision currently reads like a policy requirement and as such there are instances of potential misalignment with the policies themselves (highlighted below). It is suggested that the following changes are considered:</p> <p>•Housing: The sustainable construction policy SCC2 applies to all development not just housing. The aspiration of the Vision to transition to carbon neutrality should be removed from the housing vision and be applied to all development.</p> <p>Community Infrastructure has its own section of the Vision and does not need to be repeated within the housing section. It is suggested however that the expectation all physical and community infrastructure shall be in place first is not always practical when it is being provided as part of a comprehensive but phased masterplan.</p> <p>In the above context, the following revised wording is suggested:</p> <p><i>'Chippenham will encourage necessary housing growth to meet the needs of its existing population and those identified in the Wiltshire Local Plan Review. This will be achieved alongside the delivery of physical and social infrastructure to support new communities. High quality design and appropriate mix of housing types and tenures will support a sustainable community'</i></p>	<p>The reference to achieving 'carbon neutral' housing development in the Housing Vision has been amended to 'net zero carbon' in line with comment ref. no. S/SCC1/8. Net zero carbon cannot be applied to all development but should be retained in reference to residential development as this is likely to be the most common form of development in Chippenham during the Plan period, and one where it is viable and deliverable to achieve net zero carbon.</p> <p>Housing development in the past in Chippenham has performed poorly in providing the necessary community infrastructure to ensure sustainable communities thrive. Future housing development in Chippenham needs to be supported by the necessary community infrastructure. Therefore it is important that reference to this aspect is retained in the Housing Vision. It is agreed that it may not always be possible to achieve physical and community infrastructure in place first before housing development occurs. However, rather than being an integral element of any masterplan, it is nearly always provided towards the end of any phased development which leaves communities without the necessary infrastructure for a long period. The necessary physical and community infrastructure required to support new housing should be delivered at an early stage and in line with any housing growth to support the development of sustainable communities. First sentence of the Housing Vision amended from: <i>'Chippenham will manage housing growth so as to meet the needs of its existing and future population, whilst first providing the necessary physical and community infrastructure to support such growth'</i> to: <i>'Chippenham will manage housing growth so as to meet the needs of its existing and future population, whilst ensuring that the necessary physical and community infrastructure to support such growth is delivered at an early stage'</i></p> <p>Objective 1 of the Housing Vision modified in line with the above.</p> <p>Agree the last line of the suggested revised wording as this is more succinct than the current wording. Fourth sentence of the Housing Vision modified from: <i>'It will be of high-quality design, of an appropriate mix, and include an appropriate quantity of affordable housing'</i> to: <i>'High quality design and appropriate mix of housing types and tenures will support a sustainable community'</i></p>
S/V/8	p. 29 Economy Vision & Objectives  Para. 3.21  Para. 3.40		<p>•Economy The evidence does not indicate Chippenham is any more of a commuter town than any other Wiltshire settlement. Moreover, there is a greater volume of in-commuting because of a lack of housing when compared to out commuting. The illustrations below from DataShine support this:</p> <p>Furthermore, the greater volume of commuter trips out of Chippenham are to places like Bath, Bristol, and Swindon via rail. In this context, the Vision should not refer to Chippenham as a commuter town but should positively support the provision of housing and jobs through non-strategic scale, short term allocations. Likewise, paragraphs 3.21 and 3.40 of the eCNP should be amended.</p>	<p>The evidence that has been used from Datashine to justify the argument that Chippenham is not a commuter town is misleading as only statistics using the town centre postcode have been provided, where the level of in-commuting and out-commuting is naturally more balanced because of the mix of housing and commercial properties. The Datashine statistics from the three other postcodes (data points) in Chippenham, where housing predominates, demonstrates that the levels of out-commuting far exceed the levels of in-commuting for Chippenham as a whole. The level of out-commuting is most pronounced in the Pewsham area of Chippenham (Wiltshire 014, part of SN15 postcode). Please see: <a href="https://commute.datashine.org.uk/#mode=allflows&amp;direction=both&amp;msoa=E02006656&amp;zoom=11.7&amp;lon=-2.1328&amp;lat=51.4454">https://commute.datashine.org.uk/#mode=allflows&amp;direction=both&amp;msoa=E02006656&amp;zoom=11.7&amp;lon=-2.1328&amp;lat=51.4454</a></p> <p>Paragraph 5.45 of the Wiltshire Core Strategy acknowledges the town has significant levels of out-commuting, influenced by the excellent transport links, including the close proximity to the M4 and being located on the main Bristol to London railway route. It identified the need for appropriate economic development to take place to prevent existing and prospective employers moving elsewhere.</p> <p>St Modwen Developments in their Regulation 14 representations to the Neighbourhood Plan (ref. S/V/14) recognise that the level of out-commuting is an issue for Chippenham and support the objectives of the Plan to reduce out-commuting. Their evidence, based on the 2011 ONS Data, shows that the number of people travelling from Chippenham to a place of work on a daily basis equates to 18,548, with only 2,859 of these working within the town. 15,689 (84.6% of the total workforce) work outside the town, including 3,386 (18.3% of the total workforce) who travel outside of the district to surrounding destinations, including Swindon, Bath, South Gloucestershire and Bristol (Avonmouth).</p> <p>There is therefore no justification for amending paragraphs 3.21 and 3.40 or the Economy Vision.</p>
S/V/9	p. 27 Green Infrastructure Vision & Objectives	Environment Agency	<p>It would be good to use the phrase Green &amp; Blue Infrastructure (here and throughout the document, especially section 6). Waterbodies are considered as blue infrastructure (as acknowledged in 6.1) and presumably the 'river green' corridor will include the river. Including blue in the title would be more accurate and shows that local watercourses are valued highly (as stated in paragraphs 3.32 and 3.36). Referring to 'Green &amp; Blue Infrastructure' would also be consistent with the Wiltshire Council emerging 'Green &amp; Blue Infrastructure Strategy'.</p>	<p>Agree. Most references to 'Green Infrastructure' in the Neighbourhood Plan amended to 'Green &amp; Blue Infrastructure'.</p>
S/V/10	p. 27 Housing Vision & Objectives		<p>We strongly support the objective of requiring new housing in the area to be carbon neutral. Part of this will include ensuring that new housing includes water efficiency measures, to save water and energy. We suggest that wording to this effect is included in this section. This would be consistent with the quote in paragraph 5.2.</p>	<p>Support noted for the objective of requiring new housing in the area to be carbon neutral. However, the reference to achieving 'carbon neutral' housing development in the Housing Vision has been amended to 'net zero carbon' in line with comment ref. no. S/SCC1/8.</p> <p>Housing Vision Objective 4 amended to include reference to water efficiency measures.</p>

S/V/11	<p>p. 26 Chippenham Identity Objective 4</p> <p>p. 27 Housing Objective 4</p>	Future Chippenham	<p>An overall vision for Chippenham (referred to as Chippenham Identity) is identified along with four objectives.</p> <p>Six topic areas have been identified with objectives for each:</p> <ul style="list-style-type: none"> <li>• Green Infrastructure</li> <li>• Transport</li> <li>• Housing</li> <li>• Community Infrastructure</li> <li>• Town Centre</li> <li>• Economy</li> </ul> <p>The objectives identified for each of the above are broadly supported by the Future Chippenham programme which overall align with the emerging Framework Masterplan. However, one of the objectives under the Chippenham Identity is to “promote carbon neutral development”; and, one of the objectives under the Housing topic is to “ensure that all new housing development is carbon neutral”.</p> <p>Whilst the Neighbourhood Plan can certainly “promote” carbon neutral development (Chippenham identity objective 4) it is considered that to “ensure” all new housing development is carbon neutral (Housing objective 4) is going too far. A requirement for carbon neutrality is not set out in national planning guidance; and whilst the Regulation 18 consultation on the emerging Local Plan review (LPR) aspires to carbon neutrality, again it is not yet a requirement; it is pertinent to note that many of the representations to the LPR demonstrated the concern from some quarters regarding a carbon neutral requirement because of viability issues. Whilst carbon neutrality is laudable, requiring this could jeopardise strategic housing delivery on the grounds of viability issues. In recognition of the above it is suggested that The Neighbourhood Plan recognises this and build in flexibility.</p>	<p>Reference to achieving 'carbon neutral' housing development in the Housing Vision has been amended to 'net zero carbon' in line with comment ref. no. S/SCC1/8.</p> <p>The Viability Assessment, which accompanies the Neighbourhood Plan, demonstrates that Policy SCC1 on net zero carbon development, as amended, would allow for viable and deliverable housing development, even with an uplift above Future Homes Standard. Please refer to Appendix F of the Viability Assessment which discusses this in more detail.</p>
S/V/12	p. 26-29 Vision & Objectives	Lacock Parish Council	<p>The Council supports the Neighbourhood Plan's objectives on Sustainability and Climate Change as well as seeking to improve the environment and amenities of the area.</p> <p>In particular it supports the aim of achieving a better quality of new housing and its Green objectives.</p>	Support noted
S/V/13	p. 26 Chippenham Identity Objective 3	Robert Hitchins	<p>3.1. Our client raises an objection to Objective 3 of the CNP as stated in the blue box on p.26 to;</p> <p><b>'3. Establish a green buffer to protect the town's identity by preventing coalescence with surrounding settlements.'</b></p> <p>3.2. While preventing coalescence with surrounding settlements is a worthy objective of the CNP it is not possible, owing to the built form of the town and the designation of the approved Neighbourhood Area to establish a 'green buffer' between the north of Chippenham and our client's site which is located to the west of the B4069.</p> <p>3.3. Our client's site comprises SHELAA site 744 renamed 'Site 7' 'Land to the North of Barrow Farm' which was considered in the WLPR Regulation 18 consultation document Site Selection Report for Chippenham (January 2021) as a site to accommodate further strategic growth for Chippenham. The report recommended that the <u>wider site</u> be taken forward for further consideration to meet the market and affordable housing needs of Chippenham for the emerging plan period. The following conclusions were made;</p> <p><b>"This site is located to the north of Chippenham and east of Birds Marsh Wood. It is adjacent to the north Chippenham urban extension which is being built out. which has planning permission.</b></p> <p><b>Accessibility to local facilities is average, and the site has no significantly harmful effects on any congested roads.</b></p> <p><b>The site is classed as having medium flood risk and management measures are achievable. This site has risks from groundwater and surface water flooding, which can be mitigated against.</b></p> <p><b>This site will have a less than substantial impact on the settings of listed buildings including Barrow Farm which is within the site and Langley House to the north east of the site.</b></p> <p><b>Whilst the southern half of the site is low lying the site rises up to the north east making any development here more incongruous within the predominantly rural context. Development of this site risks coalescence between Chippenham and the village of Langley Burrell.</b></p> <p><b>Take forward for further consideration.</b></p> <p><b>Does not appear to have any overriding significant impacts that justify excluding the site at this stage."</b></p> <p>3.4. It should be noted that our client's site is located to the west of the B4069 while the main built centre of Langley Burrell village is located to the east of the B4069, therefore development at the site would not result in physical coalescence with Langley Burrell village. Our client's site is located predominantly with the Neighbourhood Area of the Langley Burrell</p>	<p>Objective 3 retained, but wording amended to 'green buffer' to reflect the significant changes made to Policy GI5 as a result of the Regulation 14 comments, in that the Plan is now not seeking to establish a single green buffer around the town or seeking to implement this strategically though the Emerging Local Plan. Instead it is now focused on establishing a small, non-strategic, green buffer located adjacent to the allocated Rawlings Green site.</p>



S/V/14	<p>p. 29 Economy Vision</p> <p>p. 22</p>	St Modwen Developments	<p>St. Modwen recognise the challenges faces by Chippenham and Wiltshire more generally in challenging out-commuting, which impacts both economically and in terms of sustainable travel objectives. It therefore supports the focus on addressing out-commuting in accordance with the wider Development Plan.</p> <p>6.2 Given the ability of the St Modwen Park Chippenham site to provide a significant response to the out commuting from the town, both in terms of its scale and location, and it being the most appropriate location for meeting the needs of the buoyant logistics industry because of its ability to limit HGV traffic to the motorway network, it is considered appropriate for the site to be appropriately acknowledged within the Neighbourhood Plan. This could either be through specific references to the site, or by merely amending reference to the support for economic development 'within' the town to 'at' the town.</p> <p>6.3 For example, the 'vision for the Economy' on Page 9 could be amended from:</p> <p><i>"Chippenham will support its existing businesses and encourage new businesses to relocate, or start up, within the town so that it becomes much more self-sufficient and less of a commuter town".</i></p> <p>To:</p> <p><i>"Chippenham will support its existing businesses and encourage new businesses to relocate, or start up, at the town so that it becomes much more self-sufficient and less of a commuter town" .</i></p> <p>6.4 In addition, on the basis of the above, we consider it appropriate for the draft Plan to recognise the site within the 'Local Context' section under Economy on Page 22, and request the draft Plan is amended accordingly.</p> <p>6.5 St. Modwen also support Objective 2, to "ensure local employment sites are connected to the town via sustainable transport modes", which is something that the St Modwen Park, Chippenham site has already secured and is delivering.</p>	<p>Economy Vision and Objective 1 amended to add words '...within <u>and around</u> the town ' to acknowledge reference to employment sites, such as J17, being located close to the town.</p> <p>Sentence added to para. 3.19 on p. 22 to recognise J17 site.</p> <p>Support noted for Objective 2 of Economy Vision.</p>
S/V/15	<p>p. 26-29 Vision &amp; Objectives</p> <p>Para. 4.2</p>	Wiltshire Council Strategic Planning	The Vision and Objectives are broadly supported.	Support noted
S/V/16	<p>p. 27 Housing Vision &amp; Objectives</p>	Summix & BoKlok	<p>We support the housing vision of the CNP whereby housing growth is provided so as to meet the needs of its existing and future population, whilst first providing the necessary physical and community infrastructure to support such growth. We are committed to delivering a development which aligns with the CNP's aspirations to maintain separate and distinctive identities by avoiding coalescence with neighbouring settlements, as well as tackling the climate emergency through carbon reduction, energy efficiency measures and renewable energy generation. Summix and BoKlok also recognise the vital importance of ensuring that new development is well-connected and accessible through a variety of sustainable modes of transport.</p> <p>Summix and BoKlok believe that a sensitive expansion of Rawlings Green can deliver this growth in a sustainable manner whilst respecting the existing character of the area.</p>	Support noted. Rawlings Green site already allocated for housing and employment uses in Wiltshire Core Strategy
S/V/17	<p>p. 27 Green Infrastructure Vision &amp; Objectives</p>	Future Chippenham	The Future Chippenham programme supports the Green Infrastructure Vision which, inter alia, seeks to protect local green spaces, green corridors and develop the central River Green corridor as a recreational space. The importance of the River-Green Corridor as a focal point for the town aligns closely with the aspirations of the emerging Future Chippenham Masterplan.	Support noted

## Policy SCC1 - Net Zero Carbon Development

Ref. No.	Page No. / Para. No. / Policy No.	Name	Comment	Response
S/SCC1/1	p. 32 & 34 Figure 5.1 & para. 5.6	Barratt David Wilson South West	BDW has championed the fabric first approach in its response to climate change as a means of reducing energy need and demand before exploring sustainable energy generation. BDW is now supporting the changes that are being introduced in 2023 by the latest Building Regulation that further support low carbon energy, such as air source heat pumps, solar PV and reduced water usage. Figure 5.1 is therefore supported. Likewise, since paragraph 5.1.6 was written, progress has been made with Building Regulations and the Future Homes Standard.	Support for Figure 5.1 noted.  Para. 5.16 updated to reflect current position with regards to Building Regulations and Future Homes Standard
S/SCC1/2	p. 37 Policy SCC1		Care needs to be taken regarding Policy SCC1, as parts of the Net Zero Emissions section run counterproductive to the new Building Regulation and the policy should not seek to rewrite them. If the eCNP wishes to encourage carbon reduction, then it should do so in alignment with other legislation.	Section of Policy SCC1 deleted referring to reductions in Building Regulations standards due to Part L Building Regulations coming into operation in June 2022, and further reductions via the Future Homes Standard in 2025. Policy SCC1 as amended would not run counterproductive to Building Regulations, it would merely support development that goes beyond Building Regulations standards to achieve net zero carbon as allowed under the Planning and Energy Act 2008. Numerous councils now have similar adopted or emerging local plan policies including Policy SCR6 of the BANES Local Plan Partial Update (2023), Cornwall Council's Climate Emergency Development Plan Document (2023) and draft Policy CC/NZ of the Greater Cambridge Local Plan – First Proposals (2021).
S/SCC1/3	p. 37 Policy SCC1		Likewise, it is not possible for all types of planning application to demonstrate SAP calculation/ whole life carbon assessments given that this can only be done when working drawings are produced. It is impractical to expect working drawing of all major development if an outline application is being submitted. As an alternative, the eCNP could signpost the need for planning conditions to provide energy performance information at the detailed design stage.	Reference to SAP calculation/whole life carbon assessments deleted from Policy SCC1 in favour of submission of an Energy Statement which would model estimated regulated energy consumption of buildings to demonstrate how an annual operational net zero carbon emissions balance will achieve net zero carbon, both pre and post construction.
S/SCC1/4	p. 30 para. 5.5	Future Chippenham	The Future Chippenham Programme team supports the recognition that the Neighbourhood Plan has the potential to significantly reduce Chippenham's carbon footprint and make a significant local contribution to the adaptation and mitigation of future climate change (Para 5.5).	Support noted
S/SCC1/5	p. 37 Policy SCC1		<p>Policy SCC1 – Net Carbon Development, requires that for major residential development there is a 35% reduction on the Dwelling Emission Rate (DER) against the Target Emission Rate (TER), based on the latest Building Regulations (Part L).</p> <p>The 35% target does not comply with national policy. The NPPF states that local requirements for the sustainability of buildings should reflect the Government's policy for national technical standards (para 154b). The national technical standards will be informed by the Future Homes Standards which will require new homes built from 2022 to produce 31% less carbon emissions compared to current standards; and from 2025, 75% less carbon emissions. In the absence of robust evidence to justify why the Neighbourhood Plan deviates from these national targets, the Neighbourhood Plan should therefore reflect the Future Homes Standards. The emerging Local Plan Review will also be required to incorporate the Future Homes Standards unless robust evidence justifies a deviation; the Neighbourhood Plan therefore risks being contrary to the local strategic plan as well.</p> <p>In order to ensure that the delivery of housing is not jeopardised on viability grounds in attempting to meet these targets, this policy needs to reflect national and local policy to be more flexible.</p>	<p>Section of Policy SCC1 deleted referring to reductions in Building Regulations standards due to Part L Building Regulations coming into operation in June 2022, and further reductions via the Future Homes Standard in 2025. Policy SCC1 as amended would not run counterproductive to Building Regulations, it would merely support development that goes beyond Building Regulations standards to achieve net zero carbon as allowed under the Planning and Energy Act 2008. Numerous councils now have similar adopted or emerging local plan policies including Policy SCR6 of the BANES Local Plan Partial Update (2023), Cornwall Council's Climate Emergency Development Plan Document (2023) and draft Policy CC/NZ of the Greater Cambridge Local Plan – First Proposals (2021).</p> <p>The Steering Group will continue to work with Wiltshire Council Strategic Planning to ensure climate change policies in the emerging Wiltshire Local Plan align with Policy SCC1.</p> <p>The Viability Assessment accompanying this Plan demonstrates that Policy SCC1 as amended would not result in development being unviable.</p> <p>Flexibility is built into Policy SCC1. In the event that net zero carbon emissions cannot be achieved through a fabric first approach, the remaining balance can be achieved through on-site renewable or off-setting.</p>

S/SCC1/6	p. 37 Policy SCC1	Gallagher Developments	<p>Within this policy, it is stated that proposals for all new buildings will aim to demonstrate that they can achieve an annual operational net zero carbon emissions balance, thus highlighting the requirement for all new housing to be carbon neutral. This appears to be operational rather than including construction. We support this and the principle of this policy and the goal of a successful transition to a net zero carbon future; however we have some concerns.</p> <p>We consider that this policy should be taking the lead and carefully adhering to national government policy. Paragraph 152 of the NPPF looks for the planning system to support the transition to a low carbon future in a changing climate and to support renewable and low carbon energy and associated infrastructure. Paragraph 154 (b) states that:</p> <p><b>“Any local requirements for the sustainability of buildings should reflect the Government’s policy for national technical standards”</b></p> <p>Changes to national technical standards are coming through the Future Homes Standards. This means all new homes must meet a 31% reduction in carbon emissions in 2022 and all new homes must meet at least a 75% emission reduction by 2025 and be zero carbon ready with no gas in new build homes. This will ultimately work towards the goal of becoming net zero by 2050. By contrast Policy SCC1 seeks a 35% reduction in the Dwelling Emission Rate from adoption of the Plan. This target, and the mechanisms for measuring success, should instead reflect the Future Homes Standards, or any deviation must be supported by robust evidence to demonstrate viability / deliverability. In the absence of this evidence, the policy is not consistent with national policy (specifically NPPF 154b) and therefore in our view it does not meet the basic conditions.</p> <p>Suggested change: In the absence of any evidence to demonstrate viability / deliverability, the policy should be aligned with the Future Homes Standards.</p>	<p>Section of Policy SCC1 deleted referring to reductions in Building Regulations standards due to Part L Building Regulations coming into operation in June 2022, and further reductions via the Future Homes Standard in 2025. Policy SCC1 as amended would not run counterproductive to Building Regulations, it would merely support development that goes beyond Building Regulations standards to achieve net zero carbon as allowed under the Planning and Energy Act 2008.</p> <p>Whilst recognising Paragraph 154(b) of the NPPF there is contrary Government guidance on planning policies in relation to energy efficiency. The Government most recently confirmed in 2021, in its Summary of Responses Received and Government Response to the Future Home Standard: 2019 Consultation on Changes to Part L (Conservation of Fuel and Power) and Part F (Ventilation) of the Building Regulations for New Dwellings, that local authorities will retain powers to set tougher energy efficiency standards for new homes in their area. Paragraph 12 of the NPPG on Climate Change (2019) also confirms that in their development plan policies, local planning authorities can set energy performance standards for new housing that are higher than Building Regulations. There is nothing in policy guidance to prevent neighbourhood planning groups doing similar. Numerous councils now have similar adopted or emerging net zero carbon local plan policies including Policy SCR6 of the BANES Local Plan Partial Update (2023), Cornwall Council’s Climate Emergency Development Plan Document (2023) and draft Policy CC/NZ of the Greater Cambridge Local Plan – First Proposals (2021).</p> <p>The Viability Assessment, which accompanies the Neighbourhood Plan, demonstrates that Policy SCC1 as amended would allow for viable and deliverable development, even with an uplift above Future Homes Standard. Please refer to Appendix F of the Viability Assessment which discusses this in more detail. Therefore the basic conditions are met.</p>
S/SCC1/7	p. 37 Policy SCC1	Hallam Land Management	<p>Hallam welcome and support the Neighbourhood Plan’s ambitions relating to net zero targets, however, the policy text requires amendments to ensure consistency on its ambitions, objections and aims. As currently drafted, the policy conflicts with, and extends beyond, Central Government’s national planning policy and Building Standards by mixing “aims” and “requirements”. For example, the policy states that proposals for all new buildings will “aim” to demonstrate that they can achieve an annual operational net zero carbon emissions balance, delivered through an energy hierarchy. This aspirational tone allows for flexibility and aligns with the Local Plan working with and encouraging new development to incorporate design measures to reduce energy demand.</p> <p>The draft Neighbourhood Plan policy also states that as a “minimum standard”, a 35% reduction on the Dwelling Emission Rate against the Target Emission Rate and whole life carbon impact assessment is “required” for major residential development. We would suggest that the policy should be in line with Building Regulations in place at the time of consideration of the application and that there is consistency in the wording of the policy that seeks to encourage uplift, but not prescribe. The draft policy extends beyond National and Local requirements and fails to consider viability implications, which without robust testing could impact the deliverability of development sites.</p>	<p>Section of Policy SCC1 deleted referring to reductions in Building Regulations standards due to Part L Building Regulations coming into operation in June 2022, and further reductions via the Future Homes Standard in 2025. Policy SCC1 as amended would not run counterproductive to Building Regulations, it would merely support development that goes beyond Building Regulations to achieve net zero carbon as allowed under the Planning and Energy Act 2008.</p> <p>Section referring to submission of whole life carbon assessment deleted.</p> <p>The Viability Assessment, which accompanies the Neighbourhood Plan, demonstrates through robust testing that Policy SCC1 as amended would allow for viable and deliverable development, even with an uplift above Future Homes Standard. Please refer to Appendix F of the Viability Assessment which discusses this in more detail.</p>

S/SCC1/8		Waddeton Park	<p>Net Zero Carbon vs Carbon Neutral</p> <p>3.14 As established in national planning guidance the vision, objectives and policies of the draft NP should be based on relevant and up-to-date evidence.</p> <p>3.15 Although the aspiration to meet 'green' aspirations is supported by our client, the draft NP makes varied reference to achieving 'carbon neutrality' and delivering 'net-zero' carbon objectives, when the two interchangeable terms are not the same thing.</p> <p>3.16 'Carbon neutrality' refers to a policy of not increasing carbon emissions and of achieving carbon reduction through offsetting. 'Net-zero' carbon means making changes to reduce carbon emissions to the lowest amount, with offsetting as a last resort. We understand the draft NP seeks to achieve the latter, but clarification of which theme the NP Steering Group seeks to adopt would be welcomed.</p> <p>3.17 Whilst the supporting Future Energy Landscape (FEL) report identifies the potential sources of renewable energy, it does not specify whether the plan should meet net-zero carbon or carbon neutral aspirations.</p> <p>3.18 Upon review of the draft NP evidence base, the plan is underpinned by the Centre for Sustainable Energy report that touches on the type and scale of renewable energy, but does not mention the achievement of net zero carbon or carbon neutrality.</p> <p>3.19 The draft NP should therefore be evolved to ensure that what is being required by policy is realistic, having particular regard to viability, infrastructure requirements/costs and how they are to be funded. In accordance with national planning guidance, the plan therefore needs to be the subject of an independent viability appraisal to ensure that the policy requirements are justified and deliverable.</p>	<p>Agree that clarification required. Plan modified to ensure that 'net zero carbon' is referred to throughout rather than 'carbon neutral'.</p> <p>An independent Viability Assessment of the Plan has been carried out which demonstrates that the policy requirements of the Plan as amended are justified and deliverable.</p>
S/SCC1/9	p. 37 Policy SCC1		<p>3.20 Draft Policy SCC1 seeks a requirement for all major residential development to achieve a 35% reduction on the Dwelling Emission Rate against the Target Emission Rate based on Part L Building Regulations, which is an ambitious target.</p> <p>3.21 National planning guidance sets out that all policies should be underpinned by relevant and up-to-date evidence. The 35% target has not been assessed within the NP evidence base, nor is this mentioned in the FEL report. Here, there is a risk that the NP Examiner might consider that this policy is not underpinned by appropriate evidence, conflicting with national planning objectives.</p> <p>3.22 This policy should therefore be supported by relevant evidence and prepared in consultation with developers, housebuilders and land promoters.</p> <p>3.23 As with carbon reduction targets, it is important to ensure that the chosen approach to whole life-cycle carbon is supported by relevant/up-to-date evidence and is subject to appropriate viability testing.</p>	<p>Section of Policy SCC1 deleted referring to reductions in Building Regulations standards due to Part L Building Regulations coming into operation in June 2022, and further reductions via the Future Homes Standard in 2025. Policy SCC1 as amended would not run counterproductive to Building Regulations, it would merely support development that goes beyond Building Regulations standards to achieve net zero carbon as allowed under the Planning and Energy Act 2008.</p> <p>Reference to submission of whole life carbon assessment deleted.</p> <p>The Viability Assessment, which accompanies the Neighbourhood Plan, demonstrates through robust testing, that Policy SCC1 as amended would allow for viable and deliverable development, even with an uplift above Future Homes Standard. Please refer to Appendix F of the Viability Assessment which discusses this in more detail.</p>

S/SCC1/10	Chapter 5 Policy SCC1	Wiltshire Council Strategic Planning	<p>It is recognised that all levels of Government have a role to play in working towards net zero carbon and the CNP is an excellent advocate of the importance of taking action to tackle climate change.</p> <p>The policies, however, need to be effective, evidence based and consistent with strategic policies. Continued dialogue with both planning and climate teams will help to refine and position the CNP's approach to this end.</p> <p>The effectiveness of these policies might be improved in several respects, and these would be the subject for further detailed discussion. Fundamentally, the viability of proposals needs to be assured. There may be extra development costs because of these additional measures which undermine delivery prospects or other plan objectives.</p> <p>In other aspects of effectiveness, the policies seek an improvement on energy efficiency compared to what might otherwise be achieved by Building Regulations. This does not in itself result in meeting net zero targets (SSC1). It may be simpler to focus on energy consumption and/or space heating standards.</p> <p>The purpose of preparing carbon assessments may be beneficial but its role to the decision maker is not stated (SSC1).</p> <p>More broadly, the policies risk a disproportionate amount of technical and costly information becoming necessary to support a planning application, which it would be difficult for the Council as Local Planning Authority to justify.</p>	<p>Meetings held between members of the Steering Group and Wiltshire Council Strategic Planning on 29 June 2022, 8 March 2023 and 11 May 2023 agreed the principles of revisions to Policy SCC1 and a shift in focus to a more simplified, flexible policy focusing on operational net zero carbon efficiencies.</p> <p>Section of Policy SCC1 deleted referring to reductions in Building Regulations standards due to Part L Building Regulations coming into operation in June 2022, and further reductions via the Future Homes Standard in 2025. Policy SCC1 as amended would not run counterproductive to Building Regulations, it would merely support development that goes beyond Building Regulations standards to achieve net zero carbon.</p> <p>Reference to whole life carbon impact assessment deleted and Policy SCC1 reframed to focus on operational energy efficiency only.</p> <p>An independent Viability Assessment of the Plan has been carried out which demonstrates that the requirements of Policy SCC1 as amended are justified and deliverable.</p>
S/SCC1/11	p. 37 Policy SCC1	BoKlok	BoKlok (Skanska & IKEA) modular home builders do agree with SCC1 and we believe that our developments encapsulate the key messages within the policy. For example, our modular homes are 100% modern methods of construction, 70% less waste compared to traditional build, 50% quicker to construct leading to less waste and local disruption.	Support noted
S/SCC1/12	p. 37 Policy SCC1	Summix	<p>Summix support the approach of BoKlok (Skanska &amp; IKEA) modular home builders and do agree with SCC1 and we believe that our developments encapsulate the key messages within the policy. For example, our modular homes are 100% modern methods of construction, 70% less waste compared to traditional build, 50% quicker to construct leading to less waste and local disruption.</p> <p>Summix and BoKlok (Skanska &amp; IKEA) modular home builders do agree with SCC1 and we believe that our developments encapsulate the key messages within the policy. All BoKlok homes come with an air source heat pump, and we are working towards the roll out of a zero-energy home by the end of 2022.</p>	Support noted

## Policy SCC2 - Sustainable Design & Construction

Ref. No.	Page No. / Para. No. / Policy No.	Name	Comment	Response
S/SCC2/1	p. 40 Policy SCC2	Wiltshire Council Strategic Planning	BREEAM standards are more usually applied to commercial premises and not residential development. Some policies refer to an array of different standards that constitute a variety of measures of building and/or environmental performance. The different measures and standards are not necessarily compatible and can cover aspects unrelated to sustainable construction materials and techniques (SSC2)	Policy SCC2 has been substantially amended in light of this comment and others. Instead of focusing on industry standards to demonstrate sustainable design and construction, it now focuses on demonstrating sustainable design, construction materials and construction methods through submission of a Sustainability Statement.  Reference retained to non-residential meeting the relevant BREEAM 'Excellent' standards as already required by the Wiltshire Core Strategy (Core Policy 41).
S/SCC2/2	p. 40 Policy SCC2	Barratt David Wilson South West	Regarding Policy SCC2, Passivhaus, Home Quality Mark and BREEAM are all private businesses and the eCNP should not promote their required engagement in the planning application process although it can signpost them as a preferred route. It seems the emerging eNCP is seeking to rely heavily on third party assessments which have not been through the same rigour as the Building Regulation that the development industry is working within. It is noted at paragraph 5.31 that “a sustainably constructed building may only cost 10% more upfront”, but it is important to understand the impact of this on overall plan viability. Whole Plan viability assessment is best achieved not by the eCNP, but by the Wiltshire Local Plan Review. Therefore, policy SCC2 should support application that meet Passivhaus etc. but not require it.	Policy SCC2 has been substantially amended in light of this comment and others. Instead of focusing on industry standards to demonstrate sustainable design and construction, it now focuses on demonstrating sustainable design, construction materials and construction methods through submission of a Sustainability Statement.  Reference retained to non-residential meeting the relevant BREEAM 'Excellent' standards as already required by the Wiltshire Core Strategy (Core Policy 41).
S/SCC2/3	p. 40 Policy SCC2	Future Chippenham	Policy SCC2 – Sustainable Construction, requires that all major residential development addresses sustainable development issues through Passivhaus standard supplemented with sustainable matrix. Home Quality Mark, or BREEAM ‘excellent’ certification, and define the position in relation to whole-life carbon.  In order to ensure that the delivery of housing is not jeopardised on viability grounds in attempting to meet these standards, this policy needs to be more flexible. It is suggested the policy is amended to state that these standards are achieved “where appropriate”.	Policy SCC2 has been substantially amended in light of this comment and others. Instead of focusing on industry standards to demonstrate sustainable design and construction, it now focuses on demonstrating sustainable design, construction materials and construction methods through submission of a Sustainability Statement.  Reference retained to non-residential meeting the relevant BREEAM 'Excellent' standards as already required by the Wiltshire Core Strategy (Core Policy 41).
S/SCC2/4	p. 40 Policy SCC2	Gallagher Developments	We support the principle of this policy, but we are not clear on the justification for the requirement for all major residential development to achieve certification with the Passivhaus Standard or the AECB Building Standard for 10% of new dwellings. There is no evidence to demonstrate that this will be viable and deliverable and so there is no justification to deviate from national policy and building regulations. For this reason the policy is not consistent with national policy (specifically NPPF 154b) and therefore does not meet the basic conditions.  Suggested change: In the absence of any evidence to demonstrate viability / deliverability, the policy should be aligned with the Building Regulations.	Policy SCC2 has been substantially amended in light of this comment and others. Instead of focusing on industry standards to demonstrate sustainable design and construction, it now focuses on demonstrating sustainable design, construction materials and construction methods through submission of a Sustainability Statement.
S/SCC2/5	p. 40 Policy SCC2	Hallam Land Management	The draft policy states that proposals for all major residential development is “required” to achieve certification with the Passivhaus Standard or the AECB Building Standard for 10% of new dwellings, supplemented with a matrix or methodology setting further standards for sustainability and define the position in relation to whole-life carbon. However, where appropriate, all developments “will be encouraged” to adopt the Home Quality Mark.  Both policy SCC1 and SCC2 are referring to standards that are above the prevailing Local Plan policy. The draft policy extends beyond National and Local requirements and fails to consider viability implications, which without robust testing could negatively impact the deliverability of development sites. As in policy SCC1, there is also a conflict and a mix between aims and requirements. We would argue that it is better to pursue the more flexible aspirations and remain in line with local and national planning policy and Buildings Regulation requirements.	Policy SCC2 has been substantially amended in light of this comment and others. Instead of focusing on industry standards to demonstrate sustainable design and construction, it now focuses on demonstrating sustainable design, construction materials and construction methods through submission of a Sustainability Statement.  An independent Viability Assessment of the Plan has been carried out which demonstrates that the requirements of both Policies SCC1 and SCC2 as amended are justified and deliverable.

S/SCC2/6	p. 40 Policy SCC2	Waddeton Park	<p>3.24 As with draft Policy SCC1, the NP needs to ensure that its policies are underpinned by relevant and up-to-date evidence. The requirement for all major residential development to achieve certification with the Passivhaus Standard or the AECB Building Standard for 10% of new dwellings is not supported by technical evidence.</p> <p>3.25 The development sector recognises the importance of delivering new homes in accordance with sustainable building regulations and this policy could benefit through effective discussion with housebuilders and land promoters in order to arrive at a suitable standard(s).</p>	Policy SCC2 has been substantially amended in light of this comment and others. Instead of focusing on industry standards to demonstrate sustainable design and construction, it now focuses on demonstrating sustainable design, construction materials and construction methods through submission of a Sustainability Statement.
S/SCC2/7	p. 40 Policy SCC2	BoKlok	BoKlok (Skanska & IKEA) modular home builders do agree with SCC2 and we believe that our developments encapsulate the key messages within the policy. For example, our modular homes are 100% modern methods of construction, 70% less waste compared to traditional build, 50% quicker to construct leading to less waste and local disruption. Over the lifetime of a BoKlok home a 55% saving of CO <sub>2</sub> compared to a traditional house will be made. We complete up to 90% of the homes in the factory and only 10% out on the construction site	Support noted.
S/SCC2/8	p. 40 Policy SCC2	Summix	Summix support the approach of BoKlok (Skanska & IKEA) modular home builders and do agree with SCC2 and we believe that our developments encapsulate the key messages within the policy. For example, our modular homes are 100% modern methods of construction, 70% less waste compared to traditional build, 50% quicker to construct leading to less waste and local disruption. Over the lifetime of a BoKlok home a 55% saving of CO <sub>2</sub> compared to a traditional house will be made. We complete up to 90% of the homes in the factory and only 10% out on the construction site	Support noted.

## Policy SCC3 - Standalone Renewable Energy

Ref. No.	Page No. / Para. No. / Policy No.	Name	Comment	Response
S/SCC3/1	p. 44 Policy SCC3	Wiltshire Council Strategic Planning	Policy for standalone renewable energy (SSC3) needs to be consistent with national policy and regulation (for example, to deliver biodiversity net gain) and it also should be comprehensive in its consideration (for example, how are possible cumulative impacts of PV Solar developments taken into account?)	Last paragraph of Policy SCC3 amended to refer to 10% biodiversity net gain.  Reference added to cumulative impact in Criterion a).
S/SCC3/2	p. 44 Para. 5.44 - Bullet 2		Include a reference to other policies in the Development Plan and their importance in providing landscape enhancement such as improving age diversity of hedgerow trees in retained hedgerows, planting new areas of woodland, creating ponds and open drainage features or providing other new, or improved, areas of habitat creation or improved habitat management.  It should also be recognised that following cessation of energy production/storage uses the electricity generating/transfer/storage infrastructure should be removed from the site and the land restored back to agricultural use or agri-environment use/s.	Bullet 2 amended to include reference to CP50, 51 and 57 of the Wiltshire Core Strategy in providing landscape enhancement and reference to the different types of landscape enhancement referred to in the comment.  New paragraph added after 5.44 to reference land being restored back to agricultural use on cessation of standalone renewable energy infrastructure.
S/SCC3/3	p. 44 Policy SCC3 Criterion c		Landscape and Visual Impact Assessment / Appraisal will assess landscape and visual receptors value/sensitivity/change effects separately but in the same report.  Landscape & Visual effects can be adverse, beneficial, or neutral. The most sensitive / important landscape receptors would typically include designations, rare/unique or important / characteristic landscape features and areas e.g. veteran trees, unimproved pasture, tranquillity etc & for visual receptors, the most sensitive visual receptors (people) are typically those which could experience visual changes from the PRoW network and areas of informal recreation space such as informal POS / riverside parks or from valued local viewpoints and adjacent residential properties.  In light of this it is recommended the policy wording be changed slightly for criterion (c) to include wider coverall scenarios and differentiate between Landscape and Visual effects in order to better align with WCS Core Policy 51 and LVIA Guidelines.  Suggested wording: c) particularly adverse / harmful landscape and/or visual effects are capable of being successfully mitigated through sensitive site selection, inherent/sensitive design measures and/or appropriate mitigating and enhancing landscaping proposals.	Agree suggested wording and Criterion C amended accordingly.  Paragraph 5.38 amended to refer to the need for submission of a Landscape and Visual Impact Assessment.
S/SCC3/4	p. 42 Para. 5.37		References to individual landowners should be avoided, in this case Wiltshire Council. Proposals for "standalone renewable energy infrastructure", like all other uses proposed in the CNP, should be determined by need and the individual merits of a location, having also first ascertained the owner's willingness to make their land available for the purposes proposed.	Remove reference to 'Wiltshire Council' but retain reference to farmland being suitable, referring specifically to the large area of farmland to the south.
S/SCC3/5	p. 44 Policy SCC3	Friends of Monkton Park	A lack of clarity about how 'adverse impacts on the local environment and amenity' will be measured, resulting in potential damage to vital local open spaces such as Monkton Park. More is needed on this issue and some areas, such as the park, should be excluded from this policy.	Paragraph 5.38 amended to refer to the need for submission of a Landscape and Visual Impact Assessment to assess whether there would be any adverse impacts on the local environment and amenity.  Reference added to Paragraph 5.37 to refer to standalone renewable energy developments not being suitable in conservation areas or local green spaces.
S/SCC3/6	p. 44 Policy SCC3		One of the few - albeit tangential - mentions of farming. It would be preferable to omit the biodiversity exception at the end, as that can be an opportunity for 'greenwash' or maybe 'farmwash'.	If, for example, the quality of the agricultural land is poor it would be more beneficial to improve biodiversity on the land. Therefore do not omit the biodiversity exception.  New paragraph added after Paragraph 5.44 to reference land being restored back to agricultural use on cessation of standalone renewable energy infrastructure.
S/SCC3/7	p. 44 Policy SCC3	BoKlok	BoKlok (Skanska & IKEA) modular home builders do agree with SCC1 and we believe that our developments encapsulate the key messages within the policy. All BoKlok homes come with an air source heat pump, and we are working towards the roll out of a zero-energy home by the end of 2022.	Support noted.



## Green and Blue Infrastructure

Ref. No.	Page No. / Para. No. / Policy No.	Name	Comment	Response
S/GI/0	p. 45 Para. 6.3	Wiltshire Council Strategic Planning	The Green and Blue Infrastructure Strategy has now been formally adopted by the Council and is available on (link here).	Para. 6.3 updated to reflect Strategy being adopted.

## Policy GI1 - Protecting and Enhancing Biodiversity

Ref. No.	Page No. / Para. No. / Policy No.	Name	Comment	Response
S/GI1/1	p. 51 Para. 6.21	Wiltshire Council Strategic Planning	For Clarity, ' <i>Developer contributions</i> ' usually refers to funds provided by way of planning obligations necessary to enable development to proceed. Enhancements to existing green infrastructure would not generally be considered a reasonable obligation unless it related to the development concerned. However, the Council could use their neighbourhood proportion of CIL to secure improvements not directly funded by development.	If development is taking place adjacent to a green space then it may be entirely appropriate to seek funds via planning obligations to the enhancement of that green space, which would be more frequently used for amenity purposes as a result of the development. However, Para. 6.21 expanded to include reference to CIL (which may also include Wiltshire Council's proportion of CIL) and BNG off-setting/credits
S/GI1/2	p. 49 Para. 6.15		The section is about biodiversity and the River Avon. Paragraph 6.15 correctly refers to Core Policy 50 Biodiversity, but it is unclear why Core Policies 2,3 and 9 have also been mentioned. The Chippenham Site Allocations Plan also includes Policy CH3 Chippenham Riverside Country Parks. This is missing.	References removed to Core Policies 2, 3 and 9, and reference added to Policy CH3 of Chippenham Site Allocations Plan.
S/GI1/3	p. 52 Policy GI1		The goal of this policy is supported; to enhance existing ecological interest and the networks upon which they rely.	Support noted.
S/GI1/4	p. 52 Policy GI1		The wording is possibly lengthy and may benefit from a review so that it is precise. For example, some elements repeat protection provided in the WCS or duplicate legal requirements for biodiversity net gain. Other elements, such as the need for a protecting 'buffer' to all ecological sites seem to be quite detailed and prescriptive and might not be an appropriate solution in all circumstances.	<p>Policy GI1 amended to make for a shorter and more precise policy, including the following changes:</p> <ul style="list-style-type: none"> <li>a) First paragraph not required as similar to second paragraph and biodiversity enhancement required anyway on sites</li> <li>b) Criterion 1 deleted as CP50 of Wiltshire Core Strategy already protects designated sites, protected species and other important habitats</li> <li>c) Criterion 2 deleted as duplicating what is in NP Policy GI3 - Green Corridors</li> <li>d) Criterion 3 amended and relocated to Paragraph 1 (i) to reflect importance of retained ancient trees and trees of arboricultural value for biodiversity, but remainder of text deleted as duplicates NP Policy GI4</li> <li>e) Criterion 4 deleted as reference already made in policy to protect and enhance wildlife habitats and priority species</li> <li>f) Criterion 5 amended and relocated to new Paragraph 2 of Policy to reflect updated status with regard to BNG</li> <li>g) Criteria 6 and 7 retained but wording amended and relocated to Paragraph 1 (ii and iii)</li> <li>h) Criterion 8 amended and relocated to Paragraph 3</li> <li>i) Criterion 9 amended and relocated to Paragraph 4</li> <li>j) Criterion 10 amended and relocated to Paragraph 1 iv-vii. Reference to hedgehog gaps added</li> <li>k) Final paragraph deleted as unnecessary to include reference to developer contributions being used to secure enhancements to existing green spaces in Policy itself. This is more likely to be achieved through CIL or BNG credits in the future. However, retain reference to such in Paragraph 6.21.</li> </ul> <p>Word 'buffer' removed as this may be misleading, but words 'appropriate and sensitive interface' added in reference to ecological sites as this should be achievable by virtue of good design and not onerous e.g. rear gardens or public open space being located adjacent to ecological sites.</p>

S/GI1/5	p. 52 Policy GI1		Criteria 5 requires 10% biodiversity net gain. This biodiversity net gain requirement will not be mandatory until November 2023 and there could be further changes.	LPA's (in their policies) and developers are already starting to implement 10% BNG, and given the Neighbourhood Plan is anticipated to be adopted in 2023 this requirement is not considered to be onerous and could be updated to reflect any further future changes. Should national policy be delayed for any reason it is important that 10% BNG is still required locally by the Neighbourhood Plan.  New text added to Para. 6.17 to provide explanation.
S/GI1/6	p. 52 Policy GI1		Core Policy 50 already seeks to ensure the protection and enhancement of sites and features. It will be important that the CNP aligns with any new Local Plan policy requirements as they emerge.	Criterion 1 of Policy GI1 deleted as CP50 of Wiltshire Core Strategy already protects designated sites, protected species and other important habitats.  New paragraph added after 6.12 to confirm role of CP50. Continuing discussions with the LPA will ensure that the Neighbourhood Plan is aligned with the emerging Wiltshire Local Plan.
S/GI1/7	p. 52 Policy GI1		The reference to developer contributions should be amended for the reasons set out regarding to 6.21	Final paragraph deleted as unnecessary to include reference to developer contributions being used to secure enhancements to existing green spaces in Policy itself. This is more likely to be achieved through CIL or BNG credits in the future. However, reference to developer contributions in Paragraph 6.21 retained.
S/GI1/8	p. 52 Policy GI1	Barratt David Wilson South West	Policy GI1 is generally supported, noting that much of it mirrors the Environment Act 2021 and the need to achieve at least a 10% biodiversity net gain.	Support noted for 10% BNG.
S/GI1/9	p. 52 Policy GI1		That said, it is not practical or appropriate in some circumstances to suggest that green roofs are maximised especially where Solar PV is a priority. Likewise, affordable housing providers are unlikely to accept the transfer of buildings with green roofs and they represent a maintenance difficulty for many homeowners. It is suggested that criterion 10 is removed as a 'must include' criterion and becomes an informative outside of the policy. Biodiversity net gain will more than address the ecological benefits that would otherwise be lost in a much more flexible manner.	Tension between requirement for green roofs and solar PV acknowledged. Criterion 10 amended and relocated to Paragraph 1 iv-vii, with reference to green roofs being retained. However, wording amended to include 'where appropriate' in acknowledgement of situations where it will not be possible or preferable to install green roofs, and to allow flexibility.
S/GI1/10	p. 52 Policy GI1	Future Chippenham	Support is given to Policy GI1 – Protecting and Enhancing Biodiversity, which refers to providing a Biodiversity Net Gain (BNG) of 10% within the Neighbourhood Plan area. This is the standard percentage net gain, will be a legal requirement in 2023 and Future Chippenham is aiming to achieve this.	Support noted for 10% BNG.
S/GI1/11	p. 52 Policy GI1	North Wiltshire Swifts	<p>In December 2020 the swift, along with the house martin, were moved from Amber to Red on the list of UK are on the Birds of Conservation Concern (BoCC). So it is really encouraging to see a direct reference to swift bricks in Policy G1 Protecting &amp; Enhancing Biodiversity, particularly because the design of swift bricks is now recognised as a design suitable for a variety of building dependent species. The British Standards Institute is due to publish BS 42021 on 28th March 2022 : Integral nest boxes – Selection and installation for new developments – Specification. This standard fully supports the 'universal' nest brick concept (see attachment 1). It is also encouraging to see the reference to the National Model Design Code included in section 7.17, as page 25 of the NDDC Guidance notes attached also mentions bird bricks.</p> <p>Your Plan at paragraph 6.11 states: 'As a predominantly built-up area' .... So a useful quote is the Environment Agency's State of the Urban Environment report (07/21) page 10 which states: "...Some species are considered 'urban specialists' eg swifts.. Urban specialist birds are a good biodiversity indicator for urban areas, because good quality, long-term data is available, and much is known about their ecology and some of the pressures affecting them." would be a useful quote to use. Perhaps the addition of a case study with photos could be included.</p> <p>I have also attached the Fulbourn Neighbourhood Plan. It is obviously quite different as Fulbourn is a small village but the plan does have wording relating to swifts at 7.15 - 7.18.</p>	<p>Support for integrated bird boxes, swift bricks and bee bricks added to first paragraph vi of Policy GI1.</p> <p>New paragraph after 6.19 added to provide explanation of swift bricks and reference/signpost to BS 42021.</p> <p>Reference to urban specialist birds from State of the Urban Environment Report included at new paragraph after 6.10, but not considered appropriate/proportionate to include a case study.</p>

S/GI1/12	p. 52 Policy GI1	Waddeton Park	Our client supports the commitment towards enhancing biodiversity through the national requirement for 10% biodiversity net gain (BNG) as established in the Environment Act 2021. Given that BNG provision will shortly be a legal requirement we do not consider that criterion 5 of the draft policy is a necessary requirement.	Support for 10% BNG noted. LPA's (in their policies) and developers are already starting to implement 10% BNG, and given the Neighbourhood Plan is anticipated to be adopted in 2023 this requirement is not considered to be onerous and could be updated to reflect any further future changes. Should national policy be delayed for any reason it is important that 10% BNG is still required locally by the Neighbourhood Plan.
S/GI1/13	p. 52 Policy GI1	Friends of Monkton Park	However enhancing biodiversity must also be an objective in the Neighbourhood's farmland and this should be built in to this Policy with a statement to that effect.	Biodiversity enhancements to farmland will not usually require planning permission and therefore cannot be included in Neighbourhood Plan policies which are to guide new development.
S/GI1/14	p. 52 Policy GI1		The answer from the Friends of Monkton park here is really Yes and No. Yes because we assume this policy is aimed at new developments outside of established parkland, but No because it doesn't say so. If interpreted literally by a hostile party this policy could support building on a part of Monkton park, for example, as long as biodiversity was enhanced in another part. The wording needs to be strengthened to avoid this. Point 1 goes some way to this but more is needed.	Policy GI1 applies to all new developments. However, strengthening of wording to protect parkland is not considered necessary as CP50 of the Wiltshire Core Strategy already protects designated sites from being built on. In addition, Policy GI2 of the Neighbourhood Plan protects local green spaces (such as Monkton Park) from inappropriate development, as does Policy TC4 relating to Conservation Areas.
S/GI1/15	p. 52 Policy GI1	Boklok	BoKlok (Skanska & IKEA) modular home builders support enhancing biodiversity and are current seeking to enhance either on site or off site net biodiversity mitigation land.	Support noted.

## Policy GI2 - Local Green Spaces

Ref. No.	Page No. / Para. No. / Policy No.	Name	Comment	Response
S/GI2/1	p. 57 Policy GI2	Wiltshire Council Strategic Planning	<p>Proposals for Local Green Space need to satisfy criteria set out in NPPF Paragraphs 101-102. This says that the Local Green Space designation should only be used where the green space is:</p> <p>a) in reasonably close proximity to the community it serves;</p> <p>b) demonstrably special to a local community and holds a particular local significance, for example because of its beauty, historic significance, recreational value (including as a playing field), tranquillity or richness of its wildlife; and</p> <p>c) local in character and is not an extensive tract of land.</p> <p>Many of the proposals do satisfy the criteria. However, this isn't the case for Site WW. Site WW is a large site currently in agricultural use and it is considered that it does not comply with criteria c. because it is not local in character and is an extensive tract of land. Remove Site WW from the Local Green Space proposals.</p>	LGS WW retained as this is not considered to be an extensive tract of land. Please refer to Appendix S of Consultation Statement which sets out in detail as to why this site is being retained.
S/GI2/2	p. 57 Policy GI2	Wiltshire Council Housing	<p>Proposals are identified for local green space on land owned by the Council. The Council support the majority of designations involving land in its ownership. There are, however, those that either do not appear to meet the NPPF criteria to justify designation or for which there is potential to develop all or part of a site (for much needed additional affordable homes, for example) or both.</p> <p>As the freehold owner of a number of Local Green Spaces proposed there has been engagement with the CNP Steering Group. A comprehensive representation was provided to the Steering Group setting out where the Council supports or not the proposed allocation. A copy of the document provided is attached for reference, but summarised as:</p> <p>LGS B -Not supported LGS C -Support LGS F - Not supported LGS H - Not supported LGS I -Support LGS J -Support LGS K -Support subject to plan LGS L -Support LGS M -Support subject to plan LGS N -Support subject to plan LGS O - Not supported LGS P - Not supported LGS Q -Support LGS S -Support subject to plan LGS T -Support subject to plan LGS V - Not supported LGS W -Support LGS Y -Support subject to plan LGS CC -Support. Note footpaths are outside of WC ownership LGS DD -Support. Note footpaths are outside of WC ownership LGS EE -Support. Note footpaths are outside of WC ownership LGS GG -Support LGS II -Support LGS KK -Support. Note footpaths are outside of WC ownership LGS LL -Support LGS RR - Not supported LGS SS - Not supported LGS VV - Not supported LGS WW - Not supported. This is existing agricultural land as LGS with the only access to the land through established formal Rights of Way, meaning that enjoyment as recreational space is not available.</p> <p>Site FF is within Wiltshire Council ownership and did not form part of the early consultation.</p> <p>Proposed allocation of Site WW as a LGS may also contradict the aspirations for standalone renewable energy infrastructure, as set out in 5.37</p>	Retain proposed LGS designations for those sites not supported by landowner. Please refer to Appendix S of Consultation Statement which sets out in detail as to why these sites are being retained.

S/GI2/3	p. 57 Policy GI2	Summix Capital	It is not appropriate to conflate the designation of Local Green Space and green belt policy. These are quite different policies and the neighbourhood plan should not seek to adopt this approach. The fact that the consultation is seeking evidence to support the contention portrays that such an approach is not justified.	The text of the final paragraph of Policy GI2 is consistent with the text of Paragraph 103 of the NPPF, which explains that 'Policies for managing development within a Local Green Space should be consistent with those for managing Green Belts'.
S/GI2/4	p. 57 Policy GI2	GreenSquare Accord	U. Allington Way – We are the landowner of this area. While we support the overall Local Green Spaces initiative, we request that this particular piece of land not be designated. The green space at Allington Way is bordered by bungalows, also within our ownership, which have no on plot parking. We submitted a planning application for a parking area on this site in 2019, and would potentially look to revisit this application in the future, taking into account the parking needs of residents at the time whilst also addressing the more recent push toward the electrification of vehicles. In terms of environmental impact, parking spaces can be designed to be environmentally sensitive which would tie into the broader aims of the Local Green Spaces initiative, that being a commitment to zero carbon.	LGS U to be retained. Please refer to Appendix S of Consultation Statement for detailed explanation.
S/GI2/5	p. 57 Policy GI2		G. Oaklands open space – We are the landowner of both green spaces identified in this area. We are happy for the southernmost area, located next to the bungalows at 88-102a Oaklands, to be designated as Local Green Space. However, we request that the northernmost area, located next to 104-128 Oaklands, not be designated as Local Green Space. There are no specific plans at this time, but we would like to keep flexibility on this piece of land in the future.	LGS G to be retained. Please refer to Appendix S of Consultation Statement for detailed explanation.
S/GI2/6	p. 57 Policy GI2	Friends of Monkton Park	Yes, as Chair of FOMp, I know the Friends will welcome the headline inclusion of Monkton park.	Support noted for designation of LGS A.

## Policy GI3 - Green Corridors

Ref. No.	Page No. / Para. No. / Policy No.	Name	Comment	Response
S/GI3/1	p. 60 Fig. 6.3	Wiltshire Council Strategic Planning	Whilst the principle of identifying green infrastructure corridors is supported, the extent of strategic green corridors shown on Figure 6.3 appear to be too extensive in places and require review e.g., North east of Rawlings Farm and Wilts and Berks Canal.	Strategic Green Corridors on Figure 6.3 reviewed and the following amendments made: - Western boundary of Wilts & Berks Canal Corridor re-aligned from field boundaries to approx. 100m distance from Canal, in order to align with Figure 8 of Wiltshire Council's Emerging Local Plan 'Planning for Chippenham' (2021). - Spur removed along Darcy Close due to new road to serve Rawlings Green development  Extent of River Avon Strategic Green Corridor north east of Rawlings Farm retained as this follows the boundaries of the Countryside Park approved in both Policies CH2 and CH3 of the Chippenham Site Allocations Plan. The Corridor here also reflects the green infrastructure shown on the outline consent at Rawlings Green (15/12351/OUT). Reference added to compliance with Policies CH1-CH3 of the Chippenham Site Allocations Plan at Para. 6.45.
S/GI3/2	p. 63 Policy GI3		All Green Corridors Criterion iii: Informal recreation could be appropriate, but prioritising investment in formal sports provision within the Green Corridors is more likely to conflict with wildlife / biodiversity and amenity / tranquillity interests as this could lead to future need or provision of buildings and servicing associated with such uses.	Agreed. Criterion iii) of Policy GI3 amended from: <i>'iii) Prioritising investment in enhancement of open space, sport and recreation within the Green Corridors'</i> to: <i>'iii) Prioritising investment in enhancement of open space, and informal recreation where appropriate'</i>
S/GI3/3	p. 63 Policy GI3	Barratt David Wilson South West	Strategic Green Corridors, by their very nature are not local policy designations and must therefore be pursued through the Wiltshire Local Plan Review aligned with its role as the strategic plan for the areas.	Reference to Strategic Green Corridors retained as they are intended to be 'strategic' for the purposes of the Neighbourhood Plan only, due to the fact that they usually span the entire Neighbourhood Area and extend beyond its boundaries. To give them an alternative name would less accurately describe their role and nature in Chippenham.
S/GI3/4	p. 63 Policy GI3		With regard to neighbourhood green corridor it is suggested each needs to be justified on its own merits. Support is given to the opportunity to realise extensions or improve corridors as part of development and is something that BDW could achieve at Gate Farm in connection with corridors along Stanley Lane/ Pewsham Way etc.	It is considered that having to justify the inclusion of each neighbourhood green corridor on its own merits would be an overly onerous task for the Neighbourhood Plan to have to record. The approach taken by the Neighbourhood Plan's Green Infrastructure Topic Group (set out in Appendix 10 of the Pre-Submission Draft Neighbourhood Plan) was to look at how Local Green Spaces could be joined together to form green corridors, using existing green and blue infrastructure features such as hedges, trees, open space or watercourses. Support noted for the opportunity to realise extensions or improve corridors as part of development.
S/GI3/5	p. 63 Policy GI3		Regarding the wording of policy GI3 and noting the above comments about Strategic Green Corridors, criterion i) should be reworded align with criterion ii) with the following inclusion: "i) ensuring that, wherever possible it will not compromise ...."	Suggested wording 'wherever possible' not necessary to include in Criterion i) as development should not compromise the integrity and principle open space use and function of green corridors which already exist. The context for Criterion ii) is different because it may not always be possible to connect new development to green corridors because of physical land constraints, hence wording 'wherever possible' can be used in this instance.
S/GI3/6	p. 63 Policy GI3	Environment Agency	We would encourage this policy to include greater reference to the flood risk purpose of the riverine corridors.	Reference to flood risk purpose of River Avon and Hardenhuish Brook Strategic Green Corridors included in new paragraph after 6.42.  Criterion i) of Policy GI3 amended to include reference to 'flood protection' as a principle function of <i>Green Corridors</i>

S/GI3/7	p. 60 Fig. 6.3	Future Chippenham	<p>Fig 6.3 illustrates Strategic Green Corridors, which broadly corresponds with the proposed country park shown on the emerging Framework Masterplan for Future Chippenham along the River Avon; however, it is significantly wider along the Wilts &amp; Berks Canal and the extent of this is challenged. It is not clear what the justification is for the extent of the Wilts &amp; Berks corridor in the Neighbourhood Plan. Detailed technical and environmental information has informed a series of constraints that in turn have served to identify the available development area and distribution of uses. This evidence has enabled the emerging Framework Masterplan to respond to existing landscape and define strategic areas of public open space and green infrastructure, structure planting and landscape elements, including opportunities for enhancement of biodiversity.</p> <p>The route of the proposed Future Chippenham distributor road is also in part of this corridor and as this road will support significant growth in the next Local Plan period, it is likely to be included in the emerging Local Plan Review.</p> <p>Further evidence is therefore required to justify the extent of the Wilts and Berks Canal Strategic Green Corridor to ensure that there is no conflict with the emerging Local Plan Review.</p>	<p>The emerging Framework Masterplan for Future Chippenham had not been shared with the Neighbourhood Plan Steering Group to assist in the preparation of the Plan and therefore the original western boundary of the Wilts &amp; Berks Strategic Green Corridor was aligned with field boundaries as far as possible. Notwithstanding, the western boundary of the Wilts &amp; Berks Canal Corridor has been re-aligned to follow an approx. 100m distance from Canal (100m wide green corridor). This can be fully justified because it now aligns with Figure 8 of Wiltshire Council's Reg. 18 Emerging Wiltshire Local Plan 'Planning for Chippenham' (2021).</p> <p>It is very important for the integrity and function of green corridors that where the Wilts &amp; Berks Canal Strategic Green Corridor ends it still connects into the Neighbourhood Green Corridors to the north west, one of which is a woodland finger extending down from the A4. This could be done through the incorporation of wildlife underpasses in any new road scheme.</p>
S/GI3/8	p. 60 Fig. 6.3	Gallagher Developments	<p>Our Client's site is located in a proposed Neighbourhood Green Corridor (along the north of the site) and a Strategic Green Corridor (along the east of the site). Neither designation precludes development, but the policy seeks to ensure that the Strategic Green Corridors remain intact and opportunities are taken to realise or improve missing links or connections for wildlife within the Neighbourhood Green Corridors. We support these principles and early designs of our scheme have already identified the importance of the northern green link. Wiltshire Council's future planning application for the Chippenham Distributor Road is likely to affect the Strategic Green Corridor and the implications of this will need to be carefully considered given the road will support significant growth in the next strategic Plan period, and so the road is likely to be included in the forthcoming Wiltshire Local Plan Review also.</p> <p>In any case, the current iteration of our development proposals proposes a green corridor along the eastern boundary which reflects the ecological and landscape sensitivities. Our buffer is approximately 44m wide between the proposed road and site boundary. The buffer shown within the draft Neighbourhood Plan is significantly wider and we would query the rationale and justification for this.</p> <p>Suggested change: To ensure there is no conflict with the forthcoming strategic plan, further evidence is needed to justify the width of the Strategic Green Corridor covering the Wilts &amp; Berks Canal Corridor.</p>	<p>Support noted for Policy GI3.</p> <p>The emerging Framework Masterplan for Future Chippenham had not been shared with the Neighbourhood Plan Steering Group to assist in the preparation of the Plan and therefore the original western boundary of the Wilts &amp; Berks Strategic Green Corridor was aligned with field boundaries as far as possible. Notwithstanding, the western boundary of the Wilts &amp; Berks Canal Corridor has been re-aligned to follow an approx. 100m distance from Canal (100m wide green corridor). This can be fully justified because it now aligns with Figure 8 of Wiltshire Council's Reg. 18 Emerging Wiltshire Local Plan 'Planning for Chippenham' (2021).</p>
S/GI3/9	p. 60 Fig. 6.3	Hallam Land Management	<p>This policy proposes a Green Corridor on land beyond the Neighbourhood Plan designated area. Hallam are supportive of the general aims of the policy, however, policy cannot be set on land outside of the designated area and must be removed.</p>	<p>Green corridors identified outside of the Neighbourhood Area (where the policy was not proposed to be applied, but which was intended to show these were cross-boundary features that did not suddenly end at the Neighbourhood Area boundary) removed from Figure 6.3 for clarity.</p>
S/GI3/10	p. 60 Fig. 6.3	Robert Hitchins Ltd.	<p>4.1. Figure 6.3: Green Corridors in Chippenham (p.60 CNP) illustrates a 'Neighbourhood Green Corridor' bleeding over the defined Chippenham Neighbourhood Area and into our client's site while a 'Countryside Connection point' is shown to the immediate south of our client's site.</p> <p>4.2. It is re-iterated that the policies of the CNP can only apply within the agreed Neighbourhood Area and not outside of it.</p> <p>4.3. Our client notes the intention of the Neighbourhood Green Corridor and Policy GI3 however it will be for Wiltshire Council to determine the Green Infrastructure requirements at the site in association with any submitted application and the relevant policies of the 'Development Plan' that relate to the site.</p> <p>4.4. It is noted that Policy GI3 states; "Development which takes the opportunities to link Neighbourhood Green Corridors to the surrounding countryside at the Countryside Connection Points identified on Figure 6.3, or to Strategic Green Corridors, <u>will be supported</u>." (emphasis added)</p>	<p>Green corridors identified outside of the Neighbourhood Area (where the policy was not proposed to be applied, but which was intended to show these were cross-boundary features that did not suddenly end at the Neighbourhood Area boundary) removed from Figure 6.3 for clarity.</p>

S/GI3/11	p. 63 Policy GI3	Waddeton Park	<p>3.27 The plan-making framework allows flexibility in the way plans and policies are applied. A rigid approach to assessing development against the proposed NP policies can hinder planned development coming forward. The NP Steering Group should therefore apply its policies with flexibility in mind, particularly in the absence of an up-to-date supply of deliverable housing sites.</p> <p>3.28 In the case of draft Policy GI3, whilst we understand the rationale for requiring development adjacent to Strategic Corridors to be designed to ensure they remain intact, the policy must not be applied so rigidly that it prevents sustainable development from coming forward.</p>	<p>The Green Corridors identified in Figure 6.3 generally follow existing treed areas, hedgerows, recreational open space, or is land within Flood Zones 2 and 3, and therefore should not hinder or prevent sustainable development coming forward. To make the wording of Policy GI3 more flexible as suggested would consequently result in the fragmentation or erosion of Strategic Green Corridors, and misses the whole point that the Corridors have to remain intact and robust for them to be successful for the movement of wildlife in particular. Otherwise there would be no point in having this policy.</p>
S/GI3/12	p. 62 Para. 6.44  p. 60 Fig. 6.3	Friends of Monkton Park	<p>This policy is confused as it includes some important farmland in some of the Green Corridors, but without recognising this. Para 6.44 offers a possible way forward for this - " Green Corridors should be multifunctional spaces that reflect and enhance the character of Chippenham and also operate at a landscape scale across the town as a whole." One of those functions is farming. This section needs to be revised to provide a clearer view of the interaction between Green Corridors and farmland. The current version is too Development focussed and would seem to permit development on valuable farmland. The Policy text on Figure 6.3 says that : " Development which takes the opportunities to link Neighbourhood Green Corridors to the surrounding countryside at the Countryside Connection Points identified on Figure 6.3, or to Strategic Green Corridors, will be supported." Firstly 6.3 does not identify these 'connection points', and secondly this approach could lead to support for developments that damage local farming capacity. Revision of this Policy is needed.</p>	<p>Text from Para. 6.44 relocated to new paragraph after 6.42 and reference to farmland within Strategic Green Corridors made, with support for the agro-ecological model to be followed on farmland with these Corridors.</p> <p>Criterion i) of Policy GI3 is clear that development proposals within or adjacent to Green Corridors must not compromise their integrity and open use space and function. This restricts development on farmland within Green Corridors and therefore the Policy does not need revising further in this respect.</p> <p>Figure 6.3 already identifies the location of 'countryside connections points' and these connect into farmland via approved or existing public rights of way for humans or via treed areas/hedgerows (where there is no human access) for wildlife. As such these do not support development that damages local farming capacity.</p>
S/GI3/13	p. 63 Policy GI3		<p>There are again some problematic ambiguities in the wording of GI3, for example: "All development located within, or adjacent to, the above Strategic Corridors must be designed to ensure that these Corridors remain intact." There is a clear contradiction here - most development in the Avon corridor, for example would mean that it did not remain intact. In the case of Monkton park, and development in the park would be a catastrophic change in its character and so GI3 needs to be reworded to clearly avoid that possibility.</p>	<p>Do not agree that there are ambiguities in the wording of Policy GI3. Development within Monkton Park for example would conflict with Criterion i) of the Policy. Reference is being made in the comment about the wider River Avon corridor, some of which is located outside the Neighbourhood Area and outside of the scope of the Neighbourhood Plan. Policy GI3 is only concerned with the River Avon Strategic Green Corridor as shown in Figure 6.3.</p>



## Policy GI4 - Trees, Woodland & Hedgerows

Ref. No.	Page No. / Para. No. / Policy No.	Name	Comment	Response
S/GI4/1	p. 68 Policy GI4	Wiltshire Council Strategic Planning	New and replacement tree planting: new and existing trees are generally treated by a landscaping condition of planning permission requiring new planting, the replacement of trees and ongoing maintenance as a scheme becomes established. Condition (b) seems unnecessary, and it is also unclear as to what 'commuted sums' this refers to and who holds them.	Agreed. Reference to use of commuted sums and maintenance of street trees in criterion b) removed. Reference to the need for inclusion of street trees in new development as per advice in Para. 131 of the NPPF retained.
S/GI4/2	p. 68 Policy GI4		Tree cover: a level of tree cover is desirable for a variety of reasons. The policy may need to be rephrased to be less prescriptive. 20% may not be suitable in all circumstances and in others may have the perverse effect of being a disincentive to higher levels of tree cover.	<p>In setting a requirement for future tree canopy cover on development sites, the Neighbourhood Plan Green Infrastructure Topic Group reviewed evidence from the Woodland Trust (recommending 30%) and Policy DM34 of the Wycombe District Local Plan 2019 (requiring 25%). Please refer to the Topic Group Proforma relating to Policy GI4 in Appendix 2 of the Pre-Submission Draft Neighbourhood Plan.</p> <p>Table 3 in 'Canopy Cover Assessment &amp; Recommendations for Wycombe District' (<a href="https://www.wycombe.gov.uk/uploads/public/documents/Planning/New-local-plan/Tree-canopy-cover-assessment-report.pdf">https://www.wycombe.gov.uk/uploads/public/documents/Planning/New-local-plan/Tree-canopy-cover-assessment-report.pdf</a>), produced as evidence to support Policy DM34 of the Wycombe District Local Plan 2019, sets out the existing tree canopy cover of a number of UK towns and cities, and the future canopy cover targets they are setting (appreciating that these targets are often set out in non-planning policy council strategies). For example Torbay has an existing tree canopy cover of 12% and a target of 20%, Bristol has an existing tree canopy cover of 14% and a target of 30%.</p> <p>The above document, at 5.1.3, shows different residential development layouts to prove development would still be viable with a 25% tree canopy cover requirement. These layouts have a density of between 29-34 dwellings per hectares with tree canopy cover of between 25.6%-35.2%. The development density and the style of development is always dependent upon the site and its particular constraints. However the residential development layouts are not specific to Wycombe and could be applied to any town/city. They are typical of what could easily be achieved in a new build residential development on a site of 0.5ha or more within Chippenham. In addition, the majority of new development on larger sites in Chippenham is likely to occur on greenfield land, where there may either be existing trees, or less site constraints to planting new trees.</p> <p>Taking on board the above evidence which proves that schemes can be viable with a tree canopy cover of 25%, but factoring in that existing tree canopy cover in Chippenham starts at a lower base than some areas (with an average existing canopy cover of 14.1%), together with a realistic aspiration to increase tree cover by at least 6% in the town, it is considered that the target of 20% tree canopy cover set out in Policy GI4 is viable and achievable, and aligns with the recommended target of the Urban Forestry and Woodland Advisory Committee Network, based on research by Doik et al (2017).</p> <p>To make Policy GI4 less prescriptive and more flexible first sentence of the Tree Canopy Cover paragraph modified from:  <i>'Proposals are required to demonstrate a minimum future tree canopy cover of 20% of the site area...'</i>  to:  <i>'Proposals should demonstrate a future tree canopy cover of at least 20% of the site area...'</i></p> <p>Policy GI4 recognises that there may be some rare circumstances where it would be impractical or unviable to achieve 20% tree canopy cover on a development site, and flexibility is built into the policy wording for this 20% to be achieved through the use of other green infrastructure to deliver equivalent benefit. The modified wording above from '...a minimum of...' to '...at least...' is now considered to be less of a disincentive to achieving higher levels of tree cover.</p>

S/GI4/3	p. 68 Policy GI4	Barratt David Wilson South West	<p>The second paragraph of Policy GI4 is somewhat negatively worded. It could therefore be revised to flexibly support the delivery of development so it is not heavily shaded by trees based on managing individual site circumstances (topography, site orientation, tree type etc.). It should signpost the detailed design process as the means of address the matter. Garden rubbish dumping or tree lopping are noted and careful detailed design can reduce this impact. BDW would be pleased to work with the Town Council in this regard and their land at Gate Farm is not impacted by shading.</p>	<p>A quantitative measure is considered to be the most effective way to achieve the objectives of Policy GI4, whilst also making reference to the importance of the detailed design process as suggested. Recent guidance (2022) produced by Natural England and the Forestry Commission 'Ancient woodland, ancient trees and veteran trees: advice for making planning decisions' recommends a minimum buffer zone of 15m between development and woodland. For ancient or veteran trees (including those on the woodland boundary), it recommends that the buffer zone should be at least 15 times larger than the diameter of the tree. It also recommends that the buffer zone should be 5 metres from the edge of the tree's canopy if that area is larger than 15 times the tree's diameter. This wording is considered to be too complicated to include in a planning policy, and therefore the 20m buffer zone, also required by the Landscape, Biodiversity and Trees SPD (2018) (Box B6) produced by Basingstoke and Deane District Council, is preferred.</p> <p>Notwithstanding the above, the second paragraph of GI4 has been shortened to avoid repetition of Paragraph 6.53 and is more positively worded, with reference to the detailed design process made.</p> <p>Second paragraph of Policy GI4 modified from:</p> <p><i>'A minimum buffer of 20m should be provided between the edge of a woodland or tree belt, and the development (including gardens), unless it can be satisfactorily demonstrated, in a particular case, that heavy shading and perceived danger will not affect quality of life for residents, and the ecology of the woodland or tree belt would not be adversely affected due to dumping of garden rubbish, light and noise pollution and pressure for lopping trees and removing valuable deadwood habitat.'</i></p> <p>to:</p> <p><i>'A buffer zone of at least 20m, consisting of semi-natural habitat, shall be provided between new development (including gardens) and the edge of a woodland or tree belt, unless it can be satisfactorily demonstrated through the detailed design process that the proposal would have no adverse impacts on trees, ecology, people, or property'.</i></p>
S/GI4/4	p. 68 Policy GI4		<p>The requirement for 20% tree canopy cover on sites over 0.5ha is difficult justified and there appear to be more effective ways of addressing the ecological benefits. It may also conflict with the need to deliver other aspects of the plan such as biodiversity net gain (BNG), play and sport provision and other public open space, all of which form part of a sustainable development scheme. Moreover, it is difficult to understand how a decision-maker going to determine what an 'equivalent benefit' might be where 20% tree cover is not achievable? It should be for the urban design, BNG and landscape design processes to determine what is suitable for the individual site circumstances having had the matter highlighted as a consideration through the eCNP not a requirement.</p>	<p>In setting a requirement for future tree canopy cover on development sites the Neighbourhood Plan Green Infrastructure Topic Group reviewed evidence from the Woodland Trust (recommending 30%) and Policy DM34 of the Wycombe District Local Plan 2019 (requiring 25%). Please refer to the Topic Group Proforma relating to Policy GI4 in Appendix 2 of the Pre-Submission Draft Neighbourhood Plan.</p> <p>Table 3 in 'Canopy Cover Assessment &amp; Recommendations for Wycombe District' (<a href="https://www.wycombe.gov.uk/uploads/public/documents/Planning/New-local-plan/Tree-canopy-cover-assessment-report.pdf">https://www.wycombe.gov.uk/uploads/public/documents/Planning/New-local-plan/Tree-canopy-cover-assessment-report.pdf</a>), produced as evidence to support Policy DM34 of the Wycombe District Local Plan 2019, sets out the existing tree canopy cover of a number of UK towns and cities, and the future canopy cover targets they are setting (appreciating that these targets are often set out in non-planning policy council strategies). For example Torbay has an existing tree canopy cover of 12% and a target of 20%, Bristol has an existing tree canopy cover of 14% and a target of 30%.</p> <p>The above document, at 5.1.3, shows different residential development layouts to prove development would still be viable with a 25% tree canopy cover requirement. These layouts have a density of between 29-34 dwellings per hectares with tree canopy cover of between 25.6%-35.2%. The development density and the style of development is always dependent upon the site and its particular constraints. However the residential development layouts are not specific to Wycombe and could be applied to any town/city. They are typical of what could easily be achieved in a new build residential development on a site of 0.5ha or more within Chippenham. In addition, the majority of new development on larger sites in Chippenham is likely to occur on greenfield land, where there may either be existing trees, or less site constraints to planting new trees.</p> <p>Taking on board the above evidence which proves that schemes can be viable with a tree canopy cover of 25%, but factoring in that existing tree canopy cover in Chippenham starts at a lower base than some areas (with an average existing canopy cover of 14.1%), together with a realistic aspiration to increase tree cover by at least 6% in the town, it is considered that the target of 20% tree canopy cover set out in Policy GI4 is viable and achievable, and aligns with the recommended target of the Urban Forestry and Woodland Advisory Committee Network, based on research by Doik et al (2017).</p> <p>To make Policy GI4 less prescriptive and more flexible first sentence of the Tree Canopy Cover paragraph modified from:</p> <p><i>'Proposals are required to demonstrate a minimum future tree canopy cover of 20% of the site area...'</i></p> <p>to:</p> <p><i>'Proposals should demonstrate a future tree canopy cover of at least 20% of the site area...'</i></p>

				<p>Policy GI4 recognises that there may be some rare circumstances where it would be impractical or unviable to achieve 20% tree canopy cover on a development site, and flexibility is built into the policy wording for this 20% to be achieved through the use of other green infrastructure to deliver equivalent benefit. The comment made that the decision maker would find it difficult to determine what an 'equivalent benefit' is, is not agreed with. This wording is used in Policy DM34 of the Wycombe District Local Plan, and it should be possible for the LPA to determine the 'equivalent benefit' in a subjective way taking into account responses from the urban design, BNG and landscape design processes.</p> <p>The comment that there may be more effective ways of addressing ecological benefits on a site than the requirement for 20% tree canopy cover misses the point that the purpose of increasing tree canopy cover on a site is also for a myriad of other equally important benefits including carbon absorption, reducing air pollution, reducing air temperature through shading, absorbing noise, helping to prevent flooding, and improving human health and wellbeing. This part of Policy GI4 is more likely to work in synergy with, than against, biodiversity net gain policy. It is also likely to work in synergy with proposals for public open space for play and sport provision, which usually incorporate tree planting.</p>
S/GI4/5	p. 68 Policy GI4	Future Chippenham	<p>The policy as drafted “requires” proposals to demonstrate a minimum future tree canopy cover of 20% of the site area on sites outside the town centre and greater than 0.5 ha in size. The policy should allow for flexibility and allow for deviation from a 20% requirement where this can be justified by robust evidence.</p>	<p>In setting a requirement for future tree canopy cover on development sites, the Neighbourhood Plan Green Infrastructure Topic Group reviewed evidence from the Woodland Trust (recommending 30%) and Policy DM34 of the Wycombe District Local Plan 2019 (requiring 25%). Please refer to the Topic Group Proforma relating to Policy GI4 in Appendix 2 of the Pre-Submission Draft Neighbourhood Plan.</p> <p>Table 3 in 'Canopy Cover Assessment &amp; Recommendations for Wycombe District' (<a href="https://www.wycombe.gov.uk/uploads/public/documents/Planning/New-local-plan/Tree-canopy-cover-assessment-report.pdf">https://www.wycombe.gov.uk/uploads/public/documents/Planning/New-local-plan/Tree-canopy-cover-assessment-report.pdf</a>), produced as evidence to support Policy DM34 of the Wycombe District Local Plan 2019, sets out the existing tree canopy cover of a number of UK towns and cities, and the future canopy cover targets they are setting (appreciating that these targets are often set out in non-planning policy council strategies). For example Torbay has an existing tree canopy cover of 12% and a target of 20%, Bristol has an existing tree canopy cover of 14% and a target of 30%.</p> <p>The above document, at 5.1.3, shows different residential development layouts to prove development would still be viable with a 25% tree canopy cover requirement. These layouts have a density of between 29-34 dwellings per hectares with tree canopy cover of between 25.6%-35.2%. The development density and the style of development is always dependent upon the site and its particular constraints. However the residential development layouts are not specific to Wycombe and could be applied to any town/city. They are typical of what could easily be achieved in a new build residential development on a site of 0.5ha or more within Chippenham. In addition, the majority of new development on larger sites in Chippenham is likely to occur on greenfield land, where there may either be existing trees, or less site constraints to planting new trees.</p> <p>Taking on board the above evidence which proves that schemes can be viable with a tree canopy cover of 25%, but factoring in that existing tree canopy cover in Chippenham starts at a lower base than some areas (with an average existing canopy cover of 14.1%), together with a realistic aspiration to increase tree cover by at least 6% in the town, it is considered that the target of 20% tree canopy cover set out in Policy GI4 is viable and achievable, and aligns with the recommended target of the Urban Forestry and Woodland Advisory Committee Network, based on research by Doik et al (2017).</p> <p>To make Policy GI4 less prescriptive and more flexible, in line with the comment, first sentence of the Tree Canopy Cover paragraph modified from:  <i>'Proposals are required to demonstrate a minimum future tree canopy cover of 20% of the site area...'</i>  to:  <i>'Proposals should demonstrate a future tree canopy cover of at least 20% of the site area...'</i></p> <p>Policy GI4 recognises that there may be some rare circumstances where it would be impractical or unviable to achieve 20% tree canopy cover on a development site, and flexibility is built into the policy wording for this 20% to be achieved through the use of other green infrastructure to deliver equivalent benefit.</p>

S/GI4/6	p. 68 Policy GI4	Gallagher Developments	<p>This policy looks to protect the existing trees, woodlands and hedgerows and avoid removal where possible. We are in support of this principle as it will positively contribute to the sustainable growth of the area, and tree retention and new planting are being maximised within our development proposals. However we have a query with the requirement for a minimum 20% tree canopy coverage on all sites over 0.5 hectares outside of the town centre. The figure appears to come from the Urban Forestry and Woodland Advisory Committee Network, and Figure 6.4 in the draft Plan shows only one ward in Chippenham exceeds 20% tree canopy cover, with an average of 14.1% across Chippenham and 9.25% in Pewsham. Further evidence is required to demonstrate how the policy can be implemented effectively and how the 20% coverage delivered alongside all other policy requirements.</p> <p>There may be a conflict between the objectives of this policy and the 10% biodiversity net gain policy, which may be difficult to achieve in combination on some sites. The policy should be more flexible to ensure it can be assessed on a site-by-site basis.</p> <p>Suggested change:  <i>The Policy for 20% tree canopy cover should be amended to include something along these lines (underlined text indicates our additions): ‘... but where it can be demonstrated that this is impractical, evidence should be provided to justify why the policy cannot be met, and this should include evidence to justify why the use of other green infrastructure (e.g. green roofs) cannot be used to deliver equivalent benefit’</i></p>	<p>Support noted for protection of existing trees, woodlands and hedgerows.</p> <p>In setting a requirement for future tree canopy cover on development sites, the Neighbourhood Plan Green Infrastructure Topic Group reviewed evidence from the Woodland Trust (recommending 30%) and Policy DM34 of the Wycombe District Local Plan 2019 (requiring 25%). Please refer to the Topic Group Proforma relating to Policy GI4 in Appendix 2 of the Pre-Submission Draft Neighbourhood Plan.</p> <p>Table 3 in 'Canopy Cover Assessment &amp; Recommendations for Wycombe District' (<a href="https://www.wycombe.gov.uk/uploads/public/documents/Planning/New-local-plan/Tree-canopy-cover-assessment-report.pdf">https://www.wycombe.gov.uk/uploads/public/documents/Planning/New-local-plan/Tree-canopy-cover-assessment-report.pdf</a>), produced as evidence to support Policy DM34 of the Wycombe District Local Plan 2019, sets out the existing tree canopy cover of a number of UK towns and cities, and the future canopy cover targets they are setting (appreciating that these targets are often set out in non-planning policy council strategies). For example Torbay has an existing tree canopy cover of 12% and a target of 20%, Bristol has an existing tree canopy cover of 14% and a target of 30%.</p> <p>The above document, at 5.1.3, shows different residential development layouts to prove development would still be viable with a 25% tree canopy cover requirement. These layouts have a density of between 29-34 dwellings per hectares with tree canopy cover of between 25.6%-35.2%. The development density and the style of development is always dependent upon the site and its particular constraints. However the residential development layouts are not specific to Wycombe and could be applied to any town/city. They are typical of what could easily be achieved in a new build residential development on a site of 0.5ha or more within Chippenham. In addition, the majority of new development on larger sites in Chippenham is likely to occur on greenfield land, where there may either be existing trees, or less site constraints to planting new trees.</p> <p>Taking on board the above evidence which proves that schemes can be viable with a tree canopy cover of 25%, but factoring in that existing tree canopy cover in Chippenham starts at a lower base than some areas (with an average existing canopy cover of 14.1%), together with a realistic aspiration to increase tree cover by at least 6% in the town, it is considered that the target of 20% tree canopy cover set out in Policy GI4 is viable and achievable, and aligns with the recommended target of the Urban Forestry and Woodland Advisory Committee Network, based on research by Doik et al (2017).</p> <p>Policy GI4 recognises that there may be some rare circumstances where it would be impractical or unviable to achieve 20% tree canopy cover on a development site, and flexibility is built into the policy wording for this 20% to be achieved through the use of other green infrastructure to deliver equivalent benefit.</p> <p>It is not considered that there would be a conflict between the objectives of Policy GI4 and 10% biodiversity net gain in Policy GI1. Policy GI4 is more likely to work in synergy with, than against, biodiversity net gain policy because existing or new trees will help contribute towards 10% biodiversity net gain on a site.</p> <p>The suggested change of wording to Policy GI4 would substantially alter the intent of the policy to its detriment, allowing circumstances where developers would not need to meet either 20% tree canopy cover or the equivalent benefit with green infrastructure on the site. Instead, to make Policy GI4 less prescriptive and more flexible, modify the first sentence of the Tree Canopy Cover paragraph from:  <i>'Proposals are required to demonstrate a minimum future tree canopy cover of 20% of the site area...'</i>  to:  <i>'Proposals should demonstrate a future tree canopy cover of at least 20% of the site area...'</i></p>
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S/GI4/7	p. 68 Policy GI4	Hallam Land Management	<p>The policy states that the proposals are “required” to demonstrate a minimum future tree canopy cover of 20% of the site area on sites outside of the town centre. National and Local policy already sets standards and land area requirements for open space and Biodiversity Net Gain providing a range of environmental, ecological and recreational benefits. This draft policy does not consider the viability repercussions and its adoption could result in some sites becoming undeliverable. Draft policy GI4 has the potential to conflict with these existing policies rendering some sites undeliverable by adding additional open space requirements. Additionally, tree cover may not be the appropriate and best environmental or ecological response in certain circumstances. We suggest that the language of this policy is altered to use language that “encourages” tree cover to a level informed by environmental, ecological and recreational needs of a site.</p>	<p>In setting a requirement for future tree canopy cover on development sites, the Neighbourhood Plan Green Infrastructure Topic Group reviewed evidence from the Woodland Trust (recommending 30%) and Policy DM34 of the Wycombe District Local Plan 2019 (requiring 25%). Please refer to the Topic Group Proforma relating to Policy GI4 in Appendix 2 of the Pre-Submission Draft Neighbourhood Plan.</p> <p>Table 3 in 'Canopy Cover Assessment &amp; Recommendations for Wycombe District' (<a href="https://www.wycombe.gov.uk/uploads/public/documents/Planning/New-local-plan/Tree-canopy-cover-assessment-report.pdf">https://www.wycombe.gov.uk/uploads/public/documents/Planning/New-local-plan/Tree-canopy-cover-assessment-report.pdf</a>), produced as evidence to support Policy DM34 of the Wycombe District Local Plan 2019, sets out the existing tree canopy cover of a number of UK towns and cities, and the future canopy cover targets they are setting (appreciating that these targets are often set out in non-planning policy council strategies). For example Torbay has an existing tree canopy cover of 12% and a target of 20%, Bristol has an existing tree canopy cover of 14% and a target of 30%.</p> <p>The above document, at 5.1.3, shows different residential development layouts to prove development would still be viable with a 25% tree canopy cover requirement. These layouts have a density of between 29-34 dwellings per hectares with tree canopy cover of between 25.6%-35.2%. The development density and the style of development is always dependent upon the site and its particular constraints. However the residential development layouts are not specific to Wycombe and could be applied to any town/city. They are typical of what could easily be achieved in a new build residential development on a site of 0.5ha or more within Chippenham. In addition, the majority of new development on larger sites in Chippenham is likely to occur on greenfield land, where there may either be existing trees, or less site constraints to planting new trees.</p> <p>Taking on board the above evidence which proves that schemes can be viable with a tree canopy cover of 25%, but factoring in that existing tree canopy cover in Chippenham starts at a lower base than some areas (with an average existing canopy cover of 14.1%), together with a realistic aspiration to increase tree cover by at least 6% in the town, it is considered that the target of 20% tree canopy cover set out in Policy GI4 is viable and achievable, and aligns with the recommended target of the Urban Forestry and Woodland Advisory Committee Network, based on research by Doik et al (2017).</p> <p>The comment refers to there already being national and local policy standards and land area requirements for open space and BNG. However, there are no such national policy standards/requirements for open space. There are no such policy standards/requirements in the Local Plan for either open space or BNG. Therefore Policy GI4 can successfully fill the void in current planning policy on this aspect.</p> <p>It is not agreed with that Policy GI4 would automatically result in additional open space requirement on a site. Tree canopy cover could be</p> <p>To make Policy GI4 less prescriptive, and more flexible, first sentence of Tree Canopy Cover paragraph modified from:  <i>'Proposals are required to demonstrate a minimum future tree canopy cover of 20% of the site area...'</i>  to:  <i>'Proposals should demonstrate a future tree canopy cover of at least 20% of the site area...'</i></p> <p>Policy GI4 recognises that there may be some rare circumstances where it would be impractical or unviable to achieve 20% tree canopy cover on a development site, and flexibility is built into the policy wording for this 20% to be achieved through the use of other green infrastructure to deliver equivalent benefit. The suggested change to the language of the policy, which 'encourages' tree planting, would not have the desired effect of increasing tree canopy cover in Chippenham.</p>
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S/GI4/8	p. 68 Policy GI4	Waddeton Park	<p>3.29 Waddeton Park is supportive of the draft NP's commitment to providing tree planting. However we consider that it is too prescriptive to include specific requirements for a buffer zone and tree planting at this point.</p> <p>3.30 The extent and number of trees and hedgerows is best established via relevant technical evidence as applications come forward. The creation of suitable landscaping and ecological mitigation strategies can help inform the provision of GI within new development.</p> <p>3.31 The legal requirement to deliver BNG also has a key role in delivering effective landscaping and ecology strategies and is considered to be an effective substitute for prescribed planting requirements.</p> <p>3.32 We therefore suggest that the draft NP removes the requirements for a minimum 20 metre buffer from woodland/tree belts and a minimum tree canopy cover extending to 20% of the site area. These strands of the policy have the potential to conflict with promoting flexibility through plan-making.</p>	<p>Support noted for the Plan's commitment to tree planting. However, unless there are some specific requirements included within Policy GI4, such as those for buffer zones, tree canopy cover, or tree replacement it is unlikely that the Neighbourhood Plan would succeed in increasing tree planting in new development.</p> <p>Whilst it is agreed that relevant technical evidence submitted in support of planning applications is useful to inform the provision of GI within new development, this should be used in conjunction with recognised standards and guidance set out in planning policies. For example the Bristol Tree Replacement Scheme, set out in the Tree Planting Guide Annex and referred to in Policy GI4, is a technical, evidence based framework for assessing the specification of replacement trees, used successfully by other local plans and neighbourhood plans (Cam Parish Neighbourhood Plan for example) to achieve sustainable development.</p> <p>To make Policy GI4 less prescriptive and more flexible, in line with the comment, first sentence of the Tree Canopy Cover paragraph modified from: <i>'Proposals are required to demonstrate a minimum future tree canopy cover of 20% of the site area...'</i> to: <i>'Proposals should demonstrate a future tree canopy cover of at least 20% of the site area...'</i></p> <p>Policy GI4 recognises that there may be some rare circumstances where it would be impractical or unviable to achieve 20% tree canopy cover on a development site, and flexibility is built into the policy wording for this 20% to be achieved through the use of other green infrastructure to deliver equivalent benefit.</p> <p>With regard to the comment made that the 20m buffer is too prescriptive, again a quantitative measure such as this is considered to be the most effective way to achieve the objectives of Policy GI4. Recent guidance (2022) produced by Natural England and the Forestry Commission 'Ancient woodland, ancient trees and veteran trees: advice for making planning decisions' recommends a minimum buffer zone of 15m between development and woodland. For ancient or veteran trees (including those on the woodland boundary), it recommends that the buffer zone should be at least 15 times larger than the diameter of the tree. It also recommends that the buffer zone should be 5 metres from the edge of the tree's canopy if that area is larger than 15 times the tree's diameter. This wording is considered to be too complicated to include in a planning policy, and therefore the 20m buffer zone, also required by the Landscape, Biodiversity and Trees SPD (2018) (Box B6) produced by Basingstoke and</p> <p>Notwithstanding the above, the second paragraph of GI4 has been shortened to avoid repetition with Paragraph 6.53 and is more positively worded. Second paragraph of Policy GI4 modified from: <i>'A minimum buffer of 20m should be provided between the edge of a woodland or tree belt, and the development (including gardens), unless it can be satisfactorily demonstrated, in a particular case, that heavy shading and perceived danger will not affect quality of life for residents, and the ecology of the woodland or tree belt would not be adversely affected due to dumping of garden rubbish, light and noise pollution and pressure for lopping trees and removing valuable deadwood habitat.'</i> to: <i>'A buffer zone of at least 20m, consisting of semi-natural habitat, shall be provided between new development (including gardens) and the edge of a woodland or tree belt, unless it can be satisfactorily demonstrated through the detailed design process that the proposal would have no adverse impacts on trees, ecology, people, or property'.</i></p> <p>The legal requirement to deliver BNG has not been introduced at the time of writing, and much of the detail around how this will be implemented, or its success, is not yet known. Whilst it is agreed that it will likely have a key role in delivering effective landscaping and ecology strategies, it is doubtful that it will be an effective substitute for prescribed planting requirements. In fact there may be some circumstances where BNG could potentially have a negative impact on tree planting in some situations where those habitats without trees are more easily achievable/give greater biodiversity credits on a site. The Neighbourhood Plan Steering Group have placed huge importance on tree planting in Chippenham, given the town has a below average tree canopy cover when compared to the UK average. Tree planting is about more than solely increasing biodiversity net gain on a site. Trees on a site may be planted for other reasons such as carbon absorption, reducing air pollution, reducing air temperature through shading, absorbing noise, helping to prevent flooding, and improving human health and wellbeing. Policy GI4 is therefore more likely to work in synergy with biodiversity net gain policy, rather than against, or as a substitute for it. The tree canopy cover part of Policy GI4 is therefore important to retain as a means to increase tree planting in Chippenham.</p>
S/GI4/9	p. 68 Policy GI4	Friends of Monkton Park	<p>Again Yes and No and again there is a missed opportunity here to extend this policy to encouraging farming improvements that promote Trees, Woodland and Hedgerows. Hopefully this can be corrected.</p>	<p>New paragraph added after 6.58 to encourage farming improvements that promote trees, woodland and hedgerows.</p>

S/GI4/10	p. 68 Policy GI4	Wessex Water	Street tree planting should consider the location of existing underground infrastructure as water mains and sewers can be damaged by tree roots. Green spaces laid to grass within residential estates may be crossed by underground services and this should be checked when tree planting is proposed.	New paragraph added after 6.58 to refer to the need for consideration of underground infrastructure when planting street trees or trees on green spaces laid to grass.
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## Policy GI5 - Green Buffers

Ref. No.	Page No. / Para. No. / Policy No.	Name	Comment	Response
S/GI5/1	p. 71 Policy GI5	Wiltshire Council Strategic Planning	<p>The CNP recognises that much landscape around Chippenham but beyond the plan area forms part of the town's current setting. This illustrates a need for strategic policies to plan for the town's growth across a wider context than the CNP plan area and strongly suggests that this is a more appropriate topic for the Local Plan Review. The CNP should only shape and direct development that is outside of strategic policies (NPPF paragraph 13).</p> <p>Whilst recognising the value of principles contained in this section, which are already factors in the preparation of the Local Plan Review, 'Green buffer principles for Chippenham' and policy GI5 should be deleted or substantially reframed.</p> <p>It may, for instance, be appropriate for the CNP to ensure that green corridors continue from within the town to the countryside. The CNP should not control the extent and form of the urban area. We would be happy to discuss in more detail with you.</p> <p>Rewording of policy could take into consideration the following:</p> <ul style="list-style-type: none"> <li>• Green and blue infrastructure shall be strategically located along contours and the edges of development sites to help screen and filter harmful urbanising effects from new development and to avoid the creation of harsh new urban settlement edges fronting countryside.</li> <li>• The creation of harsh new urban settlement edges fronting countryside will be avoided. New settlement edges will be screened with effective dense new native tree planting that will protect existing rural views from the countryside towards Chippenham in order to protect the rural character of the countryside during all times of the year.</li> </ul>	<p>The Steering Group discussed at length the options for amending or deleting Policy GI5 to address these comments. They agreed to substantially reframe the policy to remove reference to any strategic requirements and the 'Green buffer principles for Chippenham'.</p> <p>Policy GI5 as now amended is a more focused localised policy which relates to a single Green Buffer, two fields within the Neighbourhood Area, which have previously been allocated as part of the wider Rawlings Green Country Park in the Chippenham Site Allocations Plan (CSAP). The Steering Group considered it was important to designate this as a Green Buffer in order to reinforce Policies CH2 and CH3 of the CSAP and prevent coalescence between Chippenham and Langley Burrell/Tytherton Lucas and the hamlet of Peckingell. The purpose of Policy GI5, to prevent coalescence between Chippenham and its surrounding villages, has a much narrower definition than the strategic purposes of allocation of part of this land for a country park in the CSAP (a multifunctional purposes), or designation as a Green Corridor (the primary purpose being to allow for movement of wildlife and humans) under Policy GI3. The designation of the land as a Green Buffer under Policy GI5 is no different to designation of green buffers in other neighbourhood plans e.g. Corsham Neighbourhood Plan, Crissing Neighbourhood Plan and many others.</p> <p>A new Figure 6.4 has been created to show the extent of this green buffer.</p> <p>The first bullet point of the comment is helpful wording and has been added to form a new paragraph under Policy GI3, where the Steering Group considered it had a better fit.</p> <p>The second bullet point of the comment is again helpful wording and has been included in the Chippenham Design Guide under the section 'The Site's Relationship to Town and Country'.</p>
S/GI5/2	p. 71 Policy GI5	Barratt David Wilson South West	<p>Policy GI5 assumes that all development should be hidden by a buffer, limits the ability to achieve good urban design. It also potentially limits the ability to make the best use of land. Criterion a and b are generally supported, but criterion c should be removed. If settlement edge treatment needs to be highlighted, then it would be better included in supporting text as a set of guiding principles.</p>	<p>The Steering Group discussed at length the options for amending or deleting Policy GI5 to address these comments. They agreed to substantially reframe the policy to remove reference to any strategic requirements and the 'Green buffer principles for Chippenham'.</p> <p>Policy GI5 as now amended is a more focused localised policy which relates to a single Green Buffer, two fields within the Neighbourhood Area, which have previously been allocated as part of the wider Rawlings Green Country Park in the Chippenham Site Allocations Plan (CSAP).</p> <p>A new Figure 6.4 has been created to show the extent of this green buffer.</p> <p>Criterion c) has been deleted and reference made to the need for native tree planting to help screen development sites on greenfield land (with breaks in the treeline to accommodate key views) now included in the Chippenham Design Guide under the section 'The Site's Relationship to Town and Country'.</p>



S/GI5/3	p. 71 Green Buffer Principles and Policy GI5	Hallam Land Management	<p>The policy states that Chippenham's future development boundary should align closely with what is in place today. The Neighbourhood Plan should not discount future growth beyond the boundary area of the plan, particularly as the Wiltshire Council emerging plan proposes the southern expansion of the town.</p> <p>The policy principles "recommend" a green buffer around Chippenham. The Green Buffer policy encroaches on land beyond the designated boundary of the plan area, and as such is unenforceable and should be deleted.</p>	<p>The Steering Group discussed at length the options for amending or deleting Policy GI5 to address these comments. They agreed to substantially reframe the policy to remove reference to any strategic requirements and the 'Green buffer principles for Chippenham'.</p> <p>Policy GI5 as now amended is a more focused localised policy which relates to a single Green Buffer, two fields within the Neighbourhood Area, which have previously been allocated as part of the wider Rawlings Green Country Park in the Chippenham Site Allocations Plan (CSAP).</p>
S/GI5/4	p. 71 Green Buffer Principles	Robert Hitchins	<p>5.1. Our client raises objection to the 'Green Buffer Principles for Chippenham stated in the grey box on p. 71 of the CNP.</p> <p>5.2. Bullet point 3 states that;  <b>" Chippenham's future development boundary should align closely with those in place in 2021 and surrounding land should retain its rural countryside and landscape character."</b></p> <p>5.3. Such a principle will constrain growth and prevent Chippenham from meeting its housing and economic growth needs for future generations. A mix of brownfield and greenfield sites will be required in order to ensure a range of mix and type of sites come to the market to deliver the new development the Principal Settlement of Chippenham will require.</p> <p>5.4. Chippenham is just one of three principal settlements in the County of Wiltshire and serves the north of the County with its associated market towns and villages located in both its immediate rural hinterland and north beyond the M4.</p> <p>5.5. It is therefore unreasonable of the CNP to constrain growth at the settlement by requiring the future development boundary of the town to 'align closely' with that in place in 2021 especially where potential sustainable locations for new strategic growth have already been identified in documents published by Wiltshire Council in association with the WLPR during the Regulation 18 public consultation.</p>	<p>The Steering Group discussed at length the options for amending or deleting Policy GI5 to address these comments. They agreed to substantially reframe the policy to remove reference to any strategic requirements and to delete the 'Green buffer principles for Chippenham' box, including bullet point 3.</p>
S/GI5/5	p. 71 Policy GI5		<p>5.6. It is clear from paragraph 6.62 that the CNP supports the principle of a Green Buffer to the north of the town while acknowledging that it cannot deliver it, with paragraph 6.60 stating Langley Burrell as one of the settlements at risk of losing its individual identity as the built form of Chippenham grows.</p> <p><b>" The Wiltshire Core Strategy, emerging Local Plan, Langley Burrell Neighbourhood Plan, Bremhill Neighbourhood Plan, and Calne Community Neighbourhood Plan all acknowledge the importance of retaining separate identities for the rural settlements and landscape surrounding Chippenham.</b></p> <p><b>The Chippenham Neighbourhood Plan can play a part in helping to protect the character of surrounding settlements by promoting a green buffer between them and its boundaries. However, the built form of Chippenham extends near or up to its settlement boundary to the north and east, and therefore much of the protection that a green buffer could afford here is not able to be delivered in our neighbourhood plan.</b></p> <p><b>It will be up to surrounding parishes and their own neighbourhood plans to establish how green buffers will be promoted in their areas."</b></p> <p>5.7. The principle of 'green buffers' around settlements does not accord with the adopted strategies of either the Wiltshire Core Strategy or the Chippenham Sites Allocation Plan. Neither does it accord with the emerging strategy of the WLPR which seeks to allocate sustainable locations for growth sites and to ensure that blue and green infrastructure is integrated into all new development in accordance with the NPPF (2021) and online national planning practice guidance.</p> <p>5.8. In order to meet the 'basic conditions' test it is necessary for the CNP to be prepared 'in general conformity' with the strategic policies of the development plan. Green Buffers around Chippenham are not in accordance with the strategic policies of the adopted development plan.</p>	<p>The Steering Group discussed at length the options for amending or deleting Policy GI5 to address these comments. They agreed to substantially reframe the policy to remove reference to any strategic requirements and the 'Green buffer principles for Chippenham'.</p> <p>Policy GI5 as now amended is a more focused localised policy which relates to a single Green Buffer, two fields within the Neighbourhood Area, which have previously been allocated as part of the wider Rawlings Green Country Park in the Chippenham Site Allocations Plan (CSAP). Policy GI5 as amended is now in general conformity with the strategic policies of the current development plan and emerging Wiltshire Local Plan.</p>

			<p>5.9. The national planning practice guidance states that;</p> <p><b>"Where a neighbourhood plan is brought forward before an up-to-date local plan is in place the qualifying body and the local planning authority should discuss and aim to agree the relationship between policies in:</b></p> <ul style="list-style-type: none"> <li>• the emerging neighbourhood plan</li> <li>• the emerging local plan (or spatial development strategy)</li> <li>• the adopted development plan</li> </ul> <p><b>with appropriate regard to national policy and guidance.</b></p> <p><b>The local planning authority should take a proactive and positive approach, working collaboratively with a qualifying body particularly sharing evidence and seeking to resolve any issues to ensure the draft neighbourhood plan has the greatest chance of success at independent examination."</b></p> <p>5.10. The emerging CNP policy of Green Buffers around Chippenham is in conflict with the emerging WLPR which seeks to ensure that sufficient land in sustainable locations is allocated around the Principal Settlement to meet identified housing and economic growth requirements for the emerging plan period.</p>	
S/GI5/6	p. 71 Policy GI5		<p>5.11. Objection is also raised to Criteria C of draft Policy GI5 which states that;</p> <p><b>" C. Urban fringe will be screened with dense tree planting that will effectively protect views from the countryside towards Chippenham during all times of the year. "</b></p> <p>5.12. It is an entirely inappropriate landscape response to require '<i>dense tree planting</i>' to '<i>protect views from the countryside towards Chippenham during all times of the year</i>'. Any landscape masterplans associated with new development should instead seek to integrate new development within the existing landscape using indigenous species and planting regimes that complement the local landscape character.</p> <p>5.13. Criteria C as written would seem to require the planting of a dense evergreen screen around the existing settlement of Chippenham such that any new development on the existing fringes of the town would be visually distinct from the settlement rather than integrated into it. Moreover, dense evergreen planting may not reflect the existing landscape character areas surrounding the town.</p>	<p>The Steering Group agreed in part with this comment and deleted Criterion C) of Policy GI5.</p> <p>However, it was considered that this wording be rephrased and included in the Chippenham Design Guide under the section 'The Site's Relationship to Town and Country' instead. This is because for new development to be successfully integrated into a countryside landscape setting, tree planting is an entirely appropriate design response as a means of avoiding harsh urban edges being visible in views from the countryside. Indigenous species and planting regimes that complement the local landscape character would still be expected to be used in any landscape masterplans. The wording has been amended to better reflect that tree planting would not be expected along the entire length of the new settlement edge and breaks in the tree line would be sought in key views of Chippenham from the countryside and vice versa. The new wording has been amended to clarify that both evergreen and deciduous tree planting would be required, rather than implied use of evergreen species only.</p>
S/GI5/7	p. 71 Policy GI5	Summix & Boklok	<p>Supporting health and wellbeing</p> <p>Central to our plans for further development at Rawlings Green is to establish a significantly expanded country park/green buffer to the north of the site which would total more than nine hectares in size, aligning with CNP Policy GI5.</p> <p>In addition to supporting biodiversity through significant additional planting of trees, plants and shrubs, the country park/green buffer would also help to improve the health and wellbeing of new and existing residents by providing opportunities for outdoor recreation and exercise. This new community park could be gifted to the local community (via local parish councils) to ensure that this benefits local people for the long-term and prevents further development to the north.</p> <p>Summix is keen to engage with local stakeholders to understand the aspirations for the community park and how this should be managed once complete.</p> <p>We note that the designated areas of the CNP and the Langley Burrell Neighbourhood Plan (made in 2017) overlap in the context of Rawlings Green and Upper Peckington. The CNP plan designated area extends into the Langley Burrell NP designated area following approval in August 2021. There was an earlier approved CNP designated area in August 2018, the boundary of which abuts the LBNP area.</p>	<p>The Steering Group discussed at length the options for amending or deleting Policy GI5 to address the comments raised by Wiltshire Council Strategic Planning and other stakeholders. They agreed to substantially reframe the policy to remove reference to any strategic requirements and the section 'Green buffer principles for Chippenham'.</p> <p>The Steering Group note the support by Summix/Boklok for a Green Buffer as part of the Rawlings Green development and have developed this concept further by reframing Policy GI5 to specifically relate to this Green Buffer.</p> <p>The main difference between the Steering Group and Summix/Boklok is over the geographical location of the Green Buffer. The Steering Group considered that the optimum location for the Green Buffer would be on the two fields within the Neighbourhood Area which have previously been allocated as part of the wider Rawlings Green Country Park in the Chippenham Site Allocations Plan (CSAP). Whereas Summix/Boklok appear to have included these fields as developable land in the latest iteration of their proposals for Rawlings Green and are instead proposing to create a Green Buffer further north east, which would be on fields located outside of the Chippenham Neighbourhood Area, and in Langley Burrell Neighbourhood Area.</p>

			<p>Para 6.62 of the CNP states that “the Wiltshire Core Strategy, emerging Local Plan, Langley Burrell Neighbourhood Plan, Bremhill Neighbourhood Plan, and Calne Community Neighbourhood Plan all acknowledge the importance of retaining separate identities for the rural settlements and landscape surrounding Chippenham. The Chippenham Neighbourhood Plan can play a part in helping to protect the character of surrounding settlements by promoting a green buffer between them and its boundaries. However, the built form of Chippenham extends near or up to its settlement boundary to the north and east, and therefore much of the protection that a green buffer could afford here is not able to be delivered in our neighbourhood plan. It will be up to surrounding parishes and their own neighbourhood plans to establish how green buffers will be promoted in their areas”.</p> <p>We advocate that this approach can deliver a green buffer in the form that we propose. Such an approach would be consistent with para 6.65 of the CNP states, “Neighbourhood plans may only contain policies for land within their neighbourhood area. In the case of Chippenham, the majority of land that might form a green buffer lies outside our neighbourhood area.</p> <p>Therefore, the Neighbourhood Plan can only contain principles and recommendations for other plans - such as reviews of the Local Plan and neighbourhood plans from surrounding parishes as set out in the Green Buffer Principles for Chippenham”.</p>	<p>The Steering Group considered that the location of the Green Buffer proposed by Summix/Boklok would result in development being located too close to surrounding rural settlements and would therefore constitute coalescence of Chippenham with Langley Burrell/Tytherton Lucas and the hamlet of Peckingell. The Steering Group’s choice of location for the Green Buffer, via an amended Policy G15, would be on land already allocated as open space by Policies CH2 and CH3 of the CSAP and justified for this use in evidence collected as part of the CSAP Site Selection Report and the Inspector’s Report. The latter noted noting that one of the Inspector’s most significant concerns with the Rawlings Green site allocation was ‘the visual separation of the urban edge of Chippenham from Peckingell Farm and Tytherton Lucas to the north-east and the visual impact of development on the more open landscape of the river valley and more distant views to the east.’ The Country Park incorporated around the northern and eastern edges of the Rawlings Green site allocation and referred to in Policies CH2 and CH3 of the CSAP, is important in ‘providing a substantial visual buffer between the developed area and Peckingell Farm’ (as noted by the Inspector in his Report). The 6th bullet point of Policy CH2 of the CSAP reinforces the need to protect the open character of these areas, stating ‘no new buildings should be located in the Country Park unless they are ancillary to the use of the Country Park, or to the east of the 50m contour.’</p> <p>Chippenham Town Council would be very keen to engage on the proposition of gifting the new community park to the local community.</p>
S/G15/8	p. 71 Policy G15	Boklok	<p>BoKlok (Skanska &amp; IKEA) modular home builders do agree in general with the visions of the plan in respect of zero carbon and sustainable development. However, we are seeking to partner with Summix who own the land to the North of Rawlings Farm and wish to see a degree of leniency to allow for a sustainable, energy efficient, modular housing development to be promoted on part of the land to the North of Rawlings Green housing allocation. We believe this form of development will address some of the key Zero Carbon initiatives that the CNP seeks to promote. BoKlok would like to support the promotion of land of the North of Rawlings Green and fully supports the representations made by Summix in relation to the green corridors – CNP fig 6.3. BoKlok would very much like to work with CNP to include for some form of green buffer, but one that allow Summix / BoKlok to encapsulate an exemplar scheme of sustainable, modular energy efficient homes for local people. BoKlok would be keen to present our housing model, which is aimed at key workers via our ‘whats left to live’ model, which takes into consideration our cost-of-living and work out how much the customer has left to pay for a mortgage when working out the purchase price of our homes.</p>	<p>The Steering Group discussed at length the options for amending or deleting Policy G15 to address the comments raised by Wiltshire Council Strategic Planning and other stakeholders. They agreed to substantially reframe the policy to remove reference to any strategic requirements and the section ‘Green buffer principles for Chippenham’.</p> <p>The Steering Group noted the support by Boklok for a Green Buffer as part of the Rawlings Green development and have developed this concept further by reframing Policy G15 to specifically relate to this Green Buffer. The Steering Group considered that the optimum location for the Green Buffer would be on the two fields within the Neighbourhood Area which have previously been allocated as part of the wider Rawlings Green Country Park in the Chippenham Site Allocations Plan (CSAP). It is not considered that ‘modular energy efficient homes for local people’ would be appropriate for incorporation into any green buffer, but the Steering Group would support the delivery of such within the development boundaries of the Rawlings Green site allocated under Policy CH2 of the CSAP.</p>
S/G15/9	p. 71 Policy G15	Summix Capital	<p>We support the principle of Policy G15 as it presents an opportunity to establish green buffers in appropriate locations such as north of Rawlings Green - see attached submission from Summix and BoKlok. It is important to note that green corridors are not necessarily the same as green buffers and this distinction needs to be properly in the next iteration of the neighbourhood plan.</p>	<p>The Steering Group discussed at length the options for amending or deleting Policy G15 to address the comments raised by Wiltshire Council Strategic Planning and other stakeholders. They agreed to substantially reframe the policy to remove reference to any strategic requirements and the section ‘Green buffer principles for Chippenham’.</p> <p>The Steering Group noted the support by Summix for a Green Buffer as part of the Rawlings Green development and have developed this concept further by reframing Policy G15 to specifically relate to this Green Buffer. The Steering Group considered that the optimum location for the Green Buffer would be on the two fields within the Neighbourhood Area which have previously been allocated as part of the wider Rawlings Green Country Park in the Chippenham Site Allocations Plan (CSAP).</p> <p>The Steering Group noted the comment that green corridors and green buffers are not the same thing, each having a different function and new paragraph added after 6.63 to reflect this. Policy G15 has been amended accordingly to have a much clearer focus on protecting coalescence between Chippenham and surrounding villages as its main function. An explanatory box has also been added to the supporting text of Policy G15 to better help define green buffers and their purpose.</p>

## Policy H1 - Housing Mix & Types

Ref. No.	Page No. / Para No. / Policy No.	Name	Comment	Response
S/H1/1	p. 75 Policy H1	Wiltshire Council Strategic Planning	We note, with interest, the findings of the AECOM Housing Needs Assessment and recommendations. This which would form part of the credible evidence and guidance to be considered at the time of reviewing Chippenham planning applications. The Council would also need to consider, when responding to planning consultations and providing Affordable Housing advice, current evidence from the Housing Register(s) and any other subsequently adopted procedures. For example, the implementation of the Government's new First Homes product and the criteria to be applied when seeking these homes in Wiltshire. This new requirement will have an effect on the tenure mix/type and size of affordable homes which will be sought on new developments in Wiltshire.	Policy H1 has been amended in line with the Government's mandatory obligation to provide 25% of affordable housing as First Homes. The housing mix has been altered accordingly with 6% being taken off shared ownership, reducing this figure from 8% to 2%. The Steering Group considered that the % of affordable housing for rent should remain unadjusted, given that the HNA in Chippenham reported that First Homes would help extend home ownership to those on median incomes in some parts of Chippenham, but would not be enough of a discount to extend home ownership to those on lower incomes in some parts of Chippenham.  Amended housing mix in Policy H1 as follows: 60% Market 28% Affordable housing for rent 10% First Homes 2% Shared ownership  New paragraphs added in supporting text to explain the change in housing mix, when compared to the original housing mix recommended in the Chippenham HNA.
S/H1/2	p. 75 Policy H1		The policy proposes 40% of all homes on sites of 10 or more dwellings as non-market housing. This should be expressed as an aspiration or target recognising this will be negotiated on a site-by-site basis to take account of viability and individual site attributes.	The following text has been added to address this comment and provide greater flexibility to Policy H1: <i>'Where individual site circumstances, updated evidence of local need or development viability dictates a variation from these figures robust evidence shall be submitted to justify this variation.'</i>
S/H1/3	p. 75 Policy H1	Barratt David Wilson South West	Comments have already been made on the Housing Vision and are not repeated here. It is noted however that a recommended housing type, size and tenure mix is proposed based upon local survey work. Policy H1 however takes what is described as a set of recommendations and then fixes them by expecting their delivery. Housing need, tenure, type and mix is in our view a strategic requirement for Wiltshire to grapple with in accordance with the requirements laid down in Section 5 of the NPPF2021.  If the eCNP is to include a housing mix and type policy, it should be a suggested local mix at the same time as recognising that the strategic policies of the Wiltshire Local Plan Review will take priority over the CNP in due course. Policy H1 should be revised as follows:  <i>"Proposals for 10 or more dwellings shall seek to deliver the following unless indicated otherwise in either the Wiltshire Local Plan or latest Wiltshire Housing Market Assessment."</i>  If the eCNP is to include policy H1, then it also needs to address paragraph 65 of the NPPF2021:  <i>"where major development involving the provision of housing is proposed, planning policies and decision should expect at least 10% of the total number of homes to be available for affordable home ownership, unless this would exceed the level of affordable housing required in the area..."</i>  4% discount market ownership set out in policy H1 unfortunately does not meet this national requirement. To achieve a good mix, the affordable rent percentage should be reduced to 22% and the affordable home ownership be included at 10%.	The existing Wiltshire Local Plan specifies a target of 40% affordable housing in the Neighbourhood Area, but does not specify the types of affordable housing or housing mix. Given the policy vacuum, it is perfectly reasonable for the Neighbourhood Plan to specify the types of affordable housing and housing mix it wishes to see in the Neighbourhood Area based on local evidence (the Housing Needs Assessment). In the eventuality that the emerging Wiltshire Local Plan changes its affordable housing thresholds then this will of course take priority over Policy H1, but it is not considered necessary to refer to this in Policy H1 which has been developed in accordance with the current Local Plan.  In addressing Paragraph 65 of the NPPF, which requires at least 10% of the total number of homes to be available for affordable home ownership, and in line with the governments requirement for 25% of affordable housing to made available under First Homes, the figure for affordable home ownership has now been increased from 4% to 12% in Policy H1 (10% First Homes and 2% shared ownership split).  New paragraphs added in supporting text to explain the change in housing mix, when compared to the original housing mix recommended in the Chippenham HNA.
S/H1/4	p. 75 Policy H1	Future Chippenham	This section refers to the Housing Needs Assessment for Chippenham prepared by AECOM in 2020. There is a recommended tenure mix (Fig 7.1) and housing mix (Fig 7.2) and these mixes are reflected in Policy H1.  The supporting text to Policy H1 (figures 7.1 and 7.2) refer to these mixes as "recommended". However, Policy H1 as it is currently worded does not allow for such flexibility. Housing mix and types should be based on the latest evidence and therefore it is suggested that Policy H1 is amended so that it "recommends" the proposed mixes rather than "expecting" proposals to provide the mixes set out. The policy should also acknowledge that the mixes should be based on the very latest evidence which may supersede the mixes set out in the policy. The tenure and mix of affordable housing should be flexible to reflect the Local Plan Policies when adopted.	The following text has been added to address this comment and provide greater flexibility to Policy H1: <i>'Where individual site circumstances, updated evidence of local need or development viability dictates a variation from these figures robust evidence shall be submitted to justify this variation.'</i> In the eventuality that the emerging Wiltshire Local Plan changes its affordable housing thresholds then this will of course take priority over Policy H1, but it is not considered necessary to refer to this in Policy H1 which has been developed in accordance with the current Local Plan.

S/H1/5	p. 75 Policy H1	Gallagher Developments	<p>We consider it is premature to set affordable housing and housing mix targets ahead of the Wiltshire Local Plan Review, which will be supported by a larger suite of evidence base documents and will be subject to greater scrutiny at Local Plan Examination, including around viability and deliverability. In terms of mix, there is considerable deviation from the existing Wiltshire housing evidence base, and we do not consider that the Housing Needs Assessment (HNA) represents a robust evidence base to inform an implementable housing policy at this stage, as noted by paragraphs 151 and 152 of the HNA:</p> <p><i>“151. This analysis provides an indication of the likely need for different types and sizes of homes based on demographic change. However, it is important to remember that other factors should be considered in determining the dwelling mix that is desirable in the NA or on any particular site. These include the characteristics of the existing stock of housing, the role of the NA or the site within the wider housing market area) linked to any relevant LPA strategies or plans) and site specific factors which may justify a particular dwelling mix.”</i></p> <p><i>“152. As such, the recommended dwelling mix should be interpreted only as a guideline and applied with a high degree of flexibility going forward. In terms of the types of housing needed, it may be beneficial to diversify the housing stock to include more terraced homes and flats – an effort that would dovetail with the need to provide housing that is more affordable for local people, as these types of dwellings tend to be smaller and hence more affordable.”</i></p> <p>Policy H1 as currently drafted does not reflect the mix being a ‘guideline’, nor is it applied with a ‘high degree of flexibility’. In its current form the policy does not pass the basic conditions as it conflicts with the adopted Core Strategy and there is insufficient evidence to demonstrate how it will align with the forthcoming Wiltshire Local Plan Review on affordable housing and housing mix policy.</p> <p>Suggested change: The policy should delete reference to specific affordable housing targets and housing mix requirements and should instead leave these matters to the Wiltshire Local Plan Review, unless there is a robust housing needs assessment to support the policy being anything other than a highly flexible guideline for development (which will be superseded by the Local Plan Review).</p>	<p>The Steering Group do not agree that it is premature to set local affordable housing and housing mix targets ahead of the Local Plan Review given that the Emerging Local Plan has already been delayed and may not be adopted for some time. In the eventuality that the emerging Wiltshire Local Plan changes its affordable housing thresholds then this will of course take priority over Policy H1, but it is not considered necessary to refer to this in Policy H1 which has been developed in accordance with the current Local Plan.</p> <p>The Steering Group also disagree with the suggestion that the HNA does not represent a robust evidence base to inform a local housing mix policy. It was a relatively recent assessment carried out by professionals using a variety of local housing evidence, including the existing Wiltshire housing evidence base. It is the best, most up to date, evidence of local housing need for Chippenham that has been produced to date and therefore entirely appropriate for Policy H1 to be based on its findings.</p> <p>Notwithstanding the above, the following text has been added to address the comments that Policy H1 is not flexible enough: <i>‘Where individual site circumstances, updated evidence of local need or development viability dictates a variation from these figures robust evidence shall be submitted to justify this variation.’</i></p>
S/H1/6	p. 75 Policy H1	Hallam Land Management	<p>The draft policy sets out a housing mix (for over 10 dwellings). This conflicts with the adopted Wiltshire Local Plan (Core Policy 43, p243) which states that provision may vary from site-by-site depending on local need, the mix proposed and the viability of the development. Rather than set an arbitrary mix, the Neighbourhood Plan should reflect Wiltshire Council’s requirements that mix should be agreed at the point of an application’s determination. This would prevent the Neighbourhood Plan becoming outdated as needs change.</p>	<p>The following text has been added to address the comments that Policy H1 is not flexible enough: <i>‘Where individual site circumstances, updated evidence of local need or development viability dictates a variation from these figures robust evidence shall be submitted to justify this variation.’</i></p>
S/H1/7	p. 75 Policy H1	BoKlok	<p>BoKlok (Skanska &amp; IKEA) modular home builders generally agree with the housing needs assessment included within the CNP.</p>	<p>Support noted.</p>

## Policy H2 - Housing Design

Ref. No.	Page No. / Para. No. / Policy No.	Name	Comment	Response
S/H2/1	p. 79 Para. 7.23	Wiltshire Council Strategic Planning	For Clarity, the Council as local planning authority involves the public and others in the development of proposals and planning applications in accordance with its statement of community involvement. This helps to establish early and effective participation on design and masterplan processes. Engagement over and above these measures whilst potentially desirable cannot be mandated.	Reference added to masterplanning (which should involve the LPA) being carried out in accordance with Wiltshire Council's Statement of Community Involvement. For all community consultation wording tweaked to make it clear that the preferred types/method of pre-application consultation outlined in Paragraph 7.23 is advisable, not mandatory.  Paragraph 6 of Chippenham Design Guide amended to reflect new wording of Paragraph 7.23 of the Neighbourhood Plan.  Paragraph 3 of the Chippenham Design Guide amended to reflect the advisory nature of any public consultation on masterplanning work at pre-application stage.
S/H2/2	p. 79 Policy H2  Annexe 1		The CNP should reference and outline 'Building for a Healthy Life' (which is a simplified assessment approach).  The Policy references 'Building for Life 12' (including the Building for Life 12 Quality Mark). Building for Life 12 (and its traffic light scoring pass/fail assessment approach) is no longer nationally promoted and despite its merits as a design guidance and assessment tool this has been superseded by the 'Building for a Healthy Life' (Homes England June 2020) which is referenced in Policy 133 on page 39 of the National Planning Policy Framework (MHLG 2021) and listed under 'Other References' on page 53 of the National Design Guide (MHCLG January 2021).	Second paragraph of Policy H2 amended to refer to Building for a Healthy Life  Explanatory box on p. 77 amended to explain Building for a Healthy Life concept, as opposed to Building for Life 12.
S/H2/3	p. 79 Policy H2  Annexe 1  Para. 7.22		Whilst a considerable amount of new development is new homes, it is not clear why the Design Guide (Annex 1) should only apply to this one sector. A 'Design' Policy H2 and Annexe 1 should be broadened or expanded to usefully include/apply to the design of all buildings generally as this detail is not covered elsewhere for other building types. If it is retained as a guide only to housing development, the CNP should clarify/emphasise here that the Design Guide applies to all new housing development, not just schemes of 50 or more, and the headings listed in 7.22 are design matters in the Annex which also apply to all new housing development generally irrespective of the number of dwellings.	The Steering Group have reviewed the purpose of the Design Guide in light of these comments that this should be expanded to include the design of all new development. They considered that the focus of the Design Guide should remain on new residential development because a considerable majority of new future development in Chippenham will likely be new homes, a point acknowledged in these comments. For non-residential development that is located within the town centre, Neighbourhood Plan Town Centre Policies (in particular Policy TC4 which relates to design within Chippenham Conservation Area and Policy TC6 which relates to shopfront and advertisement design) adequately cover design issues. For the minority of remaining non-residential development located outside of the town centre and not related to new housing, the Steering Group consider that there is already sufficient national design guidance (NPPF and National Design Guide) to ensure that such development is well-designed.  Paragraph 7.22 has been amended to refer to the headings/design characteristics listed as applying to all new housing development, rather than schemes of 50 or more dwellings.
S/H2/4	p. 79 Policy H2		The wording to the policy should reflect the intrinsic nature of guidance and ask designers and architects to 'have regard' to it.	The Steering Group debated whether to change the wording to 'have regard to' to the Design Guide, rather than 'in accordance' with the Design Guide. They considered that the phrase 'have regard to' would be too weak and would allow developers not to adhere to the design principles in the Guide. It was therefore decided not to make the amendment suggested in the comment.

S/H2/5	p. 78 Para. 7.18	Barratt David Wilson South West	It is noted that paragraph 7.18 refers to the delivery of around 5,100 new dwellings in Chippenham up to 2036. This figure has yet to be independently evaluated at examination and should be removed from the eCNP. It is however appropriate for the eCNP to acknowledge the need for large scale strategic housing growth later in the paragraph. As an aside, this the above figure represents a significant level of growth and as such it would be prudent (as indicated throughout this letter) for Chippenham Town Council to consider the allocation of small-scale, non-strategic housing sites to start to deliver some of this in a planner manner while the Wiltshire Local Plan Review is being prepared and examined. BDW would support Chippenham Town Council if they were to take what we believe is an important step.	Paragraph 7.18 deleted in order to resolve comment and avoid repetition of Paragraph 7.3.  The Steering Group discussed the issue of allocating housing sites within its Neighbourhood Plan with Wiltshire Council Strategic Planning at the early stages of writing the Plan. Both parties agreed that given the significant amount of new housing that would likely be required to be built in Chippenham to accommodate Wiltshire's future housing needs (as subsequently realised in the Regulation 18 draft of the Emerging Wiltshire Local Plan which set a figure of an additional 5,100 dwellings) and the strategic nature of this housing, together with the lack of any obvious brownfield sites within the town, it would not be a cost-effective use of Neighbourhood Plan resources, or benefit the town, in allocating additional housing sites above and beyond the likely significant strategic allocations in the Emerging Local Plan.
S/H2/6	p. 78-79 Paras. 7.21-7.23		A masterplan approach as set out in paragraphs 7.21-7.23 is supported for larger development proposals and is something that BDW has engaged with across many different locations. BDW support Building for Life 12 (BFL12) and indeed one of their developments is included within the document as an exemplar (Sinah Lane, Hayling island). Places like Gate Farm would be aligned with BFL12.	Support noted. Second paragraph of Policy H2 amended to refer to Building for a Healthy Life as Building for Life 12 is now out of date. Explanatory box on p. 77 amended to explain Building for a Healthy Life concept, as opposed to Building for Life 12.
S/H2/7	p. 79 Policy H2	Future Chippenham	Policy H2- Housing Design, states that all development in Chippenham will be sustainably designed in accordance with the Chippenham Design Guide (Annexe 1) and other policies in the Development Plan. Major residential development schemes shall demonstrate that they achieve nine out of twelve 'green' indicators, securing Building for Life Quality Mark.  Policy H2 is supported. The Framework Masterplan will include an accompanying overarching Design Code establishing strategic design principles for the whole Framework Masterplan area in order to deliver a successful step change in the quality of place making within Wiltshire. The code's scope and content will be based on national guidance, notably the National Model Design Code which provides detailed guidance on the production of design codes, guides and policies to promote successful design. It is noted that the Chippenham design code is also based on national guidance, and hence will broadly align with the design approach adopted for Future Chippenham.	Support noted.
S/H2/8	p. 79 Policy H2	Hallam Land Management	The policy states that major residential development schemes "shall demonstrate" that they achieve nine out of twelve 'green' indicators, securing Building for Life Quality Mark. While Hallam support high quality and sustainable housing design, we suggest that this is unnecessary given the multiple layers of design requirements, including design codes, national and local policy, and building regulations, which all seek to deliver good design.	Building for a Healthy Life (BHL) Commendation has replaced Building for Life Quality Mark. The Steering Group consider that policy text should remain requiring major residential schemes to demonstrate that they achieve nine out of twelve green lights (and no red lights) because BHL is one of the few measurable design tools and is also easy to use, as opposed to other design guidance, which is harder to assess a scheme against. Reference is not made to having to achieve BHL Commendation, which is appreciated would add unnecessary cost.
S/H2/9	p. 79 Policy H2	Waddeton Park	The policy seeks all major residential development schemes to demonstrate that they achieve nine out of twelve 'green' indicators, securing Building for Life Quality Mark. It is not clear what indicators the policy refers to, and we suggest that these indicators are listed within the Chippenham Design Guide.	The twelve key considerations have been listed in the explanatory box on p. 77 as per the comment.

## Town Centre

Ref. No.	Page No. / Para. No. / Policy No.	Name	Comment	Response
S/TC/1	p. 81 Paras. 8.1 & 8.8	Wiltshire Council Strategic Planning	Reference should be made to the town centre boundary defined in WCS as shown on the policies map of the development plan – Saved Policies R1 and R2. The CNP should also note that this boundary is being reviewed as part of the Local Plan Review.	Paragraph 8.8 amended to refer to Wiltshire Core Strategy and Policies R1 & R2, and future review of boundary by the Emerging Local Plan.

## Policy TC1 - Bath Rd Car Park/Bridge Centre Site

Ref. No.	Page No. / Para. No. / Policy No.	Name	Comment	Response
S/TC1/2	p. 91 Policy TC1	Wiltshire Council Strategic Planning	<p>The policy provides a detailed assessment of the area's attributes and scope for redevelopment.</p> <p>The mix of uses and what scope exists to adjust local roads, upon which a viable comprehensive scheme will depend, needs to be considered going forward, progressing both the CNP and Local Plan Review. New uses will need to support place shaping priorities and the vitality and viability of the town centre.</p> <p>The following comments are about the proposed zones and features:</p>	<p>It is considered that Policy TC1 complies with the Regulation 18 version of the Emerging Wiltshire Local Plan, where one of the place shaping priorities for Chippenham identified in the 'Planning for Chippenham' is <i>'Developing the Bath Road Car Park/Bridge Centre site as a mixed-use scheme which complements and enhances the town centre and secures completion of planned highways improvements'</i></p>
S/TC1/3	p. 90 Figure 8.2		<p>The identified Zones 1-5 and Features 6-11 included in the policy text (TC1) don't tie up / tally consistently with the legend or graphics included on the 'Parameters Plan' for Bath Rd. Car Park / Bridge Centre Site (Figure 8.2).</p> <p>Clearly label / differentiate Zones 1-5 &amp; Features 6-11 on the Parameters Plan (Figure 8.2) to tally with policy text.</p>	<p>Legend of Figure 8.2 amended to remove numbers and zones for consistency and clarity.</p> <p>Numbers '9', '10', '11' and '12' added to Parameters Plan.</p> <p>Policy TC1 amended to refer to Numbers 1-12, rather than zones or features, for consistency and clarity.</p>
S/TC1/4	p. 90 Figure 8.2		<p>Include plan parameter for new street trees to be incorporated along Bath Road frontage / public realm if this narrow width development block (Zone 2) allows.</p>	<p>It is not considered appropriate for Figure 8.2 to show new tree planting. This is too detailed and should be left to any future masterplan. However, reference made to new street trees as part of public realm improvements along Bath Road/The Bridge under Heading 6. of Policy TC1. Reference also made in new Criterion Q) of General Design Principles.</p>
S/TC1/5	p. 91 Policy TC1		<p>There should be a reference in this policy to the different character areas described in the Conservation Area Appraisal (Annex 3) in terms of which character zones the zones are contained.</p>	<p>Text added to Paragraph 8.14 and General Design Principles (D) to reference the two character areas in the Conservation Area Appraisal - Bath Road &amp; Ivy Lane (Area 6) and The Bridge &amp; Lower New Road (Area 7). Given that the Parameters Plan has already been designed to reflect these Character Areas it is not considered necessary to add this text to Policy TC1 text.</p>



S/TC1/6	p. 91 Policy TC1	<p>Zone 1: Four storeys is far higher than the surrounding buildings. This would dominate the area and block views through to the nearby heritage assets. This would be better as an open space</p> <p>The Strategic Environmental Assessment (SEA) on the Neighbourhood Plan found that 4 storey building(s) in Zone 1 could be justified because it may not necessarily be higher than surrounding buildings. This is because if a modern building were to be developed at 4 storeys in height in Zone 1 it would have a similar overall height to any 3 storey historic buildings in the surrounding area which have greater floor to ceiling height differences (for example the ground floor of Avonbridge House is 4m in height compared to a typical modern building which has a floor to ceiling height of 2.4m). In any case, any new building here would be of a detached/standalone nature not immediately seen in the context of nearby buildings. The overall height of any new building in this location would appear further reduced in context to neighbouring existing buildings on the western frontage of Bath Road/Ivy Lane which are already sited on raised ground approximately one storey higher than the ground level of Zone 1.</p> <p>The first bullet point under Zone 1 in Policy TC1 has been modified to reflect the outcome of the SEA's preferred approach, from: <i>'Built development up to 4 storeys in height'</i> to: <i>'Built development of 2-4 storeys in height and not to exceed the height of the tallest neighbouring building'</i></p> <p>This revised wording would also ensure that single storey development could not be built in Zone 1 which the SEA advised would harm the character and appearance of Chippenham Conservation Area, harm the setting of listed buildings, have an adverse impact on the streetscene given existing building heights are generally two storeys in the vicinity of the site, and would be an inefficient/low density use of a key brownfield site in the town centre.</p> <p>The revised addition of <i>'and not to exceed the height of the tallest neighbouring building'</i> would ensure that any new building in this location is not taller than its neighbours so it does not dominate the area.</p> <p>Open space on the site was rejected by the SEA as the worst performing option as it would not support the regeneration and sustainable development of the town in accordance with wider Neighbourhood Plan objectives. Open space here would also be contrary to the development guidelines for Character Area 6 in the Chippenham Conservation Area Management Plan SPG which states 'Create a more urban street character to Ivy Lane by reducing suburban planting, street lighting and underused land and provide an active built frontage to the road where possible'. One of the reasons why the site as a whole does not currently work in urban design terms is that there is too much open space, which is why the town centre feels like 'an island', isolated from its immediately adjoining western suburbs. Introducing further open space here would only exacerbate this problem, whereas introducing a finer urban grain with new buildings and downgrading the highway would help make for a smoother transition in urban fabric.</p> <p>Please refer to pages 19-21 of the SEA for the full assessment of reasonable alternatives and commentary on the preferred approach.</p>
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S/TC1/7	p. 91 Policy TC1	Zone 2: Three storeys on land that rises up to The Bridge would be dominant in the area. Refer to layouts and scale of former condensed milk factory.	<p>The topography in Zone 2 is fairly level and does not noticeably rise up to The Bridge.</p> <p>The SEA's preferred approach for Policy TC1 was to require 'at least' two storey development to be built along the frontage to Bath Road (Zone 2) complementing existing building heights in the vicinity of the site, which are generally two storeys. Modern buildings have lower floor to ceiling heights than historic buildings (for example the ground floor of Avonbridge House is 4m in height compared to a typical modern building which has a floor to ceiling height of 2.4m). Given that any new buildings on the site would have lower floor to ceiling heights than most of the historic buildings in the vicinity of the site, a modern 3 storey building within Zone 2 would have a similar overall height to surrounding 2 storey buildings and would therefore appear in keeping with the surrounding area. The SEA notes that alternatively, a third storey could be incorporated in roof space to further reduce overall building height.</p> <p>The existing wording could allow for single storey development to be built along the frontage to Bath Road (Zone 2) and that single storey development here would harm the character and appearance of Chippenham Conservation Area, harm the setting of listed buildings, have an adverse impact on the streetscene given existing building heights are generally two storeys in the vicinity of the site, and would be an inefficient/low density use of a key brownfield site in the town centre.</p> <p>The wording of bullet point 1 of Zone 2 has been amended from '<i>built development up to..</i>' to '<i>built development of..</i>' to give the option of a 2-3 storey building but also to prevent a single storey building being built, as this would very much be out of keeping with the prevailing height of 2-3 storeys in the vicinity of the site.</p> <p>Please refer to pages 19-21 of the SEA for the full assessment of reasonable alternatives and commentary on the preferred approach.</p>
S/TC1/8	p. 91 Policy TC1	Zone 3: Again, refer to history maps. This looks to have been the former nursery (garden) area so there were open views to and from the terrace in Foghamshire.	A mid-1930s map does show a nursery in a similar location, becoming smaller in site area from the late 1800s as large buildings connected with the condensed milk factory began to be erected on the site. The nursery was subsequently tarmaced over to form part of the Bath Road Car Park. It is not considered that 'open views' of the rear of Foghamshire properties from Zone 3 are a positive feature of the Conservation Area nor are they referred to in either the Chippenham Conservation Area Character Appraisal or Conservation Area Management Plan SPG. In any case such views of these residential properties are largely screened by mature trees now. More viable and land efficient uses are proposed for Zone 3 as set out in Policy TC1.
S/TC1/9	p. 91 Policy TC1	Zone 4: Why is the open square in between a four storey, three storey and two storey commercial developments? This will not be a pleasant open space with views.	Enclosing the public square (Zone 4) with buildings would actually achieve a much better urban design resolution and would be more in keeping with historic character than leaving wide open public spaces as suggested. Introducing a finer urban grain, akin to that in the historic town centre, would result in intimate, human-scale, public space. A prime example of where this works is the Lower Market Place, which is a relatively small public square enclosed by 2-3 storey buildings and The Buttercross which effectively terminates views to the north. The public square has been designed with key views to both the Town Bridge and to The Bridge (with demolition of No. 13 The Bridge), but there are likely to be other views created as it is not expected that new buildings would take up the entire floor area of Zones 1-3 identified in the parameters plan.
S/TC1/10	p. 91 Policy TC1	Zone 5: Biodiversity improvements will depend on less built form and traffic.	Agree to some extent, but biodiversity improvements can be made to any space regardless of its size and surroundings.
S/TC1/11	p. 91 Policy TC1	Feature 6: What is meant by highways improvements?	Highway improvements which would create shared space for pedestrians/vehicles. This was proposed for Bath Road in the Chippenham Central Area Masterplan (2014). This might included dropped kerbs, special materials, non-standard road markings, changes in the width of the road, inclusion of street trees etc. It is not considered appropriate for this Neighbourhood Plan policy to work up that level of detail or what solutions might work for the site without any input from highway engineers. That would be the remit of a future detailed masterplan for the site. The parameters plan is just that, setting out general parameters for developing this site.
S/TC1/12	p. 91 Policy TC1	Feature 7: Time limited parking means that there will be more frequent vehicle moment, which will make it less peaceful.	Bath Road Car Park is currently time-limited parking, so the situation would be no different to existing.
S/TC1/13	p. 91 Policy TC1	Feature 8: How will reduced highway access help to reach car parks and cross town?	There will not be reduced highway access, but downgrading of the highway as proposed would encourage through-traffic to use more appropriate roads such as the A350, and would help encourage modal shift to active travel in order to respond to the climate emergency. There are proposals to develop a link road to Rawlings Green and a southern bypass at the time of writing, which may reduce the amount of traffic currently using the gyratory at the site.

S/TC1/14	p. 91 Policy TC1		Feature 9 & 10: How will this open things up if the site is also proposed as a three-storey commercial unit?	Figure 8.2 shows that Zone 2 is angled to allow unobscured views of the new public square from the Town Bridge (Feature 10) and vice versa. The demolition of No. 13 The Bridge (Feature 9) would allow unobscured views of the new public square from The Bridge. Amendments made to Figure 8.2 to make this more obvious by extending sight line arrow between new public square and Town Bridge, and slightly reducing size of Zone 2 to better achieve sight line.
S/TC1/15	p. 91 Policy TC1	Historic England	<p>I recall that we previously responded to an SEA screening consultation (10th May 2021). On that occasion, we did not concur with the screening conclusion that a full SEA would not be necessary. We were concerned that policies TC1 and TC2 were effectively proposing site allocations for development that could have the potential for adverse impact on heritage assets, or their settings. However, on that occasion we suggested that if the Neighbourhood Planning Steering Group were to produce an alternative robust evidence base, this might obviate the need to undertake a full SEA exercise. Such an alternative evidence base ought to identify the risk of potential harmful impact to any heritage assets.</p> <p>I also recall that two topic papers were produced that further explored the proposed sites allocated for development in policies TC1 and TC2 (22nd September 2022). Although this more detailed work was a welcome addition to the Neighbourhood Plan, we were still not convinced that these studies provided the essential evidence-base to reassure us that the heritage assets would not be at risk from negative impact. At this previous stage, we urged the local authority conservation team to satisfy themselves that the evidence-base was indeed robust enough and that the assertions and judgements being made in the topic papers could be supported by sufficient heritage expertise with appropriate "bona-fides".</p> <p>Clearly, in the absence of an evidenced justification for development, the Neighbourhood Plan would be unlikely to comply with the heritage obligations of the emerging Wiltshire Local Plan, or section 16 of the National Planning Policy Framework (NPPF). Therefore, we would like to take this opportunity to reiterate our previous call to the Local Planning Authority officers to reassure themselves, that given the allocation of sites for development and the potential for harm to heritage assets, a robust evidence-base and rigorous justification are indeed in place. In our view, the local authority conservation team are best placed to judge the suitability of the evidence-base and the justifications for the specific policies.</p>	<p>A Strategic Environmental Assessment (SEA) carried out on the Neighbourhood Plan concludes that there would be 'neutral effects' in relation to the historic environment SEA theme. It explains that this is given that supporting evidence (namely Topic Papers) provided by the Council, alongside policy requirements, seek to ensure Policy TC1 does not adversely impact upon the existing built form.</p> <p>The wording of Policy TC1, in terms of building heights in Zones 1 and 2, has been amended to reflect the outcome of the preferred approach of the SEA assessment of reasonable alternatives.</p> <p>Please refer to the SEA Environmental Report for a full commentary of the effects of Policies TC1 and TC2 on heritage assets and their settings.</p>
S/TC1/16	p. 91 Policy TC1	Friends of Monkton Park	Again No and Yes. One of the few public toilets in the town s located on this site. This is only place I can find to comment on the absence of policy support for public toilet provision in the town centre. Public toilet provision is one hallmark of a civilised town. The need for public toilets and the risks to them were well summarised in a 2008 House of Commons Report (The Provision of Public Toilets, HC 636, October 2008). The Report gave 'strong encouragement for local authorities to adopt a strategic approach to public toilets, taking into account the needs of all those who use public spaces, including those with children, older people, people with disabilities and visitors to our villages, towns and cities'. The situation is no less important today. The Bath Road toilets have recently been at risk and its important that this Plan should assert the need for their provision in a forward looking town, seeking to encourage footfall in the town centre and provide a welcoming town for those who are less able. The Plan must be revised to include such a commitment.	<p>The Steering Group agreed that public toilet facilities should not be lost as a result of new development. New criterion P) added to General Design Principles box stating: <i>'P. Existing public toilets on the site shall be replaced, preferably on-site, or at an off-site location within the same area of the town centre'</i></p> <p>The Steering Group, after discussion, concluded that it would not be appropriate to dictate the exact location of any replacement public toilets on site as this would be too detailed for the parameters plan and Policy TC1, but would be included in any future detailed masterplan. They discussed whether off-site replacement toilets should be <i>'in close proximity to the site'</i> and concluded that this definition may not be specific enough and instead opted for the tighter definition of <i>'within the same area of the town centre'</i>.</p> <p>New paragraph added after 8.14 to reference existence of public toilets.</p>
S/TC1/17	p. 91 Policy TC1	Wessex Water	There is existing underground infrastructure crossing the site. If you're building within 6 metres of a strategic public sewer, you will need our approval because damage to this type (size) of sewer could affect a significant number of households. If you would like us to assess your proposal, and determine whether its feasible or not, please contact us. There is an existing water supply main crossing the site and an easement of typically 3m either side of the pipeline is required to allow access at all times to carry out maintenance and repairs. Any new development must be located at a safe distance from our water mains. Our preference is that your plans are designed to avoid our public system. If your works cannot be altered we will consider diversion options. Please see our website for more information <a href="https://www.wessexwater.co.uk/services/building-and-developing/building-near-or-over-water-main">https://www.wessexwater.co.uk/services/building-and-developing/building-near-or-over-water-main</a>	Reference to strategic public sewer and water supply main crossing the site added to new paragraph after 8.14. Easements noted.

## Policy TC2 - River-Green Corridor Masterplan

Ref. No.	Page No. / Para. No. / Policy No.	Name	Comment	Response
S/TC2/1	p. 97 Policy TC2	Wiltshire Council Strategic Planning	<p>The policy largely shows how riverside areas might be managed into the future and attaches to this a set of principles and detailed requirements for any redevelopment within the area.</p> <p>The possible redevelopment of the Emery Gate shopping area is clearly an area that will come within planning controls. The CNP identifies ancillary and detailed aspects of any scheme (A, K, L and M), such as parking and frontage design, but a viable mix of uses needs to be considered progressing both the CNP and Local Plan Review. New uses will need to support place shaping priorities and the vitality and viability of the town centre as a whole, as well the riverside area.</p> <p>The wording of the policy objectives could be reviewed to provide greater clarity:</p>	<p>Agreed. The mix of uses for any redevelopment of Emery Gate Shopping Centre would need to continue to underpin the health of the town centre as per the findings of Wiltshire Retail and Town Centres Study, 2020, Avison Young, para. 4.75. Text added to Criterion A: '<i>...and with uses that continue to underpin the vitality and viability of the town centre...</i>'</p>
S/TC2/2			B. It is not clear under what justification developer contributions would be sought and in what circumstances	<p>First sentence of Criterion B) amended to clarify justification for developer contributions from: '<i>B. Legible pedestrian and cycle routes alongside the River between the Town Bridge and Gladstone Road will be provided by adjacent new development or developer contributions</i>' to:</p> <p><i>'B. Improved pedestrian and cycle routes alongside the River, between the Town Bridge and Gladstone Road, will be provided by adjacent major developments or developer contributions associated with these developments, in order to meet any increase in demand for active travel to/from these developments'</i></p>
S/TC2/3			G. Regenerated for what leisure and community uses	<p>Criterion G amended to provide greater specificity, from:</p> <p><i>'G. The Olympiad site will be retained and regenerated for leisure and community uses.'</i></p> <p>to:</p> <p><i>'G. The Olympiad site will be retained for public indoor sport, recreation or fitness uses. The demolition of the existing building and redevelopment of the site to retain these uses will be supported, providing that any new building frontages on to Monkton Park are designed to be sympathetic to the parkland setting and enhance the significance of Chippenham Conservation Area.'</i></p>
S/TC2/4			J. The term 'generic design' in this context is not clear	<p>Criterion J amended to remove reference to 'generic design'. Text amended from:</p> <p><i>'Generic design on frontages facing the river corridor will not be tolerated. Design and Access Statements should demonstrate how the scheme will provide a pleasing backdrop for the River Avon when viewed from the opposite bank.'</i></p> <p>to:</p> <p><i>'Design and Access Statements shall demonstrate, through photo-visuals, that the frontages of development proposals facing the River are of the highest quality design, and will provide a pleasing backdrop for the River when viewed from the opposite bank.'</i></p>
S/TC2/5	p. 97 Policy TC2	Environment Agency	The removal of the radial gate is mentioned as an enhancement for wildlife within policy TC2. This policy should include reference to improving flood risk, which will be part of the reason for removing/replacing the radial gate. This would then be aligned with the Environment Agency's ambitions for this project, and the partnership working that is underway.	<p>Criterion E. amended to add reference to '<i>reduces flood risk</i>'. Text added to Paragraph 8.28 to explain '<i>The Environment Agency are currently exploring a range of options for the removal/replacement of the radial gate whilst aiming to reduce flood risk.</i>'</p>

S/TC2/6	p. 97 Policy TC2	Historic England	<p>I recall that we previously responded to an SEA screening consultation (10th May 2021). On that occasion, we did not concur with the screening conclusion that a full SEA would not be necessary. We were concerned that policies TC1 and TC2 were effectively proposing site allocations for development that could have the potential for adverse impact on heritage assets, or their settings. However, on that occasion we suggested that if the Neighbourhood Planning Steering Group were to produce an alternative robust evidence base, this might obviate the need to undertake a full SEA exercise. Such an alternative evidence base ought to identify the risk of potential harmful impact to any heritage assets.</p> <p>I also recall that two topic papers were produced that further explored the proposed sites allocated for development in policies TC1 and TC2 (22nd September 2022). Although this more detailed work was a welcome addition to the Neighbourhood Plan, we were still not convinced that these studies provided the essential evidence-base to reassure us that the heritage assets would not be at risk from negative impact. At this previous stage, we urged the local authority conservation team to satisfy themselves that the evidence-base was indeed robust enough and that the assertions and judgements being made in the topic papers could be supported by sufficient heritage expertise with appropriate "bona-fides".</p> <p>Clearly, in the absence of an evidenced justification for development, the Neighbourhood Plan would be unlikely to comply with the heritage obligations of the emerging Wiltshire Local Plan, or section 16 of the National Planning Policy Framework (NPPF). Therefore, we would like to take this opportunity to reiterate our previous call to the Local Planning Authority officers to reassure themselves, that given the allocation of sites for development and the potential for harm to heritage assets, a robust evidence-base and rigorous justification are indeed in place. In our view, the local authority conservation team are best placed to judge the suitability of the evidence-base and the justifications for the specific policies.</p>	<p>A Strategic Environmental Assessment (SEA) carried out on the Neighbourhood Plan concludes that there would be 'neutral effects' in relation to the historic environment SEA theme. It explains that this is given that supporting evidence (namely Topic Papers) provided by the Council, alongside policy requirements, seek to ensure Policy TC1 does not adversely impact upon the existing built form.</p> <p>The wording of Policy TC1, in terms of building heights in Zones 1 and 2, has been amended to reflect the outcome of the preferred approach of the SEA assessment of reasonable alternatives.</p> <p>Please refer to the SEA Environmental Report for a full commentary of the effects of Policies TC1 and TC2 on heritage assets and their settings.</p>
S/TC2/7	p. 97 Policy TC2	Friends of Monkton Park	Yes, especially the sections relating to Emery gate. Also F, H, I, P and Q.	Support noted
S/TC2/8			FOMP suggest some revised wording on Olympiad redevelopment (G) to make it clear that any new park facing frontage must be in sympathy with the park, unlike the present design.	<p>Criterion G amended to make clear that any new building frontage on to Monkton Park must be designed to be sympathetic to the parkland surroundings and Conservation Area. Text amended from:</p> <p><i>'G. The Olympiad site will be retained and regenerated for leisure and community uses.'</i></p> <p>to:</p> <p><i>'G. The Olympiad site will be retained for public indoor sport, recreation or fitness uses. The demolition of the existing building and redevelopment of the site to retain these uses will be supported, providing that any new building frontages on to Monkton Park are designed to be sympathetic to the parkland setting and enhance the significance of Chippenham Conservation Area.'</i></p>
S/TC2/9			Under K, it should be made clear that any public houses facing the park would be at a distance from it and <u>not accessible from and to the park</u> .	Reference to 'public houses' deleted from Criterion K
S/TC2/10			As before we are concerned about the loose wording of N, which seems to allow that there could be development within the park.	Criterion N. deleted. On further reflection it is not considered appropriate for the Neighbourhood Plan to specify the type of biodiversity net gain delivered by proposals. This would be more appropriate for evaluation through the forthcoming national biodiversity net gain regime when introduced. Monkton Park is adequately protected from inappropriate development by Policies GI2 and GI3 of the Neighbourhood Plan. Notwithstanding Figure 8.3 amended to make reference to River Avon Strategic Green Corridor.

### Policy TC3 - Public Realm Improvements to Upper Market Place

Ref. No.	Page No. / Para. No. / Policy No.	Name	Comment	Response
S/TC3/1	p. 100 Policy TC3	Wiltshire Council Strategic Planning	This policy should be presented in a different colour, as lower case or deleted since it does not deal with issues that fall within planning controls.	The proposed scheme would likely be delivered/implemented as a whole scheme as opposed to piecemeal, and planning permission would therefore be required for engineering works and landscaping associated with the scheme, as was the case for a similar such scheme for public realm improvements to Cirencester Market Place. It would also be inappropriate to only pick out those elements from the parameters plan (Figure 8.4) which may require planning permission as this would not provide an accurate presentation of the scheme to the general public.
S/TC3/2	p. 100 Policy TC3		It should be explained which enhancement objectives/negative features of the Conservation Area appraisal will be addressed in particular.	Enhancement proposals in Chippenham Conservation Area Management Plan SPG that will be addressed by the proposals added to Paragraph 8.49 as suggested.
S/TC3/3	p. 100 Policy TC3		<u>Specific comments about the policy areas and features are:</u> Area 1: Due to building layout, there is little intervisibility between the upper and lower Market Place.	There is some degree of intervisibility between Upper and Lower Market Places, although because The Market Place road runs along the line of intervisibility they are not currently perceived as public squares. The shared space/stone pavements proposed to be introduced along the line of visibility would assist in making these spaces more legible public squares and therefore help to 'restore the visual connection' between them, which was lost when the road was introduced. Text of Area 1 of Policy TC3 amended to better explain visual connection through use of common surface material.
S/TC3/4	p. 100 Policy TC3		Area 2: Looking at the suggest plan, the war memorial is in the edge of the space, not the central focal point.	The War Memorial does not have to be located at the centre of the new public square to be a focal point. It would remain a focal point to the Upper Market Place as a whole because of its central location.
S/TC3/5	p. 100 Policy TC3		Area 3: Moving the 8 car parking spaces to the centre means that any vehicles parked will be in the sight line of the war memorial and Yelde Hall when approaching along The Causeway. This defeats the point of the improvements.	This is considered to be the most sensitive location for any relocated car parking spaces, being furthest away from the War Memorial. It is not clear what alternative areas are being suggested in this comment. If car parking surveys demonstrate at a later time that these spaces are not required/in demand, then they can be omitted. However, it is envisaged that some form of limited car parking e.g. for disabled people would still be required.
S/TC3/6	p. 100 Policy TC3		Area 4: Reduction in vehicles is a benefit but conflicts with recent permission granted for improved parking outside St Andrew's church.	Reference to removal of vehicular access deleted under Area 4 of Policy TC3 to allow for access to parking area immediately located in front of St. Andrews Church, but reference retained to the removal of inefficient parking spaces on the public highway and replacement of tarmac with stone pavements which would benefit the setting of the Church and enhance the significance of Chippenham Conservation Area.
S/TC3/7	p. 100 Policy TC3		Feature 5: Anything added will block views to the war memorial and other heritage assets.	Disagree that a low drinking water fountain or sculpture/public art would block views of the War Memorial or other heritage assets any more than the sea of parked cars currently does. The War Memorial would be located some 30m distant from any new public square feature.
S/TC3/8	p. 100 Policy TC3		Feature 6: Adding trees will need to be carefully considered as these may impact on historic structures and obscure the intervisibility between spaces and historic buildings that currently exists.	Agreed. Note to Legend of Figure 8.4 added to explain that the location of tree planting is indicative only.
S/TC3/9	p. 100 Policy TC3		Feature 7: Why isn't the cycle path going through Lord's Lane?	Lord's Lane would be too narrow to create LTN 1/20-compliant segregated cycling and walking routes – 3m would be required for a two-way cycleway, plus 0.5m on either side because of the building walls, plus 2m alongside that for a footway, meaning 6m in total minimum. Even to put just a cycleway through here, would require 3m plus 0.5m either side because of the building walls, so a minimum of 4m, and it is not certain that there is even that distance at the narrowest point. It would be best left as a walking-only route.  In addition, for a lot of cycle journeys, the route via Market Place, as outlined in Figure 8.4, is the desire line for a lot more journeys than Lord's Lane would be, e.g. Pewsham to Station via Wood Lane and Island Park, or Pewsham to High Street/lower Market Place, or West Chippenham to library via Island Park.

S/TC3/10	p. 100 Policy TC3	Wessex Water	Street tree planting should consider the location of existing underground infrastructure as water mains and sewers can be damaged by tree roots. There is an existing water main where new tree planting is proposed.	Figure 8.4 is intended to show the location of indicative tree planting only. The exact location will of course be dependent on the location of existing underground infrastructure. Text added to end of first sentence of 6. of Policy TC3 ' <i>...subject to the location of existing underground infrastructure.</i> '
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**Policy TC4 - Development within Chippenham Conservation Area**

Ref. No.	Page No. / Para. No. / Policy No.	Name	Comment	Response
S/TC4/1	p. 105 Para. 8.59	Wiltshire Council	We welcome, in particular, the considerable work undertaken to update understanding of local <u>heritage assets and the conservation area.</u>	Support noted.
S/TC4/2	p. 105 Policy TC4	Strategic Planning	Whilst the intentions of this policy are fully supported, the precise wording may need to be reviewed in order to reflect legislation governing historic buildings and conservation areas.	New criterion a) added in third paragraph of Policy TC4 to use wording in Section 72 of the Planning (Listed Buildings and Conservation Areas) Act 1990: <i>'a) preserves or enhances the special character or appearance of the Conservation Area'</i>
S/TC4/3	p. 105 Policy TC4		<p>In order to steer development, alteration and additions to the town, the definition of what is particular to the place needs to be defined. Define high quality design, local character and distinctiveness and heritage assets making a positive contribution. Everyone has their own views and without a tighter definition relevant to the area, this cannot be applied in decision making.</p> <p>This will ensure full and appropriate weight is applied to the appraisal as a material consideration in decision making.</p>	<p>Text added to Paragraph 8.56 to clarify that there is no one character or appearance which defines the Conservation Area and that each character area contains a rich variety of buildings, spaces and landscapes. Text also added to explain that the Conservation Area is focused on the historic town centre and immediate environs.</p> <p>Text added to Paragraph 8.60 to explain that each character area has its own unique set of buildings, spaces, landscapes and views which combine to form that special local character and distinctiveness. Text added to explain that heritage assets further contribute to that local character and distinctiveness and details of the types of heritage asset which may contribute are listed.</p> <p>New paragraph and bullets added after 8.60 to define the different elements of high quality design which make a positive contribution to local character and distinctiveness.</p>
S/TC4/4	p. 105 Policy TC4	Friends of Monkton Park	FOMp strongly support this and welcome the reminder that the park is in the Chippenham Conservation Area and the continuation of the CA Management plan ambitions - so shockingly <u>ignored with the building of the Sadlers Mead car park.</u>	Support noted.



## Policy TC5 - Buildings of Local Merit

Ref. No.	Page No. / Para. No. / Policy No.	Name	Comment	Response
S/TC5/1	p. 107 Policy TC5	Wiltshire Council	The wording to the final paragraph might be clearer to the decision-maker, substitute 'harm for <del>'conflict' and delete the remainder of the sentence.</del>	Revision made in accordance with suggestion.
S/TC5/2	p. 107 Policy TC5	Strategic Planning	In terms of the buildings identified, some of these buildings already have some form of permission for alteration or removal, and some have already been altered. The local listing will not impact a decision <del>already made.</del>	This is recognised and understood.
S/TC5/3	p. 107 Policy TC5		Former Technical School: There may be extant consents that have already permitted its removal.	Planning application 17/05828/FUL for demolition of the building was not implemented and expired in June 2021. Planning permission PL/2022/03760 was refused in February 2023, one of the reasons for refusal was that the proposed development did not outweigh the loss of this heritage asset. The Steering Group will wait to see if an appeal is lodged and would of course review the situation if consent were granted at appeal.
S/TC5/4	p. 107 Policy TC5		Chippenham library is a modern building. Are you suggesting that the building itself is locally listed or that the facility is?	The Steering Group considered that the building itself is worthy of being locally listed. Built in 1973, it is a good example of the Modernist architecture of that time. The building is still being used for the purpose intended and is a popular and well used facility with a fine interior. It is one of very few well designed Modernist buildings in the town and therefore of local importance. The building is a local landmark which stands out from its neighbours due to its distinctive Modernist architecture. It is respectful in its scale to surrounding architecture, and is a classic example of a building which, though being very different from its neighbours, provides interest and variety to Chippenham Conservation Area.
S/TC5/5	p. 107 Policy TC5		The Citadel would be dwarfed by proposals set out in TC2.	It is not agreed that the proposals set out in Policy TC2 for a 2-3 storey neighbouring building, would dwarf the Citadel. Modern storeys have lower floor to ceiling heights than existing historic buildings, such as the Citadel. For example, the ground floor of Avonbridge House is 4m in height, compared to a typical modern building which has a floor to ceiling height of 2.4m. It is therefore considered that a modern 2-3 storey building would actually respond sensitively to the Citadel in terms of its height. Notwithstanding, the consideration should be around the merits of the Citadel building itself, rather than any proposed future neighbouring uses.
S/TC5/6	p. 107 Policy TC5		Providence Terrace: Some of these buildings have already been altered, so it's too late to locally list them.	It is disagreed that the minor alterations to some of the buildings within this terraced group mean that this group has no local historic significance. The group is highly prominent in the streetscene, facing visitors on one of the main routes into Chippenham. The group is of local importance primarily because of its strong architectural unity which is retained (rhythmic fenestration, stone facades, red brick window and door surrounds, front entrance steps, stone lintels and cills and tiled roofs). Unusually gardens are sited to the front, with small courtyards to the rear. Soft landscaping in the front gardens contributes to the setting of the group. When viewed together from Ivy Lane, Providence Terrace and the curved terrace of Foghamshire forms a particularly attractive townscape that contributes to the significance of this part of Chippenham Conservation Area.
S/TC5/7	p. 107 Policy TC5		Old Laundry Chimney: There may be extant consents that have already permitted its removal.	There are no extant consents.
S/TC5/8	p. 107 Policy TC5		17-25 Station Hill: There may be extant consents that have already permitted its removal.	Planning application 20/06500/FUL for the retention of the front section of the building (including the facade) and demolition of the majority of the building is extant until April 2025. To date this consent has not been implemented and therefore The Steering Group considered that the building should remain on the Building of Local Merit list until such time as the consent is implemented. If the consent is implemented the Steering Group would review the situation.
S/TC5/9	p. 107 Policy TC5	Theatres Trust	The Trust welcomes recognition of part a. (Reel Cinema) and part l. (17-25 Station Hill) both of which are buildings that fall within our remit having been constructed with theatre facilities and which as non-designated heritage assets positively contribute towards local interest, townscape and character.	Support noted for the Reel Cinema and 17-25 Station Hill to be designated as Buildings of Local Merit.

**Policy TC6 - Design of Shopfronts and Advertisements**

Ref. No.	Page No. / Para. No. / Policy No.	Name	Comment	Response
S/TC6/1	p. 109 Policy TC6	Wiltshire Council	The wording to the policy should reflect the intrinsic nature of guidance and ask designers and architects to 'have regard' to it. .	Wording of policy amended as suggested to ' <i>have regard to</i> '.
S/TC6/2	p. 109 Policy TC6	Strategic Planning	A cross reference to Appendix 16 which explains the selection process for the Local List should be included	New paragraph 8.75 added to explain that the Buildings of Local Merit Topic Paper (Appendix 16) should be used to guide and assess development proposals which relate to the shopfronts of <b>Buildings of Local Merit or advertisements on these buildings.</b>
S/TC6/3	p. 109 Policy TC6		However, a great deal of signage has deviated from the previous shop front guidance that was produced by the former North Wiltshire District Council. When applications are made, everyone has the opportunity to comment on them but it's rare that this is done.	It is envisaged that once the Neighbourhood Plan has been made the Town Council can do some promotional work with shop owners around the Shopfront Design Guide to raise awareness of it, and the requirements for planning/advertisement consent.

## Transport

Ref. No.	Page No. / Para. No. / Policy No.	Name	Comment	Response
S/T/1	Policies T1-T5	Wiltshire Council Strategic Planning	The CNP should not create new policies when transport policies for Wiltshire are already set out in the Local Transport Plan (and it's supporting documents such as the Cycle Strategy), and WCS. The transport policies set out in the CNP do not appear to relate directly to new developments in the CNP area.	<p>The Local Transport Plan (LTP) and its supporting documents are strategic documents which cover the whole of the county. Neighbourhood Plan Policies T1-T5 are non-strategic policies, confined to the Chippenham Neighbourhood Area, and are therefore entirely reasonable policies for the Plan to pursue.</p> <p>The LTP (although an important document which has been taken into account in forming Neighbourhood Plan policies) does not form part of the development plan for Chippenham, and there is no legal requirement for the Neighbourhood Plan to be in general conformity with this document. Having said this, the Steering Group do not consider there any circumstances where Neighbourhood Plan Policies T1-T5 deviate from being in general conformity with the LTP. The emerging LTP has not been shared with the Steering Group and therefore it was not possible to take this into account in forming Neighbourhood Plan policies.</p> <p>The Steering Group disagrees with the comment that Policies T1-T5 do not appear to relate directly to new developments in the Neighbourhood Area. All of these policies refer to transport infrastructure requirements directly related to new development only, and written (and in many cases now amended as a result of the Regulation 14 comments received) in such a way as to comply with Regulation 122 of the CIL Regulations 2010 (as amended).</p> <p>Details of future development sites in the emerging Local Plan have not been shared with the Steering Group. There is a Regulation 18 draft of the Local Plan which proposed a couple of large sites in early 2021 but there has been no subsequent confirmation that these will be pursued and the emerging Local Plan is still at its early stages. Given there are no adopted strategic future development allocations for the Neighbourhood Plan to work with it has not been possible to predict where development sites might be located in the Neighbourhood Area. Instead, Neighbourhood Plan Policies T1-T5 have taken a pragmatic approach and can be used in accordance with Regulation 122 of the CIL Regulations 2010 (as amended) wherever new development takes place in the Neighbourhood Area. There will of course be windfall development sites that occur in the Neighbourhood Area during the Plan period and therefore the Plan cannot be solely focused on meeting the needs of future allocated development sites only.</p>
S/T/2			Some aspects of the Transport section are inconsistent with guidance issued by the Department for Transport (DfT). For example, paragraph 9.10, 'encourages developers and the Highways authority' to design schemes in line with 'Making Space for Cycling' rather than LTN 1/20, which is recommended to the Highway Authority by the Department for Transport. The DfT advises that schemes that are not designed to LTN 1/20 standards will be unlikely to receive funding in the future and a new body 'Active Travel England' will be assessing new cycling and walking schemes against LTN 1/20. Therefore, it is considered inappropriate for the CNP to suggest that other guidelines should be used.	Paragraph 9.10 deleted. First paragraph of Policy T1 amended to refer to LTN 1/20 for cycle design, rather than Making Space for Cycling.

S/T/3			<p>Certain policies do not seem to cover areas of development within planning control and should be reviewed because they largely discuss matters relating to management or some other aspect of transport services (e.g., Policies T4 and T5)</p>	<p>Policy T4 has been reviewed and substantially amended as a result of this comment to cover areas of development within planning control. The following changes have been made:</p> <ul style="list-style-type: none"> <li>- First sentence of the Policy deleted and replaced with a new paragraph which requires developers to have full regard to the best practice guidance in Inclusive Mobility: A Guide to Best Practice on Access to Pedestrian and Transport Infrastructure (2001) by the Department of Transport.</li> <li>- The above guidance better covers the elements set out in bullet points 1, 2 and 9 and therefore these have been deleted. The text for bullet points 1 and 2 has been incorporated into Paragraph 9.34 which refers to pavement design.</li> <li>- Bullet point 6 deleted and text relocated to 'Parking' Section of Chippenham Design Guide where it is considered more appropriately located.</li> <li>- Bullet point 8 deleted as road signage does not require planning permission.</li> <li>- Bullet point 10 deleted as too site specific. In addition, works have subsequently been undertaken to substantially remodel the crossings in the vicinity of the Brunel Viaduct.</li> <li>- Text amended to bullet points 3, 4 and 5.</li> </ul> <p>Policy T5 has been reviewed and amended. It is considered that the policy as amended directly relates to new development that is located adjacent to existing footpath and cycle networks and the increased use of these networks would justify provision of waymarking signage. Criteria 2 and 3 have been amended to be less prescriptive on the signage details, as this is best left to the local highway authority specifications.</p>
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## Policy TC1 - Provision and Enhancement of Cycle Paths

Ref. No.	Page No. / Para. No. / Policy No.	Name	Comment	Response
S/T1/1	p. 118 Policy T1	Wiltshire Council Strategic Planning	Paragraph 9.1 and Policy T1. This states that developer contributions will be sought towards the high priority cycle routes outlined in the CNP. It needs to be ensured that these routes connect to development and are necessary for planning permission to go ahead. There needs to be an evidence base for providing these links; this is not currently demonstrated in the CNP.	<p>It is not considered necessary for Policy T1 to demonstrate that the high priority improvements to the existing cycle network connect to future development sites. Details of future development sites in the emerging Local Plan have not been shared with the Steering Group. There is a Regulation 18 draft of the Local Plan which proposed a couple of large sites in early 2021 but there has been no subsequent confirmation that these will be pursued and the emerging Local Plan is still at its early stages. Given there are no adopted strategic future development allocations for the Neighbourhood Plan to work with, it has not been possible to predict where development sites might be located in the Neighbourhood Area. Instead, Policy T1 and the accompanying high priority improvements are a vision developed by the local community of how they would like to see the future of their local cycle network improved, and can be specifically targeted for use wherever new development takes place in the Neighbourhood Area. There will of course be windfall development sites that occur in the Neighbourhood Area and therefore the Plan cannot be solely focused on meeting the needs of future allocated development sites only.</p> <p>Notwithstanding the above, the following text has been added to the third paragraph of Policy T1: '<i>major development proposals which generate increased use of the existing cycle network to access the site (directly or indirectly)</i>'. This makes it clear that a financial contribution will be sought towards the cost of a relevant high priority improvement link identified in Figure 9.1 where this connects to the development and is therefore 'directly related to the development'. In the above additional text, the word 'access the site' is preferred as opposed to 'connecting to the site' as the latter implies that route would need to be physically connected to the site, whereas the former allows for circumstances where the cyclist may use part of a route to access the site. Text added to Paragraph 9.13 to reinforce that the high priority improvements represent a vision for future improvements that the local cycling community wish to see materialise.</p> <p>With regard to the comment that there needs to be an evidence base for providing these links, the Chippenham Cycle Network Development Group, who are members of the local community that use the existing cycle routes in Chippenham on a daily basis and understand their deficiencies, are the evidence base, and are arguably more qualified than a desktop transport engineer to understand where improvement links are required from a users point of view. In addition, some of these members work in the transport planning sector and are suitably qualified professionals in this field. Therefore Table 9.2, which has been moved to a new appendix (see response S/T1/2), is the evidence base for the community's vision for improving the cycle network in Chippenham.</p>
S/T1/2	p. 113 Para. 9.13		The CNP outlines a revised town cycle map, stating that the existing map outlined as part of the Local Transport Plan, is now out of date. Whilst the map is now a little outdated, as required by Government, the Council is in the process of developing a Local Walking and Cycling Infrastructure Plan for Chippenham. Local Cycling and Walking Infrastructure Plans (LCWIPs), as set out in the Government's Cycling and Walking Investment Strategy, are a new, strategic approach to identifying cycling and walking improvements required at the local level. They enable a long-term approach to developing local cycling and walking networks, ideally over a 10-year period, and form a vital part of the Government's strategy to increase the number of trips made on foot or by cycle. The routes outlined in the CNP will be considered as part of the LCWIP process. However, it is felt that the list of 'prioritised schemes' set out on page 114 - 117 is too prescriptive for inclusion in an CNP, and each scheme should be properly assessed by traffic engineers. In addition, this appears to be a wish list of cycle improvement schemes for the town, rather than ones linked to development sites.	<p>The inclusion of high priority improvement schemes listed in Policy T1 for consideration in the LCWIP process is welcomed. Whilst there is likely to be much alignment between the LCWIP and Neighbourhood Plan over future priorities for the cycle network, there will also be some instances where these priorities differ between the documents. This arises because the purpose of creating each document, from a funding perspective, is somewhat different. To simplify, the LCWIP's focus is on securing funding from Government and the Neighbourhood Plan's focus is on securing developer contributions. There is a need for both documents to exist for this reason. In addition, the LCWIP will not form part of the development plan for Chippenham, as opposed to the Neighbourhood Plan, which will.</p> <p>It is agreed with the comment that Table 9.2 is too prescriptive to be included within the Plan document and this has been moved to a new appendix (Appendix 22) with Figure 9.1 (the map) being retained. It is unreasonable to expect that each high priority improvement scheme listed in Table 9.2 be assessed by a traffic engineer. This is the community users vision for improving the cycle network and can act as a starting point for discussion with developers and traffic engineers as and when the need arises. Paragraph 9.13 has been amended to reflect this.</p> <p>The Steering Group do not agree with the description of the high priority improvement schemes as a 'wishlist'. This does not take into account the hard work and careful thought that Chippenham Cycle Network Development Group have given to creating the list of schemes. It is not considered necessary for Policy T1 to demonstrate that the high priority improvements to the existing cycle network connect to future development sites. Details of future development sites in the emerging Local Plan have not been shared with the Steering Group. There is a Regulation 18 draft of the Local Plan which proposed a couple of large sites in early 2021 - to the south of Pewsham and to the east of the River Avon - but there has been no subsequent confirmation that these will be pursued and the emerging Local Plan is still at its early stages.</p>

				<p>Notwithstanding, in order to address this comment, the Cycle Network Development Group have moved some of their improvement routes from their wider list to the high priority list - Table 9.2/Appendix 22 in the vicinity of these two possible sites referred to in the Regulation 18 draft of the emerging Local Plan. These are Improvement Ref. Nos. 19 + 27 – London Road (part of LCWIP - one of the high-priority schemes), Improvement Ref. Nos. 20 + 21a + 21b + 21c – Pewsham arterial roads (part of LCWIP) and Improvement Ref. Nos. 22 + 24 (Crossings on Pewsham Way).</p> <p>Policy T1 and the accompanying high priority improvements are a vision developed by the local community of how they would like to see the future of their local cycle network improved, and can be used to secure funding where this directly relates to new development elsewhere in the Neighbourhood Area. There will of course be windfall development sites that occur in the Neighbourhood Area over the Plan period and therefore the Plan cannot be solely focused on meeting the needs of future allocated development sites only and must have a wider remit to capture all new major developments.</p>
S/T1/3	p. 118 Policy T1	Barratt David Wilson South West	BDW support the provision of cycle networks across Chippenham and note that there may be opportunities to enhance them as part of development to the east of the town <u>around Gate Farm/ Abbeyfield School.</u>	Support noted.
S/T1/4			Regarding Policy T1, the use of the Government's Cycling Level of Service Tool (LTN1/20) is noted as is the need for major development to link to the cycle network. Certainly, land at Gate Farm could achieve this. Requirements for developer contributions towards high-priority cycle network improvements are also noted, but the policy should recognise S106s must be prepared in line with Regulation 122 of the Community Infrastructure Regulations 2010 (as amended). As Chippenham Town Council is not a CIL charging authority, it cannot rely on CIL itself to secure funding unless agreed with Wiltshire Council.	The following text has been added to the third paragraph of Policy T1: ' <i>major development proposals which generate increased use of the existing cycle network to access the site (directly or indirectly)</i> '. This makes it clear that a financial contribution will be 'necessary to make the development acceptable in planning terms' because of the increased use of the cycle network generated by that development, and 'will be directly related to the development' because it will use the existing cycle network to access the site. The third test of planning obligations laid down in Regulation 122 of the Community Infrastructure Regulations 2010 (as amended), that such a contribution should be 'fairly and reasonably related in scale and kind to the development', is not considered necessary to refer to in Policy T1 as Policy T1 is already written in a flexible manner which is not explicit or prescriptive about the amount of funding or what specific infrastructure the contribution would be spent on within the remit of the high priority improvements list.
S/T1/5	p. 118 Policy T1	Future Chippenham	Policy T1- Provision and Enhancement of Cycle Paths, requires that cycle paths on new Major Developments, particularly for strategic housing sites, should link to the existing town cycle network. Future Chippenham is already proposing strategic new cycle paths <u>and this policy is supported.</u>	Support noted.
S/T1/6	p. 118 Policy T1	Waddeton Park	3.34 Our client supports the draft NP's aspiration towards promoting sustainable modes of travel, but considers that the references to making space for cycling in Cyclenation <u>report from 2014 are too prescriptive.</u>	Paragraph 9.10 deleted and first paragraph of Policy T1 amended to refer to LTN 1/20 for cycle design, rather than Making Space for Cycling.
S/T1/7			3.35 There may also be sites where space for dedicated cycle provision is limited, therefore impacting on the ability of a site to deliver a measurable BNG or a sufficient <u>level of public open space.</u>	The Steering Group consider that a site should not be developed upon or is not actually suitable as a 'major development site' if it cannot deliver active travel infrastructure. Similar applies to BNG and public open space.
S/T1/8			<p>3.36 The draft policy should therefore be amended as follows:</p> <p><i>"Cycling schemes shall be prepared for all Major Developments where appropriate to encourage modal shift from the private car to cycling. <del>Such schemes should demonstrate how the design solutions for different types of streets and links as outlined on Pages 10-25 of 'Making Space for Cycling' published by Cyclenation have been reflected in design decisions. The quality of cycling infrastructure that has been incorporated into the design must be quantified by using the 'Cycling Level of Service Tool' as set out in Appendix A of LTN1/20.</del></i></p> <p><i>Cycle paths on new Major Developments, particularly for strategic housing sites, should link to the existing town cycle network, as shown on Figure 9.1.</i></p> <p><i>Major development proposals will require on-site or off-site developer contributions for the high priority improvements to the cycle network shown on Figures 9.1 and 9.2."</i></p>	First paragraph of Policy T1 amended to delete reference to Making Space for Cycling as suggested. However, new text added to require the developer to demonstrate how the design adheres to the Core Design Principles set out in Section 4 of LTN 1/20. Reference to the 'Cycling Level of Service Tool' as set out in Appendix A of LTN 1/20, has been retained. Given that LTN 1/20 is government guidance that the developer should be following regardless of its planning status, it is not considered that reference to this guidance is overly prescriptive.

## Policy T2 - Access to the Bus Network

Ref. No.	Page No. / Para. No. / Policy No.	Name	Comment	Response
S/T2/1	p. 122 Policy T2	Barratt David Wilson South West	As with policy T1, Policy T2 is generally supported but will need to be aligned with Regulation 122 of the CIL Regulations where contributions are sought through S106.	Text amended in second paragraph of Policy T2 in line with comment, to make reference to financial contributions having to be necessary to make the development acceptable in planning terms, directly related to the development and fairly and reasonably related in scale and kind to the development.
S/T2/2			Reference however to maintaining bus stops (public and private) does not seem to be a land-use matter and it is questioned whether this is relevant to planning?	Fourth paragraph deleted and text relocated to 'Sustainable Transport' section of Chippenham Design Guide and summarised in Paragraph 9.21 instead.
S/T2/3			Regarding maximum walking distances, it is not unsustainable for a dwelling to be 405m from a bus stop as opposed to 395m and as such the policy wording should provide for a degree of flexibility in this regard. It is suggested that the penultimate paragraph of Policy T2 is amended to: <i>"Bus stops serving major development shall be accessible by walking. As a general rule that will mean each building within 400m walking distance."</i>	The LPA, in determining any planning application, would likely use their discretion to judge what might be an appropriate deviation from the 400m walking distance recommended in Policy T2 (for example this might reasonably be 405m or 395m). The Transport Topic Group collected evidence, which is set out in a new Appendix 23, and which explains the reasons for adopting a maximum 400m walking distance rule.  The developer's suggested policy wording offers too much left to interpretation/potential deviation from this figure. For example, the term 'as a general rule' could be used to argue that 49% of all applications do not need to include buildings located within 400m of a bus stop.
S/T2/4	p. 122 Policy T2	Future Chippenham	Policy T2 – Access to the Bus Network, requires that Major Developments provide on-site and off-site improvements to the local bus network (as required by the Chippenham Design Guide) linking the development to the town centre through developer contributions.  The Framework Masterplan is taking a comprehensive, whole town approach which addresses integrated transport and how to optimise transport connectivity by modes other than the car. It is recommended that the policy or supporting text recognises that improvements to the local bus network will also be subject to agreement and collaboration with local bus service providers.	This is already referred to in Paragraph 9.21.
S/T2/5	p. 122 Policy T2	Waddeton Park	3.37 The policy aspiration of ensuring suitable access to the bus network is supported. As the preparation of the draft NP progresses, Waddeton Park Ltd will keep this policy under review.	Support noted.
S/T2/6	p. 122 Policy T2	Friends of Monkton Park	In principle yes, though not strictly within our remit.	Support noted.
S/T2/7	p. 122 Policy T2	Chippenham Youth Council	The Chippenham Youth Council particularly welcomes the Draft Plan's intention to seek real-time passenger information indicators (for local and National Express bus services) where Major Developments are required to make off-site contributions to improve town centre access.	Support noted for real-time passenger information indicators.

### Policy T3 - Electric Vehicle Charging Infrastructure

Ref. No.	Page No. / Para. No. / Policy No.	Name	Comment	Response
S/T3/1	p. 124 Policy T3	Wiltshire Council Strategic Planning	With reference to the second paragraph, in line with the latest government guidance, this should state 'residential buildings undergoing a major renovation which will have more than 10 parking spaces must have at least one EV charge point, per dwelling with associated parking along with cable routes in all spaces without charge points.'	Second paragraph amended in line with suggested wording in comment.
S/T3/2	p. 124 Policy T3		In the third paragraph, again based on government guidance this should state that 'All new non-residential buildings and all non-residential buildings undergoing a major renovation, with more than 10 parking spaces must have a minimum of one charge point and cable routes for one in five (20%) of the total number of spaces.'	Third paragraph amended in line with suggested wording in comment.
S/T3/3	p. 124 Policy T3	Waddeton Park	3.38 Whilst the draft NP's aspiration to deliver electric vehicle (EV) charging points at new residential properties is supported, their provision will soon become a legal requirement as per amendments to regulation 44D of the Building Regulations.  3.39 We therefore suggest that the draft policy makes reference to the new legislation, once updated.	Noted. The Neighbourhood Plan wishes to retain Policy T3 in the event that electric vehicle charge points are not provided under Building Regulations because a situation arises where the cost of an individual connection is more than £3,600 - known as 'the £3,600 cap'. Reference to the new Building Regulations has been added in Paragraphs 9.25 and 9.28.
S/T3/4	p. 124 Policy T3	Boklok	BoKlok (Skanska & IKEA) modular home builders include for a EV charging point with every home and we fully support the policy.	Support noted
S/T3/5	p. 124 Policy T3	Barratt David Wilson South West	BDW encourage the provision of infrastructure to support one off-street EV charging point per dwelling. It is however important to note that not all charging points are of the same design and compatibility as there is no industry standard yet, so care needs to be taken if the policy is seeking to specify chargers.	Support noted. Policy T3 does not specify the type of charger.
S/T3/6	p. 124 Policy T3		It is also important however to note that in some cases there where there is limited grid capacity the on-cost of upgrading of the power grid needs to be limited for viability reasons. A recent Government consultation set a threshold at £3,600 per dwelling. This is something the eCNP should note and apply. At this stage there is no evidence to suggest an issue for sites like Gate Farm and BDW would commit to exploring this with the Town Council were land to be designated for small-scale housing growth.	Unlike Building Regulations, Policy T3 does not provide local exemptions where the cost of an individual connection is more than the price cap. This is because the Neighbourhood Plan considers that new development should not proceed where electric vehicle charging points cannot be incorporated given the importance of the climate emergency.



#### Policy T4 - Access for Disabled People and those with Reduced Mobility

Ref. No.	Page No. / Para. No. / Policy No.	Name	Comment	Response
S/T4/1	p. 127 Policy T4	Barratt David Wilson South West	Policy T4 raises a point of compliance with the Regulation 122 of the CIL Regulations 2010 (as amended). It is noted that the third bullet point seeks contributions towards the maintenance of public footways. This is not CIL Regulation 122 compliant and is addressed through Council Tax charges. It is not directly related to development and could not be reasonably related in scale and kind as it would be impossible to determine the level of usage of a footpath (and subsequent maintenance) attributed to a specific group of new residents. Whilst the intent is noted, it should be removed from the eCNP. Development can of course support the upgrading of routes and connections where there relate to it. With cycle and pedestrian networks and priority areas around Gate Farm there is an opportunity to for localised improvements that would benefit a wider range of residents where needed.	Policy T4 has been substantially amended in light of this comment and compliance with Regulation 122 of the CIL Regulations 2010 by amending the text of bullet points 3 & 4 (and amalgamating them to form a single paragraph) which seeks to ensure that new development provides long-term maintenance for unadopted footways and footpaths, and that contributions are sought for the upgrade and long term maintenance of existing footways and footpaths where the development would likely result in an increased use of such. The Steering Group disagree with the comment that <i>'it would be impossible to determine the level of usage of a footpath (and subsequent maintenance)'</i> . It should be possible for highway engineers to provide an approximate cost estimate based on trip patterns from elsewhere/similar such schemes/guidance.
S/T4/2	p. 127 Policy T4	Waddeton Park	3.40 The principle of maintaining access for disabled people and those with reduced mobility is supported, but some of the requirements of this policy are not appropriate to include within a planning policy and/or are too prescriptive.	Support noted. Policy T4 has been substantially amended as a result of this and other comments to retain appropriate land use elements only and delete overly prescriptive elements. The following changes have been made:  - First sentence of the Policy deleted and replaced with a new paragraph which requires developers to have full regard to the best practice guidance in Inclusive Mobility: A Guide to Best Practice on Access to Pedestrian and Transport Infrastructure (2001) by the Department of Transport.  - The above guidance better covers the elements set out in bullet points 1, 2 and 9 and therefore these have been deleted. The text for bullet points 1 and 2 has been incorporated into Paragraph 9.34 which refers to pavement design.  - Bullet point 6 deleted and text relocated to 'Parking' Section of Chippenham Design Guide where it is considered more appropriately located.  - Bullet point 8 deleted as road signage does not require planning permission.  - Bullet point 10 deleted as too site specific. In addition, works have subsequently been undertaken to substantially remodel the crossings in the vicinity of the Brunel Viaduct.  - Text amended to bullet points 3, 4 and 5.
S/T4/3			3.41 In regard to the former, it is not appropriate for the draft policy to include "traffic signals for pedestrians [that will] have audible warnings and will consider the least able when setting crossing intervals". We suggest that the NP Steering Group discusses the provision of pedestrian crossings with Wiltshire Council's Highways team.	Bullet point 9 deleted. It is considered that this is better covered by best practice guidance in Inclusive Mobility: A Guide to Best Practice on Access to Pedestrian and Transport Infrastructure (2001) by the Department of Transport, to which the opening sentence of Policy T4 now refers.
S/T4/4			3.42 Whilst pedestrian mobility is important, the provision of a requirement that "footways and pavements should be constructed of durable materials that are not subject to cracking or splitting" is difficult to measure, monitor and quantify and should <u>also be raised with Wiltshire Council's Highways team.</u>	Bullet point 1 deleted. It is considered that this is better covered by best practice guidance in Inclusive Mobility: A Guide to Best Practice on Access to Pedestrian and Transport Infrastructure (2001) by the Department of Transport, to which the opening sentence of Policy T4 now refers. Text has been relocated and incorporated into Paragraph 9.34 <u>instead, which refers to pavement design.</u>
S/T4/5			3.43 Moreover, it is considered that the maintenance of pavements can be paid via the Town Council's forthcoming CIL budget.	Firstly, the Town Council's expected CIL income would not cover the costs of changes to highways infrastructure (usually very expensive) as a result of development - this cost should be borne by the developer. Secondly, the Town Council are not the local highways authority and have no expertise or responsibilities in this sector.

**Policy T5 - Waymarking Signage on the Footpath and Cycle Network**

Ref. No.	Page No. / Para. No. / Policy No.	Name	Comment	Response
S/T5/1	p. 129 Policy T5	Wiltshire Council Strategic Planning	'Public footpaths' should be changed to 'public rights of way' (PRoW) so that this policy would be applicable to all PRoW such as bridleways and not restricted to just footpaths.	Public footpaths' changed to 'public rights of way' as per the suggested comment.
S/T5/2			The specification of the signage should be changed to be the same as the Highway Authority, Generic signage can be provided if appropriate or proofs and sign off of any specific projects will be required.	<p>Criterion 2 of Policy T5 amended to delete reference to signage being '<i>of a durable material, preferably metal, with an anti-graffiti finish, and will be clearly legible</i>' and replacement text added to reference signage being '<i>produced to the latest signage specifications of the local highway authority, unless there are specific projects which require bespoke signage, which should be agreed with the local highway authority.</i>'</p> <p>Criterion 3 of Policy T5 also amended to delete reference to signage being '<i>mounted on either a 6 foot pole or securely on another structure such as a wall or fence</i>' as this may not correspond to the latest signage specifications of the local highways authority.</p>

## Policy C11 - Community Infrastructure

Ref. No.	Page No. / Para. No. / Policy No.	Name	Comment	Response
S/C11/1	p. 133 Policy C11	Wiltshire Council Strategic Planning	The role and purpose of this policy needs to be reviewed to ensure it meets legal tests and does not place unreasonable burdens on applicants and/or new developments. As currently drafted, this relates to all proposals for development.	First sentence of Policy C11 deleted which referred to all development having to demonstrate need for community infrastructure. Replaced with new wording which clarifies that major residential developments only shall submit a Community Infrastructure Statement which demonstrates how the community infrastructure needs of new residents, generated as a result of the scheme, can be fully met on site or nearby.
S/C11/2	p. 133 Policy C11		Infrastructure necessary to support new development is set out as a part of the proposals of the development plan or can be provided through the community infrastructure levy. The final paragraph suggests a new charge on development over and above what is usually acceptable	Final paragraph of Policy C11, which referred to 1% of development cost to fund new community infrastructure, deleted as no evidence to demonstrate that this figure is viable. Replaced with the following wording, in part as suggested by Barratt David Wilson South West (see S/C11/3), in new Paragraph 3 which allows greater flexibility and potentially a larger contribution than 1% to be secured where appropriate:  <i>'Largescale major residential development will be expected to provide new community infrastructure on site. Where major residential development cannot accommodate on-site community infrastructure an appropriate financial contribution, based on individual site circumstances, will be provided towards off-site community infrastructure or public art provision.'</i>  This does not represent a new charge on development, rather giving greater weight to securing financial contributions towards new community infrastructure than the Wiltshire Core Strategy policy does (which it considers not to be essential infrastructure).
S/C11/3	p. 133 Policy C11	Barratt David Wilson South West	BDW support the delivery of community infrastructure as part of new development. However, it is noted that in cases where it is not provided, then 1% of the development cost will be sought as an off-site contribution. This raises several questions that would need to be justified to ensure this is compliant with CIL Regulation 122: -How has 1% of development cost been arrived at as the appropriate amount? -How does this account for existing available community infrastructure in sustainable locations? -What is included in the 'development cost' calculation? -Who will review the calculation? -Who will administer the payment and, ensure it is spent appropriately? Our concern is that the policy is very open-ended and is highly likely to delay the delivery of development if agreement on the above cannot be reached by relevant parties. It is therefore suggested that reference to 1% of development cost is removed and replaced with <i>"appropriate financial contribution based on individual site circumstances"</i> . In the case of Gate Farm, being situated between a school and sports club makes it an ideal location to co-locate housing and community infrastructure of a proportionate scale. It is therefore unlikely that BDW would need to rely on navigating the last part of the proposed policy.	Final paragraph of Policy C11, which referred to 1% of development cost to fund new community infrastructure, deleted, as concur that no evidence to demonstrate that this figure is viable. Replaced with following wording, in part, as suggested by the comment, in new Paragraph 3:  <i>'Largescale major residential development will be expected to provide new community infrastructure on site. Where major residential development cannot accommodate on-site community infrastructure an appropriate financial contribution, based on individual site circumstances, will be provided towards off-site community infrastructure or public art provision.'</i>
S/C11/4	p. 133 Policy C11	Waddeton Park	3.44 A policy requiring the delivery of, and contributions to community infrastructure is welcomed, but the draft policy should avoid any conflict with Policies 60-69 of the Core Strategy and reflect the legislative position towards planning obligations as set out in Part 11 of the CIL Regulations and the PPG4. In summary, the CIL Regs and the PPG state that planning obligations are appropriate where they are: a) "Necessary to make the development acceptable in planning terms; b) Directly related to the development; and c) Fairly and reasonably related in scale and kind to the development."	Final paragraph of Policy C11, which referred to 1% of development cost to fund new community infrastructure, deleted, as no evidence to demonstrate that this figure is viable. Replaced with the following wording, in part, as suggested by Barratt David Wilson South West (see S/C11/3), in new Paragraph 3, which allows greater flexibility and accords with the relevant legislation and guidance referred to in the comment:  <i>'Largescale major residential development will be expected to provide new community infrastructure on site. Where major residential development cannot accommodate on-site community infrastructure an appropriate financial contribution, based on individual site circumstances, will be provided towards off-site community infrastructure or public art provision.'</i>

S/CI1/5	p. 133 Policy CI1	Chippenham Youth Council	As previously mentioned, we have a strong sense in wanting to see the protection/enhancement of existing facilities and the prospect of any new facilities outlined in Objective 5. As representatives of young people in Chippenham, we have identified a significant need for improved and additional facilities through peer engagement. Any flexibility therefore, for local groups to use and hire venues, as outlined in the policy, would be a great help in achieving this objective.	Support noted. Additional text added to Para. 10.8 to refer specifically to facilities for young people being needed.
S/CI1/6	p. 133 Policy CI1	Theatres Trust	We welcome Policy CI1 and the protection it affords to the town's valued community facilities which include the Neeld Community & Arts Centre and the Reel Cinema. Both of these contribute towards the social and cultural wellbeing of local people, providing access to live performance and the arts. We also support the potential for additional arts and cultural facilities being identified and supported within the town centre. Such uses help activate town centres, maintain footfall and activity including outside of traditional retail hours, and support other businesses.	Support noted.

## Economy

Ref. No.	Page No. / Para. No. / Policy No.	Name	Comment	Response
S/E/1	p. 134 para. 11.2	Wiltshire Council Strategic Planning	<p>Correction: the paragraph incorrectly states, <i>'that housing development has been prioritised over economic development'</i>.</p> <p>A shortage of land for employment development also applied to a shortage of land for housing development during a period when dwelling completions fell to less than 30 a year in 2012. This was remedied by the adoption of the Chippenham Site Allocations Plan that proposed two sites for a mix of uses including a total of 23ha of land for employment development.</p>	This phrase has been deleted and wording amended to still reflect that development on employment land has not kept pace with development on housing land in Chippenham in recent decades leading to high levels of commuting from the town. Paragraph also expanded to refer to changing working practices as a result of COVID-19 pandemic

## Policy E1 - Circular Economy

Ref. No.	Page No. / Para. No. / Policy No.	Name	Comment	Response
S/E1/1	p. 138 Policy E1	Future Chippenham	This issue is addressed in the emerging Framework Masterplan and the Future Chippenham programme therefore supports the creation of a circular economy.	Support noted.
S/E1/2	p. 138 Policy E1	Wessex Water	A further aspect which could be considered by the policy is the reduction of single use plastic through the installation of a water refill point. More information can be found on our website <a href="https://www.wessexwater.co.uk/community/water-refill">https://www.wessexwater.co.uk/community/water-refill</a>	The Town Council has previously looked at installing water refill points in the town centre. However, because of their modern, bright appearance it was considered difficult to find a location which would be sensitive to the character and appearance of Chippenham Conservation Area and the setting of listed buildings.
S/E1/3	p. 138 Policy E1	Friends of Monkton Park	Circular economy is clearly a very desirable objective, but cannot be sensibly promoted in a Neighbourhood like this without addressing circular economy for the farmland around the town - which could include encouraging agro-ecological methods and regenerating natural systems but also encouraging the use of locally produced food. This Policy needs revision to include these opportunities.	<p>Paragraph 11.16 expanded to refer to circular economy practices in farming, recognising that there is farmland within the Neighbourhood Area.</p> <p>Reference to support for development proposals which seek to create circular economy benefits for 'agricultural' processes added to first paragraph of Policy E1</p>

**Policy E2 - Business Incubator Units**

Ref. No.	Page No. / Para. No. / Policy No.	Name	Comment	Response
S/E2/1	p. 138 Policy E1  p. 141 Policy E2	Wiltshire Council Strategic Planning	Consider evidence provided by the Local Economic Partnership and commissioned by Wiltshire Council, notably an Employment Land Review ( <a href="#">link here</a> ).	The Wiltshire Employment Land Review has already been reviewed and is already referenced in Paragraph 11.20.
S/E2/2	p. 141 Policy E2		Policy E2 in seeking to require business incubator units on all allocated sites and influence at reserved matters stage could be too prescriptive and undermine delivery of allocations in the Local Plan.	Text of first paragraph amended to ensure that business incubator units are required to be built on the wider allocated employment land but are not required to be built as part of a single reserved matters submission for example. Outline permission alone will not guarantee that business incubator units are delivered on employment land, as masterplans are indicative only and the needs/demands of the market can change in the time period between an outline and reserved matters submission.
S/E2/3	p. 141 Policy E2	Future Chippenham	The Future Chippenham programme support this policy; reference to Business Incubator units has been included in the draft Vision Document for the Framework Masterplan stating that business incubator units could be provided within the mixed-use local centre.	Support noted.

## Developer Contributions

Ref. No.	Page No. / Para. No. / Policy No.	Name	Comment	Response
S/DC/1	p. 142-143 Paras. 12.6-12.7 Developer Contributions	Wiltshire Council Strategic Planning	<p>The expectations about developer contributions would benefit from review to ensure they are reasonable.</p> <p>Wiltshire Council has a set process for prioritising the use of its Community Infrastructure Levy (CIL) Strategic Fund, which already identifies funding for specific projects at Chippenham. However, the Town Council can direct their own neighbourhood proportion of CIL to new infrastructure.</p>	<p>The Steering Group have reviewed the list of potential developer contributions and consider this to be reasonable and in line with policies in the Neighbourhood Plan as revised. Notwithstanding, 4th bullet point amended to make clear that it is not expected that developer contributions/CIL would completely pay for the development of Bath Road Car Park/Bridge Centre site. 8th bullet point deleted regarding highway improvements for people with reduced mobility or who require support from dogs in line with revisions made to Policy T4.</p> <p>The 'set process' for getting projects on to Wiltshire Council's Infrastructure Funding Statement is not readily transparent, but the Town Council would be keen to work with Wiltshire Council to get some, if not all, of the infrastructure requirements bulleted in Section 12 incorporated into this Statement. These are projects that are likely to be of a scale which the Town Council would not be able to finance under their much smaller proportion of CIL. However, the Town Council would likely consider making contributions out of their CIL pot to any of these projects. PPG recommends that Town Councils should work closely with the charging authority to agree on infrastructure spending priorities. The Town Council accordingly hopes that Wiltshire Council will work positively with the spending priorities outlined in the Neighbourhood Plan, which will become part of the Development Plan for Wiltshire.</p>
S/DC/2	p. 142-143 Developer Contributions	Barratt David Wilson South West	<p>As with many of the proposed policies, BDW support the principle of ensuring that contributions towards the impacts of development are captured and used to support Chippenham's sustainable future. The list in paragraph 12.6 of the eCNP is noted and in some cases, there is evidence that could align with CIL Regulation 122 to support specific requirements. That said, there are some aspects which appear less well supported as a direct requirement of new development. It is suggested therefore that the Town Council review and prepare an evidence base to support CIL compliance.</p>	<p>Each of the items listed at Paragraph 12.6 has come from the relevant policy sections of the Neighbourhood Plan, where an explanation of why developer contributions are required has been provided in the supporting text and/or reference has been made to any such contributions needing to meet the tests of CIL Regulation 122. It would be unduly onerous on the Town Council to produce any further evidence, particularly as developer contributions are negotiated on a site by site, case by case basis. In any event, PPG makes it clear that parishes can spend their funds on a wider range of things than can the LPA.</p>

## Final Comments

Ref. No.	Name	Comment	Response
S/FC/1	BoKlok	BoKlok (Skanska & IKEA) modular home builders are seeking to partner with Summix on land to the North of Rawlings Green. We would very much like to present to CNP and discuss how we can bring forward a housing proposal for modular, energy efficient homes in line with the key policies within the CNP.	The Neighbourhood Plan is not allocating any housing sites. However, the Town Council's Planning, Environment and Transport Committee would welcome any pre-application presentation, so that Ward Councillors can appraise the Applicant of any local issues and ensure there is proper engagement.
S/FC/2	Friends of Monkton Park	<p>FARMING - Lack of attention to the farmland around the town would be a huge error and lost opportunity. Whilst not directly involved in many planning applications, this farmland has the potential to shape and be shaped by the Chippenham community. The focus only on the town, which is prominent from the start in the Executive Summary, undermines the claim in the same summary, for this to be a 'green plan'. This is the opportunity to see this land for what it is – the vital farmland neighbour of urban Chippenham. There are many imaginative and entirely realistic opportunities for the future of this area for sustainable farming, with strong connections to the local communities. This draft is otherwise a remarkable achievement with much to be supported but this omission is serious for the future of the Neighbourhood and cannot be endorsed. As this seems not to have been properly considered, I hope it will be helpful to include here a full quotation on the agro-ecology / local consumption case: agroecology:</p> <p>“So instead of the conventional, monoculture-based industrial approach which relies on external inputs, we need to develop sustainable, regenerative farming systems that improve the well-being of small-scale farmers, create diversity to make food production resilient to a changing and unpredictable climate, and produce sufficient food whilst enhancing biodiversity. Instead of marginalising sustainable local food producers, we need to put sustainable local food at the centre of our food supply, with small-scale producers feeding local communities, rather than being squeezed by industrial-scale global supply chains. Agroecological farming is needed to preserve natural resources. This includes recycling nutrients and energy on the farm, rather than using external inputs; integrating crop and livestock farming; diversifying species (and therefore genetic resources); and focusing on the ways in which crops and livestock can mutually benefit each other, rather than on individual species. By using organic matter and improving the soil, farmers can promote better plant growth. This is an agro-ecology knowledge-intensive system, but the knowledge is developed by the farmer through understanding local conditions and experimenting. Re-connecting farmers and consumers is important to help building vibrant local food economies. The aim is to support local producers, processors and retailers, and build links between consumers, local farmers and local food businesses. This means creating decentralized short supply chains, diversified markets based on solidarity and fair prices, and closer links between producers and consumers locally. Consumers should be able to purchase ecologically-produced food from small-scale producers. Short distance distribution models are also an important aspect for the closure of nutrient cycles, a basic need in agro-ecological farming practices. To return plant nutrients back into the loop, back to the soil, on the right spot, in the right composition and in the right amounts, is a complex issue. This complexity increases significantly over distance, so agroecology promotes closed production loop and minimised external inputs. In this way local food economies answer the basic need for plant nutrients in agroecological farming practices.” (From the ARC 2020 web site <a href="https://www.arc2020.eu/agroecology/briefing-note-agroecology/">https://www.arc2020.eu/agroecology/briefing-note-agroecology/</a> ) Much more evidence can be supplied on request. Please reconsider and revise the Draft on this issue.</p>	Support for the Plan is noted. The Neighbourhood Plan can only guide development that requires planning permission, and the majority of agro-ecological processes are likely not to require planning permission. Notwithstanding, where relevant and possible to do so, the Steering Group have made changes to the Plan to better recognise the intrinsic nature of farmland, the agricultural economy to the town and agro-ecological processes - please refer to Ref. Nos. S/V/4, S/GI3/12, S/GI4/9 and S/E1/3 for specific changes.
S/FC/3		The NP is a considerable achievement and those who worked on it are to be congratulated. FOMP do have two further concerns about the draft. First and perhaps most important we are very concerned about the wording of paragraph 8.26 eg "both the local community and Wiltshire Council consider that it represents a missed opportunity, which the town centre turns its back on". We feel sure that this was not the intention of the authors but this could in some more hostile future be taken as support for extending the built environment of the Town Centre into the park. Especially when taken together with one of two other bits of loose wording already identified. We strongly recommend some rewording of 8.26, for example adding to 'missed opportunity' something like 'for better connection of the park with the town centre, and more and better use of while strictly maintaining its special character'	Support for the Plan is noted.  Paragraph 8.26 has been amended in line with the comment, with reference to better connection of the River and Park with the town centre and reference to preserving and enhancing the special character of the River Green Corridor.
S/FC/4		Second the park is of such importance to the town that we missed a section that brings together the town's future commitments to it, which are currently rather dispersed across the hundreds of pages and Appendices. This could no doubt be done alongside similar commitments to John Coles.	There are no plans for future development, which require planning permission in either Monkton Park or John Coles Park. Policies GI2, GI3 and TC2 are clear on the retention of the River-Green Corridor which includes Monkton Park (please refer to Ref. No. P/TC2/10). The day to day management of Monkton Park is covered by the Town Council's Monkton Park Management Plan and is a land management issue, rather than a planning issue.



S/FC/5	Gallagher Developments	<p>Please see our enclosed covering letter.</p> <p>Whilst we are in support of the Chippenham Neighbourhood Plan, we consider that there are a number of areas where the draft Plan does not meet the basic conditions. It is important to address these now to progress the Neighbourhood Plan towards adoption, but also to avoid the Neighbourhood Plan becoming out of date when the Wiltshire Local Plan Review is adopted.</p> <p>We are in support of policies to address and respond to climate change, but the draft Plan needs to be supported by robust evidence to demonstrate the policies are deliverable if they are to deviate from national policy and technical standards.</p> <p>It is also important that policies protecting green buffers do not come into conflict with draft strategic policies which will facilitate much needed growth in the town.</p> <p>In terms of affordable housing and housing mix policy, it is crucial that the evidence is properly set out to support the deviation from the existing housing evidence. Again, given the forthcoming Local Plan Review, it may be better to ensure these matters are left to the strategic plan to avoid the Neighbourhood Plan becoming out of date.</p> <p>We would welcome the opportunity to discuss these matters further and would be grateful if you could give consideration to our comments.</p>	<p>The enclosed covering letter has been reviewed. The Neighbourhood Plan has been modified such that the Steering Group considers it does meet the basic conditions. Policies which respond to climate change, green buffers and housing mix have been amended following comments received and additional evidence provided where necessary.</p>
S/FC/6	Summix	<p>Summix and BoKlok (Skanska &amp; IKEA) working in partnership to provide modular home development will address some of the key Zero Carbon initiatives that the CNP seeks to promote. BoKlok would like to support the promotion of land of the North of Rawlings Green and fully supports the representations made by Summix in relation to the green buffers, as explained in the attached submissions. Summix and BoKlok would very much like to work with CNP to include for some form of green buffer, but one that allow Summix / BoKlok to encapsulate an exemplar scheme of sustainable, modular homes for local people.</p>	<p>The Steering Group have reviewed the different comments received on Policy GI5 (Green Buffers) and have significantly amended this Policy in light of these comments, the policy now referring to a relatively small single green buffer located immediately to the north of the allocated Rawlings Green housing site. Please refer to response to Ref. No. S/GI5/9 for further details of these changes.</p>
S/FC/7	Hallam Land Management	<p>We trust that these comments are helpful and will be taken into consideration through the progression and preparation of a <u>robust and sound Neighbourhood Plan</u>.</p>	<p>The comments have been helpful and the Neighbourhood Plan has been amended accordingly in light of <u>these, and other comments, received</u>.</p>
S/FC/8	Chippenham Youth Council	<p>We are pleased to see a Draft Chippenham Neighbourhood Plan that carefully considers the needs of young people in the area in addition to bringing sustainability, so fundamental to future generations, to the heart of policies. We would be grateful to be <u>kept informed of any updates to the Plan</u>.</p>	<p>Support noted.</p>
S/FC/9	Wiltshire Council Strategic Planning	<p>The draft document and supporting texts assume a degree of implied understanding of technical language – the documents would benefit from a glossary to ensure the reader is clear of the meaning and terms used in the document.</p>	<p>The Steering Group discussed whether to include a glossary but on reviewing the Plan and simplifying some of the language, together with the fact that explanatory boxes have been used throughout the document to define more technical terms/concepts, a separate glossary was not necessary.</p>