

Strategic Environmental Assessment for the Chippenham Neighbourhood Plan

Environmental Report to accompany the Submission
Neighbourhood Plan

Chippenham Town Council

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Quality information

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Non-Technical Summary

Introduction

AECOM is commissioned to lead on Strategic Environmental Assessment (SEA) in support of the emerging Chippenham Neighbourhood Plan (CNP).

SEA is a mechanism for considering and communicating the likely effects of an emerging plan, and alternatives, with a view to avoiding and mitigating negative effects and maximising positive effects. The CNP has been screened in by Wiltshire Council as requiring a full SEA process.

The CNP is being prepared by the Town Council in the context of the Wiltshire Local Plan (adopted 2015), and with regard to the emerging Local Plan Review (2021). Once 'made' the CNP will have material weight when deciding on planning applications, alongside the Wiltshire Local Plan.

The Neighbourhood Plan is at an advanced stage of preparation, with this SEA Environmental Report, accompanying the Submission version of the Neighbourhood Plan.

Structure of the Environmental Report

SEA reporting essentially involves answering the following questions in turn:

1. What has plan-making / SEA involved up to this point?
- including in relation to 'reasonable alternatives'.
2. What are the SEA findings at this stage?
- i.e. in relation to the Submission plan.
3. What happens next?

Each of these questions is answered in turn within a discrete 'part' of the Environmental Report and summarised within this Non-Technical Summary (NTS). However, firstly there is a need to set the scene further by answering the questions 'What is the Plan seeking to achieve?' and 'What's the scope of the SEA?'

What is the Plan seeking to achieve?

The CNP has produced the following vision statement:

Chippenham will capitalise on its history, location and beautiful surrounding countryside to maintain itself as an attractive and vibrant, riverside Market Town in which to live, work and for people to visit. Its future growth will be appropriate in scale, of high quality design, be environmentally sustainable and planned so as to mitigate the causes, and be adapted to the impacts of climate change.

This is supported by seven topic areas; each underpinned by a number of objectives (see Chapter 2).

What is the scope of the SEA?

The scope of the SEA is reflected in a list of themes, objectives, and assessment questions, which, taken together indicate the parameters of the SEA and provide a methodological ‘framework’ for assessment. A summary framework is presented overleaf, and a full framework which includes assessment questions is provided within Appendix B of the main Environmental Report.

SEA theme	SEA objective
Air quality	Improve air quality in the Neighbourhood Area and minimise and/ or mitigate all sources of environmental pollution.
Biodiversity and geodiversity	Protect and enhance all biodiversity
Climate change and flood risk	Reduce the contribution to climate change made by activities within the Neighbourhood Area. Support the resilience of the Neighbourhood Area to the potential effects of climate change, including flooding.
Community wellbeing	Ensure growth in the Neighbourhood Area is aligned with the needs of all residents and capacity of the settlement and social infrastructure, improving accessibility, anticipating future needs and specialist requirements, and supporting cohesive and inclusive communities.
Historic environment	To protect, conserve and enhance heritage assets within the Neighbourhood Area.
Land, soil, and water resources	Ensure the efficient and effective use of land use. Protect and enhance water quality and use and manage water resources in a sustainable manner.
Landscape	To protect and enhance the character and quality of the immediate and surrounding landscape.
Transportation and movement	Promote sustainable transport use and reduce the need to travel.

Plan-making / SEA up to this point

An important element of the required SEA process involves assessing ‘reasonable alternatives’ in time to inform development of the proposals, and then publishing information on reasonable alternatives for consultation alongside the proposals.

As such, Part 1 of the Environmental Report explains how work was undertaken to develop and assess a ‘reasonable’ range of alternative approaches for the CNP.

Specifically, Part 1 of the report –

- Chapter 5 – explains the process of establishing reasonable alternatives
- Chapter 6 – presents the outcomes of assessing reasonable alternatives
- Chapter 7 – explains reasons for establishing preferred options, in light of the assessment.

Establishing the alternatives

The aim of Part 1 of the Environmental Report is to explain work undertaken to develop and assess reasonable alternatives. Given that the CNP does not allocate land for housing development within the Plan area, it was considered appropriate for reasonable alternatives to focus on planning issues and considerations raised through SEA screening.

In light of Wiltshire Council's conclusions to screening (see Chapter 5 of the main Environmental Report), the SEA process has undertaken appraisals of a series of high-level approaches and alternatives (hereafter referred to as 'options') which are currently being considered for Policy TC1 (Bath Road/ Bridge Centre), Policy TC2 (River Green Corridor Masterplan) and Policy TC3 (Public Realm Improvements to Upper Market Place) as part of plan development. This is for the benefit of plan-makers tasked with selecting preferred policy approaches for the CNP and to highlight to consultees the relative sustainability merits of the different approaches that can be taken relating to the key contentious elements of the Plan.

Policies TC4 (Development within Chippenham Conservation Area) and TC5 (Buildings of Local Merit) do not allocate land for development. Both policies are seen to be positive in their implementation, and hence unlikely to have the potential to lead to negative effects of significance. This is further evidenced through Historic England's response to screening (Chapter 5) which does not comment on either policy TC4 or TC5. As such these policies are not considered through the reasonable alternatives.

The options established for Policies TC1 – TC3 are set out below:

Options for Policy TC1 Bath Road/ Bridge Car Park Site

- **Option 1:** Demolition of No. 13 The Bridge. Allow built development up to 4 storeys in height in Zone 1, up to 3 storeys in Zone 2, and up to 2 storeys in Zone 3.
- **Option 2:** Demolition of No. 13 The Bridge, allow built development of 2-4 storeys in height in Zone 1, 2-3 storeys in Zone 2, and up to 2 storeys in Zone 3.
- **Option 3:** Do not demolish No. 13 The Bridge. Allow built development of 1-2 storeys in height in Zone 1, 1-2 storeys in Zone 2, and up to 1 storey in Zone 3.
- **Option 4:** Do not demolish No. 13 The Bridge. Do not permit built development across the site. Instead set out support for use as open space.

Options for Policy TC2 River Green Corridor Masterplan

- **Option 1:** Demolition of No. 1 High Street and redevelopment of a 2-3 storey high quality landmark building with active street and river frontages.
- **Option 2:** Demolition of No. 1 High Street and redevelopment of a 1-2 storey high quality landmark building with active street and river frontages.
- **Option 3:** Do not demolish No. 1 High Street.

A second set of options have been established for Policy TC2 to consider the effects of redeveloping Emery Gate Shopping Centre. This reflects Regulation 14 consultation responses received:

- **Option 1:** Redevelop Emery Gate Shopping Centre.
- **Option 2:** Do not redevelop Emery Gate Shopping Centre.

Options for Policy TC3 Public Realm Improvements to Upper Market Place

- **Option 1:** Policy TC3
- **Option 2:** Do not implement policy TC3

Assessing the alternatives

As identified above, four sets of options have been established which focus on CNP town centre policies TC1 – TC3. All options were subject to a comparative assessment against the SEA framework of objectives. Numbers are used to highlight the option or options that are preferred from an SEA perspective with 1 performing the best. The findings of which are presented in Chapter 6 of the main Environmental Report. Summary findings are presented in the tables below.

Table NTS.1: Assessment of options for Policy TC1

SEA theme		Option 1	Option 2	Option 3	Option 4
Air quality	Likely significant effect	No	No	No	No
	Rank	=	=	=	=
Biodiversity	Likely significant effect	No	No	No	No
	Rank	4	3	2	1
Climate change	Likely significant effect	No	No	No	No
	Rank	=	=	=	=
Landscape	Likely significant effect	No	No	No	No
	Rank	4	3	2	1
Historic environment	Likely significant effect	No	No	No	No
	Rank	3	2	1	1
Land, soil and water resources	Likely significant effect	No	No	No	No
	Rank	1	2	3	4
Community wellbeing	Likely significant effect	No	No	No	No
	Rank	2	1	3	4
Transportation	Likely significant effect	No	No	No	No
	Rank	2	2	1	1

Table NTS.2: Assessment of options for Policy TC2 (a)

SEA theme		Option 1	Option 2	Option 3
Air quality	Likely significant effect	No	No	No
	Rank	1	1	2
Biodiversity	Likely significant effect	No	No	No
	Rank	1	1	2
Climate change	Likely significant effect	No	No	No
	Rank	1	1	2
Landscape	Likely significant effect	No	No	No
	Rank	1	2	3
Historic environment	Likely significant effect	No	No	No
	Rank	1	2	3
Land, soil and water resources	Likely significant effect	No	No	No
	Rank	1	2	3
Community wellbeing	Likely significant effect	No	No	No
	Rank	1	2	3
Transportation	Likely significant effect	No	No	No
	Rank	1	1	2

Table NTS.3: Assessment of options for Policy TC2 (b)

SEA theme		Option 1	Option 2
Air quality	Likely significant effect	No	No
	Rank	1	2
Biodiversity	Likely significant effect	No	No
	Rank	1	2
Climate change	Likely significant effect	No	No
	Rank	1	2
Landscape	Likely significant effect	No	No
	Rank	1	2
Historic environment	Likely significant effect	No	No
	Rank	1	2
Land, soil and water resources	Likely significant effect	No	No
	Rank	1	2
Community wellbeing	Likely significant effect	No	No
	Rank	1	2
Transportation	Likely significant effect	No	No
	Rank	1	2

Table NTS.4: Assessment of options for Policy TC3

SEA theme		Option 1	Option 2
Air quality	Likely significant effect	No	No
	Rank	1	2
Biodiversity	Likely significant effect	No	No
	Rank	1	2
Climate change	Likely significant effect	No	No
	Rank	1	2
Landscape	Likely significant effect	No	No
	Rank	1	1
Historic environment	Likely significant effect	No	No
	Rank	1	2
Land, soil and water resources	Likely significant effect	No	No
	Rank	=	=
Community wellbeing	Likely significant effect	No	No
	Rank	1	2
Transportation	Likely significant effect	No	No
	Rank	1	2

Developing the preferred approach

Chippenham Town Council have set out the following reasons for selection and rejection of reasonable alternative options assessed through the SEA.

Policy TC1

Option 1 is rejected on the basis that the wording ‘up to’, when referring to building storey heights, could allow for single storey development to be built along the frontage to Bath Road (Zone 2) and at the Bridge Centre (Zone 1). The Town Council consider 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.

Option 2 is selected as the preferred approach for Policy TC1. The Town Council explain that this is because it requires ‘at least’ two storey development to be built along the frontage to Bath Road (Zone 2) and at the Bridge Centre Site (Zone 1) 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.

Alternatively, a third storey could be incorporated in roof space to further reduce overall building height.

The Town Council explain that 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 for the reasons give above relating to floor to ceiling height differences. 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. Notwithstanding, the Town Council have inserted text 'and not to exceed the height of the tallest neighbouring building' into the Submission Version of CNP Policy TC1 in order to ensure that any new building in this location is not taller than its neighbours.

Option 3 is rejected as it could allow for single storey development to be built along the frontage to Bath Road (Zone 2) and at the Bridge Centre (Zone 1). The Town Council consider 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. The retention, rather than demolition, of No. 13 The Bridge would represent a missed opportunity to increase the permeability of the site to pedestrians and cyclists from New Road and better reveal the culvert as a natural, place-making feature running through the site.

Option 4 is rejected 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.

Policy TC2

Option 1 is selected as the preferred approach for Policy TC2 because the SEA found it performed similarly to Option 2. The Town Council considers that a replacement building for No. 1 High Street of 2-3 storeys in height in this location would not appear out of keeping with existing historic buildings along the High Street (some of which are also three storeys in height), particularly given the lower floor to ceiling heights of historic buildings when compared to modern buildings and the possibility of including a third storey in roofspace. An attractive 3 storey hotel building previously occupied this site for many years until it was demolished and redeveloped as an unattractive 2 storey building in the Post-War period (along with the wider redevelopment of the riverside). A 3 storey building here would better define the landmark nature of the site location (gateway to the High Street, fronting the River Avon) as the former 3 storey building successfully did.

Option 2 is rejected as it performs similarly to Option 1, but the potential for a single storey replacement building for No. 1 High Street in this location would be out of keeping with building heights along the High Street. It would also expose the blank gable wall of No. 2 which would have a negative impact on the streetscene and appearance of Chippenham Conservation Area.

Option 3 is rejected as the worst performing option as it would not support sustainable growth/ regeneration in accordance with wider Neighbourhood Plan objectives.

Supplementary Option 1 (with redevelopment of Emery Gate Shopping Centre) is the preferred approach because it is the best performing option against all SEA themes.

Supplementary Option 2 (without redevelopment of Emery Gate Shopping Centre) is rejected because it is the worst performing option against all SEA themes.

Policy TC3

Option 1 is the preferred approach to Policy TC3 because it performs more positively against SEA themes than Option 2 overall

Option 2 is rejected because it performs less positively against SEA themes than Option 1 overall.

Appraisal of the Pre-Submission CNP

In February 2023 AECOM assessed the draft Pre-Submission Regulation 14 Neighbourhood Plan, providing the following recommendations:

1. It is noted that Policy GI1 requires development proposals to 'Provide a Biodiversity Net Gain (BNG) of 10% within the Neighbourhood Plan area.' This is likely to lead to neutral effects, aligning with the mandatory minimum requirement (i.e. the baseline) set through the Environment Act (2021) to achieve at least a 10% biodiversity net gain increase from the pre-development biodiversity value. It is considered that there is the potential for draft CNP Policy GI1 to exceed national requirement; for example if it were to support new development where it delivered in excess of 10% net gain. This would have the potential to deliver positive effects overall.
2. The draft CNP sets out a list of general design principles which should be used to inform a future masterplan for the Bath Road Car Park/Bridge Centre Site. This includes respecting the setting of listed buildings and requiring that 'new buildings introduce a finer urban grain to the site to reflect that of the historic town centre and Chippenham Conservation Area.' However, it is recognised that these general design principles currently fall within the supporting policy text, and it is therefore recommended that they be moved into the main policy text to give them greater weight given the concerns raised around the historic environment.

Following Regulation 14 consultation, the Town Council updated the draft Neighbourhood Plan in response to the recommendations proposed through the SEA, alongside comments received (April 2023) from the local community and other interested parties.

Assessment findings at this stage

Part 2 of the Environmental Report presents appraisal findings and recommendations in relation to the current 'Submission' version of the CNP. The following conclusions and recommendations have been made:

Conclusions

The CNP does not allocate any sites for housing development; and is therefore unlikely to have any significant negative effects on SEA topics.

The assessment has concluded that the current version of the CNP is likely to lead to **significant positive effects** in relation to the community wellbeing SEA topic. This largely relates to the Neighbourhood Plan's focus on enhancing the quality of life of residents through regenerating the town centre and protecting and enhancing open space and green infrastructure networks, to support a thriving, attractive market town.

Minor positive effects are predicted in relation to the majority of SEA themes. This includes air quality, biodiversity, climate change, land, soil and water resources, landscape, and transport. Minor positive effects reflect the policies in place to help mitigate and adapt to the effects of climate change and flood risk in the area; the emphasis placed on safeguarding, maintaining, and enhancing biodiversity, natural resources, and the high quality landscape; and the focus on facilitating balanced transport provision (i.e. pedestrian and cycle linkages) in the area; and reducing levels of congestion, which will in turn improve air quality.

Neutral effects are concluded in relation to the historic environment SEA theme. 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 existing built form. It is however considered that setting a reduced building height for development within Zone 1 (Policy TC1) would better align with the town, including designated assets.

Overall, it is broadly considered that regeneration of key locations within the town centre to deliver high quality development that is appropriately designed will likely provide benefits for the historic environment. While Policy TC1 supports development up to four storeys in height (Zone 1 only), supporting evidence (namely Topic Papers) provided by the Council, alongside design guidance and policy requirements, seek to ensure adverse effects on existing built form are avoided.

Neutral effects are therefore concluded at this stage. It is however considered that setting a reduced height for the Bath Road Car Park/ Bridge Centre 'Zone 1' would better align with the town, including designated assets.

Next steps

Part 3 of this Environmental Report explains the next steps that will be taken as part of plan-making and SEA.

Plan finalisation

The CNP and Environmental Report are being submitted to the Local Planning Authority, Wiltshire Council, for Independent Examination. If the Independent Examination is favourable, the CNP will be subject to a referendum, organised by Wiltshire Council. If more than 50% of those who vote agree with the CNP, then it will be 'made'. Once made, the CNP will become part of the development plan for the neighbourhood area.

Introduction

1. Introduction

- 1.1 AECOM has been commissioned to undertake an independent Strategic Environmental Assessment (SEA) in support of the emerging Chippenham Neighbourhood Development Plan (CNP).
- 1.2 The CNP is currently being prepared as a Neighbourhood Development Plan under the Localism Act 2011 and the Neighbourhood Planning (General) Regulations 2012. The CNP is being prepared in the context of the Wiltshire Local Plan (adopted 2015), and with regard to the emerging Local Plan Review (2021).
- 1.3 SEA is a mechanism for considering and communicating the likely effects of an emerging plan, and alternatives, with a view to avoiding and mitigating negative effects and maximising positive effects. SEA of the CNP is a legal requirement.

SEA explained

- 1.4 It is a requirement that SEA is undertaken in line with the procedures prescribed by the Environmental Assessment of Plans and Programmes Regulations 2004.
- 1.5 In-line with the Regulations, a report (known as the Environmental Report) must be published for consultation alongside the Submission plan that 'identifies, describes and evaluates' the likely significant effects of implementing 'the plan, and reasonable alternatives'.¹ The report must then be considered, alongside consultation responses, when finalising the plan.
- 1.6 More specifically, the Report must answer the following three questions:
 1. What has plan-making / SEA involved up to this point?
 - including in relation to 'reasonable alternatives'.
 2. What are the SEA findings at this stage?
 - i.e., in relation to the Submission plan.
 3. What happens next?

This Environmental Report

- 1.7 This Environmental Report is published alongside the 'pre-submission' version of the CNP, under Regulation 14 of the Neighbourhood Planning Regulations (2012, as amended).
- 1.8 This report essentially answers questions 1, 2 and 3 in turn, to provide the required information. Each question is answered within a discrete 'part' of the report.
- 1.9 However, before answering Q1, two initial questions are answered to further set the scene; what is the plan seeking to achieve? And what is the scope of the SEA?

¹ Regulation 12(2) of the Environmental Assessment of Plans and Programmes Regulations 2004.

2. What is the CNP seeking to achieve?

Introduction

- 2.1 This section considers the strategic planning policy context provided by the Wiltshire Local Plan, and then presents the vision and objectives of the CNP.
- 2.2 **Figure 2.1** below presents the neighbourhood area.

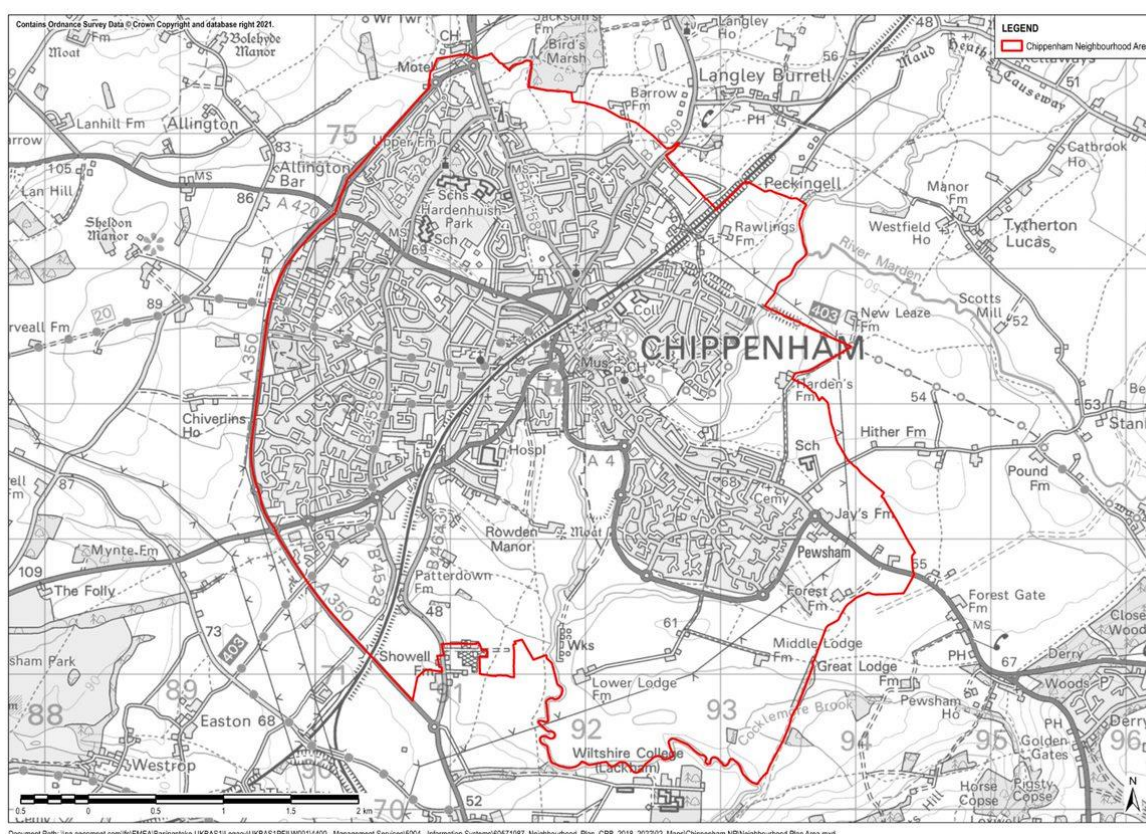


Figure 2.1 Chippenham Neighbourhood Area

Strategic Planning context

- 2.3 As set out above, the CNP is being prepared in the context of the Wiltshire Local Plan, which sets out a framework for how future development across Wiltshire will be planned and delivered in the period to 2026.
- 2.4 The Wiltshire Local Plan comprises the Wiltshire Core Strategy (2015), the Chippenham Site Allocations Plan (CSAP) (2017), and the Wiltshire Mineral and Waste Plans.² The Local Plan together with adopted Neighbourhood Development Plans³ forms the Development Plan for Wiltshire.

Wiltshire Core Strategy

- 2.5 Policy 1 of the WCS (2015) sets out a settlement hierarchy for Wiltshire, designating four tiers of settlements subject to differing strategic approaches for future development. These are: Principal Settlements, Market Towns, Local

² Wiltshire Council (2022) 'Minerals and Waste' can be accessed [here](#).

³ Wiltshire Council (2022) 'Made plans' can be accessed [here](#).

Service Centres, and Large and Small Villages. In the context of the neighbourhood area, Chippenham is designated as a 'Principal Settlement', which are defined as: 'strategically important centres and the primary focus for development. This will safeguard and enhance their strategic roles as employment and service centres. They will provide significant levels of jobs and homes, together with supporting community facilities and infrastructure, meeting their economic potential in the most sustainable way to support better self-containment as a strategic employment location'.

- 2.6 Core Policies 9 and 10 set out the strategy for the Chippenham Area. Core Policy 9 (Chippenham Central Areas of Opportunity) focuses on Chippenham's role as a strategic employment location, setting out support for the redevelopment of Bath Road Car Park/Bridge Centre Site to form a retail extension, and redevelopment of Langley Park to deliver a mixed-use site.
- 2.7 Core Policy 10 (Spatial Strategy for the Chippenham Community Area) sets out the current strategy for growth 2006-2026, identifying a requirement for 4,510 homes and 26.5 hectares of employment land.
- 2.8 The Chippenham Site Allocations Plan (2017) fulfilled Core Strategy Policy 10, providing for at least 4,510 new homes to be delivered by 2026.⁴

Wiltshire Local Plan Review

- 2.9 The Wiltshire Core Strategy (and saved policies from district local plans), which form a substantive part of the development plan, are under review. The Local Plan review will set out a positive vision for the future of Wiltshire for the period to 2038 and a framework for addressing housing needs and other economic, social, and environmental priorities.
- 2.10 To date consultation has included Regulation 18 Issues and Options consultation (Autumn 2017) and two further informal consultations (Autumn 2018 and 2019).
- 2.11 Following Cabinet approval on 1 December 2020, Wiltshire Council held a further consultation on the Local Plan Review between 13 January 2021 and 9 March 2021. The consultation was not on a draft Local Plan but on key components to inform one, including proposals for the scale and distribution of housing and employment growth across Wiltshire.
- 2.12 The planning for Chippenham document sets out information including:⁵
- Proposed scale of growth (2016 to 2036).
 - Place shaping priorities to guide development (these play a central role in developing planning policies and proposals for development at each place).
 - Potential development sites - the justification for these is set out in an accompanying 'Site Selection Report'.
 - Settlement profiles on important services and infrastructure that will need to be taken into consideration when planning for the future of the town.

³ Wiltshire Council (2022) 'Chippenham Site Allocations Plan' can be accessed [here](#).

⁵ Wiltshire Council (2022) 'Wiltshire Local Plan Review consultation' can be accessed [here](#).

- 2.13 In terms of scale of growth for Chippenham, the strategy proposed a requirement of 9,225 homes for the plan period 2016-2038. From this total estimate of need over the plan period, homes already built and those already in the pipeline can be deducted. When the number of homes built and in the pipeline is deducted it leaves a further 5,100 homes to be accommodated up until 2036. However it is recognised that there is a level of uncertainty in terms of how many dwellings will be proposed for Chippenham in the forthcoming Regulation 19 version of the Local Plan.
- 2.14 Separate to the housing numbers set out, Wiltshire Council also identify a 'brownfield target' for 2021-2031. An additional 240 dwellings are included as an estimated amount of development that would come forward in the first part of the plan period.
- 2.15 Whilst the Neighbourhood Plan cannot influence strategic housing numbers, where it is determined that new housing is required for Chippenham, it intends to influence the housing mix, and set the standard to which the new dwellings are built in terms of design and sustainability.

CNP vision and objectives

- 2.16 The overall **vision** for Chippenham, as established through the CNP, is set out below:

CHIPPENHAM IDENTITY

Chippenham will capitalise on its history, location and beautiful surrounding countryside to maintain itself as an attractive and vibrant, riverside Market Town in which to live, work and for people to visit. Its future growth will be appropriate in scale, of high quality design, be environmentally sustainable and planned so as to mitigate the causes and be adapted to the impacts of climate change.

Objectives:

- 1. Promote and enhance the special character of Chippenham as a historic, riverside, Market Town by ensuring that all new development is sustainable and of the highest quality design.*
 - 2. Ensure the town's excellent transport links and easy access to surrounding countryside are maintained and enhanced.*
 - 3. Establish a green buffer to protect the town's identity by preventing coalescence with surrounding settlements.*
 - 4. Promote carbon neutral development and ensure that future development is resilient with respect to climate change.*
- 2.17 Six topic areas became apparent from the Pre-Vision Survey results, with a 'golden thread' of sustainability and climate change mitigation running through all topic areas. **Objectives** established for each topic area are set out below:

Green infrastructure

- Protect, enhance and extend the 'River-Green Corridor' as a focal point for the town, establishing green links to it from existing parks/green spaces, and connecting surrounding new development to it via green infrastructure.

- Identify a linked set of green spaces that allow people and fauna to travel freely between the town and surrounding countryside.
- Protect and enhance important green spaces, by formally designating them as Local Green Spaces.
- Establish a regime for new and replacement tree planting where development is proposed.
- Protect and enhance biodiversity.
- Ensure that green space for public recreational use is incorporated into new housing development and linked to existing and proposed green corridors where possible.

Housing

- Ensure that housing growth is sustainable and supported only where key infrastructure is built first – including social, transport and green infrastructure.
- Ensure that new housing development contains the right type and mix of housing, including affordable and market housing to meet the identified needs of the whole community.
- Secure a high quality of design for new housing development, using a design code for specific areas of the town, and encouraging self-build, use of local materials and innovative housing design.
- Ensure that all new housing development is carbon neutral.

Town centre

- Develop the Bath Road Car Park/Bridge Centre Site as an extension of the town centre, for mixed-use development which may include leisure, shopping, residential and/or public car parking.
- Preserve and enhance the special historic character of the town centre by ensuring that new development, including advertising and shopfronts, is sympathetically and sensitively designed, and enhances the significance of heritage assets.
- Support the market as a focus for the town, providing a key visitor attraction and a source of local produce.
- Identify sites within the town centre which could be developed/enhanced to increase the attractiveness of the public realm.
- Facilitate the flexible use of town centre buildings to increase footfall, increase independent traders, and allow businesses to adapt to changing shopping habits and expectations.
- Identify sites or buildings that could be developed or used for community or leisure purposes.
- Increase the vibrancy of the town centre by strengthening the evening economy and encouraging new residential development where this does not affect the long term vitality or viability of the town centre as a shopping destination.

- Make the town centre a more pedestrian-friendly environment.

Transport

- Improve current walking and cycling networks and infrastructure throughout the town and into the surrounding countryside.
- Incorporate sustainable infrastructure for car users into new development and in public places.
- Promote sustainable transport by improving infrastructure and making modal shift easier in favour of public transport, walking and cycling.
- Reduce through traffic in Town.

Community infrastructure

- Protect or enhance existing facilities, or create new top class facilities, for sporting and recreational opportunities.
- Encourage the community to come together by providing a range of indoor and outdoor meeting places and event spaces.
- Resist the loss of existing community uses and buildings.
- Promote a strong sense of community that is diverse and inclusive.
- Protect or enhance existing facilities, or create new facilities, for young people.

Economy

- Promote and encourage new businesses to locate in the town and provide diversified employment opportunities for the local population.
- Ensure local employment sites are connected to the town via sustainable transport modes.
- Work with key local and regional economic stakeholders to ensure support and infrastructure for businesses e.g. LEP, Chamber of Commerce.
- Promote and enhance existing employment sites and protect them from loss to housing or retail uses.

3. What is the scope of the SEA?

Introduction

- 3.1 The aim here is to introduce the reader to the scope of the SEA, i.e., the sustainability themes and objectives that should be a focus of the assessment of the plan and reasonable alternatives. Further information is presented in Appendix B.

Consultation

- 3.2 The SEA Regulations require that ‘when deciding on the scope and level of detail of the information that must be included in the report, the responsible authority shall consult the consultation bodies’. In England, the consultation bodies are the Environment Agency, Historic England and Natural England. As such, these authorities were consulted earlier this year (August 2022). Scoping responses are detailed in Appendix B.

The SEA framework

- 3.3 The SEA scope is summarised in a list of themes and objectives, known as the SEA framework. The full SEA framework as broadly agreed earlier in 2022 is provided in Appendix B and Table 3.1 below presents a summary version.

Table 3.1 Summary SEA framework

SEA theme	SEA objective
Air quality	Improve air quality in the Neighbourhood Plan area and minimise and/ or mitigate all sources of environmental pollution.
Biodiversity	Protect and enhance all biodiversity.
Climate change (including flood risk)	Reduce the contribution to climate change made by activities within the CNP area. Support the resilience of the Neighbourhood Plan to the potential effects of climate change, including flooding.
Community wellbeing	Ensure growth in the Neighbourhood Plan area is aligned with the needs of all residents, improving accessibility, anticipating future needs and specialist requirements, and supporting cohesive and inclusive communities.
Historic environment	Protect, conserve and enhance heritage assets within the CNP area.
Land, soil, and water resources	Ensure the efficient and effective use of land. Protect and enhance water quality and use and manage water resources in a sustainable manner.
Landscape	To protect and enhance the character and quality of the immediate and surrounding landscape.
Transportation and movement	Promote sustainable transport use and reduce the need to travel.

Part 1: What has plan-making / SEA involved to this point?

4. Introduction (to Part 1)

Overview

- 4.1 The aim of this part of the report is to explain work undertaken to develop and assess reasonable alternatives. Whilst work on the CNP has been underway for some time, the aim here is not to provide a comprehensive explanation of work to date, but rather to discuss the evolution of the CNP in association with the SEA process. More specifically, this part of the report presents information on the consideration given to reasonable alternative approaches to particular issues of central importance to the plan.

What is the focus of the reasonable alternatives?

- 4.2 The SEA Regulations are not prescriptive as to what constitutes a reasonable alternative, stating only that the Environmental Report should present an appraisal of the ‘plan and reasonable alternatives considering the objectives and geographical scope of the plan’. As in many cases, Chippenham Town Council are limited in terms of potential alternatives that can be considered for the CNP, which must be in general conformity with and support the strategic development needs set out in the adopted Local Plan (2015), and with regard to the emerging Local Plan Review (2021).
- 4.3 As discussed within Chapter 2, anticipated future housing growth in Chippenham will be determined by the Local Plan Review and be of a strategic scale outside the remit of the Neighbourhood Plan. The decision has therefore been taken to develop and assess reasonable alternatives in relation to Chippenham town centre. This is on the basis that options for redevelopment in the town centre are known to be matters of key interest amongst local residents and stakeholders, and also reflects Wiltshire Council’s SEA screening decision that the potential for significant effects on the historic environment within the town centre could not be ruled out. National Planning Practice Guidance is clear that SEA should focus on matters likely to give rise to significant effects.
- 4.4 In accordance with the SEA Regulations the Environmental Report must include:
- An outline of the reasons for selecting the alternatives dealt with; and
 - The likely significant effects on the environment associated with alternatives/ an outline of the reasons for selecting the preferred approach in light of the alternatives appraised.

Structure of this part of the report

- 4.5 This part of the report is structured as follows:
- Chapter 5 – explains the process of establishing reasonable alternatives
 - Chapter 6 – presents the outcomes of assessing reasonable alternatives
 - Chapter 7 – explains reasons for establishing preferred options, in light of the assessment.

5. Establishing alternatives

Introduction

- 5.1 The aim here is to explain the process that led to the establishment of reasonable alternatives, and thereby present ‘an outline of the reasons for selecting the alternatives dealt with’.

Options to inform policy approaches within the Neighbourhood Plan

- 5.2 Given that the CNP does not allocate land for housing development within the Plan area, it was considered appropriate for reasonable alternatives to focus on planning issues and considerations raised through SEA screening. A screening request with draft CNP was submitted to Wiltshire Council (WC) in April 2021. One year later, in April 2022, Wiltshire Council (WC) issued a screening determination which considered that the draft Chippenham Neighbourhood Plan was likely to have significant environmental effects for the following reason:

‘Draft policies TC1 – TC5 are considered likely to have significant effects on heritage assets and this has been confirmed by a Wiltshire Council Senior Conservation Officer. This is on the basis that the draft document allocates resources at a local level which affect the built environment, including zones of development in Policy TC1, and enhancement objectives throughout the body of the text and appendices and annexes. The documents also specify materials and design in reference to measures to protect local character and appearance which will cause long term impacts on the local area. Thus, the culminative impacts of the documents will trigger the need for an SEA.’

- 5.3 Historic England’s (HE’s) initial response in June 2021 to WC’s screening supports the conclusion that the draft CNP has the potential to lead to significant effects. Specifically, *‘both policies TC1 and TC2 could well generate impacts on designated heritage assets capable of being deemed significant environmental effects in SEA terms, and perhaps even causing harm. The absence of evidence makes it difficult to demonstrate to an adequate degree that such impacts are unlikely.’*
- 5.4 Furthermore, *‘policy TC3 proposes specific enhancement interventions to the Upper Market Place Public Realm. These too may have potential to generate impacts on designated heritage assets, but we have not commented on this as much if not all of what is proposed is perhaps unlikely to require explicit statutory consent for its delivery.’*
- 5.5 In September 2021, WC provided HE with further evidence, namely two topic papers prepared by the Town Council to support Policies TC1 and TC2 within the emerging Neighbourhood Plan (topic papers can be viewed as appendices to the draft CNP). HE reviewed these two papers and came to the following conclusions in October 2021:
- 5.6 *“These are impressive documents in terms of the scope and depth of their coverage, including consideration of relevant heritage issues and assets. Taking the documents as read there appears to be an informed and logical*

narrative which identifies relevant heritage matters, their significance, and how the proposals within each policy represent a suitable response to their respective historic contexts.

- 5.7 *The conclusions reached are of course based on judgement and this relies on sufficient heritage expertise to ensure correct conclusions are reached. Without knowing the composition of the topic groups and being able to be reassured as to their heritage 'bona fides' it is difficult, especially without local knowledge, to then confirm the veracity of the conclusions in question from a remote (ie our) perspective.*
- 5.8 *That is not to necessarily dispute the topic papers and if confirmed as being 'sound' from a heritage perspective we would be happy to agree that a full SEA for the Plan is not required.*
- 5.9 *This means that the best arbiter in this matter is likely to be your conservation team colleagues, to whose view we would be happy to defer.*
- 5.10 *So in summary, I can state that we have no objection to the view that a full SEA is not required, subject to the suitability of the policies in question and their heritage evidence base being confirmed by the Council's conservation team or other appropriate source of heritage expertise.'*
- 5.11 Despite HE's subsequent view that a full SEA was not required WC's view remained, as per the SEA screening determination (at para 5.2 above), that the draft CNP is likely to have significant environmental effects and accordingly a SEA is required.
- 5.12 In light of the above, the SEA process has undertaken appraisals of a series of high-level approaches and alternatives (hereafter referred to as 'options') which are currently being considered for draft Policy TC1 (Bath Road/ Bridge Centre), Policy TC2 (River Green Corridor Masterplan) and Policy TC3 (Public Realm Improvements to Upper Market Place) as part of plan development. This is for the benefit of plan-makers tasked with selecting preferred policy approaches for the CNP and to highlight to consultees the relative sustainability merits of the different approaches that can be taken relating to the key contentious elements of the Plan.
- 5.13 Draft policies TC4 (Development within Chippenham Conservation Area) and TC5 (Buildings of Local Merit) do not allocate land for development. Both policies are seen to be positive in their implementation, and hence unlikely to have the potential to lead to negative effects of significance. This is further evidenced through HE's response to screening which does not comment on either policy TC4 or TC5. As such these policies are not considered through the reasonable alternatives.
- 5.14 A description of the options for draft policies TC1 – TC3 (i.e., the reasons for selecting the alternatives dealt with) is provided below.

Options for Policy TC1: Bath Road/ Bridge Centre Site

5.15 The Bath Road Car Park (Figure 5.1 - centre) and Bridge Centre (Figure 5.1 - left) site represent a key regeneration opportunity for the town. The CNP seeks to develop the Bath Road Car Park/Bridge Centre Site as an extension of the town centre, for mixed-use development which may include leisure, shopping, residential and/or public car parking.



Figure 5.1 Bath Road Car Park & Bridge Centre

5.16 Currently in the ownership of Wiltshire Council (WC), the site has been the subject of several development proposals during the last three decades which have failed to come to fruition due to a combination of factors including the need to alter the gyratory system which divides the site, the impact of recent recessions, and the impact of out of town shopping trends - all of which have affected the financial viability of development. However, WC recently commissioned a Market Assessment of the site, which concluded that a mixed-use scheme, as an extension to the town centre, and which amalgamates the two sites, could be commercially viable.⁶

5.17 Policy TC1 seeks to ensure that the development of this key site is realised, and meets the aspirations of the Chippenham community, including the delivery of:

- a) High quality development befitting of the town centre location.
- b) Viable uses and buildings which meet current and future market trends.
- c) Buildings, uses and public realm that reflects the wishes of the community.
- d) Connectivity to the rest of the town centre; and
- e) Benefits to the historic environment, namely Chippenham Conservation Area, and listed buildings located on or adjacent to the site.

⁶ Market Assessment: Bridge Centre, Bath Road, Chippenham, Cushman & Wakefield, 2019

- 5.18 Policy TC1 is therefore supported by a detailed masterplan endorsed by the community which sets out a high quality, mixed-use alternative scheme for the site.
- 5.19 The focus of reasonable alternatives relates to the potential for significant negative effects on the historic environment. Specifically, the site is located within Chippenham Conservation Area. The Grade II Listed Bank House is located on the Bath Road Car Park section of the site, whilst located opposite the site, on the south side of Bath Road, is the Grade II Listed Avonbridge House. There are several Grade II Listed properties which adjoin the northern boundary of the site and front onto Foghamshire. The Grade I Listed Ivy House and West Wing, and Grade II* Listed Ivy Longhouse and Stables are located opposite the site to the south west and set within extensive treed grounds.
- 5.20 Key contentious issues in relation to Policy TC1 therefore include demolishing No. 13 The Bridge (Figure 5.2 above), and buildings heights within identified development zones (Figure 5.2). This reflects concerns raised by HE and WC (above).
- 5.21 The following options have therefore been considered through the SEA:
- **Option 1:** Demolition of No. 13 The Bridge. Allow built development up to 4 storeys in height in Zone 1, up to 3 storeys in Zone 2, and up to 2 storeys in Zone 3.
 - **Option 2:** Demolition of No. 13 The Bridge, allow built development of 2-4 storeys in height in Zone 1, 2-3 storeys in Zone 2, and up to 2 storeys in Zone 3.
 - **Option 3:** Do not demolish No. 13 The Bridge. Allow built development of 1-2 storeys in height in Zone 1, 1-2 storeys in Zone 2, and up to 1 storey in Zone 3.
 - **Option 4:** Do not demolish No. 13 The Bridge. Do not permit built development across the site. Instead set out support for use as open space.
- 5.22 **Figure 5.2** below identifies the masterplan area, including the distinguished Zones and the location of No. 13 The Bridge.

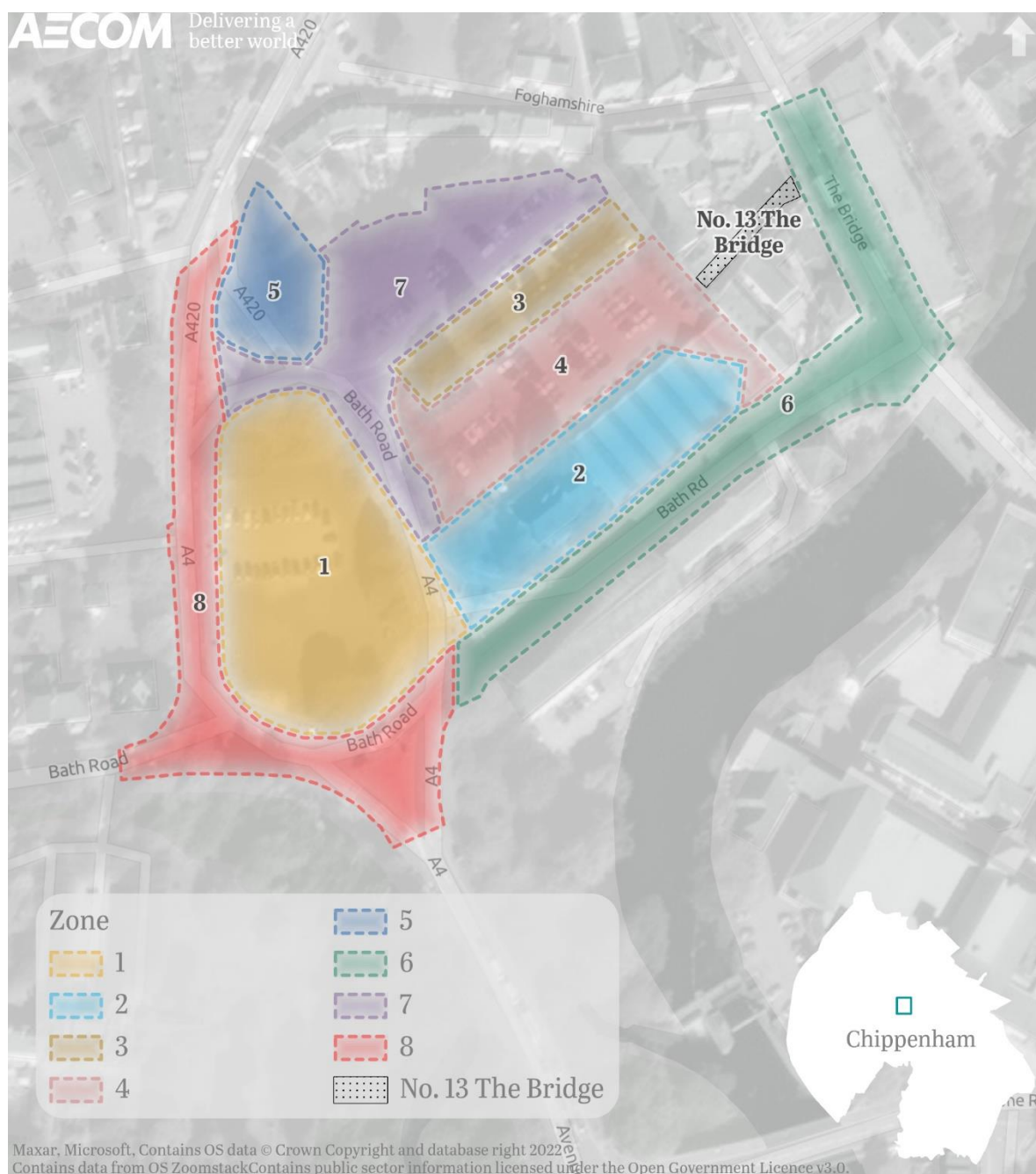


Figure 5.2 Policy TC1 – Reasonable alternative options parameters map

Options for Policy TC2: River-Green Corridor Masterplan

5.23 The River Avon frontage (Figure 5.3) is one of the largest river frontages in the country in comparison to Chippenham's size. The Neighbourhood Plan Pre-Vision Survey results demonstrate that the local community values the River Avon and Monkton Park as an asset to Chippenham, and it is used for events such as the town's carnival and the Folk Festival. However, both the local community and Wiltshire Council consider that it represents a missed opportunity, which the town centre turns its back on. The community considers it a high priority that the river is best utilised as a place-making feature in the future development of the town.



Figure 5.3 River Avon within Chippenham Town Centre

- 5.24 The masterplan area covered by Neighbourhood Plan Policy TC2 essentially relates to the area of the River Avon which runs through the town centre, and this is wholly located within Chippenham Conservation Area. There are a number of statutorily listed buildings, all Grade II Listed, located within the masterplan area. The River Avon is identified as a Local Wildlife Site and National Cycle Route 403 runs parallel to the River through Monkton Park.
- 5.25 Various proposals have been put forward in the past to transform the River Corridor but have not been delivered. The most recent led to the 2014 Chippenham Central Area Masterplan, which set out masterplans for the town with the River as a key component identified for enhancement and improvement in places. However due to resourcing issues, the masterplan was never formally adopted as a Development Plan document.
- 5.26 The CNP seeks to present a modified version of the 2014 masterplan, underpinned by Policy TC2. Policy TC2 aligns with the objectives of the CNP for this area by supporting the enhancement of the River Avon Corridor for leisure and recreation uses in an environmentally sensitive manner. Furthermore the policy supports the development of the Corridor as an attractive cycle/pedestrian route connecting the town centre with the wider green infrastructure network, while conserving and enhancing its role as a wildlife corridor.
- 5.27 Key contentious issues in relation to the policy include demolishing No. 1 The High Street, buildings heights, and the redevelopment of Emery Gate Shopping Centre. This reflects concerns raised by HE and WC (above).
- 5.28 The following options have therefore been considered through the SEA:
- **Option 1:** Demolition of No. 1 High Street and redevelopment of a 2-3 storey high quality landmark building with active street and river frontages.
 - **Option 2:** Demolition of No. 1 High Street and redevelopment of a 1-2 storey high quality landmark building with active street and river frontages.
 - **Option 3:** Do not demolish No. 1 High Street.

5.29 A second set of options have been established for Policy TC2 to consider the effects of redeveloping Emery Gate Shopping Centre. This reflects Regulation 14 consultation responses received:

- **Option 1:** Redevelop Emery Gate Shopping Centre.
- **Option 2:** Do not redevelop Emery Gate Shopping Centre.

5.30 Option 1 seeks to redeliver commercial space within Emery Gate Shopping Centre, maintaining the space as one of the town's prime shopping areas.

5.31 **Figure 5.4** below broadly shows the masterplan area, identifying the location of No. 1 High Street and Emery Gate Shopping Centre.

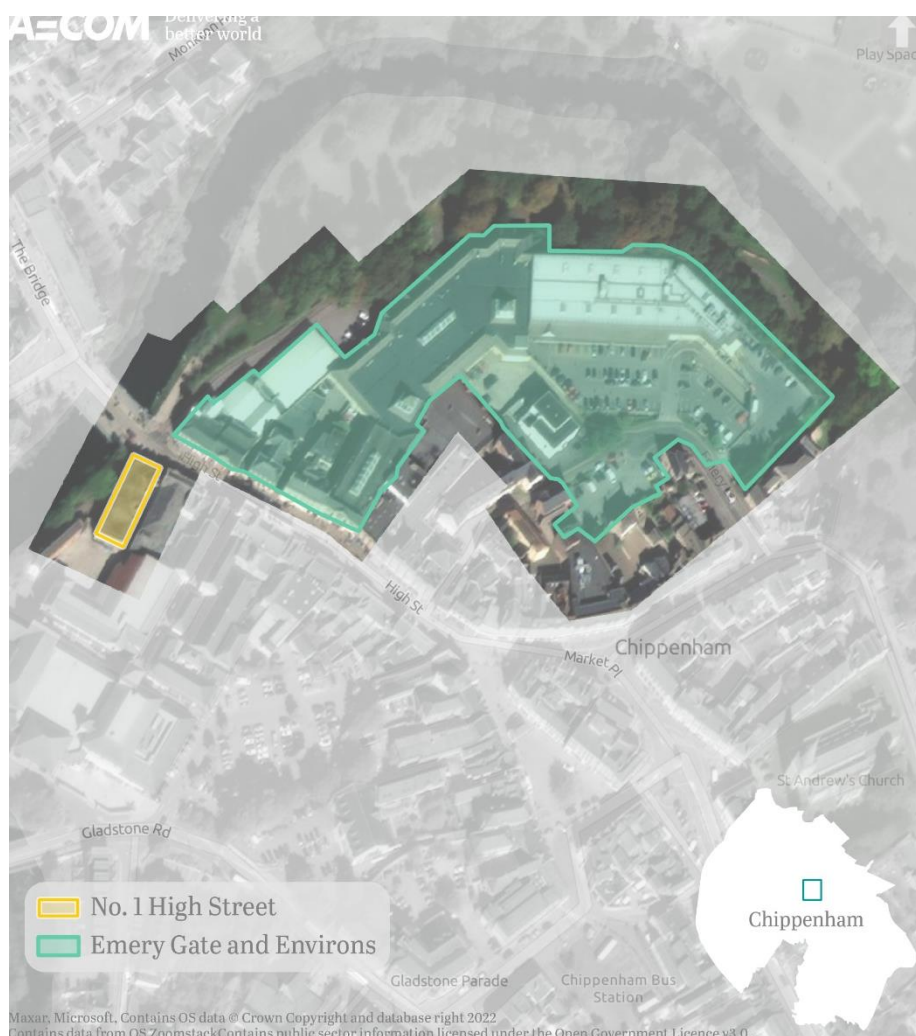


Figure 5.4 Policy TC2 – Reasonable alternative options parameters map

Options for Policy TC3: Public Realm Improvements to Upper Market Place

5.32 The Market Place is the historic core of Chippenham, adjacent to the parish church of St. Andrew and the site of the Saxon town. The area once formed a single large open space and there was a market here from 1320 onwards. Encroachment of buildings over the centuries effectively divided up the Market Place into two distinct spaces: the Lower Market Place - the area around the

restored Buttercross; and the Upper Market Place - the area around the War Memorial, which is the largest space in the Market Place.



Figure 5.5 Upper Market Place

- 5.33 The Chippenham Conservation Area Management Plan SPG specifically refers to enhancement proposals for the Upper Market Place area.⁷ To further develop upon these proposals, an indicative parameters plan has been developed, alongside Policy TC3, to guide future development in the Upper Market Place area and demonstrate how public realm could be delivered in a realistic, affordable and flexible way.
- 5.34 It is considered that the delivery of public realm improvements (removal of access, relocation of parking, etc.) in this sensitive location should be considered through the SEA. This reflects the response provided by HE to WC's screening of the draft CNP (see above).
- 5.35 As such, reasonable alternatives for policy TC3 reflect implementation of Policy TC3 vs 2) a 'no policy' option. This would essentially see a 'do nothing' approach, likely leading to piecemeal public realm improvements.
- 5.36 The following options have therefore been considered through the SEA:
- **Option 1:** Policy TC3
 - **Option 2:** Do not implement policy TC3

⁷ Chippenham Conservation Area Management Plan, Wiltshire Council, 2010

6. Assessment of reasonable alternatives

- 6.1 As identified above, four sets of options have been established which focus on CNP town centre policies TC1 – TC3. All options were subject to a comparative assessment against the SEA framework of objectives; the findings of which are presented in this section.

Methodology

- 6.2 For each of the options, the assessment examines likely significant effects on the baseline, drawing on the sustainability objectives identified through scoping (see **Table 3.1**) as a methodological framework.
- 6.3 Every effort is made to predict effects accurately; however, where there is a need to rely on assumptions in order to reach a conclusion on a 'significant effect' this is made explicit in the appraisal text.
- 6.4 Where it is not possible to predict likely significant effects based on reasonable assumptions, efforts are made to comment on the relative merits of the alternatives in more general terms and to indicate **a rank of preference**. This is helpful, as it enables a distinction to be made between the alternatives even where it is not possible to distinguish between them in terms of 'significant effects'. Numbers are used to highlight the option or options that are preferred from an SEA perspective with 1 performing the best.
- 6.5 Finally, it is important to note that effects are predicted considering the criteria presented within Regulations.⁸ So, for example, account is taken of the duration, frequency and reversibility of effects.

⁸ Schedule 1 of the Environmental Assessment of Plans and Programmes Regulations 2004.

Policy TC1: Bath Road/ Bridge Centre Site

Option 1: Demolition of No. 13 The Bridge. Allow built development up to 4 storeys in height in Zone 1, up to 3 storeys in Zone 2, and up to 2 storeys in Zone 3.

Option 2: Demolition of No. 13 The Bridge, allow built development of 2-4 storeys in height in Zone 1, 2-3 storeys in Zone 2, and up to 2 storeys in Zone 3.

Option 3: Do not demolish No. 13 The Bridge. Allow built development of 1-2 storeys in height in Zone 1, 1-2 storeys in Zone 2, and up to 1 storey in Zone 3.

Option 4: Do not demolish No. 13 The Bridge. Do not permit built development across the site. Instead set out support for use as open space.

Table 6.1: Assessment of options for Policy TC1

SEA theme		Option 1	Option 2	Option 3	Option 4
Air quality	Likely significant effect	No	No	No	No
	Rank	=	=	=	=
Biodiversity	Likely significant effect	No	No	No	No
	Rank	4	3	2	1
Climate change	Likely significant effect	No	No	No	No
	Rank	=	=	=	=
Landscape	Likely significant effect	No	No	No	No
	Rank	4	3	2	1
Historic environment	Likely significant effect	No	No	No	No
	Rank	3	2	1	1
Land, soil and water resources	Likely significant effect	No	No	No	No
	Rank	1	2	3	4
Community wellbeing	Likely significant effect	No	No	No	No
	Rank	2	1	3	4
Transportation	Likely significant effect	No	No	No	No
	Rank	2	2	1	1

Commentary:

The Bath Road Car Park/ Bridge Centre Site represents a key regeneration opportunity for the town. Demolishing No. 13 The Bridge and the delivery of new development up to four storeys in height in Zones 1-3 is unlikely to lead to any significant effects or differences in relation to many of the SEA

SEA theme	Option 1	Option 2	Option 3	Option 4
themes, including air quality, biodiversity, climate change (higher storeys are not being delivered in a flood risk zone), land, soil and water resources, and community wellbeing.				
<p>However, by placing higher density development in the Bath Road/ Bridge Centre site, it is considered that Option 2, followed by 1 and then to a lesser extent Option 3, will deliver a mix of uses i.e. residential, community uses, E Class units, offices, hotel, restaurants, cafes, bars etc. to create greater footfall and linked trips to existing retail uses. Option 2 is considered to have the potential to deliver the highest density of development given that it does not allow for single storey development in Zones 2 and 3. Higher density development in this respect is likely to support the vitality of the town and encouraging sustainable economic growth. This is likely to lead to minor positive effects in relation to community wellbeing. Option 4 therefore performs least positively of the options in relation to community wellbeing, although the delivery of open space would support theme objectives to some extent. Increasing access to green infrastructure in the town centre and delivering an attractive town centre location would support community cohesion and increase footfall/ visitor numbers.</p> <p>If No. 13 The Bridge is demolished under Options 1 and 2 this could have minor temporary negative effect on biodiversity as a result of disturbance to species/ habitats. However effects are likely to be negligible in this respect given the urban nature of this part of the site, and subsequent absence of sensitive receptors. Otherwise, increased storey heights (Option 2 followed by Option 1, then 3) in the masterplan area could impact upon ancient, veteran and mature trees or hedgerows present, with the potential for minor negative effects. This could be an indirect impact on views and setting through the delivery of taller buildings, or a direct impact where trees or branches could be lost through construction. Option 4 is therefore best performing in relation to the biodiversity theme, with the delivery of open space likely to best support green infrastructure connectivity and amenity value of the town centre.</p> <p>The delivery of new open space under Option 4 is also considered likely to support minor long-term positive effects in relation to climate change, natural resources, landscape and historic environment. Notably new open space would benefit the historic environment and landscape by supporting the integration of green infrastructure as a positive element of the urban environment. However, redevelopment of Zones 1-3 would arguably be a more efficient use of brownfield land. Option 2 followed by Option 1, and subsequently Option 3, therefore perform more positively than Option 4 in relation to land, soil and water resources.</p> <p>In terms of transport, it is recognised that the town's parking requirement will need to be assessed to progress redevelopment of the site. Specifically, traffic modelling would need to inform any site masterplan. As such, effects are broadly uncertain at this stage. However, where Options include the demolition of No. 13 The Bridge (Options 3 and 4), it is considered that this will allow improved permeability and access for pedestrians and cyclists. This is likely to include a new link through the site between Ivy Lane and The Bridge/ New Road. Options 3 and 4 therefore perform more positively than Options 1 and 2 in terms of supporting active travel uptake and reducing the need to travel.</p> <p>The main differences between options are drawn in relation to the historic environment and landscape. In being specific as to the scale (height) of new development (Option 1, 2 and 3), consideration must be given to the potential adverse impact upon setting and intrinsic qualities of historic designations present. All three 'Zones' within the masterplan area fall within the Chippenham Conservation Area, and there is a Grade II Listed Building within Zone 2. Specifically in terms of No. 13 The Bridge, this building falls within Chippenham Conservation Area, and there are five Grade II listed buildings within 50m of the site along the Foghamshire, The Bridge and Bath Road. It is recognised that the demolition of 13 The Bridge and built development of up to four storeys (Option 1 and 2) have the potential to adversely impact upon these features; their setting and character.</p> <p>Both the Chippenham Conservation Area Appraisal (2007) and Chippenham Conservation Area Management Plan SPG (2010) concluded that there were many negative aspects of the townscape resulting from Bath Road Car Park and Bridge Centre sites. The former identified this as an 'enhancement site', whilst the latter went further and advised production of a design brief for the site. This brief set out support for 'creating a more urban street character' and 'active frontages of suitable scale to Bath Road.' The Townscape Analysis Map in the Conservation Area Appraisal (2007) notes 13 The Bridge as having 'poor townscape merit', 'poor shopfront' and 'poor quality frontage' It is therefore considered that Option 1, 2 and 3 have the potential to perform positively in relation to the landscape and historic environment, as regenerating the site with built development, demolition of</p>				

SEA theme	Option 1	Option 2	Option 3	Option 4
<p>the existing 'market shed' building and demolition of 13 The Bridge (under Options 1 and 2) can ensure high quality design and placemaking. Given that built form will be delivered in accordance with local and higher level policy provisions (including design principals/ design guide) these options are likely to deliver positive effects. This includes through improved access and understanding of the special qualities and urban character of the Bath Road site, including its historic core.</p> <p>In terms of differentiating between Options 1, 2 and 3 (i.e. higher vs lower storey heights in different zones), it is considered that two storey building heights throughout the masterplan area would best align with the existing built form within the town, including designated assets (i.e. the Conservation Area and associated Listed Buildings). It is considered that allowing built development up to 4 storeys in height in Zone 1 (Option 1 and Option 2) has the potential to dominate/ suppress existing assets, given that building heights would exceed the heights of existing assets. However, it is recognised that the Town Council have confirmed the following assumptions, which could reduce the potential for adverse effects:</p> <ul style="list-style-type: none"> a) floor to ceiling heights would be lower in any new building when compared to existing historic buildings so no. of storeys is not a fair comparison to make between buildings b) existing buildings fronting Bath Road/Ivy Lane are already sited on raised ground at approx. one storey higher than ground level of Zone 1; and c) any new building in Zone 1 would be of a detached/standalone nature not immediately seen in the context of nearby buildings. <p>Additionally it is recognised that there are mature trees within and around Zone 1, which could be used to soften the visual impact of any new building. There are numerous examples of recent well designed four storey (three storey plus roof space) buildings in and around the town centre, for example Bowles Court.</p> <p>Taking the above into consideration, it is difficult to identify a best performing option. Proposals through Option 3 (single storey development in Zones 1 and 2) are considered too low, and proposals through Options 1 and 2 (3-4 storey development) are considered too high, to align with the existing scale of Bath Road. Option 1 is worst performing with Option 2 performing better than Option 1, given building heights in Zone 1 are limited to 2-4 storeys. Option 2 does not present an opportunity for lower building heights than would be in keeping with the existing built form of Zone 1. Negative effects in terms of exceeding two storey building heights in zone 1 are equally possible under Option 1 and 2.</p> <p>However it is recognised that all options also present the opportunity to improve the character and appearance of Chippenham Conservation Area and the setting of listed buildings in accordance with the Conservation Area Management Plan. Residual effects will nonetheless be dependent on detailed design and masterplanning.</p> <p>Option 4 arguably performs most positively in relation to historic environment and landscape SEA themes through delivering green infrastructure to improve the public realm and enhance the local area. However, this would not support regeneration and sustainable development of the town in accordance with wider Neighbourhood Plan objectives.</p> <p>Overall it is considered that Option 4 is worst performing as would not support sustainable growth/ regeneration. Option 1 and 2 perform similarly positively against the majority of SEA themes, with differentiating effects in relation to the historic environment relatively uncertain and dependant on detailed design and layout. However as Option 2 limits development to 2-4 storeys, Option 2 performs more positively than Option 1.</p> <p>Option 3 performs similarly to other options but is considered to perform less well than Options 1 and 2 overall. This is given that reduced storey heights in Zone 1 and 2 would not be in keeping with the existing built form, and would not support local economic growth to the same extent as other options.</p>				

Policy TC2: River-Green Corridor Masterplan

Option 1: Demolition of No. 1 High Street and redevelopment of a 2-3 storey high quality landmark building with active street and river frontages.

Option 2: Demolition of No. 1 High Street and redevelopment of a 1-2 storey high quality landmark building with active street and river frontages.

Option 3: Do not demolish No. 1 High Street.

Table 6.2: Assessment of options for Policy TC2 (a)

SEA theme		Option 1	Option 2	Option 3
Air quality	Likely significant effect	No	No	No
	Rank	1	1	2
Biodiversity	Likely significant effect	No	No	No
	Rank	1	1	2
Climate change	Likely significant effect	No	No	No
	Rank	1	1	2
Landscape	Likely significant effect	No	No	No
	Rank	1	2	3
Historic environment	Likely significant effect	No	No	No
	Rank	1	2	3
Land, soil and water resources	Likely significant effect	No	No	No
	Rank	1	2	3
Community wellbeing	Likely significant effect	No	No	No
	Rank	1	2	3
Transportation	Likely significant effect	No	No	No
	Rank	1	1	2

Commentary:

In recent years, the number of people visiting and the range of shops to be found in town centres has changed, there has been a related impact on the local historic character of town centre buildings, their range of uses and street patterns.⁹ Reduced footfall and increased vacancy rates in some areas has led to under-investment and a deterioration in the quality of the environment. Some high streets and town centres are subsequently in decline, and there is a need to redefine the high street's role and function at the centre of community activities.

No. 1 High Street is currently under retail use (as Superdrug store), in the vicinity of the River Avon, and there is vacant space to the side of the building. It is considered that its demolition (Option 1 and 2) would support the role of the town centre in taking a positive approach to its growth, management and adaptation. The demolition of No. 1 High Street is supported by members of the community in the Town Centre Topic Group, recognising that it is currently poor in terms of its architecture and context. The subsequent delivery of a high quality landmark replacement building with active street and river frontages is considered to support a stronger leisure/ retail offer, improving vibrancy and encouraging visitors to this part of the town. Options 1 and 2 therefore perform more positively than Option 3 in relation to community wellbeing, as Option 3 (essentially a 'do nothing' scenario) would likely see a continued decline in the quality of the town centre/ riverside

⁹ Historic England (2022) Historic Town Centres and High Streets <https://historicengland.org.uk/advice/planning/historic-towns-and-high-streets/>

SEA theme	Option 1	Option 2	Option 3
environment and visitor numbers. It is considered that the height of the landmark building is unlikely to significantly impact community wellbeing objectives. However for the purposes of differentiating between Options 1 and 2, Option 1 is considered best performing as 2 storeys is the predominant existing building height, with some 3 storey buildings also on this High Street frontage. As such Option 1 would be most in-keeping with the existing building heights and deliver a more attractive streetscape.			
The river-green corridor area, including the high street and wider town centre, is constrained by numerous designated historic assets, notably falling within Chippenham Conservation Area which includes a number of Grade II Listed buildings. However, the Chippenham Conservation Management Plan SPG highlights the negative contribution of features within the high street area to the Conservation Area, and the opportunity for redevelopment to positively impact the historic core of the town. Specifically, the demolition of No. 1 High Street (Options 1 and 2) is supported through the Chippenham Conservation Management Plan SPG. The SPG encourages 'a high quality building of more suitable height for its prominent location, and which addresses both the High Street and river frontage and removes the vacant space to the side of the current building'. The SPG further identifies as a priority, the need to 'provide active frontages onto the park from Emery Gate, and Wilkinson's to provide a stronger and more attractive link between the shopping centre and park'. Options 1 and 2 therefore perform positively in terms of delivering improvements to the vitality and historic character of the town. Option 3 is subsequently worst performing in this respect, as without regeneration could lead to the deterioration in the quality of the environment.			
In terms of land, soil and water resources, Options 1 and 2 perform positively through the positive use of land, maximising regeneration opportunities to deliver an improved urban environment. Option 3 is worst performing in this respect.			
Similarly, in relation to the landscape SEA theme, it is considered that demolishing No. 1 High Street (Option 1 and 2) could lead to positive effects, improving the local character and distinctiveness, particularly in relation to the riverside frontage. As above, Option 1 is considered best performing in relation to landscape objectives, as it is most in-keeping with the existing building heights and will support an attractive townscape setting. Option 3 would perform least positively overall.			
The River Avon is identified as a Local Wildlife Site. Given the brownfield nature of No. 1 High Street, it is considered that the demolition of the building and redevelopment of a 2-3 (Option 1) or 1-2 (Option 2) storey high quality landmark building with active street and river frontages, would likely deliver positive effects in relation to biodiversity, preserving the green character of the River Corridor. Active river frontages are likely to include a level of green infrastructure, which will support connectivity throughout the masterplan area including with the designated biodiversity site and Monkton Park. It is noted that Chippenham Town Council have produced a Monkton Park Management Plan, written in conjunction with Wiltshire Wildlife Trust. Biodiversity enhancements are set out within the Management Plan and will be introduced over the next five years. Therefore while there is a level of uncertainty at this stage, minor positive effects are likely through either Option 1 or 2. Similar conclusions are made in relation to climate change and air quality, recognising that improvements to the green infrastructure network can deliver a wide range of ecosystem services. Option 3 is worst performing in relation to these themes.			
Finally, in terms of transport, Options 1 and 2 would likely deliver positive effects through improving the attractiveness of the area, increasing footfall and in turn active/ sustainable travel uptake/ modal shift. Notably National Cycle Route 403 runs parallel to the River through Monkton Park and the site connects well to the train station.			
Overall it is considered that Option 3 is worst performing as would not support sustainable growth/ regeneration. Option 1 and 2 perform similarly, however Option 1 is best performing as would be most in-keeping with the existing building heights and deliver an attractive streetscape.			

Option 1: Redevelop Emery Gate Shopping Centre.
Option 2: Do not redevelop Emery Gate Shopping Centre.

Table 6.3: Assessment of options for Policy TC2 (b)

SEA theme		Option 1	Option 2
Air quality	Likely significant effect	No	No
	Rank	1	2
Biodiversity	Likely significant effect	No	No
	Rank	1	2
Climate change	Likely significant effect	No	No
	Rank	1	2
Landscape	Likely significant effect	No	No
	Rank	1	2
Historic environment	Likely significant effect	No	No
	Rank	1	2
Land, soil and water resources	Likely significant effect	No	No
	Rank	1	2
Community wellbeing	Likely significant effect	No	No
	Rank	1	2
Transportation	Likely significant effect	No	No
	Rank	1	2

Commentary:

The riverfront is a key asset for Chippenham as a market town. It is considered locally that Emery Gate Shopping Centre currently turns its back on the river and presents an ‘unattractive and lifeless frontage’. Its redevelopment (Option 1) would likely provide a stronger and more attractive link between the shopping centre and the river/ Monkton Park, with the potential for minor positive effects in relation to the majority of SEA themes.

Redevelopment of the site will likely include enhancements to the green infrastructure network. Improving connectivity between the site, the river/Monkton Park will deliver a wide range of ecosystem services, supporting climate change, air quality, and biodiversity objectives. Additionally, redevelopment of the site (Option 1) performs well in relation to land, soil and water objectives through making a positive use of the town’s brownfield land resource.

In terms of the historic environment and landscape objectives, redevelopment of the shopping centre (Option 1) performs most positively. While the shopping centre falls within the Conservation Area and in close proximity to Grade II Listed Buildings, as highlighted above the baseline condition of the site is poor. Notably, ‘providing active frontages onto the park from Emery Gate and Wilkinson’s to provide a stronger and more attractive link between the shopping centre and park’ is a priority listed in the Conservation Area Management Plan SPG. This is likely to be delivered through Option 1, with redevelopment required to be within the shopping centre’s existing curtilage, and with existing High Street facades retained. This is anticipated to lead to long term positive effects, providing a streetscape that is both more attractive and useable, that celebrates the town’s distinctive character. The delivery of Option 2 conversely would likely negatively impact upon the broad area in the longer term, through loss of character and declining historic elements.

Positive effects of greatest significance relate to the community wellbeing SEA theme. It is considered that redevelopment of Emery Gate shopping centre (Option 1) would complement any regeneration taking place at Bath Road/Bridge Centre site, connecting the main shopping areas within the town centre to support increased footfall and promote riverside activity. While specific details are currently unknown, any improvements to Emery Gate Shopping Centre through Option 1 will likely improve the shopper and visitor experience to Chippenham, supporting sustainable economic growth of the town.

In terms of accessibility and transport, it is noted that existing access into Emery Gate Shopping Centre via the Town Bridge creates a barrier between the High Street and Monkton Park/River Avon. Any future redevelopment of Emery Gate Shopping Centre is anticipated to remove the access and include uses which would support active travel uptake, improving the public realm and reducing the use of the private vehicle to access the site. Furthermore, the site is close to the train station and its regeneration would likely increase active travel uptake and utilisation of the train station, reducing private car use.

Option 1 therefore is best performing against all SEA themes.

Policy TC3: Public realm improvements to Upper Market Place

Option 1: Policy TC3.

Option 2: Do not implement policy TC3.

Table 6.4: Assessment of options for Policy TC3

SEA theme		Option 1	Option 2
Air quality	Likely significant effect	No	No
	Rank	1	2
Biodiversity	Likely significant effect	No	No
	Rank	1	2
Climate change	Likely significant effect	No	No
	Rank	1	2
Landscape	Likely significant effect	No	No
	Rank	1	1
Historic environment	Likely significant effect	No	No
	Rank	1	2
Land, soil and water resources	Likely significant effect	No	No
	Rank	=	=
Community wellbeing	Likely significant effect	No	No
	Rank	1	2
Transportation	Likely significant effect	No	No
	Rank	1	2

Commentary:

Policy TC3 (Option 1) seeks to guide future development in the Upper Market Place, addressing enhancement proposals referred to in the Chippenham Conservation Area Management Plan, and delivering shared spaces within a pedestrian friendly environment. Provisions set out include tree planting, art installation, and the delivery of other features to increase the attractiveness of the public realm and support community cohesion. The holistic approach proposed is anticipated to lead to long term positive effects in relation to community wellbeing, supporting an inclusive, sustainable town centre environment. Positive effects are also considered likely in relation to air quality, biodiversity, and climate change objectives; notably planting new trees in the square can deliver ecosystem services, providing shading and supporting a network of green infrastructure. This is further supported by soft landscaping which is to be provided specifically to increase biodiversity in the town centre.

Conversely, Option 2 would deliver a 'do-nothing' scenario, where the Upper Market Place would likely further deteriorate without a coordinated and holistic approach to intervention. This reflects the changing role of high streets discussed above.

In terms of the historic environment it is considered that public realm improvements proposed through Option 1 has the potential to negatively impact upon the historic core. However, Policy TC3 seeks to utilise assets present, delivering a new public square with the Grade II Listed War Memorial as its focal point. This is likely to lead to positive effects, improving access to and enjoyment/understanding of the historic environment, enhancing the town's special qualities. Option 1 will contribute positively towards creating and reinforcing a sense of place within the town and responding appropriately to the

historic/ local context. This is unlikely to be the case through Option 2, where any new proposals within the town centre are likely to be piecemeal, and less likely to be in keeping with, or improving, the appearance of the Upper Market Place. Option 2 misses the opportunity to deliver the benefits presented through a coordinated, holistic approach to development (Policy TC3, Option 1).

It is recognised that the Upper Market Place continues to remain a car dominated, peripheral area of the town centre. The Chippenham Conservation Area Management Plan SPG specifically identifies the need for any scheme within the area to 'reduce the negative impact of vehicles, move parking away from building frontages where possible, and rationalise highway infrastructure'. Option 1 therefore performs positively through providing 'a pedestrian friendly environment' that 'restores the visual connection between Lower and Upper Market Places'. This, alongside the 'realignment and relocation' of car parking spaces, will likely reduce car use within the Market Place, expanding upon traffic restrictions proposed along Lord's Lane. This is likely to improve both the existing pedestrian route and setting of Grade II* listed buildings present. It is further considered that these requirements will enhance the setting of the historic townscape and character, the Conservation Area and the fabric and setting of designated and non-designated features of historic significance. Notably this includes 'an improved setting for the Grade II* Listed St Andrews' Church'.¹⁰

Long term positive effects are therefore considered through Option 1 in relation to the historic environment and landscape, in addition to transportation, through the likely increase in active travel uptake and modal shift. Positive effects are further considered in relation to transport where Option 1 delivers improved cycle routes as part of a wider cycle loop, linking to wider cycle paths in the longer-term.

Conversely, not implementing policy TC3 (Option 2) would likely see a disjointed approach to improvements to the public realm, which could impact upon the special qualities of the Market Place and reduce opportunities to link active travel networks. Furthermore Option 2 would likely lead to a continued use of the private vehicle and reliance on limited parking within the town centre, negatively impacting upon sustainable transport objectives and accessibility.

In relation to population and community SEA theme it is considered that extending the town centre function to the south through Option 1 will likely benefit surrounding local businesses by increasing footfall. Investment in the public realm would likely help to ensure businesses remain viable and that this part of the town centre better connects into the High Street through a series of high quality public spaces.

Furthermore, it is considered that the public realm improvements proposed under Option 1 would support inward investment, improving the area's attractiveness to businesses and other town centre uses. This would further support economic growth of the town with the potential for long term positive effects.

Option 1 therefore performs more positively than Option 2 overall. Masterplanning proposed through Policy TC3 sets out a clear design vision and expectations for the high quality re-design of the public realm at the Upper Market Place. This seeks to support sustainable growth of the town centre, adopting a holistic approach to redevelopment of the space, that ensures connectivity and inclusivity for all. Furthermore, the policy ensures that historic assets are protected and enhanced in conformity with Core Policy 58 of the Wiltshire Core Strategy and the Chippenham Conservation Area Management Plan SPG. Additionally, the delivery of Policy TC3 aligns with Core Policies 60 and CP61 of the Wiltshire Core Strategy which supports rationalising car parking and making the Upper Market Place pedestrian and cycle friendly.

¹⁰ Wiltshire Council (2023) Wiltshire and Swindon Historic Environment Record [online] available at: <https://services.wiltshire.gov.uk/HistoryEnvRecord/Home/Index>

7. Establishing the preferred approach

- 7.1 Chippenham Town Council have set out the following reasons for selection and rejection of reasonable alternative options assessed through the SEA.

Policy TC1: Bath Road/ Bridge Centre Site

- 7.2 Option 1 is rejected on the basis that the wording 'up to', when referring to building storey heights, could allow for single storey development to be built along the frontage to Bath Road (Zone 2) and at the Bridge Centre (Zone 1). The Town Council consider 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.
- 7.3 Option 2 is selected as the preferred approach for Policy TC1. The Town Council explain that this is because it requires 'at least' two storey development to be built along the frontage to Bath Road (Zone 2) and at the Bridge Centre Site (Zone 1) 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. Alternatively, a third storey could be incorporated in roof space to further reduce overall building height.
- 7.4 The Town Council explain that 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 for the reasons give above relating to floor to ceiling height differences. 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. Notwithstanding, the Town Council have inserted text 'and not to exceed the height of the tallest neighbouring building' into the Submission Version of CNP Policy TC1 in order to ensure that any new building in this location is not taller than its neighbours.
- 7.5 Option 3 is rejected as it could allow for single storey development to be built along the frontage to Bath Road (Zone 2) and at the Bridge Centre (Zone 1). The Town Council consider 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. The retention, rather than demolition, of No. 13 The Bridge would represent a missed opportunity to increase the permeability of the site to pedestrians and

cyclists from New Road and better reveal the culvert as a natural, place-making feature running through the site.

- 7.6 Option 4 is rejected 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.

Policy TC2: River-Green Corridor Masterplan

- 7.7 Option 1 is selected as the preferred approach for Policy TC2 because the SEA found it performed similarly to Option 2. The Town Council considers that a replacement building for No. 1 High Street of 2-3 storeys in height in this location would not appear out of keeping with existing historic buildings along the High Street (some of which are also three storeys in height), particularly given the lower floor to ceiling heights of historic buildings when compared to modern buildings and the possibility of including a third storey in roofspace. An attractive 3 storey hotel building previously occupied this site for many years until it was demolished and redeveloped as an unattractive 2 storey building in the Post-War period (along with the wider redevelopment of the riverside). A 3 storey building here would better define the landmark nature of the site location (gateway to the High Street, fronting the River Avon) as the former 3 storey building successfully did.
- 7.8 Option 2 is rejected as it performs similarly to Option 1, but the potential for a single storey replacement building for No. 1 High Street in this location would be out of keeping with building heights along the High Street. It would also expose the blank gable wall of No. 2 which would have a negative impact on the streetscene and appearance of Chippenham Conservation Area.
- 7.9 Option 3 is rejected as the worst performing option as it would not support sustainable growth/ regeneration in accordance with wider Neighbourhood Plan objectives.
- 7.10 Supplementary Option 1 (with redevelopment of Emery Gate Shopping Centre) is the preferred approach because it is the best performing option against all SEA themes.
- 7.11 Supplementary Option 2 (without redevelopment of Emery Gate Shopping Centre) is rejected because it is the worst performing option against all SEA themes.

Policy TC3: Public realm improvements to Upper Market Place

- 7.12 Option 1 is the preferred approach to Policy TC3 because it performs more positively against SEA themes than Option 2 overall.
- 7.13 Option 2 is rejected because it performs less positively against SEA themes than Option 1 overall.

Appraisal of the Pre-Submission CNP

7.14 In February 2023 AECOM assessed the draft Pre-Submission Regulation 14 Neighbourhood Plan, providing the following recommendations:

1. It is noted that Policy GI1 requires development proposals to 'Provide a Biodiversity Net Gain (BNG) of 10% within the Neighbourhood Plan area.' This is likely to lead to neutral effects, aligning with the mandatory minimum requirement (i.e. the baseline) set through the Environment Act (2021) to achieve at least a 10% biodiversity net gain increase from the pre-development biodiversity value. It is considered that there is the potential for draft CNP Policy GI1 to exceed national requirement; for example if it were to support new development where it delivered in excess of 10% net gain. This would have the potential to deliver positive effects overall.
2. The draft CNP sets out a list of general design principles which should be used to inform a future masterplan for the Bath Road Car Park/Bridge Centre Site. This includes respecting the setting of listed buildings and requiring that 'new buildings introduce a finer urban grain to the site to reflect that of the historic town centre and Chippenham Conservation Area.' However, it is recognised that these general design principles currently fall within the supporting policy text, and it is therefore recommended that they be moved into the main policy text to give them greater weight given the concerns raised around the historic environment.

7.15 Following Regulation 14 consultation, the Town Council updated the draft Neighbourhood Plan in response to the recommendations proposed through the SEA, alongside comments received (April 2023) from the local community and other interested parties.

Part 2: what are the SEA findings at this stage?

8. Introduction (to Part 2)

Introduction

8.1 The aim of this chapter is to present appraisal findings and recommendations in relation to the current 'submission' version of the CNP. This chapter presents:

- An appraisal of the current version of the CNP under the eight SEA theme headings; and
- The overall conclusions at this current stage and recommendations for the next stage of plan-making.

CNP policies

8.2 The CNP puts forward 29 policies to guide development in the Neighbourhood Plan area. These are set out in Table 8.1 below.

Table 8.1 CNP policy list

Policy reference	Policy name
Sustainability and Climate Change	
SCC1	Net Zero Carbon Development
SCC2	Sustainable Construction
SCC3	Standalone Renewable Energy
Green Infrastructure	
GI1	Protecting and Enhancing Biodiversity
GI2	Local Green Spaces
GI3	Green Corridors
GI4	Trees, Woodland and Hedgerows
GI5	Green Buffers
Housing	
H1	Housing Mix and Types
H2	Housing Design
Town Centre	
TC1	Bath Road Car Park/ Bridge Centre Site
TC2	River Green Corridor Masterplan
TC3	Public Realm Improvements to Upper Market Place
TC4	Development within Chippenham Conservation Area
TC5	Building of Local Merit
TC6	Design of Shopfronts and Advertisements
Transport	
T1	Provision and Enhancement of Cycle Paths

Policy reference	Policy name
TC2	Access to the Bus Network
TC3	Electric Vehicle Charging Infrastructure
TC4	Access for Disabled People and those with Reduced Mobility
TC5	Waymarking Signage on the Footpath Network
Community Infrastructure	
CI1	Community Infrastructure
Economy	
E1	Circular Economy
E2	Business Incubator Units

Methodology

- 8.3 The assessment identifies and evaluates 'likely significant effects' on the baseline, drawing on the sustainability objectives identified through scoping (see **Table 3.1**) as a methodological framework.
- 8.4 Every effort is made to predict effects accurately; however, this is inherently challenging given the strategic nature of the policies under consideration and understanding of the baseline (now and in the future under a 'no plan' scenario) that is inevitably limited. Given uncertainties there is a need to make assumptions, e.g., in relation to plan implementation and aspects of the baseline that might be impacted. Assumptions are made cautiously and explained within the text (with the aim of striking a balance between comprehensiveness and conciseness). In many instances, given reasonable assumptions, it is not possible to predict 'significant effects', but it is possible to comment on merits (or otherwise) of the Submission plan in more general terms.
- 8.5 Finally, it is important to note that effects are predicted taking account of the criteria presented within Schedule 1 of the SEA Regulations. So, for example, account is taken of the probability, duration, frequency, and reversibility of effects as far as possible. Cumulative effects are also considered, i.e., the potential for the Neighbourhood Plan to impact an aspect of the baseline when implemented alongside other plans, programmes, and projects. These effect 'characteristics' are described within the assessment as appropriate.

9. Appraisal of the submission CNP

Plan contents, aims and objectives

- 9.1 The area covered by the Neighbourhood Plan is Chippenham, a market town in the north of Wiltshire, with a population of over 35,000. Chippenham is one of the largest towns in Wiltshire and acts as an important service centre for surrounding towns and villages. It has excellent transport links, being located just 4.5 miles south of the M4 motorway, and on the main London to the South West railway route (Great Western Railway Line).
- 9.2 Chippenham is located within a rural setting, with the Cotswolds Area of Outstanding Natural Beauty located approximately 3.5 miles to the west of the town, and the North Wessex Downs Area of Outstanding Natural Beauty located approximately 8 miles to the east of the town. The River Avon (the Bristol Avon) dissects the town centre.
- 9.3 The location of the Chippenham means it performs an important housing and commercial role in Wiltshire, Swindon, Bath and Bristol area. It is identified as a Principal Settlement in the Wiltshire Core Strategy (Core Policy 1); a 'strategically important centre and primary focus for development'. Core Policy 1 goes on to explain that principal settlements 'will provide significant levels of jobs and homes, together with supporting community facilities and infrastructure, meeting their economic potential in the most sustainable way to support better self-containment'.
- 9.4 Anticipated future housing growth in Chippenham will be determined by the Local Plan Review and be of a strategic scale outside the remit of the Neighbourhood Plan. The Wiltshire Local Plan Review (Regulation 18 draft, January 2021) indicated that the emerging strategy for 2016-2036 for Chippenham had an overall housing requirement of 9,225 dwellings. After accounting for existing allocations, completions and permissions, this left a residual requirement of 5,100 dwellings over the plan period. In addition to this, a 'brownfield target' for 2021-2031 of an additional 240 dwellings was included as an estimated amount of development that would come forward in the first part of the Plan period.
- 9.5 The Neighbourhood Plan is required to be in general conformity, and plan positively to support, the strategic policies of the emerging Local Plan Review. The Neighbourhood Plan intends to support housing growth according to evidence of local need and design expectations, and less by speculative market demand. Furthermore, the Plan seeks to reconnect the community with the natural environment, encourage opportunities to regenerate key areas of the community (e.g., Bath Road Car Park/ Bridge Centre Site), and facilitate housing development that meets local needs and respects the quality and heritage of the natural and built environment. This will be achieved through a variety of policies (see Table 8.1 above) that cover a range of themes, including sustainability and climate change, green infrastructure, transport, economy as well as specific policies for the town centre masterplanning/ regeneration.
- 9.6 Masterplanning set out in Policy TC1 and TC2 has evolved from proposals set out in the Wiltshire Core Strategy and Chippenham Central Area Masterplan (2014), which was never formally adopted. Previous retail-led proposals in the

Chippenham Masterplan are not now fit for purpose, and therefore a detailed up to date masterplan (reflecting local evidence and planning policy) has been produced to support positive regeneration of the town centre. Policy TC1 has been informed by the Chippenham Conservation Area Appraisal (2007) and Chippenham Conservation Area Management Plan SPG (2010), which conclude that there are many negative aspects of the townscape resulting from the Bath Road Car Park/ Bridge Centre Site. Detailed analysis of the site can be viewed in the Bath Road Car Park/Bridge Centre Site Topic Paper (Chippenham Neighbourhood Plan Appendix 14).

- 9.7 Unrealised proposals to transform the River Corridor have also been revisited, and aspects updated for delivery through the Neighbourhood Plan (Policy TC2). Modifications to the 2014 Masterplan are discussed in more detail in the River-Green Corridor Topic Paper (Chippenham Neighbourhood Plan Appendix 15).
- 9.8 Recognising that the Market Place is the historic core of Chippenham, and in order to further develop upon the enhancement proposals above (Policy TC1 and TC2), an indicative parameters plan has been developed to guide future development in the Upper Market Place area and demonstrate how public realm could be delivered in a realistic, affordable and flexible way (Policy TC3).
- 9.9 Finally, it is highlighted that the cross-cutting theme of sustainability and climate change mitigation and adaptation has been considered in the formulation of all Neighbourhood Plan policies - being integral to the Chippenham Identity Vision (see Chapter 2). The Chippenham Neighbourhood Plan seeks to reduce Chippenham's carbon footprint and make a significant local contribution to the adaptation and mitigation of future climate change.

Air quality

- 9.10 While there are no AQMAs declared within the neighbourhood area, there are areas of localised congestion, including along New Road, Station Hill, the Bridge Centre roundabout and Malmesbury Road. Policy T1 and T2 seek to protect and enhance sustainable travel networks within the town, utilising opportunities presented through strategic growth. It is considered that policy provisions in this respect will reduce the possibility of increased congestion and reduced air quality due to the likely increase in additional cars on the road.
- 9.11 Town centre masterplanning seeks to deliver positive effects in this respect, enhancing accessibility and supporting more local and sustainable journeys/connections around Chippenham. Notably Policy TC2 requires that '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.' This is anticipated to lead to modal shift, reducing reliance on the private vehicle for local journeys.
- 9.12 Policy TC1 further seeks to avoid unnecessary commercial traffic crossing through the town centre, further supporting active travel networks and connectivity through the town. Additionally, the relocation of existing parking is considered to make a positive contribution to good traffic management. Removal of inefficient parking spaces and vehicular access within the Upper Market Place (Policy TC3) will support objectives of making the Upper Market Place pedestrian friendly, in turn improving air quality within the town centre. This aligns with Policy CP60 and CP61 of the Wiltshire Core Strategy.

- 9.13 It is also noted that improvements to the green infrastructure network are supported throughout the CNP framework, which will positively impact local air quality. Notably Policy TC3 seeks to plant new trees, which will improve air quality within the public square.
- 9.14 On balance, it is considered that the CNP policy framework is likely to contribute positively towards addressing localised congestion issues, supporting active travel uptake, and connected places to encourage improvements in air quality. While strategic allocations proposed through the Local Plan review may add more cars to the road, the CNP framework seeks to capitalise upon opportunities presented through economies of scale, with the potential for **minor positive effects** in the long-term.

Biodiversity

- 9.15 The Neighbourhood Plan area is not constrained by internationally or nationally designated biodiversity sites. However nationally important ancient woodland exists within Chippenham at Mortimores Wood, Vincients Wood and just outside the Parish boundary at Birds Marsh Wood. Mortimores Wood and Vincients Wood, Bristol Avon River, Baydons Meadow and Middle Lodge Wood are designated as County Wildlife Sites.
- 9.16 In June 2021 Chippenham Town Council declared an ecological emergency. Ensuring biodiversity net gain in new development, and that trees, hedgerows and woodlands are retained and increased in Chippenham, are key priorities for the Neighbourhood Plan. The CNP seeks to develop the central 'River Green' corridor as a recreational space, bringing the countryside into the centre of town with the River Avon as its focus. Policy TC2 seeks to connect new development to the river corridor via green infrastructure, while Policy TC3 which seeks to plant new trees to improve biodiversity within the public square. Policy TC1 further supports an improved environment in the town centre at the Bath Road Car Park/ Bridge Centre Site. Notably, alongside redevelopment, trees on site are to be retained, green spaces be enhanced, and new trees and high quality soft landscaping shall be incorporated throughout the development. This will improve biodiversity while providing an attractive town centre environment.
- 9.17 It is noted that Policy GI1 requires development proposals to 'Provide a Biodiversity Net Gain (BNG) of 10% within the Neighbourhood Plan area.' This is likely to lead to neutral effects, aligning with the mandatory requirement set through the Environment Act (2021) to achieve at least a 10% biodiversity net gain increase from the pre-development biodiversity value. Policy GI1 further sets out support for 'development proposals that deliver in excess of 10% Biodiversity Net Gain'. This has the potential to lead to long-term positive effects on the baseline through exceeding national requirements.
- 9.18 The sensitive nature of the natural environment is reflected through several CNP policies which more broadly seek to 1) help limit potential effects on designated features and areas of ecological interest and 2) support the resilience of local green infrastructure networks. This includes but is not limited to Policy GI2 which identifies almost 50 specific green sites in Chippenham that are valued by the local community and subsequently designated as Local Green Spaces. Policy GI4 further seeks to protect and enhance trees, woodland and hedgerows within the Neighbourhood Area. Notably, Policy GI4

supports an increase in tree coverage in Chippenham, recognising that it is currently below average in parts of the Neighbourhood Area. Policy GI4 sets a target of 20% canopy cover on all new development sites.

- 9.19 At the wider scale, Policy GI3 identifies four ‘Strategic Green Corridors’, extending beyond the Neighbourhood Plan area linking the countryside to the town; a number of ‘Neighbourhood Green Corridors’ which are less connected to the surrounding countryside; and opportunities for link enhancements within Chippenham’s Green Corridor network. This will likely inform developer contributions, supporting the longevity and effectiveness of the valued networks.
- 9.20 Overall, it is considered that the CNP policy framework seeks to help ensure that ecological sensitivities are appropriately considered during the planning, construction, and operational phases for new development proposals, recognising that strategic development is likely to come forward through the Local Plan. The delivery of biodiversity net gains is supported in accordance with higher level policy provisions, and town centre policies seek to support the development of a network of inter-linked green spaces across the town. It is therefore considered that **minor positive effects** are predicted in the long term, enhancing the natural environment and strengthening links with the surrounding countryside.

Climate change

- 9.21 In 2019 Wiltshire Council (WC) declared a Climate Emergency and resolved to seek to make the county carbon neutral by 2030. WC is subsequently reviewing its approach to carbon neutral development in the review of the Local Plan. In 2019 Chippenham Town Council also declared a Climate Emergency.
- 9.22 WC document ‘Addressing Climate Change and Biodiversity Net Gain through the Local Plan - Raising the Ambition’ (2021) sets out the Local Planning Authority’s proposed approach to low carbon development. While the CNP does not allocate land for housing, the policy framework seeks to ensure that any housing development in the CNP area will be carbon neutral by incorporating energy efficiency, renewable energy generation and sustainable transport connectivity. Specifically, Policy SCC1 has been developed and further refined in consultation with the Local Planning Authority and consultant specialists in this field, McBains.
- 9.23 Policy SCC1 therefore requires that major development proposals for all new buildings will include an Energy Statement. This should demonstrate how an annual operational net zero carbon emissions balance will achieve net zero carbon by modelling each building’s estimated regulated energy consumption.
- 9.24 Policy SCC1 seeks to achieve net zero carbon emissions for all new buildings using regulated energy data, prioritising fabric energy efficiency as far as possible in accordance with the Energy Hierarchy. For any remaining energy balance, on-site renewable energy should be used to the maximum extent possible to reach net zero emissions.
- 9.25 The approach set out through Policy SCC1 is anticipated to lead to positive effects, informing early design decisions which aim to minimise the building’s whole life carbon impacts.

- 9.26 Policy SCC2 places focus on sustainable construction, furthering WC Core Policy 41 by ensuring the delivery of net zero carbon development through sustainable building construction techniques and materials. This includes encouraging certification with the Passivhaus Standard, AECB Building Standard, BREEAM and Home Quality Mark, which are widely recognised best practice standards for assessing sustainable building construction. This is further reiterated through Policy H2 which requires major residential development schemes shall demonstrate that they achieve nine out of twelve 'green' indicators, securing Building for Life Quality Mark.
- 9.27 Town centre policy TC1 further requires that new buildings on the site shall be designed to be net carbon neutral, and easily adaptable. Positive effects in this respect are also considered through Policy E1, which supports proposals that seek to create circular economy benefits for built development.
- 9.28 Policy SCC3 sets out support for proposals for standalone renewable energy developments, including renewable energy storage, where criteria set out is met. In this context, Policy TC2 specifically highlights that 'opportunities should be explored to provide renewable energy at any replacement weir structure.'
- 9.29 The CNP supports the de-carbonisation of transport in Chippenham. Notably Policy T3 seeks to address the limited electric vehicle charging infrastructure currently seen in the town. Policy T3 prescribes minimum standards for the provision of charging facilities in all new developments to facilitate the Government's targets for 2030. While standards are based on a recent Government consultation report, it is considered that there is opportunity for the CNP to support proposals which exceeds minimum standards, with the potential for long term positive effects.
- 9.30 A key objective of the CNP is to promote sustainable transport by improving infrastructure and making modal shift easier in favour of public transport, walking and cycling. This is reflected through the CNP policy framework, notably the town centre policies seek to create attractive neighbourhoods to encourage active travel uptake and removal of private vehicles from the town centre. This is anticipated to support numerous climate objectives, improving accessibility, modal shift, amenity access and improved air quality.
- 9.31 In terms of flood risk, it is recognised that flooding of the River Avon in Chippenham is likely to become more severe in the future as climate change continues. While the CNP does not allocate sites for housing, in terms of the regeneration of the town centre, Policy TC1 requires that 'Where possible SUDS shall be incorporated within the development to ensure sustainable drainage and improve resilience to flooding'. Furthermore, Policy TC2 highlights that 'the feasibility of re-routing or improving the Avon Path to limit the risk from flooding and provide year-round access in the vicinity of Gladstone Road Bridge will be explored.'
- 9.32 It is recognised that the protection of green spaces, habitats and biodiversity features within the neighbourhood area through policies GI1 - GI5 will safeguard natural carbon sequesters (i.e. trees and hedgerows). Notably, in accordance with Policy GI5 green corridors will be 'identified and protected from future development to promote their role for natural flood management'.

- 9.33 It is noted that green infrastructure also supports climate objectives through carbon absorption, reducing air pollution, and reducing air temperature through shading. Notably Policy GI4 seeks to increase tree cover throughout Chippenham, with a target of 20% on new development sites.
- 9.34 Overall it is considered that the CNP will lead to **minor positive effects**, promoting carbon neutral development and ensuring that future development is resilient with respect to climate change.

Land, soil and water resources

- 9.35 Brownfield land in the town is limited in terms of current availability. Therefore, it is likely that future growth (5,100 homes planned for within the Local Plan Review) will predominately need to occur on less sustainable greenfield land which surrounds the town. This growth for Chippenham is set by the strategic directions of the Local Plan, and it is recognised that the neighbourhood plan cannot influence strategic matters in this respect. It is however noted that the Local Plan Review includes a 'brownfield target' for Chippenham for 2021-2031 of 240 dwellings.
- 9.36 Whilst the neighbourhood plan cannot influence housing delivery, the regeneration of the town centre through policies TC1 – TC3 has the potential to lead to significant long term positive effects against this SEA theme. Notably, the delivery of a mixed-use scheme within the Bath Road Car Park/ Bridge Centre Site will support the efficient use of land, increasing viability of the site for future use.
- 9.37 Concerning the protection of water resources, Policy GI1 seeks to ensure all new development include the provision of adequate drainage, promoting the use of Sustainable Drainage Systems (SuDS). This is also a specific design principal set for the Bath Road Car Park/ Bridge Centre Site. However as set out above it is considered that moving design principals into policy would better ensure their implementation.
- 9.38 In terms of water use and efficiency, it is recognised that this can be positively managed through BREEAM, which is supported through Policy SSC2. Policy SCC2 requires 'all major residential development to achieve certification with the Passivhaus Standard or the AECB Building Standard for 10% of new dwellings, supplemented with a matrix or methodology (e.g. BREEAM) setting further standards for sustainability.' This is anticipated to lead to positive effects in relation to the SEA theme and water resource objectives.
- 9.39 Overall, it is considered that the CNP policy framework will lead to **minor positive effects** through promoting the regeneration of brownfield land within the town centre and supporting the sustainable management of water resources.

Landscape

- 9.40 Chippenham is located within a rural setting, with the Cotswolds Area of Outstanding Natural Beauty (AONB) located approximately 3.5 miles to the west of the town, and the North Wessex Downs (AONB) located approximately eight miles to the east of the town.

- 9.41 In terms of features within the neighbourhood area, the River Avon (the Bristol Avon) dissects the town centre, while Monkton Park runs alongside the River through the town centre. Monkton Park is the largest open space within the town boundary and has a semi-rural character. These features, and the agricultural farmland setting around Chippenham, have created the town's high quality, distinctive character and environment.
- 9.42 The Neighbourhood Plan therefore highlights the importance of a Green Buffer (Policy GI5), to support surrounding villages in their desire not to be amalgamated within an expanded Chippenham, which would result in the loss of their setting, identity and amenity. Policy GI5 seeks to ensure the maintenance of a separate and distinctive identity by avoiding coalescence with neighbouring settlements. In line with Policy GI5, where possible, green and blue infrastructure will be extended to create an effective buffer between the urban fringe and the surrounding countryside. Furthermore, the 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. Establishing a green buffer and dense vegetative screening is considered to protect the town's identity by preventing coalescence with surrounding settlements.
- 9.43 The rural character surrounding the town will further be protected through the wider CNP policy framework, which seeks to protect and enhance the green infrastructure network and support attractive places. All Green Infrastructure policies (GI1-5) perform positively in this respect. Notably Policy GI3 seeks to link the town to the surrounding countryside, ensuring that the integrity of the overall green infrastructure network is not compromised by inappropriate development and land management.
- 9.44 Consideration is also given to the town centre policies, which seek to regenerate key locations within the town centre to deliver high quality development that is appropriately designed and connects with the green spaces on its urban fringe. Notably Policy TC2 seeks to revitalise the River Green Corridor and requires that 'Design and Access Statements should demonstrate how the scheme will provide a pleasing backdrop for the River Avon when viewed from the opposite bank'. Additionally, public and semi-public viewing platforms from raised positions over the River Avon corridor will be supported, capitalising upon the beautiful surrounding countryside, including Avon Valley to the east of town.
- 9.45 Overall, the CNP policies have a strong focus on protecting and enhancing landscape and townscape character, the quality of the public realm, settlement identity, and local distinctiveness. **Minor positive effects** are therefore predicted against the Landscape SEA theme.

Historic environment

- 9.46 Chippenham is a historic market town, rich in designated and non-designated heritage assets. The town centre contains many buildings which are statutorily listed, others locally recognised for their historic or architectural quality. The town centre is located wholly within Chippenham Conservation Area.
- 9.47 As set out above the CNP doesn't allocate sites for housing. However Policy H2 does require that any new residential development within the neighbourhood area be sustainably designed in accordance with the

Chippenham Design Guide. This includes detailed design principles to ensure high quality design (see Chippenham Design Guide) and encourages the use of local materials and consideration of local architecture, with reference made to consideration of design guidance criteria specifically within Chippenham Conservation Area (taken from the Chippenham Conservation Area Management Plan SPG).

- 9.48 The CNP places focus on redevelopment and regeneration of the town centre, notably through Policy TC1 – the Bath Road Car Park/ Bridge Centre Site, and TC2 – the River Green Corridor Masterplan.
- 9.49 Policy TC1 seeks to regenerate the Bath Road Car Park/ Bridge Centre Site, recognising that the site holds numerous historic environment constraints. Notably, the Grade II Listed Bank House is located on the Bath Road Car Park section of the site, whilst located opposite the site, on the south side of Bath Road, is the Grade II Listed Avonbridge House. There are several Grade II Listed buildings which adjoin the site. The Grade I Listed Ivy House and West Wing, and Grade II* Listed Ivy Longhouse and Stables are located opposite the site to the south west and set within extensive tree'd grounds. Redevelopment of the site therefore has the potential to negatively impact on these features.
- 9.50 However, while the site is constrained, it is recognised that both the Chippenham Conservation Area Appraisal (2007) and Chippenham Conservation Area Management Plan SPG (2010) conclude that there were many negative aspects of the townscape resulting from the Bath Road Car Park/ Bridge Centre Site. As such, redevelopment of the site also presents an opportunity to establish a positive strategy for the conservation and enjoyment of the historic core of the town.
- 9.51 The Bath Road Car Park/Bridge Centre Site Topic Paper (Appendix 14 of the CNP) provides a detailed SWOT analysis of the site, exploring key opportunities and constraints as highlighted above. This is reflected through Policy TC1, which sets out a detailed up to date parameters plan for the site, specifying building heights for its discrete spatial elements. Notably built development is supported up to four storeys in height in Zone 1, up to three storeys in height in Zone 2, and up to two storeys in height in Zone 3. While the wider policy seeks to preserve and enhance the special historic character of the town centre, it is considered that lower building heights throughout the site area would better align with the existing built form within the town, including designated assets.
- 9.52 Considering the wider policy details and masterplanning, it is not considered that allowing built development of up to four storeys in height in Zone 1 (Option 1) would dominate/ suppress existing assets. However it is recommended that parameters proposed should be supported by evidence, demonstrating that relevant historic environment considerations have been taken account of.
- 9.53 Nonetheless it is recognised that a set of general design principles has been developed which should be used to inform a future masterplan for the Bath Road Car Park/ Bridge Centre Site (as supported through Policy TC1). This includes respecting the setting of listed buildings and requiring that 'new buildings introduce a finer urban grain to the site to reflect that of the historic town centre and Chippenham Conservation Area.'

- 9.54 Policy TC1 also includes the ‘demolition of No. 13 Bridge to provide a pedestrian link from the site’. It is considered that this building detracts from the historic character of the town, and therefore its demolition has the potential to positively improve the local historic environment, supporting attractive places in accordance with the Chippenham Conservation Area Character Appraisal and Chippenham Conservation Area Management Plan SPG.
- 9.55 The masterplan area covered by Policy TC2 relates to the area of the River Avon which runs through the town centre. This is also wholly located within the Chippenham Conservation Area, and there are also a number of Grade II listed buildings located within the Masterplan area. Both the Chippenham Conservation Area Appraisal (2007) and Chippenham Conservation Area Management Plan SPG (2010) identified a number of features in the vicinity of the River Avon which have a negative contribution on the significance of Chippenham Conservation Area and outlined suggestions for enhancements. The ‘demolition of No. 1 High Street and redevelopment as a 2-3 storey high quality landmark building with active street and river frontages’ is supported. Notably demolition of the aged ‘Superdrug’ store is supported by members of the community in the Town Centre Topic Group, and will support the objective for Chippenham to maintain itself as an attractive and vibrant, riverside Market Town for residents and visitors alike.
- 9.56 As with Policy TC1, the CNP includes the River Green Corridor Topic Paper (Appendix 15), which further explores key issues and opportunities for the site. This supporting evidence has informed Policy TC2, which presents a masterplan for the area, building upon unrealised proposals put forward in the past by Wiltshire Council. Policy TC2 seeks to enhance and better reveal the significance of Chippenham Conservation Area and the setting of Grade II Listed Buildings. Policy TC2 supports proposals to redevelop Emery Gate Shopping Centre within its existing curtilage and with existing High Street facades retained, alongside other criteria. Also of relevance in this respect is Policy TC6 (Design of Shopfronts and Advertisements), which requires new or altered shopfront development be designed in accordance with the Shopfront Design Guidance, to support local character and distinctiveness.
- 9.57 In terms of Policy TC3, while this part of the town centre includes numerous Listed Buildings and is centred on the Grade II listed War Memorial, the Chippenham Conservation Area Management Plan SPG specifically refers to enhancement proposals for the Upper Market Place area. Policy TC3 therefore seeks to deliver public realm improvements to enhance the significance and setting of assets present in the Upper Market Place, increase footfall and create an improved community space for events/ activities. Specifically, Policy TC3 seeks to provide ‘an improved setting for the Grade II* Listed St. Andrews Church’.
- 9.58 Policy TC4 seeks to ensure that proposals for development within the Conservation Area, or that affect its setting, take account of the character area analysis¹¹, and make a positive contribution to its local character and distinctiveness. Policy TC4 should be used by applicants alongside the Conservation Area Management Plan SPG to inform design choices, and by decision takers to determine planning outcomes. Similarly, Policy TC5 (Buildings of Local Merit) recognises locally important buildings and structures

¹¹ Chippenham Conservation Area Character Appraisal

as non-designated heritage assets. Policy TC5 highlights the need to avoid conflict between these buildings' conservation and any forthcoming proposal.

- 9.59 Overall, it is concluded that town centre Policies TC1 – TC5, alongside the wider policy framework and NP appendices (including the Chippenham Design Guide) seek to protect and enhance the historic environment which is characterised in sections 9.43 to 9.55 above, delivering CNP objectives. Notably this includes *'to Preserve and enhance the special historic character of the town centre by ensuring that new development, including advertising and shopfronts, is sympathetically and sensitively designed, and enhances the significance of heritage assets.'*
- 9.60 It is broadly considered that regeneration of key locations within the town centre to deliver high quality development that is appropriately designed will likely provide benefits for the historic environment. While Policy TC1 supports development up to four storeys in height (Zone 1 only), supporting evidence (namely Topic Papers) provided by the Council, alongside design guidance and policy requirements, seek to ensure adverse effects on existing built form are avoided. **Neutral effects** are therefore concluded at this stage.
- 9.61 It is however considered that setting a reduced height for the Bath Road Car Park/ Bridge Centre 'Zone 1' would better align with the town, including designated assets. As such, depending on the amendment of building scale criteria, there remains the potential for the CNP to deliver **minor positive effects** in the long term.

Community wellbeing

- 9.62 It is recognised that deprivation varies across the town. While the CNP does not allocate sites for housing, a key objective of the plan is to ensure that new housing development contains the right type and mix of housing. This is set out within Policy H1 and includes affordable and market housing to reflect the findings of the Housing Needs Assessment (HNA), and subsequently meet the identified needs of the whole community.
- 9.63 Recognising that strategic housing allocations for around 5,100 new dwellings will be required in Chippenham up to 2036 (Local Plan Review), CNP Policy H2 seeks to ensure a high quality of design is ensured for new housing development, using detailed design principles in the Chippenham Design Guide. The Chippenham Design Guide sets out masterplanning principles for future residential development, including the housing allocations from the Local Plan Review.
- 9.64 Alongside design guidance, in accordance with Policy CI1, development will be expected to fully meet the need for new community infrastructure generated by their schemes so that there is no additional pressure placed on existing community facilities.
- 9.65 It is recognised through the CNP and supporting evidence that the high street is declining (notable due to Covid-19 pandemic and shift to online shopping). The focus of the CNP is therefore to revive the town centre; protecting and enhancing existing facilities to support young people.
- 9.66 Masterplanning proposed through Policies TC1 – TC3 therefore seek to rejuvenate the town centre as a vibrant meeting place for residents and visitors,

supporting shopping, employment and leisure. Policy TC1 specifically seeks to develop the Bath Road Car Park/Bridge Centre Site as an extension of the town centre, for mixed-use development which may include leisure, shopping, residential and/or public car parking. Policy TC1 requires that a mix of uses, which complement and are compatible with the town centre, shall be provided on the Bath Road Car Park/Bridge Centre Site to ensure flexibility, viability and longevity.

- 9.67 Policy TC2 supports proposals to redevelop Emery Gate Shopping Centre, which will also support economic objectives, in addition to rejuvenating the town centre for residents' use. More broadly Policy TC2 presents a masterplan for the River-Green Corridor, seeking to enhance the River Avon as a defining and connecting feature in the revitalisation of the town centre, whilst also protecting and enhancing the function of the River Green Corridor.
- 9.68 Furthermore, it is recognised that development at the Upper Market Place (Policy TC3) presents an opportunity to provide a new southern gateway to the town centre and an opportunity to improve the poor public realm at this location.
- 9.69 In terms of employment, Chippenham is located within the A350 Growth Zone and Swindon-M4 Growth Zone¹ as identified by the Swindon & Wiltshire Local Enterprise Partnership (SWLEP). Additionally, several business and industrial parks exist on the edge of the town, with many businesses also in the town centre. CNP Policy E1 encourages new businesses in the town, while Policy E2 seeks to ensure that a diverse portfolio of unit sizes is provided, to meet the needs of a range of different types of employment uses and different sized businesses. This is with the objective of increasing levels of self-sufficiency, and reducing out-commuting to Bath, Bristol, Swindon and London.
- 9.70 Transport policies (notably Policy T1 and T2) further seek to support reduced out commuting, accessibility and connectivity within the Plan area. These policies focus on access to sustainable, active travel encouraging opportunities for walking and cycling (healthier modes of transport), in addition to access to the bus network. This is discussed further under the transportation SEA theme.
- 9.71 As touched upon above, a key aim of the CNP is to develop the central 'River Green corridor' as a recreational space, bringing the countryside into the centre of town with the River Avon as its focus (Policy TC2). This is reflected more widely through green infrastructure policies GI1 – 5, which seek to develop a network of inter-linked green spaces across the town, increasing accessibility for all to the surrounding countryside. Notably, Policy GI5 seeks to protect and enhance the urban fringe, extending green and blue infrastructure where possible to create a buffer from the built form. This will lead to the enhancement of the natural environment, increasing accessibility for all, with the potential for long term positive effects.
- 9.72 Overall, the CNP policy framework seeks to regenerate the town centre, capitalising upon the natural environment to support an attractive and vibrant Market Town for residents and visitors alike. Policy provisions seek to ensure any new development supports economic and social objectives, supporting self-containment and inclusivity. **Significant long term positive effects** are therefore predicted in relation to this SEA theme.

Transportation

- 9.73 Chippenham is well located in terms of the strategic transport network; being 4.5 miles south of the M4 motorway, and on the main London to the South West railway route (Great Western Railway Line). Chippenham is also located on the Great West Way, a new 125 mile touring route stretching between London and Bristol, which follows the route of the A4. The A4 connects the town along an east-west axis to Calne (approximately 6 miles to the east) and to Bath (approximately 12.5 miles to the west). The A350, which runs around the western edge of the town, connects it along a north-south axis to the M4 motorway (three miles to the north) and Melksham (approximately six miles to the south).
- 9.74 Policies and proposals within the CNP seek to maximise the ability for residents to travel by public, sustainable, and active modes of transport. Key policies in this regard include T1 and T2, which seek to utilise opportunities presented through strategic growth. Policy T1 requires that cycling schemes shall be prepared for all Major Developments where appropriate, while Policy T2 requires that Major Development provide on-site and off-site improvements to the local bus network, linking the development to the town centre. This is considered likely to lead to positive effects in the longer term, enabling local journeys to be made solely via sustainable transport modes and reducing the reliance on the private vehicle.
- 9.75 Accessibility will be further improved through the provisions of Policy T4, ensuring full consideration of the needs of people with reduced mobility, including children. This includes the construction of footways and pavements, road signage safety and markings (Policy T5).
- 9.76 It is recognised that the town centre and public realm is currently highway-dominated. Regeneration of the Bath Road Car Park/Bridge Centre Site (Policy TC1) is considered to present an opportunity to provide an extension to the town centre, and create a new, unique 'place', with new buildings arranged around a new public square. Regeneration of the site will therefore contribute towards making the town centre a more pedestrian friendly environment, improving current active travel networks. Green Infrastructure policies are noteworthy in this respect (Policy GI-G5), protecting and enhancing green networks which allow active travel between the town and the surrounding countryside.
- 9.77 Policy TC2 is also of relevance in this respect, connecting the town centre to the riverside through a network of well-connected walking and cycling routes. Specifically the policy requires that '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.' Notably the Sustrans National Cycle Network Route 403 passes through the town, linking Chippenham to Marlborough and the Kennet & Avon Canal.
- 9.78 Policy TC2 further highlights that for any redevelopment of Emery Gate Shopping Centre, the existing vehicular access to the car park/service yard from the Town Bridge shall be removed in order to resolve the pinch point and improve public realm/access for pedestrians to Monkton Park. This is anticipated to lead to positive effects, reducing unnecessary traffic crossing through the town centre.

- 9.79 Policy TC3 focuses on the Upper Market Place, recognising that the area is currently car dominated. A key feature of the Upper Market Place public realm improvements is to introduce areas of shared space for people driving, walking and cycling. Notably Policy TC3 seeks to introduce a segregated cycle path to link Wood Lane/The Causeway/Timber Street/Burlands Road/Market Place. This is anticipated to lead to positive effects through alleviating traffic, creating a pedestrian friendly environment and restoring the visual connection between the Lower and Upper Market Places.
- 9.80 Policy TC3 also seeks to relocate car parking within the Upper Market Place. This is anticipated to make positive contribution to good traffic management, reducing congestion associated with parking by providing access off The Causeway.
- 9.81 It is highlighted that the CNP supports the provision of more local employment opportunities in suitable locations both within the town and on the urban fringe. It seeks to ensure that more employment opportunities come forward, taking advantage of the town's location within the M4 and A350 employment growth areas (Policy E1 and E2).
- 9.82 Overall, it is considered that delivering a network of well-connected walking and cycling routes across the town, and through into the surrounding countryside, will support active travel uptake and modal shift, reducing reliance on the private vehicle for local journeys. Positive effects also include supporting self-containment, notably through setting minimum infrastructure requirements for strategic growth likely to come forward through the Local Plan Review. **Minor positive effects** are concluded overall.

Conclusions

- 9.83 The assessment has concluded that the current version of the CNP is likely to lead to **significant positive effects** in relation to the community wellbeing SEA topic. This largely relates to the Neighbourhood Plan's focus on enhancing the quality of life of residents through regenerating the town centre and protecting and enhancing open space and green infrastructure networks, to support a thriving, attractive market town.
- 9.84 **Minor positive effects** are predicted in relation to the majority of SEA themes. This includes air quality, biodiversity, climate change, land, soil and water resources, landscape, and transport. Minor positive effects reflect the policies in place to help mitigate and adapt to the effects of climate change and flood risk in the area; the emphasis placed on safeguarding, maintaining, and enhancing biodiversity, natural resources, and the high quality landscape; and the focus on facilitating balanced transport provision (i.e. pedestrian and cycle linkages) in the area; and reducing levels of congestion, which will in turn improve air quality.
- 9.85 **Neutral effects** are concluded in relation to the historic environment SEA theme. 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 existing built form. It is however considered that setting a reduced building height for development within Zone 1 (Policy TC1) would better align with the town, including designated assets.

9.86 Overall, it is broadly considered that regeneration of key locations within the town centre to deliver high quality development that is appropriately designed will likely provide benefits for the historic environment. While Policy TC1 supports development up to four storeys in height (Zone 1 only), supporting evidence (namely Topic Papers) provided by the Council, alongside design guidance and policy requirements, seek to ensure adverse effects on existing built form are avoided. **Neutral effects** are therefore concluded at this stage. It is however considered that setting a reduced height for the Bath Road Car Park/ Bridge Centre 'Zone 1' would better align with the town, including designated assets.

Part 3: What are the next steps?

10. Next steps and monitoring

10.1 This part of the report explains the next steps that will be taken as part of plan-making and SEA.

Plan finalisation

10.2 The CNP and Environmental Report are being submitted to the Local Planning Authority, Wiltshire Council, for Independent Examination.

10.3 At Independent Examination, the CNP will be considered in terms of whether it meets the basic conditions for neighbourhood plans and is in general conformity with local planning policy.

10.4 If the Independent Examination is favourable, the CNP will be subject to a referendum, organised by Wiltshire Council. If more than 50% of those who vote agree with the CNP, then it will be 'made'. Once made, the CNP will become part of the development plan for the neighbourhood area.

Monitoring

10.5 The SEA regulations require 'measures envisaged concerning monitoring' to be outlined in this report. This refers to the monitoring of likely significant effects of the Neighbourhood Plan to identify any unforeseen effects early and take remedial action as appropriate.

10.6 It is anticipated that monitoring of effects of the Neighbourhood Plan will be undertaken by Wiltshire Council as part of the process of preparing its Annual Monitoring Report (AMR). No significant negative effects are considered likely in the implementation of the CNP that would warrant more stringent monitoring over and above that already undertaken by Wiltshire Council.

Appendix A Regulatory requirements

As discussed in Chapter 1, Schedule 2 of the Environmental Assessment of Plans Regulations 2004 (the Regulations) explains the information that must be contained in the Environmental Report; however, interpretation of Schedule 2 is not straightforward. Table A.1 overleaf links the structure of this report to an interpretation of Schedule 2 requirements, whilst Table A.2 explains this interpretation. Table A.3 identifies how and where within the Environmental Report the regulatory requirements have / will be met.

Table A.1: Questions answered by this Environmental Report, in line with an interpretation of regulatory requirements

	Questions answered		As per regulations... the Environmental Report must include...
Introduction	What's the plan seeking to achieve?		<ul style="list-style-type: none"> An outline of the contents, main objectives of the plan and relationship with other relevant plans and programmes
	What's the SEA scope?	What's the sustainability 'context'?	<ul style="list-style-type: none"> Relevant environmental protection objectives, established at international or national level Any existing environmental problems which are relevant to the plan including those relating to any areas of a particular environmental importance
		What's the sustainability 'baseline'?	<ul style="list-style-type: none"> Relevant aspects of the current state of the environment and the likely evolution thereof without implementation of the plan The environmental characteristics of areas likely to be significantly affected Any existing environmental problems which are relevant to the plan including those relating to any areas of a particular environmental importance
		What are the key issues and objectives that should be a focus?	<ul style="list-style-type: none"> Key environmental problems / issues and objectives that should be a focus of (i.e., provide a 'framework' for) assessment
Part 1	What has plan-making / SEA involved up to this point?		<ul style="list-style-type: none"> Outline reasons for selecting the alternatives dealt with (and thus an explanation of the 'reasonableness' of the approach) The likely significant effects associated with alternatives Outline reasons for selecting the preferred approach in-light of alternatives assessment / a description of how environmental objectives and considerations are reflected in the draft plan
Part 2	What are the SEA findings at this current stage?		<ul style="list-style-type: none"> The likely significant effects associated with the draft plan The measures envisaged to prevent, reduce and offset any significant adverse effects of implementing the draft plan
Part 3	What happens next?		<ul style="list-style-type: none"> A description of the monitoring measures envisaged

Table A.2: Questions answered by this Environmental Report, in line with regulatory requirements

Schedule 2	Interpretation of Schedule 2		
The report must include...	The report must include...		
(a) an outline of the contents, main objectives of the plan and relationship with other relevant plans and programmes;	An outline of the contents, main objectives of the plan and relationship with other relevant plans and programmes	i.e. answer - <i>What's the plan seeking to achieve?</i>	
(b) the relevant aspects of the current state of the environment and the likely evolution thereof without implementation of the plan	Any existing environmental problems which are relevant to the plan including, in particular, those relating to any areas of a particular environmental importance	i.e. answer - <i>What's the 'context'?</i>	i.e. answer – <i>What's the scope of the SA?</i>
(c) the environmental characteristics of areas likely to be significantly affected;	The relevant environmental protection objectives, established at international or national level		
(d) any existing environmental problems which are relevant to the plan or programme including, in particular, those relating to any areas of a particular environmental importance, such as areas designated pursuant to Directives 79/409/EEC and 92/43/EEC;	The relevant aspects of the current state of the environment and the likely evolution thereof without implementation of the plan'	i.e. answer - <i>What's the 'baseline'?</i>	
(e) the environmental protection objectives, established at international, Community or Member State level, which are relevant to the plan and the way those objectives and any environmental considerations have been taken into account during its preparation;	The environmental characteristics of areas likely to be significantly affected		
(f) the likely significant effects on the environment including on issues such as biodiversity, population, human health, fauna, flora, soil, water, air, climatic factors, material assets, cultural heritage including architectural and archaeological heritage, landscape and the interrelationship between the above factors;	Any existing environmental problems which are relevant to the plan including, in particular, those relating to any areas of a particular environmental importance	i.e. answer - <i>What are the key issues & objectives?</i>	
(g) the measures envisaged to prevent, reduce and as fully as possible offset any significant adverse effects on the environment of implementing the plan;	Key environmental problems / issues and objectives that should be a focus of appraisal		
(h) an outline of the reasons for selecting the alternatives dealt with and a description of how the assessment was undertaken including any difficulties (such as technical deficiencies or lack of know-how) encountered in compiling the required information	An outline of the reasons for selecting the alternatives dealt with (i.e. an explanation of the 'reasonableness of the approach')	i.e. answer - <i>What has Plan-making / SA involved up to this point?</i> [Part 1 of the Report]	
(i) a description of the measures envisaged concerning monitoring.	The likely significant effects associated with alternatives, including on issues such as... ... and an outline of the reasons for selecting the preferred approach in light of the alternatives considered / a description of how environmental objectives and considerations are reflected in the draft plan.		
	The likely significant effects associated with the draft plan	i.e. answer - <i>What are the assessment findings at this current stage?</i> [Part 2 of the Report]	
	The measures envisaged to prevent, reduce and as fully as possible offset any significant adverse effects of implementing the draft plan		
	A description of the measures envisaged concerning monitoring	i.e. answer - <i>What happens next?</i> [Part 3 of the Report]	

Table A.3: ‘Checklist’ of how (throughout the SEA process) and where (within this report) regulatory requirements have been, are and will be met.

Regulatory requirement	Discussion of how requirement is met
Schedule 2 of the regulations lists the information to be provided within the SEA Report	
1. An outline of the contents, main objectives of the plan or programme, and relationship with other relevant plans and programmes;	Chapter 2 (‘What is the plan seeking to achieve’) presents this information.
2. The relevant aspects of the current state of the environment and the likely evolution thereof without implementation of the plan or programme;	These matters have been considered in detail through scoping work, which has involved dedicated consultation on a Scoping Report. The ‘SEA framework’ – the outcome of scoping – is presented within Chapter 3 (‘What is the scope of the SEA?’).
3. The environmental characteristics of areas likely to be significantly affected;	
4. Any existing environmental problems which are relevant to the plan or programme including, in particular, those relating to any areas of a particular environmental importance, such as areas designated pursuant to Directives 79/409/EEC and 92/43/EEC.;	
5. The environmental protection, objectives, established at international, Community or national level, which are relevant to the plan or programme and the way those objectives and any environmental, considerations have been considered during its preparation;	The SEA framework is presented within Chapter 3 (‘What is the scope of the SEA’). Also, the SEA Scoping Report presents key messages from the context review. With regards to explaining “ <i>how...considerations have been taken into account</i> ”, Chapter 7 explains the Steering Group’s ‘reasons for supporting the preferred approach’, i.e., explains how/ why the preferred approach is justified considering the alternatives appraisal.
6. The likely significant effects on the environment, including on issues such as biodiversity, population, human health, fauna, flora, soil, water, air, climatic factors, material assets, cultural heritage including architectural and archaeological heritage, landscape and the interrelationship between the above factors. (Footnote: These effects should include secondary, cumulative, synergistic, short, medium and long-term permanent and temporary, positive and negative effects);	Chapter 6 presents alternatives appraisal findings . Chapters 9 presents an appraisal of the plan. With regards to assessment methodology, Chapter 8 explains the role of the SEA framework/scope, and the need to consider the potential for various effect characteristics/ dimensions, e.g., timescale.
7. The measures envisaged to prevent, reduce and as fully as possible offset any significant adverse effects on the environment of implementing the plan or programme;	The assessment highlights certain tensions between competing objectives, which might potentially be actioned by the Examiner, when finalising the plan. Also, specific recommendations are made in Chapter 10.
8. An outline of the reasons for selecting the alternatives dealt with, and a description of how the assessment was undertaken including any difficulties (such as technical deficiencies or lack of know-how) encountered in compiling the required information;	Chapters 4 and 5 deal with ‘Reasons for selecting the alternatives dealt with’, in that there is an explanation of the reasons for focusing on issues and options. Also, Chapter 7 explains the Town Council’s ‘reasons for selecting the preferred option’ (considering the alternatives appraisal).

Regulatory requirement	Discussion of how requirement is met
9. Description of measures envisaged concerning monitoring in accordance with Art. 10;	Chapter 11 presents measures envisaged concerning monitoring.
10.A non-technical summary of the information provided under the above headings	The NTS is provided at the beginning of this Environmental Report.

The SEA Report must be published alongside the Draft Plan, in accordance with the following regulations

Authorities with environmental responsibility and the public, shall be given an early and effective opportunity within appropriate time frames to express their opinion on the Draft Plan or programme and the accompanying environmental report before the adoption of the plan or programme (Art. 6.1, 6.2)	At the current time, this Environmental Report is published alongside the 'pre-submission' version of the Chippenham Neighbourhood Plan, with a view to informing Regulation 14 consultation.
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The SEA must be considered, alongside consultation responses, when finalising the plan.

The environmental report prepared pursuant to Article 5, the opinions expressed pursuant to Article 6 and the results of any transboundary consultations entered into pursuant to Article 7 shall be taken into account during the preparation of the plan or programme and before its adoption or submission to the legislative procedure.	Appraisal findings presented within this Environmental Report, and consultation responses received, have been fed back to the Town Council and have informed plan finalisation.
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Appendix B Scoping information

Introduction

This appendix presents additional information on the SEA scope, namely key issues under each of the SEA framework headings. As set out in the Scoping Report, these key issues were identified following a review of the context and baseline.

Additionally, this appendix presents a summary of responses received as part of the scoping consultation, followed by the SEA Framework.

Air quality

- Although there are currently no AQMAs declared within the Neighbourhood area or nearby, the air quality in Chippenham is seen to be an undiagnosed issue. It is considered that this issue could worsen through the delivery of significant new homes in the town, i.e., associated commuting in the medium term, and potential future road expansion such as the dualling of the A350 in the short-medium term.
- Increased pressure on road capacity will further contribute to increased traffic and congestion on local roads both within and surrounding the Neighbourhood area. This includes along the identified congested roads such as Malmsbury Road and the A350. It is noted that the effects of the CNP in relation to traffic and congestion will be explored in further detail under the 'Transportation' SEA theme.
- Domestic wood burning is also a cause of air pollution in the town, in line with national data. Designated biodiversity and geodiversity sites within and in proximity to the CNP area are potentially sensitive to air pollution issues. The effects of the CNP in relation to these concerns will be explored under the 'Biodiversity and Geodiversity' SEA theme.
- The CNP could present opportunities to improve accessibility and support more local and sustainable journeys/connections. These opportunities will be explored in the 'Community Wellbeing' and 'Transportation' SEA themes.

Biodiversity

- Nationally and locally important habitats and sites, in addition to locally identified buffers, wildlife corridors, and restoration areas present within the CNP area have the potential to be impacted by new development. Habitats and species will potentially face increasing pressures from future development within the CNP area, with the potential for adverse impacts on the wider ecological network. This could lead to a loss of habitats, which exacerbated by the effects of climate change, could lead to changes in the distribution and abundance of species and changes to the composition of habitats.
- However, the CNP provides an opportunity to set out requirements for both site-specific mitigation (e.g., mitigation to reduce the effects of light pollution) and targeted habitat enhancement/ creation and biodiversity net-gain in any new development.

- Consideration should also be given to the likely additional recreational needs arising, and the need to plan for good access to open and green spaces which reduce recreational pressures on aforementioned designated biodiversity sites.

Climate change

- CO₂ emissions in Wiltshire are lower than the regional and national averages, with transport being the highest contributing sector. Any development in the Chippenham Neighbourhood area should consider the need to provide access to sustainable or low carbon travel options, that meet the needs of residents and improves mobility, whilst also reducing emissions.
- Several areas within the CNP are susceptible to flooding, caused in part by seasonal, prolonged or above average intensity rainfall and the proximity of the Chippenham Neighbourhood area to the River Avon. The CNP provides an opportunity to enhance Chippenham's resilience to climate change, which could include re-routing of sections of the Avon Valley Path to limit the risk from flooding.
- Climate change is predicted to result in more frequent and extreme rainfall events, increasing the frequency and severity (depth/hazard) of flooding from fluvial and surface water sources. However, results of the SFRA (Level 1)¹² for Wiltshire indicate that in most catchments, the extent of Flood Zone 3 areas in the district is not likely to increase significantly with climate change.

Landscape

- Chippenham is located within the setting of Cotswolds AONB approximately 3.5 miles to the west of the town, and the North Wessex Downs AONB located approximately 8 miles to the east of the town.
- Chippenham has grown significantly in recent decades which has led to urban encroachment into the surrounding countryside. As the town expands its green and blue corridors become increasingly important to both the town and surrounding settlements. This includes Langley Burrell, Tytherton Lucas, Derry Hill, Allington, Kington Langley, Lacock. Studley and Notton, which have the potential to be at risk of coalescence if Chippenham's built form spreads towards them.
- Important viewpoints have been identified in Chippenham through the CNP evidence base¹³, which reflect the special qualities of the Chippenham Neighbourhood area and are highly valued by local residents. Development should seek to preserve these views and countryside visibility where possible.
- The CNP should seek opportunities to reinforce the riparian character of the River Avon and small tributaries flowing through the area including retention /creation and future management of waterside meadows.

Historic environment

- The parish is rich in heritage assets, most significantly two Conservation Areas fall within the Neighbourhood Area. Chippenham Conservation Area extends

¹² JBA Consulting (2019): 'SFRA Level 1' [online] can be accessed [here](https://chippenhamneighbourhoodplan.org.uk/):

¹³ <https://chippenhamneighbourhoodplan.org.uk/>

throughout the town centre, while Rowden Conservation Area adjoins Chippenham Conservation Area to the south of the town. There are also two Ancient Monuments present.

- Designated and undesignated heritage assets within the Chippenham Neighbourhood area such as the already 'at risk' Moated site and fishponds southeast of Rowden Farm have the potential to be adversely impacted by future development due to insensitive design, layout, or massing. Development within the plan area therefore requires the preservation and maintenance of assets and their setting.
- The interaction between buildings and the spaces around them play an important role in defining the character of Chippenham. The landscape which frames the Conservation Area, the river Avon valley, and the Grade II* listed railway viaduct should be preserved through the CNP. Open land around the fringes of and within the conservation area should be given special attention to preserve the contribution it makes to the views into and out of the Conservation Area.

Land, soil and water resources

- The Provisional Agricultural Land Quality dataset indicates that areas of the Chippenham Neighbourhood area are underlain by land classified as the best and most versatile (BMV) agricultural land (Grade 2 and possibly Grade 3a (current unknown if 3a or 3b)). Future development should seek to avoid loss of BMV land wherever possible.
- The status of waterbodies in the Chippenham Neighbourhood area has deteriorated in recent years and in 2019, the chemical classification of the Avon Bristol confluence, Marden confluence to Semington Brook water body was 'Fail' with their ecological and biological quality elements classifications being moderate, respectively. As such, new development in Chippenham has the potential to further impact upon the declining ecological and chemical status of the watercourses.
- The Mineral Resource Zone (MRZ) MCS 1, is located in the south of the Chippenham Neighbourhood area. New development should be sympathetic to the status of this MRZ and seek to preserve the integrity of the site through development.

Community wellbeing

- Despite the proportions of younger people in Chippenham being higher than Wiltshire, there has been a decline in those aged below 15 years (-3.5%) and also a notable decline of young adults (-11.2%) in those aged 25-44 between 2001 and 2011. Meanwhile, the rest of the population has grown markedly, especially for the 16-24 and 45- 64 age groups. This suggests there is an ageing population within the parish and a subsequent need to plan for more adaptable homes and specialist homes. Furthermore, an ageing population can place extra and different demands on local health, education, transport and potentially housing.
- Access to green space is good within the town and is highly valued by residents. Any new development should acknowledge the needs of residents in

this respect, delivering an appropriate level of accessible green space to support sustainable communities.

- Considering changing working patterns seen in response to the recent pandemic, it will be important to ensure that all residents have suitable access to broadband connectivity to support high levels of working from home in the CNP area.

Transportation

- New development in Chippenham can induce pressure on road capacity and can potentially contribute to increased traffic and congestion on both local roads and roads within the nearby main towns. This includes along Malmesbury Road and the A350 where residents have noted traffic related issues and congestion. With regards to sustainable transport opportunities, the Wiltshire Councils Transport Review¹⁴ indicates that bus services in Chippenham currently have the worst reliability of all services in Wiltshire.
- As such, there is a significant need for early planning in relation to transport and movement in development through the CNP, particularly planning should seek to maximise opportunities to reduce the need to travel via the private vehicle and access a choice of sustainable transport modes. Appropriate consideration will also need to be given early on to potential development requirements in terms of mitigating impacts on road capacity and access.
- The CNP can support small-scale infrastructure improvements and active travel opportunities that seeks to maximise opportunities for pedestrian and cyclist movements. In order to retain this momentum and shift to sustainable transport modes, and reduce the effects of climate change more rapidly, it is essential that the CNP ensures safe and effective infrastructure for cycling and walking is incorporated within new development.
- Opportunities to improve and/ or extend active travel connections, alongside public realm improvements and urban greening within the plan are should also be sought.
- The COVID-19 pandemic and climate change movement have seen increasing numbers of the local community turn to cycling and walking as a means of both travelling around the town and for physical exercise and mental wellbeing. Therefore, the CNP can support small-scale infrastructure improvements and active travel opportunities that seeks to maximise opportunities for pedestrian and cyclist movements.

¹⁴ Wiltshire Council (2021) 'Wiltshire local Plan Transport Review' can be accessed [here](#).

Scoping consultation responses

Table AB.1 Scoping consultation responses

Consultee	Consultation response summary	AECOM response
Environment Agency	<p>Overall we support the content of the Scoping Report, including the ‘issues’, objectives and assessment questions. However, we have a few suggestions for further points to be included/amended.</p> <p>Green & Blue Infrastructure, page 15 We would prefer to see more emphasis on rivers and the blue element of this ‘issue’ in this section. Indeed, watercourses should be referred to as all rivers and streams are of value in the context of green and blue infrastructure.</p> <p>Climate Change, page 18 Please include reference to water resources in this section. Resource efficiency is referred to here but a more explicit mention of water resources, particularly water quantity, will emphasise that the issues of climate change and section 7 (water resources) are inextricably linked (see below).</p> <p>Water Resources, page 49, section 7.14 There may have been a misinterpretation of information within our report called ‘Areas of Water Stress: final classification’. The last sentence in section 7.14 of your SEA scoping report states “The water classification map identifies the whole of the Bristol Water supply area as an area of ‘Low’ water stress”. Whilst this is true, Chippenham is served by Wessex Water (not Bristol Water, as acknowledged in the first sentence of this section) which is classed as “seriously water stressed for metering purposes” (page 6, Areas of Water Stress: final classification, Environment Agency). This is significant because as extreme weather events, caused by climate change, worsen we will see droughts arriving more frequently and lasting longer. Therefore this serious water stress will worsen in coming years. The SEA should include assessment of this risk.</p>	<p>Comments noted. As the SEA process proceeds, further emphasis will be placed on the ‘blue’ element of G&BI, and water resources will be referenced in the context of climate change. Furthermore, consideration will be given to water stress within the area.</p>

Consultee	Consultation response summary	AECOM response
	We look forward to providing further comments on the CNP as it progresses.	
Historic England	<p>Thank you for your consultation on the SEA Scoping Report associated with the emerging Chippenham Neighbourhood Plan.</p> <p>In our response to Wiltshire Council's previous SEA Screening consultation we drew attention to the potential which policies TC1 – 3 might have for generating significant environmental effects (see attached). We note from the Scoping Report that this has formed the basis of the decision in favour of a full SEA and is underscored by the view of the Council's heritage team that heritage asserts are likely to be affected (para 1.19, p3).</p> <p>We are therefore pleased to note that our guidance on relevant themes has been included for consideration in the undertaking of the SEA process and preparation of the Environmental Report. But given the above we would also recommend that our guidance on Site Allocations is also cited and similarly used as it has equal application to Neighbourhood Plan scenarios - https://historicengland.org.uk/images-books/publications/historic-environment-and-site-allocations-in-local-plans/</p> <p>Otherwise, there are no other comments on the Report that we would wish to make.</p>	Comment noted. Additional guidance cited will be considered through the SEA process.
Natural England	Natural England has no specific comments to make on this neighbourhood plan SEA scoping.	Noted.
Wiltshire Council	<p>The NP SEA scoping report covers all the requirements and is appropriate to allow SEA of the plan.</p> <p>The report highlights the requirements of the SEA Directive and Regulations. It covers all of the required topics/themes listed in the Regs. Each section includes a policy/plan review, baseline summary, discussion of future baseline, key issues and suggests objectives and assessment questions in order to assess likely effects of the plan. And there is a proposed SEA Framework at the end.</p> <p>I suggest that where you mention the Local Plan Review consultation 2021, that you add in the words Regulation 18 so there is no confusion.</p>	Comments noted. Reference will be made to the <i>Regulation 18</i> Local Plan Review consultation, in addition to the Rowden Conservation Area, where relevant through the next stages of the SEA process.

Consultee	Consultation response summary	AECOM response
	<p>I also noticed that in the historical section the conservation area that covers the town centre is mentioned, but the Rowden conservation area isn't. Whilst it may not be as important and relevant as the town centre conservation area, it probably should get a brief mention as well.</p> <p>I checked with our conservation officers and regarding the Bath Road/Bridge Centre site and other policies in the town centre, they reiterated their concerns that the policies are detailed and are akin to a development brief for each site and there would be effects on the character area which trigger the need for an SEA.</p> <p>The current timetable for the Local Plan Review is as published on our website. We are working towards publishing a Regulation 19 consultation later this year.</p>	

SEA Framework

Table AB.2 SEA Framework

SEA theme	SEA objective	Assessment questions (will the option/ proposal help to...)
Air Quality	Improve air quality in the Neighbourhood Plan area, and minimise and/ or mitigate all sources of environmental pollution	<ul style="list-style-type: none"> Promote enhancements in sustainable modes of transport, including walking, cycling, and public transport? Reduce emissions of pollutants from transport and any other sources? Promote the use of low emissions vehicles? Reduce the need to travel outside of the Neighbourhood Plan area? Implement measures (such as appropriate planting and provision of green infrastructure) which will help support air quality in the Neighbourhood Plan area?
Biodiversity	Protect and enhance all biodiversity.	<ul style="list-style-type: none"> Protect and enhance nationally and locally designated sites? Protect and enhance priority habitats and species and the areas that support them, such as Ancient Woodland? Achieve a net gain in biodiversity? Support enhancements to multifunctional green infrastructure networks? Support access to, interpretation and understanding of biodiversity and geodiversity? Seek to improve ecological connectivity and reduce fragmentation within Defra's Network Enhancement Zones?
Climate change (including flood risk)	Reduce the contribution to climate change made by activities within the CNP area.	<ul style="list-style-type: none"> Reduce the number of journeys made? Reduce the need to travel? Promote the use of sustainable modes of transport, including walking, cycling and public transport? Increase the number of new developments meeting or exceeding sustainable design criteria? Generate energy from low or zero carbon sources? Reduce energy consumption from non-renewable resources? Improve access to EV charging points within and beyond the CNP area?
	Support the resilience of the Neighbourhood Plan to the potential effects of climate change, including flooding.	<ul style="list-style-type: none"> Ensure that inappropriate development does not take place in areas at higher risk of flooding, taking into account the likely future effects of climate change? Improve and extend green infrastructure networks in the plan area to support adaptation to the potential effects of climate change? Sustainably manage water run-off, reducing surface water runoff (either within the plan area or downstream)?

SEA theme	SEA objective	Assessment questions (will the option/ proposal help to...)
		<ul style="list-style-type: none"> • Ensure the potential risks associated with climate change are considered through new development in the Neighbourhood area? • Increase the resilience of biodiversity in the area to the effects of climate change, including through enhancements to ecological networks?
Historic Environment	Protect, conserve and enhance heritage assets within the CNP area.	<ul style="list-style-type: none"> • Conserve and enhance the significance of buildings and structures of architectural or historic interest, both designated and non-designated, and their setting? • Help to protect and enhance the significance of the Chippenham Conservation Area and the Rowden Conservation Area; and their setting, and maintain their integrity? • Make a positive contribution to local character and distinctiveness? • Guide development proposals to secure remediation of issues identified as affecting the conservation areas and prevent cumulative impacts? • Support the integrity and the historic setting of sites of archaeological or historic interest recorded on the Wiltshire and Swindon HER? • Support access to, interpretation and understanding of the historic evolution and character of the environment? • Conserve and enhance archaeological remains, including historic landscapes?
Land Soil and Water Resources	Ensure the efficient and effective use of land.	<ul style="list-style-type: none"> • Promote the use of previously developed land? • Avoid the development of the best and most versatile agricultural land, which in the parish may comprise Grade 2 and 3a agricultural land? • Avoid the unnecessary sterilisation of, or hindering of access to mineral resources within/ in close proximity to the Plan area?
	Protect and enhance water quality and use and manage water resources in a sustainable manner.	<ul style="list-style-type: none"> • Support improvements to water quality? • Ensure the timely provision of wastewater infrastructure? • Ensure appropriate drainage and mitigation is delivered alongside development? • Protect groundwater and surface water resources from pollution? • Maximise water efficiency and opportunities for water harvesting and/ or water recycling?
Landscape	To protect and enhance the character and quality of the immediate and	<ul style="list-style-type: none"> • Protect and/or enhance the intrinsic qualities and setting of surrounding AONBs? • Protect and/ or enhance local landscape designations, character and quality of place?

SEA theme	SEA objective	Assessment questions (will the option/ proposal help to...)
	surrounding landscape.	<ul style="list-style-type: none"> • Conserve and enhance local identity, diversity and settlement character? • Identify and protect locally important viewpoints which contribute to character and sense of place? • Protect and extend/ enhance strategic and local GI corridors? • Protect visual amenity and where appropriate, building vernacular? • Retain and enhance landscape features that contribute to the rural setting, including green open spaces, trees and hedgerows?
Community Wellbeing	Ensure growth in the Neighbourhood Plan area is aligned with the needs of all residents, improving accessibility, anticipating future needs and specialist requirements, and supporting cohesive and inclusive communities.	<ul style="list-style-type: none"> • Provide everyone with the opportunity to live in good quality, and affordable housing? • Support the provision of a range of house types and sizes? • Meet the needs of all sectors of the community? • Provide flexible and adaptable homes that meet people's needs? • Improve the availability and accessibility of key local facilities, including specialist services for disabled and older people, including GP surgeries, health centres, schools and community facilities? • Ensure there are opportunities and spaces for outdoor recreation and enjoyment of the natural environment? • Protect against adverse impacts on health and wellbeing resulting from land, water and air pollution? • Protect against adverse impacts on health and wellbeing resulting from greenhouse gas emissions and biodiversity loss? • Encourage and promote social cohesion and active involvement of local people in community activities? • Minimise fuel poverty? • Maintain or enhance the quality of life of existing local residents?
Transportation	Promote sustainable transport use and reduce the need to travel.	<ul style="list-style-type: none"> • Improve connectivity in the Plan area, including associated with enhancements to sustainable transport networks? • Encourage modal shift to more sustainable forms of travel such as walking and cycling? • Facilitate working from home and remote working? • Improve road safety? • Reduce the impact on residents from the road network?

