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RESPONSE FROM SWINDON BOROUGH COUNCIL (THE LPA)

Chiseldon Neighbourhood Development Plan 2022-2037

Regulation 14 Draft

January 2024 Version

Section / Paragraph / Page	Topic	Comments from SBC	RESPONSE TO COMMENTS FROM CHISELDON PC
General			
Various	Plans / Maps	Difficult to view in terms of detail within the main document.	These were provided separately so that they would be easier to view to enable respondees to zoom in. Perhaps the maps were not forwarded to all officers?
Chapter 1			
Role of Neighbourhood Plans			
P7. Footnotes	NPPF	You will note that the NPPF that the last update to the NPPF was December 2023.	Agree – amend all references to NPPF 2023
P.7 Para 7	Plan weighting	Some complexities regarding plan weighting – worth noting the national guidance on this matter: NPPG Paragraph: 007 Reference ID: 41-007-20190509	Para 7 will be rewritten accordingly when the NDP is submitted under Reg. 15.
P.7 Para 8	Strategic policies	Please note that SBC is intending to consult on both a regulation 18 and regulation 19 plan within the next 12 months with the intention of submitting the finalised plan to the Secretary of State before 30 th June	Noted but no specific dates will be published in the Reg. 15 version of the CNDP in case SBC dates change. No changes proposed.

		2025 for public examination. Subject generally to the degree of progression of the plan and extent and nature of representations received together with degree of consistency with the NPPF, aspects of the plan may be gathering legal weighting during this period including strategic policies.	
Neighbourhood Plan Period			
P8	Plan period	Noting the potentially evolving strategic policy context within which the neighbourhood plan may be taken forward it may be advisable to consider the extent of the plan period and degree of flexibility required in the plan. The new local plan is proposing a plan period to 2043 (base date currently of 1 st April 2023).	It is not possible to prepare the CNDP to align with the emerging local plan since nothing has been published yet by the LPA. It is therefore not possible to extend the plan period to the new local plan period (which has not been published and is therefore unknown). The CNDP will need to be updated when the new Local Plan is adopted and the time period can change then – this is stated clearly in para 11. No changes proposed.
Chapter 2 – Chiseldon Parish			
P18	Statistics	The statistics all relate to Census data apart from the IMD? So we are seeing a seeing a loss of population in the area over the 10-year period of 167 residents. – circa 6% calculated against the 2011 census figure and an ageing population?	The data is from the 2021 Census as stated in para 33. The implications of this are discussed in the Housing Needs Assessment. No changes proposed.
Chapter 3 – Community Vision and Planning Policy Context			

P.20	Key Challenges	Is one of the key challenges not the loss of population? See para 46 on affordable housing.	Does the Parish Council consider that this is a key challenge? I have not said anything about this as it has not come up in any discussions with the community or PC.
P23	Extent of development in the countryside	Might need a tighter reading / application of SD2 - development proposals in rural and countryside locations outside the rural settlement boundaries as shown on the Policies Map will be permitted where: local needs have been identified and allocated through a Neighbourhood Plan or Neighbourhood Development Order; and/or it supports the expansion of tourist and visitor facilities in appropriate locations where identified needs are not met by existing facilities in a rural service centre; or it is in accordance with other policies in this Plan permitting specific development in the countryside.	Agree – tighten up the wording to better reflect SD2.
Chapter 4 – Policies			
P25-26 / Policy 1: Housing Mix	First Homes	From the planning policy side, we haven't presently applied a deeper discount or eligibility criteria beyond the minimum, or published a specific planning policy on First Homes. The Council may have additional comments on Policy 1 in terms of first homes and related, including practical experience from is	The fact that SBC is behind schedule in preparing up to date policies should not prevent the neighbourhood plan from containing national policies such as First Homes. When the Local Plan is adopted, and where this conflicts with Policy 1, the new LP will take presence in weight according to

	<p>Wheel chair use adaptable.</p> <p>Viability</p>	<p>application. This will also relate to new housing evidence on the Local Plan. It is suggested that some joint policy work is done on this policy area before further plan development.</p> <p>This policy implies 100% wheel chair adaptable / accessible? This may lead to an increase / possibly substantial in costs. Note LP Policy HA3 is at min of 2%.</p> <p>In new plan-making (strategic level) viability is tested at the plan-making level not at application.</p>	<p>national policy. The Parish Council would welcome joint policy work with SBC in this regard.</p> <p>Yes, the policy implies 100% wheel chair adaptable. DOES THE PARISH COUNCIL WISH TO REDUCE THIS TO 2%?</p> <p>This is not correct. Every planning application is subject to viability testing – it is at the application stage that final decisions are made on the % of affordable housing, for instance.</p> <p>No changes proposed.</p>
Policy 2	Sustainable Transport	<p>Not sure how the proposed infrastructure improvements will be implemented? Fig 14 is the proposals but Figure 13 the problems. Assuming some connection has been made to the Council’s active travel lead on cycling and walking infrastructure priorities? The council can assist with further policy development in this area.</p> <p>The adopted Swindon Local Cycling and Walking Infrastructure Plan (LCWIP) does not currently include</p>	<p>It is not clear how the proposals will be implemented. It is likely that some of the improvements will arise if the new Local Plan allocates land for housing. It might also be possible that LTP4 will consider some of these improvements. However, the Local Plan and LTP4 have not been prepared so Figures 13 and 14 set out the Parish Council’s aspirations for improvement. Policy 2 relies on local plan policies TM21 and CR2 for delivery and provides local evidence how improvements in S106 agreements should be sought.</p>

		<p>any scheme proposals for Chiseldon. Sustrans have been active in enhancing the National Cycle Network Route 45 in this locality over the last 10-15 years, which Swindon Borough Council complemented with a formal waymarking signing scheme.</p> <p>The mapping of scheme proposals such as Figure 12 and Figure 13 could benefit from being shown at a larger scale. Any proposal would be subject to a feasibility investigation to assess the scope to develop a scheme, such as land ownership and the width of available highway.</p>	<p>Yes, it is correct that the LWCIP does not extend to Chiseldon – this is why it has not been included in the evidence for Policy 2. NCNR 45 is mentioned and show in Figure 13.</p> <p>Larger scale maps have been provided as part of the Reg 14 consultation (but perhaps were not distributed to officers?)</p> <p>Agreed that schemes would need to be tested individually.</p> <p>No changes proposed.</p>
Policy 3	BNG and LNRS	<p>Rather than sign-posting the Council can assist with policy drafting to make this policy more effective. Changes may or may not be required to the policies / proposals map.</p> <p>Para 81. Update as guidance has been published.</p> <p>Para 82 change tense as LNRS is underway. Andrea Pellegram (advising Chiseldon) is involved in LNRS so can update. Call it “LNRS” consistently. Supporting text around Policy 3 needs to be edited down and supported by evidence. It’s currently largely aspirational. It is unclear</p>	<p>A draft of the policy was sent to SBC before the publication of Reg. 14 text. No comment was forthcoming. No wording has been supplied at this time either so it is not clear how to change the wording.</p> <p>The NDP cannot address SBC resourcing issues.</p> <p>Agree to update para. 81 and 82 as text is now out of date. Will update all text according to last LNRS progress – however, draft LNRS will not be available until later in 2024</p>

		<p>what the parish is seeking from this policy. Need to explain evidence for potential areas of importance in Fig 15. Name as “potential” as will change through LNRS. Para 89: plan needs to show area letters.</p> <p>Policy 3 needs to reflect legislation and SBC Policy EN4. Re-write the policy so it can actually deliver what the parish wants and remove caveats from it. How is the policy to be implemented and what resources are required – including from the Parish Council?</p> <p>SBC doesn’t have the resources to deliver this unless accompanied by planning application income.</p>	<p>and it will therefore be necessary for this policy to be aspirational but linked to the completed LRNS.</p>
Policy 4	LGS	<p>It would be advisable to ensure that all landowners have been or should be contacted for their opinion on setting a LGS before it is finally designated.</p> <p>It would be worth including a brief assessment for every proposed Local Green Space against the criteria in the NPPF para 106. This appears to have been undertaken to a certain extent as part of Appendices 4 and 5, however some of the amenity greenspaces/verges in Appendix 5 do not clearly demonstrate how they meet the criteria.</p>	<p>All landowners have been consulted and their views considered. This will be explained in the Basic Conditions Statement.</p> <p>Agree to clarify the wording in para 97 how the land in Figure 17 meets the criteria in NPPF 106.</p>

Policy 5	Design Codes	<p>It would be useful to know whether the design code work has been finalised or additional input can be provided? There may be some areas of the code that can be further enhanced.</p> <p>The Design Code has a strong emphasis on characterisation specific to Chiseldon which is very positive, however it could do with a much stronger emphasis on distinguishing between <i>mandatory</i> and <i>advisory</i> guidance across the document. The reader has to go through many pages of text and drawings/images to distinguish between the two.</p> <p>Also, I question the timing of the design code and the need to hold off finalising it until we have a clearer idea of housing numbers required to be delivered through the local plan over the next plan period. If the Parish Council have agreed on the broad quantum of growth they are willing to achieve over the plan period, the Design Code should be clearer about how the village could deliver this growth over the period. This could be through a natural process taking say 5-10% growth of</p>	<p>The design code has been finalised.</p> <p>WOULD THE PARISH COUNCIL WISH TO HAVE THE TEXT IN THE NDP CLARIFY WHAT IS MANDATORY AND WHAT IS ADVISORY?</p> <p>The Design Code and the NDP should not be halted because of delays in the preparation of the Local Plan. They can be updated once the Local Plan has been adopted. This advice from the LPA is not helpful because it is asking the Parish Council to consider hypothetical allocations which is not appropriate and has not been tested through the Local Plan process.</p> <p>The Local Plan MAY allocate housing in Chiseldon. At that time, it would be expected for the Master Plan (part of the Local Plan) to consider development plan policies including CNDP Policy 5 and the Design Code.</p> <p>The CNDP has been prepared against the Adopted Local Plan which contains a presumption that no development will occur outside the development boundaries and in limited circumstances in the</p>
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		<p>the village over the plan period. Most of this growth would probably be through infill developments, some through small-scale extensions to the street, etc. At the moment the Design Code reads more like an enhanced version of a Characterisation/Conservation area appraisal, providing very little guidance about how to deliver new housing – even for small developments. Some precedent of good, sensitive infill would be very useful here, with some principles drawn out of these examples to relate to the given context – such as high hedges and stone wall boundaries along the street with small courtyard-type housing formations, and the more compact, irregular forms (the guidance already refers to) that exist and that are an inherent characteristic in Chiseldon.</p> <p>Further detailed comments on design coding and local plan process can also be discussed.</p>	<p>countryside. The Design Code is fit for those purposes.</p> <p>No changes proposed.</p>
Policy 6	ND Heritage Assets	<p>Wide range of potential assets noted. Would be advisable to ensure that landowning interests are notified where possible or potential designation. It would be useful in the assessment to set out the specific</p>	<p>Where possible the Parish Council has alerted owners of the designations but the NDP (containing the designations) was widely advertised so all owners had an</p>

		<p>category against which an asset has been assessed. The Council may provide further support in finalising the Non Designated Heritage Assets (NDHA) list. There is some finessing required as to what NDHA's are included and why. Some clarity between designated and non-designated heritage assets (NDHA) would be beneficial at Policy 6 (para 105)</p> <p>Some identified assets are actually designated (i.e. assets referenced 1 and 21 under policy 6). May also relate to curtilage listed walls (and therefore, subject to statutory controls beyond result of being in Conservation Area).</p> <p>This is relevant to Appendix 6 too (which as relevant would might benefit from having any maps next to relevant images for ease of reference)</p> <p>Built assets identified in Conservation Area Appraisal are not included in the Policy 6 list or maps e.g. map p. 93 in relation to Badbury</p> <p>As per NPPF definition NDHA's need not just be buildings – perhaps needs clarification. Generally, some clarity and differentiation between (built)</p>	<p>opportunity to comment and some comments were indeed received.</p> <p>The comment “<i>It would be useful in the assessment to set out the specific category against which an asset has been assessed.</i>” is unclear. There were no “specific categories” – the assets were chosen because they had community relevance and value.</p> <p>When will the Council assist with the NDHA list? That is the purpose of the Reg. 14 consultation and those comments should have been included here.</p> <p>WHAT DOES THE PARISH COUNCIL WISH TO DO WITH THESE COMMENTS? THE AUTHOR SHOULD HAVE MADE CORRECTIONS TO THE NDP TEXT – THIS IS NOT VERY CLEAR.</p> <p>Assets already identified in Conservation Area Appraisals are not included because they are already protected.</p> <p>Not clear what the reference to NPPF not requiring NDHAs to be buildings –</p>
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		<p>conservation areas and the natural environment e.g. plan on page 63 repeats information elsewhere (for CA's) would be beneficial.</p> <p>Reference to the Wiltshire and Swindon Historic Environment Record (HER) would be useful information source)</p> <p>Importantly Table 2 in regard to NDHA's identifies them as 'social objective' (rather than 'environmental').</p> <p>There is good x-ref in the Design Code document of CA appraisals. There may be opportunity to liaise with our Conservation Officer and Urban Designers on this as the plan progresses.</p>	<p>no building have been included in Policy 6.</p> <p>Agree to include a reference to the HER.</p> <p>NDHAs are consider social objectives. However, can also add environmental to Table 2.</p>
Policy 8 / p.41 / para 114	Community Facilities	<p>Number of exclusions under GPDO – maybe just refer to and leave at that.</p> <p>The Town and Country Planning (General Permitted Development etc.) (England) (Amendment) Order 2021 (legislation.gov.uk)</p>	<p>Agree to made clearer reference to GDPO.</p>

STATUTORY CONSULTEES



Chiseldon Parish Council
Issued via email: clerk@chiseldon-pc.gov.uk

David Wilson
E: david.wilson@thamewater.co.uk
M: +44 (0) 7747 647031

1st Floor West
Cleanwater Court
Vestern Road
Reading
RG1 8DB

27 February 2024

Swindon – Regulation 14 Chiseldon Neighbourhood consultation

Dear Sir/Madam,

Thank you for allowing Thames Water Utilities Ltd (Thames Water) to comment upon the above.

As you will be aware, Thames Water are the statutory water supply and sewerage undertaker for the Swindon area and are hence a **“specific consultation body”** in accordance with the Town & Country Planning (Local Planning) Regulations 2012.

We have the following comments on the consultation in relation to our water supply and sewerage undertakings:

General Sewerage/Wastewater and Water Supply Infrastructure Comments

A key sustainability objective for the preparation of Local Plans and Neighbourhood Plans should be for new development to be co-ordinated with the infrastructure it demands and to take into account the capacity of existing infrastructure. Paragraph 20 of the revised National Planning Policy Framework (NPPF), 2023, states: *“Strategic policies should set out an overall strategy for the pattern, scale and quality of development, and make sufficient provision for... infrastructure for waste management, water supply, wastewater...”*

Paragraph 11 states: *“Plans and decisions should apply a presumption in favour of sustainable development. For plan-making this means that:
a) all plans should promote a sustainable pattern of development that seeks to: meet the development needs of their area; align growth and infrastructure; improve the environment; mitigate climate change (including by making effective use of land in urban areas) and adapt to its effects”*

Paragraph 28 relates to non-strategic policies and states: *“Non-strategic policies should be used by local planning authorities and communities to set out more detailed policies for specific areas, neighbourhoods or types of development. This can include allocating sites, the provision of infrastructure...”*

Paragraph 26 of the revised NPPF goes on to state: *“Effective and on-going joint working between strategic policy-making authorities and relevant bodies is integral to the production of a positively prepared and justified strategy. In particular, joint working should help to determine where additional infrastructure is necessary....”*

The NDP does not allocate sites for housing and therefore this advice would only apply to infill development.

Proposed change: amend the Chiseldon Design Codes to insert text provided in this letter.

“Where appropriate, planning permission for developments which result in the need for off-site upgrades, will be subject to conditions to ensure the occupation is aligned with the delivery of necessary infrastructure upgrades.”

“The Local Planning Authority will seek to ensure that there is adequate water and wastewater infrastructure to serve all new developments. Developers are encouraged to contact the water/waste water company as early as possible to discuss their development proposals and intended delivery programme to assist with identifying any potential water and wastewater network reinforcement requirements. Where there is a capacity constraint the Local Planning Authority will, where appropriate, apply phasing conditions to any approval to ensure that any necessary infrastructure upgrades are delivered ahead of the occupation of the relevant phase of development.”

“Development must be designed to be water efficient and reduce water consumption. Refurbishments and other non-domestic development will be expected to meet BREEAM water-efficiency credits. Residential development must not exceed a maximum water use of 105 litres per head per day (excluding the allowance of up to 5 litres for external water consumption) using the ‘Fittings Approach’ in Table 2.2 of Part G of Building Regulations. Planning conditions will be applied to new residential development to ensure that the water efficiency standards are met.”

With regard to surface water drainage, Thames Water request that the following paragraph should be included in the Neighbourhood Plan ***“It is the responsibility of a developer to make proper provision for surface water drainage to ground, water courses or surface water sewer. It must not be allowed to drain to the foul sewer, as this is the major contributor to sewer flooding.”***

The web based National Planning Practice Guidance (NPPG) includes a section on 'water supply, wastewater and water quality' and sets out that Local Plans should be the focus for ensuring that investment plans of water and sewerage/wastewater companies align with development needs. The introduction to this section also sets out that *"Adequate water and wastewater infrastructure is needed to support sustainable development"* (Paragraph: 001, Reference ID: 34-001-20140306).

Thames Water therefore recommends that developers engage with them at the earliest opportunity (in line with paragraph 26 of the revised NPPF) to establish the following:

- The developments demand for Water Supply and Sewage/Wastewater Treatment and network infrastructure both on and off site and can it be met; and
- The surface water drainage requirements and flood risk of the development both on and off site and can it be met.

Thames Water offer a free Pre-Planning service which confirms if capacity exists to serve the development or if upgrades are required for potable water, waste water and surface water requirements. Details on Thames Water's free pre planning service are available at: <https://www.thameswater.co.uk/developers/larger-scale-developments/planning-your-development/water-and-wastewater-capacity>

In light of the above comments and Government guidance we consider that the Neighbourhood Plan should include a specific reference to the key issue of the provision of wastewater/sewerage and water supply infrastructure to service development proposed in a policy. This is necessary because it will not be possible to identify all of the water/sewerage infrastructure required over the plan period due to the way water companies are regulated and plan in 5 year periods (Asset Management Plans or AMPs). We recommend that the Neighbourhood Plan include the following policy/supporting text:

"Where appropriate, planning permission for developments which result in the need for off-site upgrades, will be subject to conditions to ensure the occupation is aligned with the delivery of necessary infrastructure upgrades."

"The Local Planning Authority will seek to ensure that there is adequate water and wastewater infrastructure to serve all new developments. Developers are encouraged to contact the water/waste water company as early as possible to discuss their development proposals and intended delivery programme to assist with identifying any potential water and wastewater network reinforcement requirements. Where there is a capacity constraint the Local Planning Authority will, where appropriate, apply phasing conditions to any approval to ensure that any necessary infrastructure upgrades are delivered ahead of the occupation of the relevant phase of development."

Water Efficiency/Sustainable Design

The Environment Agency has designated the Thames Water region to be "seriously water stressed" which reflects the extent to which available water resources are used. Future pressures on water resources will continue to increase and key factors are population growth and climate change.

Water conservation and climate change is a vitally important issue to the water industry. Not only is it expected to have an impact on the availability of raw water for treatment but also the demand from customers for potable (drinking) water. Therefore, Thames Water support the mains water consumption target of 110 litres per head per day (105 litres per head per day plus an allowance of 5 litres per head per day for gardens) as set out in the NPPG (Paragraph: 014 Reference ID: 56-014-20150327) and support the inclusion of this requirement in the Policy.

Thames Water promote water efficiency and have a number of water efficiency campaigns which aim to encourage their customers to save water at local levels. Further details are available on the our website via the following link:
<https://www.thameswater.co.uk/Be-water-smart>

It is our understanding that the water efficiency standards of 105 litres per person per day is only applied through the building regulations where there is a planning condition requiring this standard (as set out at paragraph 2.8 of Part G2 of the Building Regulations). As the Thames Water area is defined as water stressed it is considered that such a condition should be attached as standard to all planning approvals for new residential development in order to help ensure that the standard is effectively delivered through the building regulations.

Within Part G of Building Regulations, the 110 litres/person/day level can be achieved through either the 'Calculation Method' or the 'Fittings Approach' (Table 2.2). The Fittings Approach provides clear flow-rate and volume performance metrics for each water using device / fitting in new dwellings. Thames Water considers the Fittings Approach, as outlined in Table 2.2 of Part G, increases the confidence that water efficient devices will be installed in the new dwelling. Insight from our smart water metering programme shows that household built to the 110 litres/person/day level using the Calculation Method, did not achieve the intended water performance levels.

Proposed policy text:

"Development must be designed to be water efficient and reduce water consumption. Refurbishments and other non-domestic development will be expected to meet BREEAM water-efficiency credits. Residential development must not exceed a maximum water use of 105 litres per head per day (excluding the allowance of up to 5 litres for external water consumption) using the 'Fittings Approach' in Table 2.2 of Part G of Building Regulations. Planning conditions will be applied to new residential development to ensure that the water efficiency standards are met."

Comments in Relation to Flood Risk and Sustainable Drainage Systems

The National Planning Practice Guidance (NPPG) states that a sequential approach should be used by local planning authorities in areas known to be at risk from forms of flooding other than from river and sea, which includes "Flooding from Sewers".

Flood risk sustainability objectives and policies should also make reference to 'sewer flooding' and an acceptance that flooding can occur away from the flood plain as a result of development where off site sewerage infrastructure and capacity is not in place ahead of development.

With regard to surface water drainage it is the responsibility of the developer to make proper provision for drainage to ground, watercourses or surface water sewer. It is important to reduce the quantity of surface water entering the sewerage system in order to maximise the capacity for foul sewage to reduce the risk of sewer flooding.

Limiting the opportunity for surface water entering the foul and combined sewer networks is of critical importance to Thames Water. Thames Water have advocated an approach to SuDS that limits as far as possible the volume of and rate at which surface water enters the public sewer system. By doing this, SuDS have the potential to play an important role in helping to ensure the sewerage network has the capacity to cater for population growth and the effects of climate change.

SuDS not only help to mitigate flooding, they can also help to: improve water quality; provide opportunities for water efficiency; provide enhanced landscape and visual features; support wildlife; and provide amenity and recreational benefits.

With regard to surface water drainage, Thames Water request that the following paragraph should be included in the Neighbourhood Plan "***It is the responsibility of a developer to make proper provision for surface water drainage to ground, water courses or surface water sewer. It must not be allowed to drain to the foul sewer, as this is the major contributor to sewer flooding.***"

Site Allocations

There are no new allocations in the draft Neighbourhood Plan and the level of information does not enable Thames Water to make an assessment of the impact the proposed development will have on the waste water/sewerage network infrastructure and sewage treatment works. To enable us to provide more specific comments we require details of the type and scale of development together with the anticipated phasing.

Early engagement between the developers and Thames Water would be beneficial to understand:

- What water supply requirements are required on and off site
- What drainage requirements are required on and off site
- Clarity on what loading/flow from the development is anticipated

We recommend Developers contact Thames Water to discuss their development proposals by using our pre app service via the following link: <https://developers.thameswater.co.uk/Developing-a-large-site/Planning-your-development/Water-and-wastewater-capacity>

It should be noted that in the event of an upgrade to our sewerage network assets being required, up to three years lead in time is usual to enable for the planning and delivery of the upgrade. As a developer has the automatic right to connect to our sewer network under the Water Industry Act we may also request a drainage planning condition if a network upgrade is required to ensure the infrastructure is in place ahead of occupation of the development. This will avoid adverse environmental impacts such as sewer flooding and / or water pollution.

We recommend developers attach the information we provide to their planning applications so that the Council and the wider public are assured wastewater and water supply matters for the development are being addressed.

We trust the above is satisfactory, but please do not hesitate to contact David Wilson on the above number if you have any queries.

Yours faithfully,

David Wilson
Thames Water Property Town Planner

Natural England

Date: 06 March 2024
Our ref: 466002
Your ref: Chiseldon Neighbourhood Plan

Clair Wilkinson
clerk@chiseldon-pc.gov.uk

BY EMAIL ONLY



Horbeam House
Crewe Business Park
Electra Way
Crewe
Cheshire
CW1 6GJ

T 0300 060 3900

Dear Mrs Wilkinson,

Chiseldon Neighbourhood Plan - Pre-submission Regulation 14

Thank you for your consultation on the above dated 23 January 2024

Natural England is a non-departmental public body. Our statutory purpose is to ensure that the natural environment is conserved, enhanced, and managed for the benefit of present and future generations, thereby contributing to sustainable development.

Natural England is a statutory consultee in neighbourhood planning and must be consulted on draft neighbourhood development plans by the Parish/Town Councils or Neighbourhood Forums where they consider our interests would be affected by the proposals made.

Natural England does not have any specific comments on this draft neighbourhood plan.

However, we refer you to the attached annex which covers the issues and opportunities that should be considered when preparing a Neighbourhood Plan and to the following information.

Natural England does not hold information on the location of significant populations of protected species, so is unable to advise whether this plan is likely to affect protected species to such an extent as to require a Strategic Environmental Assessment. Further information on protected species and development is included in [Natural England's Standing Advice on protected species](#).

Furthermore, Natural England does not routinely maintain locally specific data on all environmental assets. The plan may have environmental impacts on priority species and/or habitats, local wildlife sites, soils and best and most versatile agricultural land, or on local landscape character that may be sufficient to warrant a Strategic Environmental Assessment. Information on ancient woodland, ancient and veteran trees is set out in Natural England/Forestry Commission [standing advice](#).

We therefore recommend that advice is sought from your ecological, landscape and soils advisers, local record centre, recording society or wildlife body on the local soils, best and most versatile agricultural land, landscape, geodiversity and biodiversity receptors that may be affected by the plan before determining whether a Strategic Environmental Assessment is necessary.

Natural England reserves the right to provide further advice on the environmental assessment of the plan. This includes any third party appeal against any screening decision you may make. If an Strategic Environmental Assessment is required, Natural England must be consulted at the scoping and environmental report stages.

For any further consultations on your plan, please contact: consultations@naturalengland.org.uk

Natural England had no specific comments to make on the NDP though suggested that it consult the local records centre. This was done and it is considered that no changes will be necessary.

No changes proposed.

Yours sincerely

Kimberley McDowell
Consultations Team

Annex 1 - Neighbourhood planning and the natural environment: information, issues and opportunities

Natural environment information sources

The [Magic](#)¹ website will provide you with much of the nationally held natural environment data for your plan area. The most relevant layers for you to consider are: **Agricultural Land Classification, Ancient Woodland, Areas of Outstanding Natural Beauty, Local Nature Reserves, National Parks (England), National Trails, Priority Habitat Inventory, public rights of way (on the Ordnance Survey base map) and Sites of Special Scientific Interest (including their impact risk zones)**. Local environmental record centres may hold a range of additional information on the natural environment. A list of local record centres is available from [the Association of Local Environmental Records Centres](#).

Priority habitats are those habitats of particular importance for nature conservation, and the list of them can be found [here](#)². Most of these will be mapped either as **Sites of Special Scientific Interest**, on the Magic website or as **Local Wildlife Sites**. Your local planning authority should be able to supply you with the locations of Local Wildlife Sites.

National Character Areas (NCAs) divide England into 159 distinct natural areas. Each character area is defined by a unique combination of landscape, biodiversity, geodiversity and cultural and economic activity. NCA profiles contain descriptions of the area and statements of environmental opportunity, which may be useful to inform proposals in your plan. NCA information can be found [here](#)³.

There may also be a local **landscape character assessment** covering your area. This is a tool to help understand the character and local distinctiveness of the landscape and identify the features that give it a sense of place. It can help to inform, plan and manage change in the area. Your local planning authority should be able to help you access these if you can't find them online.

If your neighbourhood planning area is within or adjacent to a **National Park** or **Area of Outstanding Natural Beauty** (AONB), the relevant National Park/AONB Management Plan for the area will set out useful information about the protected landscape. You can access the plans on from the relevant National Park Authority or Area of Outstanding Natural Beauty website.

General mapped information on **soil types** and **Agricultural Land Classification** is available (under 'landscape') on the [Magic](#)⁴ website and also from the [LandIS website](#)⁵, which contains more information about obtaining soil data.

Natural environment issues to consider

The [National Planning Policy Framework](#)⁶ sets out national planning policy on protecting and enhancing the natural environment. [Planning Practice Guidance](#)⁷ sets out supporting guidance.

Your local planning authority should be able to provide you with further advice on the potential impacts of your plan or order on the natural environment and the need for any environmental assessments.

Landscape

Your plans or orders may present opportunities to protect and enhance locally valued landscapes. You may want to consider identifying distinctive local landscape features or characteristics such as ponds, woodland or dry stone walls and think about how any new development proposals can respect and enhance local landscape character and distinctiveness.

¹ <http://magic.defra.gov.uk/>

² <https://www.gov.uk/government/publications/habitats-and-species-of-principal-importance-in-england>

³ <https://www.gov.uk/government/publications/national-character-area-profiles-data-for-local-decision-making>

⁴ <http://magic.defra.gov.uk/>

⁵ <http://www.landis.org.uk/index.cfm>

⁶ <https://www.gov.uk/government/publications/national-planning-policy-framework-2>

⁷ <http://planningguidance.planningportal.gov.uk/blog/guidance/natural-environment/>

If you are proposing development within or close to a protected landscape (National Park or Area of Outstanding Natural Beauty) or other sensitive location, we recommend that you carry out a landscape assessment of the proposal. Landscape assessments can help you to choose the most appropriate sites for development and help to avoid or minimise impacts of development on the landscape through careful siting, design and landscaping.

Wildlife habitats

Some proposals can have adverse impacts on designated wildlife sites or other priority habitats (listed [here](#)⁸), such as Sites of Special Scientific Interest or [Ancient woodland](#)⁹. If there are likely to be any adverse impacts you'll need to think about how such impacts can be avoided, mitigated or, as a last resort, compensated for.

Priority and protected species

You'll also want to consider whether any proposals might affect priority species (listed [here](#)¹⁰) or protected species. To help you do this, Natural England has produced advice [here](#)¹¹ to help understand the impact of particular developments on protected species.

Best and Most Versatile Agricultural Land

Soil is a finite resource that fulfils many important functions and services for society. It is a growing medium for food, timber and other crops, a store for carbon and water, a reservoir of biodiversity and a buffer against pollution. If you are proposing development, you should seek to use areas of poorer quality agricultural land in preference to that of a higher quality in line with National Planning Policy Framework para 112. For more information, see [Guide to assessing development proposals on agricultural land](#)¹².

Improving your natural environment

Your plan or order can offer exciting opportunities to enhance your local environment and should provide net gains for biodiversity in line with the [National Planning Policy Framework](#). If you are setting out policies on new development or proposing sites for development, you should follow the biodiversity mitigation hierarchy and seek to ensure impacts on habitats are avoided or minimised before considering opportunities for biodiversity enhancement. You may wish to consider identifying what environmental features you want to be retained or enhanced or new features you would like to see created as part of any new development and how these could contribute to biodiversity net gain and wider environmental goals.

Opportunities for environmental enhancement might include:

- Restoring a neglected hedgerow.
- Creating a new pond as an attractive feature on the site.
- Planting trees characteristic to the local area to make a positive contribution to the local landscape.
- Using native plants in landscaping schemes for better nectar and seed sources for bees and birds.
- Incorporating swift boxes or bat boxes into the design of new buildings.
- Think about how lighting can be best managed to reduce impacts on wildlife.
- Adding a green roof to new buildings.
- Providing a new footpath through the new development to link into existing rights of way.

⁸ <https://www.gov.uk/government/publications/habitats-and-species-of-principal-importance-in-england>

⁹ <https://www.gov.uk/guidance/ancient-woodland-and-veteran-trees-protection-surveys-licences>

¹⁰ <https://www.gov.uk/government/publications/habitats-and-species-of-principal-importance-in-england>

¹¹ <https://www.gov.uk/protected-species-and-sites-how-to-review-planning-proposals>

¹² <https://www.gov.uk/government/publications/agricultural-land-assess-proposals-for-development/guide-to-assessing-development-proposals-on-agricultural-land>

[Defra's Biodiversity Metric](#) should be used to understand the baseline biodiversity value of proposed development sites and may be used to calculate biodiversity losses and gains where detailed site development proposals are known. For small development sites the [Small Sites Metric](#) may be used. This is a simplified version of [Defra's Biodiversity Metric](#) and is designed for use where certain criteria are met.

Where on site measures for biodiversity net gain are not possible, you should consider off site measures.

You may also want to consider enhancing your local area in other ways, for example by:

- Setting out in your plan how you would like to implement elements of a wider Green Infrastructure Strategy (if one exists) in your community.
- Assessing needs for accessible greenspace and setting out proposals to address any deficiencies or enhance provision. Natural England's [Green Infrastructure Framework](#) sets out further information on green infrastructure standards and principles
- Identifying green areas of particular importance for special protection through Local Green Space designation (see [Planning Practice Guidance](#)¹³).
- Managing existing (and new) public spaces to be more wildlife friendly (e.g. by sowing wild flower strips in less used parts of parks or on verges, changing hedge cutting timings and frequency).
- Planting additional street trees.
- Identifying any improvements to the existing public right of way network, e.g. cutting back hedges, improving the surface, clearing litter or installing kissing gates) or extending the network to create missing links.
- Restoring neglected environmental features (e.g. coppicing a prominent hedge that is in poor condition, or clearing away an eyesore).

Natural England's [Environmental Benefits from Nature tool](#) may be used to identify opportunities to enhance wider benefits from nature and to avoid and minimise any negative impacts. It is designed to work alongside [Defra's Biodiversity Metric](#) and is available as a beta test version.

¹³ <https://www.gov.uk/guidance/open-space-sports-and-recreation-facilities-public-rights-of-way-and-local-green-space>

3rd December 2018

To whom it may concern:

I am the Curator of the British and European Iron Age collections at the British Museum. It has come to my attention that Swindon Borough Council has included in their Strategic Housing and Economic Land Availability Assessment (SHELAA) land in Chiseldon on which a developer aims to build over 400 new houses. I am writing to raise concerns that this potential development, were it to go ahead, would have a significant detrimental impact on an important multi-period archaeological landscape.

The land in question lies within the North Wessex Downs Area of Outstanding Natural Beauty, adjacent to the chalk escarpment of The Ridgeway National Trail. It is also very close to the internationally important site where seventeen Iron Age cauldrons were discovered in 2004. Whilst this material has been excavated, the site's importance can only be understood in relation to the landscape, with views across the surrounding countryside towards the hillforts of Liddington and Barbury Castles. A large housing development in this area would also be visible from The Ridgeway trail and the hillforts themselves, and would seriously negatively affect the experience of both locals and visitors to the Area of Outstanding Natural Beauty.

Given the archaeological importance of this area, and the strong and enthusiastic local support for the heritage of the site, I would suggest that alternative uses for the land be explored. There is clear potential for encouraging heritage tourism to the area, and as such a more sensitive development might be of greater social and economic benefit to the community. I hope that you will revisit the plans for large-scale development of this area and instead choose to protect the historical and archaeological significance of this beautiful area of open countryside.

Yours faithfully,



Dr Julia Farley

Curator of British and European Iron Age collections

Appendix 1 shows the site which is subject of this letter as a scheduled monument. The NDP does not support development on this site and the recommendations in the letter are therefore not relevant. However, the site is mentioned in policy 3 Area F which appears to be aligned with the intention of the letter.

No changes proposed.

Historic England (David Stuart Historic Places Adviser)

Thank you for your consultation on the SEA Screening Report associated with the emerging Chiseldon Neighbourhood Plan.

This would appear to be our first involvement with the preparation of this Plan so we welcome the opportunity to familiarise ourselves with its policy aspirations and identify any matters of interest which it would be useful to highlight at this stage.

We note that the Plan does not intend to allocate sites for development and the limited scope of its intended policies. On the basis of the draft which has been shared with us I can confirm that there are no issues of immediate interest and this is likely to continue to be the situation as the Plan progresses unless there are significant changes.

On this basis I can also confirm that we have no objection to the view that a full SEA is not required.

Thank you for your Regulation 14 consultation on the pre-submission version of the Chiseldon Neighbourhood Plan.

There are no specific issues associated with the Plan upon which we wish to comment. This echoes our response to the association which we commented in December (see attached).

We would therefore want only to congratulate your community on the preparation of its Plan and wish it well in getting it made.

Kind regards

David

David Stuart | Historic Places Adviser

Historic England had no specific comments to make.

No changes proposed.

National Highways

Thank you for providing National Highways with the opportunity to comment on the pre-submission version of the Chiseldon Neighbourhood Development Plan. National Highways is responsible for operating, maintaining and improving the strategic road network (SRN) which in this case comprises the M4 motorway which passes along the northern boundary of the plan area. The A345 passes north-south through the plan area providing a direct connection to M4 junction 15. As you will be aware, junction 15 can experience congestion particularly during the network peak periods.

We consider that the Plan's proposed policies are unlikely to lead to a scale of development which would adversely impact on the safe and efficient operation of the M4 and we therefore have no specific comments to offer. However, in general terms any large scale development that may come forward within the Plan area will need to be supported by an appropriate assessment of traffic impacts which should consider the operation of the SRN in line with national planning practice guidance and DfT Circular 01/2022. Where proposals would result in a severe congestion or unacceptable safety impact, mitigation will be required in line with current policy. We are therefore looking forward to working with Swindon Borough Council as they develop their transport evidence base to support their emerging Local Plan.

These comments do not prejudice any future responses National Highways may make on site specific applications as they come forward through the planning process, which will be considered by us on their merits under the prevailing policy at the time.

National Highways have no specific comments to make.

No changes proposed.

OTHER STAKEHOLDERS

Resident (RK)

Response to Chiseldon Local Development Plan

Response Summary

There is a lot to be applauded about Neighbourhood Development Plans to preserve the characters of villages and prevent the destruction of communities by setting clear objectives and policies. They should be used to reflect the ambitions of the parish and in Chiseldon's case a desire to maintain the village as an attractive and pleasant place to live and work.

The Chiseldon Neighbourhood Development Plan (CNDP) tries to do this but does contain some ambiguity and vague policy wording that could compromise the work done.

There is a lot of caveated wording, especially in Chapter 3, about the relationship between the CNDP and the Swindon Borough Council Local Development Plan (LDP) and what can and cannot be done.

However, there is a lot the parish could put in the plan to control development of allocated housing. I appreciate the comments should be focused on the CNDP but the CNDP is the **only opportunity Chiseldon has to have some say in this.**

The village infrastructure is stretched, yet the proposed CNDP gives no mention of how these needs will be met. Pressure on existing services including GP's, schools, roads and transport has not been considered.

The main tenor of this letter seeks to prevent new development. The NDP does not propose development sites but it also complies with NPPF 2023 29. The NDP is criticised for not stopping development (which is not within the remit of a NDP).

The NDP is criticised for not saying enough about how local services are "stretched" already. However, the respondent has not provided any evidence of this pressure. The NDP on the other hand has provided a thorough assessment of available shops, infrastructure and census data.

The qualifying body may wish to add a new paragraph to reflect matters raised in this letter for including in the section "Chiseldon: location and description". The new information should be restricted to description of:

- Accident hot spot with supporting accident statistics
- Monitoring data on effluent leaks.

The accident blackspot at Hodson Road on the East side into the village has not been mentioned, nor has the diminishing public transport from the village.

The existing mains sewer down Mount Prow, already at capacity before Home Close estate was built, is now at breaking point, under continuous monitoring with **regular effluent leaks** into areas flagged in the plan as “Green areas” of significant biodiversity and wildlife corridors.

It also gives no mention of the 74 dwellings built over the last 4 years – more than anything required in the Swindon Borough LDP 2026 or 2036 (DRAFT) and considerably more than the housing needs would indicate.

The CNDP does not go far enough in demonstrating that Chiseldon Parish can accommodate any additional needs **within the existing boundary** nor set out adequate policies to try to control this properly. It sets the bar too low for the people and community of Chiseldon at the expense of the destruction of the green space which makes this village a great place to live and bring up families.

XXXXX

Chiseldon

06 Mar 2024

CNDP in the Context of Swindon LDP 2036

The National Planning Policy Framework 2021, 29 as quoted in the CNDP states that “neighbourhood plans should not promote less development than set out in the strategic policies of the Swindon Borough Local Development Plan (LDP) or undermine those strategic policies”.

The CNDP straddles the current approved Swindon Borough LDP up to 2026 where there is NO commitment or allocation and the DRAFT LDP 2036 that at last public sight had 42 houses allocated (LA22). The CNDP goes up to 2031.

However, the Local Development Plan (LDP) 2036 DRAFT which proposed LA22 and the development of 42 homes at Hodson Road is being redeveloped itself and will not be known until 2025. The opening statement in the Chairman’s Introduction seemingly suggest we cannot contradict this in the CNDP – but the LDP 2036 has not been approved.

Whilst the Parish Council has made the selection of this site highly opaque in proposing it as an alternative to the more sensible location at the other side of the village, the need for any development schemes at all is questionable given the housing needs analysis.

Housing needs can and should be met through normal development processes within the confines of the development boundaries already established. **The record of planning approvals for the construction of new homes has historically exceeded by some margin the identified needs from the last Swindon Borough Council Local Development Plan (0 houses).**

There is no sufficiently identified need to designate additional land for building purposes and no history to suggest that Chiseldon won’t

The LDP referred to was a Reg. 18 draft that was withdrawn and the reference to LA22 is now redundant.

The NDP has not promoted this site though it has spoken to the agent of this site who may wish to progress it. There is currently no 5 year housing land supply. The NDP cannot prevent an application from coming forward nor can it provide sufficient justification to over-rule the provisions of NPPF para. 11. All it can do is set out design policies in the event that an application is prepared.

The NDP identifies local businesses and where these are Class F, they are protected under policy 8. Unfortunately, changes of use from Class E (commercial and services) to residential is difficult to control due to national permitted development rights.

by natural processes exceed any housing development targets imposed. **Over 74 new dwellings have been approved in the last 4 years within the existing boundaries – almost double the amount identified in the previous draft of the Swindon Local Development Plan (LDP) 2036.**

Coupled with the needs assessment identifying at its most speculative and wishful a need for around 20 houses, **the demand simply is not there for minor developments** that do not contribute towards community infrastructure upgrades.

The LDP 2026 extract below should be reflected in the CNDP and Swindon Borough Council encouraged to adopt for LDP 2036.

“Of the remaining villages in the Borough; Broad Blunsdon, Chiseldon, Wanborough and Bishopstone have some supporting facilities, but they lack core services, particularly employment and leisure compared with Highworth and Wroughton. Development should be in accordance with the settlement hierarchy. The villages in the Borough have distinct characteristics and features that are worthy of protection and enhancement, and therefore development should be at a scale in keeping with the historic form and character of the village.”

Detailed Response to NDP

Consultee heading Section	Consultee Sub-Section / Policy	Consultee Comments	Qualifying Body response
Chairman's Introduction		<ul style="list-style-type: none"> This section would have greater impact if it started with the "Our Vision" paragraph. The 2nd paragraph seems somewhat apologetic about constraints on flexibility with regards to the Swindon Borough LDP – this should be removed as that plan is in DRAFT and not due to complete until 2025. The Chair should be identifying the CNDP as providing the guidance – not preparing us for some unknown (?) bad news? It should be signed by the Chair not the company contracted to write the plan. The introduction stats that the areas should grow and that the parish cannot remain unchanged. This is debatable given the housing needs analysis and the fact that growth would inevitably overwhelm the infrastructure and impact the desirability of the village. Traffic congestion is mentioned – which should immediately preclude any minor developments. 	<p>Proposed changes – Chair to add name to the Chairman's introduction and make other modifications as he sees fit.</p> <p>Traffic congestion is not in itself a reason for refusal for new developments and this suggestion cannot be taken forward. Individual developments are assessed on their own merits.</p>
Chapter 1 Introduction		<ul style="list-style-type: none"> No mention is made of the fact that Chiseldon has built more than double the amount of houses potentially required in the Swindon Borough LDP 2036 DRAFT and about 4 times the amount from the housing needs analysis. Chiseldon has been 	<p>Most of the development referred to has occurred within the development boundaries and is therefore infill or windfall development. The NDP was not prepared with a specific housing target because it did not allocate land</p>

Consultee heading Section	Consultee Sub-Section / Policy	Consultee Comments	Qualifying Body response
		<p>doing its part to support development above and beyond what was expected.</p> <ul style="list-style-type: none"> • Paragraph 4 states <i>“This means that when the CNDP successfully passes its referendum with a majority vote in favour of adopting it, every planning application and decision that is submitted and considered in the parish must pay regard to the policies in the CNDP.”</i> The Parish Council should be ensuring then that the document contains unambiguous and clear statements including preserving the development boundary of the village. • Paragraph 11 – if this is the case we should be reflecting the comments in the Swindon Borough LDP 2026 that state any development should be in keeping with the scale of the community. 	<p>for housing and the matter of housing allocations is left to the emerging Local Plan.</p> <p>The development boundary is clearly indicated in the maps and figures.</p>
<p>Chapter 2 Chiseldon Parish</p>		<ul style="list-style-type: none"> • Page 60 – the classification of land is interesting specifically the difference between arable and horticulture and improved grassland. Looking either side of Hodson Road – the fields equally have crops/grass in. Where is this classification from as I would have thought all that land would be designated arable. On Page 58 the land is designated as arable. 	<ul style="list-style-type: none"> • The map on page 60 was prepared by the Wiltshire and Swindon Biological Records Centre which hold this data on behalf of both authorities.
<p>Chapter 3 Vision and Context</p>		<ul style="list-style-type: none"> • Traditionally, the vision should come first? • There should be a stronger statement about not expanding outside the existing development boundaries. 	<p>Would the Parish Council prefer to move the vision to the start of the document? If so, where?</p>

Consultee heading Section	Consultee Sub-Section / Policy	Consultee Comments	Qualifying Body response
		<ul style="list-style-type: none"> • Paragraph 38 – 74 new dwellings have been created in 4 years – this is hardly insignificant. Suggest this is removed as Chiseldon has expanded. • Paragraph 40 – why would major housing development be likely to occur in a village that has shown a very low need for housing with major developments of thousands of homes happening 3-5 miles away? This should be written to state that whilst there may be a desire for major housing from Swindon Borough Council, the village as evidenced in the current LDP is not the place to do it. • Paragraph 41 – policies do not adequately reflect this in the CNDP – development which impacts water run-off or biodiverse areas should be prevented. • Paragraph 49 – sustainable transport is not just cycling and walking. What about residents and potential residents that can do neither? • Paragraph 51 – the table of priority needs is confusing, does the shading represent preference or weighting? This doesn't really say what is being met or how? • Paragraph 54 – This paragraph is confusing and should be reworded with the ambiguity removed and put in a specific Policy section. It is in the wrong place as it seems to imply some form of Policy. It seems to contradict itself saying that 	<p style="color: red;">Would the Parish Council wish to modify para. 38?</p> <p>Most of the new housing provision has been infill within the development boundary as explained above.</p> <p>These matters are covered in policy 3.</p> <p>Sustainable transport is usually about walking, cycling and public transport. The latter is not significant in the parish.</p> <p>Perhaps the author is not familiar with NPPF para. 8?</p> <p>This is a summary of local plan policy, not NDP policy (hence the reference to the Local Plan). This</p>

Consultee heading Section	Consultee Sub-Section / Policy	Consultee Comments	Qualifying Body response
		<p>development boundaries have been identified but that development can occur in the countryside if identified in a neighbourhood plan such as CNDP to meet local needs (none identified that couldn't be filled within existing boundaries as demonstrated over last 4 years) or tourist and visitor facilities. Please remove the wording from "Local Plan" onwards as it opens up a loophole in the document.</p>	<p>is not a "loophole" but a reference to the development plan policy context.</p>
Chapter 4 Policies	Policy 1: Housing Mix	<ul style="list-style-type: none"> • This section is very much based on the housing needs assessment. But seems to give slightly different interpreted results than those in the accompanying detailed report? <ul style="list-style-type: none"> ○ Q1 – 25 people wanted to move ○ Q2 most indicated 2-3-4 bedroom houses - within the village 2-3 bedroom properties are taking a long time to sell indicating that the needs analysis is price/ market sensitive ○ Q5 – indicates only 18 requirements for affordable houses <p>This would indicate 18 affordable houses are required. No more. This should be reflected in the CNDP and stated clearly and unambiguously.</p> <ul style="list-style-type: none"> • Paragraph 56 – more dwellings than this were delivered? 	<ul style="list-style-type: none"> • Policy 1 is for housing mix (a percentage of what is proposed) and not an allocation of a number of dwellings. The NDP does not allocate land for housing and therefore does not comment on the number that may be permitted. The Local Plan housing needs assessment will eventually derive a requirement for houses in the parish. SBC has indicated that a housing requirement cannot be provided now.

Consultee heading Section	Consultee Sub-Section / Policy	Consultee Comments	Qualifying Body response
		<ul style="list-style-type: none"> Paragraph 72 – if land is allocated will it be compatible with the housing needs assessment and affordability? Policy lettering is used here rather than numbering. Should be consistent. 	<p>When the new local plan allocates land for housing, it can be expected that this will be based on new data on housing need and the need for affordable housing.</p> <p>Not sure what the reference to letter is – para 72 is in Normal.</p>
	Policy 2: Sustainable Transport	<ul style="list-style-type: none"> Sustainable transport does not equal cycle routes. It should include references to how the parish will look to influence public transport which can considerably reduce environmental impacts. There is no mention of this anywhere. Pavement provision or safe walking space between Chiseldon and Hodson is not mentioned. The bus stop on Hodson Road stands in splendid pavement isolation, cut-off from any easy or direct pavement access. Again not mentioned. This is particularly significant given the housing needs analysis and residents with disabilities who may also wish to enjoy the public rights of way or catch a bus. The extension of the cycle network is great but equal provision should be made for public rights of way and walkers. Care should be taken to discourage motorbikes and vehicles from using such networks. 	<ul style="list-style-type: none"> Public transport is indeed a form of sustainable transport but the NDP cannot influence how it is delivered, particularly where no allocations are made. The NDP is therefore silent on this matter. Pavement provision is not mentioned because this would require significant changes to the roads and this cannot be paid for by mechanisms available in the NDP. <p>Would the Parish Council wish to address any of these points?</p>

Consultee heading Section	Consultee Sub-Section / Policy	Consultee Comments	Qualifying Body response
		<ul style="list-style-type: none"> • Paragraph 76 – the statement around developer contribution is interesting and out of place in the document suggesting to developers that developments might be green lit if a cycle way upgrade is promised. This sentence should be removed. How it happens is not the business of this document. • Paragraph 76 – where is the needs analysis to make this such a significant part of the document? Will it be published? • Figure 14 proposes significant development on the Local Green Spaces including running a tarmac cycle way through the old railway. This part of the plan seems to be more fully developed and thought through than the housing needs analysis. It also seems to be suggesting some quite large-scale changes to the existing cycle path which may be out of keeping (flattening paths and straightening). • Figure 14 proposes segregating the cycle lane. Will this be at the expense of footpath or road? The road is not wide enough to accommodate this and introducing passing places or narrowing to a single track would create a very dangerous accident blackspot like the Marlborough Road. 	<p>This is a misunderstanding of developer contributions as set out in para. 57 of the NPPF. The NDP sets out a wish list of necessary infrastructure improvements as the starting point for considerations of how to deliver sustainable transport infrastructure. The need for this will be determined on an application by application basis.</p> <p>The proposals in Fig 14 are indicative of how improvements could be made. Actual delivery will require detailed scheme design and identification of funding streams. Such design will address how, on any specific stretch of improvement, walkers, cyclists and cars can travel safely</p>
	Policy 3: Biodiversity and nature recovery	<ul style="list-style-type: none"> • This does not go far enough in protecting areas of biodiversity need. 	<ul style="list-style-type: none"> • When the LRNS is published, it will identify priorities and measures that will become

Consultee heading Section	Consultee Sub-Section / Policy	Consultee Comments	Qualifying Body response
		<ul style="list-style-type: none"> • Point 1 is unclear – what is the action and who is it on? Who should contact SBC? How will Chiseldon and SBC assess whether this has been taken into account. • Point 2 is poorly defined, ambiguous and unenforceable. The current wording creates loopholes which means applicants are under no obligation to carry out conditional activities. This should be strengthened to ensure that biodiversity net gain is mandated to the applicant and concrete plans should be included in their applications to show how this will be delivered. <p>Equally Chiseldon Parish Council should be mandating as part of the protection of the village environment that applications should not be permitted to convert land usage where sites are bounded on more than one side by biodiversity areas due to the impact this will have.</p> <ul style="list-style-type: none"> • Point Number 3 should be reconsidered in light of the proposed Draft Local Plan Policy LA 22 as development on sites immediately adjacent to those areas identified for biodiversity gain will ultimately see a knock-on detrimental impact. Development sites should NOT be next to these sites or on them. 	<p>constraints to development. However, this does not exist yet and this is an interim policy.</p> <ul style="list-style-type: none"> • The action in point 1 is that any applicant who must deliver BNG should do so within the context of the LNRS (an not according to other measures). • Point 2 is clear - offsite BNG should be delivered in Chiseldon parish. The author does not understand the requirements of BNG set out in recent regulations. • All other aspects of this policy will probably be rewritten when the LRNS is issued (at least in draft form in summer 2024). <p>Proposed change – this policy was written before BNG guidance including planning practice guidance was issued and before the LRNS preparation had begun. The policy wording should be refined.</p> <p>This is not within the purview of the planning system. However, the LRNS will address where LNRS priorities lie.</p>

Consultee heading Section	Consultee Sub-Section / Policy	Consultee Comments	Qualifying Body response
		<ul style="list-style-type: none"> Point Number 4 does not really state any definition of expert nor define long term management. Point 5 should be removed as it contradicts the nature and intent of a Chiseldon NBC and Point 2. This is creating a get-out-of-jail card for applicants who have no intention of benefitting the parish through their development. Point 6 this should include mandatory legally binding signed agreements as evidence in planning proposals. “Must demonstrate” is weak in terms of wording and should be linked to approval. 	<p>LA22 has been withdrawn and is redundant. The LNRS will address where priorities lie.</p>
	Policy 4: Local Green Spaces	<ul style="list-style-type: none"> The wording should be updated to reflect detrimental impact to Local Green Spaces of adjacent development which would impact them detrimentally. 	<ul style="list-style-type: none"> The provisions for LGS in the NPPF does not make reference to adjacent development.
	Policy 5: Design	<ul style="list-style-type: none"> Policy wording should be stronger – change “should” to “must”. The Chiseldon Design Codes and Guidance (2023) is a great piece of work and should be used to enforce as much as possible planning designs and decisions. 	<ul style="list-style-type: none"> Agree. Change should to will.
	Policy 6: Non-designated Heritage Assets	<ul style="list-style-type: none"> No Comments. 	<ul style="list-style-type: none">

Consultee heading Section	Consultee Sub-Section / Policy	Consultee Comments	Qualifying Body response
	Policy 7: New play equipment	<ul style="list-style-type: none"> • Policy wording should reflect paragraph 111 explicitly especially where play equipment should be situated 30m from the nearest dwelling boundary. Suggest changing should to must. • This should be reflected and assessed by the Parish Council with new applications. 	<ul style="list-style-type: none"> • Agree – change reference to para 110 to 111.
	Policy 8: Community Facilities	<ul style="list-style-type: none"> • Policy wording could be stronger. “Must” rather than “Should” 	<ul style="list-style-type: none"> • Agree – change should to will.
	Appendices	<ul style="list-style-type: none"> • Page 60 – the classification of land is interesting specifically the difference between arable and horticulture and improved grassland. Looking either side of Hodson Road – the fields equally have crops/grass in. Where is this classification from as I would have thought all that land would be designated arable. On Page 58 the land is designated as arable. 	<ul style="list-style-type: none"> • The WSBRC holds the most up to date information available.

Appendix

Houses have been built in Chiseldon Parish totalling at least 74 since 2018.

Planning Application	Development Name	Number of Dwellings Approved
S/23/0139	Burderop Park House	52
S/21/1126	Burderop Park House	6
S/22/1170	Burderop Cottage	11
S/18/1160	Land at Badbury House Farm	5
	Total	74

Burderop Estate

REPRESENTATIONS TO CHISELDON PARISH COUNCIL'S
NEIGHBOURHOOD PLAN REGULATION 14 CONSULTATION

Prepared on behalf of Burderop Estate

March 2024

The Burderop Estate's support of the NDP is noted with thanks.

- 1.1 These representations are made by Howard Cole Limited on behalf of the Burderop Estate in response to Chiseldon Parish Council's Neighbourhood Plan Regulation 14 Consultation Draft and its supporting documents:
 - Chiseldon Design Codes and Guidance;
 - Chiseldon Housing Needs Assessment; and
 - Accompanying Plans and Maps.
- 1.2 The Burderop Estate is a private agricultural and sporting estate on the edge of the Marlborough Downs and includes much of Chiseldon Parish. The Estate has been owned by the Calley and Langton family since 1614, and currently extends over 1,800 acres of grassland, arable and woodland. The Estate has had and continues to have an ongoing constructive relationship with the Chiseldon community and its elected representatives.
- 1.3 We welcome the Parish Council's commitment to produce its Neighbourhood Plan. It is recognised that such a challenge requires significant investment of time and resources, and we applaud the Parish Council and Members of the Steering Group's leadership in undertaking this process. With that in mind, these submissions have been made in a spirit of constructiveness and collaboration, as we seek to ensure that a robust and resilient neighbourhood plan is put in place.
- 1.4 The Estate can confirm that there was consultation with regard to the proposed Local Green Space in summer 2023 as required by the National Planning Practice Guidance. The Estate also has no objections to the proposed areas of Local Green Space as set out at Policy 4 and Appendix 4 in the Regulation 14 Neighbourhood Plan.
- 1.5 We note that the Regulation 14 Neighbourhood Plan makes no allocations for development as encouraged by NPPF Paragraph 71a and accepts that this is a decision for the parish council to make. Instead, the Neighbourhood Plan has opted to provide a framework of policies to assist in development management, once planning applications are made.
- 1.6 Policy 1 provides a framework to achieve an appropriate mix of housing to meet the needs identified in the Housing Needs Assessment. We also note that Policy 1 makes provision for the viability of any submitted scheme to be considered in terms of the housing mix with reference to the 'first homes' discount requirements. We welcome this approach.
- 1.7 The Estate also supports the list of Community Facilities set out in the table at Policy 8.
- 1.8 In summary therefore, the Burderop Estate welcomes the Regulation 14 Chiseldon Neighbourhood Plan and its content and looks forward to continued constructive work with the Parish Council.

Chiseldon Community Group

Chiseldon Community Group

Report on Swindon Borough Council's
Strategic Housing & Economic Land Availability
Assessment



Chiseldon Community Group

The Chiseldon Community Group was formed to represent the views of the residents of Chiseldon.

The group was set up to respond to a presentation made by Swindon Borough Council at a public meeting in Chiseldon on the 15th November 2018. At this meeting Gary Sumner, Swindon Borough Council's Cabinet Member for Strategic Planning, presented the case for building more than 400 new houses in Chiseldon along with a school, a country park, shops and a high street running along New Road.

An open meeting was called for Chiseldon residents to attend, learn more about the proposals and give their views. Many residents attended this meeting, and all voiced their opposition to the above developments as well as the proposed development of 40 houses off Hodson Road.

A group of volunteers then created a small committee, with representation from a cross-section of the community to produce this collective response to the proposals and to represent the concerns of villagers.

Aims of Chiseldon Community Group

To formulate a collective response to proposals to build houses on AONB designated land, which sits outside of Chiseldon village's settlement boundary. This land has been marked 'green' for development in Swindon Borough Council's recently published draft Strategic Housing & Environmental Land Assessment (SHELAA):

- Land south of New Road and adjacent to The Ridgeway: SHELAA reference numbers S0027 & S0028 (capacity of 697)
- Land adjacent to Hodson Road: SHELAA reference number S0078 (S0078 capacity of 71)

To investigate what is in the community/public interest.

To investigate if the SHELAA process has been dealt with in the correct manner.

To help the Parish Council work towards publishing a Chiseldon Local Plan.

The NDP does not allocate land for housing leaving the matter of allocation to the emerging local plan which has not yet proposed potential site allocations. The SBC SHEELA is therefore not a matter for the NDP to consider. The NDP does not support development in the AONB.

No changes proposed.

KEY POINTS FOR CONSIDERATION

- Chiseldon is set in rural surroundings and is wholly within the North Wessex Downs Area of Outstanding Natural Beauty, one of the most extensive and least spoiled downland tracts in southern England.
- AONBs have the same level of protection as National Parks and there is now greater emphasis to protect our landscape due to the urban expansion into village locations.
- National planning policy set out in the NPPF¹ is explicit that the landscape and scenic beauty of an AONB has the highest status of protection and therefore 'great weight' should be given to conserving and enhancing the landscape and its scenic beauty. Developments on these greenfield sites would neither conserve or enhance the landscape or its scenic beauty.
- The three sites identified as green for development in the SHELAA sit within the North Wessex Downs Area of Outstanding Natural Beauty and sit outside the Chiseldon village settlement boundary. Each site in its own right would constitute a **'major development'**.
- There is **no evidence of any 'exceptional circumstances'** (paragraph 172 of the NPPF provides criteria) that would support any allocation or, for that matter, development on any of the three Chiseldon NWD AONB sites identified in the SHELAA.
- Under Section 82 of The Countryside and Rights of Way Act 2000² the Parish Council and Swindon Borough Council have a 'duty of regard' to defend protected landscape from development.
- Swindon Borough Council should be pursuing all possible means to meet development needs on non-protected land to fulfil its housing requirements.
- The earlier application for just 12 affordable houses on SHELAA site S0028 went to appeal and was rejected in January 2012³. The Planning Inspectorate concluded that the effects of the proposed development would detract from the established rural character and appearance of the countryside, thereby eroding the natural beauty of the AONB. Nothing has changed since and therefore the inspector's conclusion is as valid now as it was in 2012.
- Robert Buckland, QC and Member of Parliament for South Swindon, also opposes the proposed housing allocation in SBC's SHELAA. In an email sent to us he writes: "I agree that this proposed housing allocation is completely inappropriate and unsuitable for development. The sites sit within the North Wessex Area of Outstanding Natural Beauty, which merits strong protection from development. I have opposed previous planning applications on this site."
- The land marked green in the SHELAA has a maximum capacity of more than 760 houses. That would be nearly a 70% increase in houses in Chiseldon.
- The site south of New Road sits within direct view and very close to sites of national historic importance; the Ridgeway National Trail, the Ickneild Way (one of the country's oldest highways), Liddington Castle and Barbury Castle.
- There are prominent local views within the village identified in the Chiseldon Conservation Area Appraisal and Management Plan⁴, which will be spoilt by the development. The proposed sites and any buildings on them would change the rural approach and views of the village from the

South and West.

- All three sites within the Parish share the aspects of landscape, heritage and geology, which are attracting support nationally.
- The cycleway and footpaths attract local, regional and national visitors and provide a gateway from Swindon to the NWD AONB, for the experience, enjoyment and wellbeing of all.

Planning

The National Planning Policy Framework (NPPF, July 2018):

- The NPPF must be taken into account in preparing the development plan and is a material consideration in planning decisions. Swindon Borough Council must consider the planning policy in the NPPF.
- Chapter 15 of the NPPF is about conserving and enhancing the natural environment. It expects planning policies to 'contribute to and enhance' natural environments by 'protecting and enhancing valued landscapes' and recognise 'the intrinsic character and beauty of the countryside'.
- The AONB designation, of course, defines the countryside around Chiseldon as a 'valued landscape' of the highest status and with 'scenic beauty' of the highest status.

Swindon Borough Council's Local Plan 2011 – 2026 (Formally adopted by Swindon Borough Council on 26 March 2015)

- Swindon Borough Council's Local Plan states: "The villages in the Borough have distinct characteristics and features that are worthy of protection and enhancement, and therefore development should be at a scale in keeping with the historic form and character of the village."
- The Local Plan also states: "Creating sustainable communities is about more than just housing. It is also about recognising and understanding the social and economic value of historical, cultural and natural assets." This includes features of importance (natural and historic) such as: landscape character, historic landscape, flood protection, tree and hedgerow protection, protected habitats, archaeology and heritage assets.
- SBC recognises that Chiseldon's infrastructure is not suitable for further development.
- Given the above, it cannot be rationally or reasonably concluded that the identification of the three AONB sites identified in the draft SHELAA merits taking forward in any capacity. We respectfully request that the three green AONB sites in Chiseldon are rejected and removed from the SHELAA.

Community & Public Interest

- The vast majority of residents are against AONB land being developed and came out in force to voice their views at two public meetings organised by the Parish Council meetings.
- The Chiseldon Community Group organised an additional session where a significant proportion of the community attended.
- As of early December 2018, and within three days of its launch, over 1,000 people have signed a petition against development on the NWD AONB.
- In 2016, Chiseldon Parish Council commissioned a survey of residents' views on what they liked about life in the Parish and what they disliked or would like to see improved. The results are very relevant to the SHELAA plans. A total of 1250 statements were gathered. Topping the list of likes were the village's rural location and feel and the wealth of facilities on offer.
- Current and proposed development has led to intensification of traffic through the village. Traffic was the top concern for residents in the 2016 survey commissioned by Chiseldon Parish Council.
- Chiseldon already has a viable and vibrant community with a wide range of facilities, which are more than adequate for the size of the population (including a school, village halls, shops, recreation ground, post office, hotels, social club and two pubs).
- Additional housing stock is already being delivered locally, which should negate the need to build houses on AONB protected land. Local developments include, but are not limited to:
 - Burderop Park will deliver nearly 80 residences (25 apartments/dwellings, 52 dwellings).
 - 100 houses at Berkley Farm in Wroughton
 - 800 houses already built in Wichelstowe, as well as a Joint Venture signed by SBC and Barrett Homes in January 2018, to build a further 2,750 houses at this site.
 - Potentially an additional 300 houses at nearby Badbury Park (in addition to the hundreds already being built or planned in the area).

Continued...

Conclusion

There are a number of factors here that mean there is really only one conclusion to be reached.

First and foremost is that these three sites are designated as part of the NWD AONB. The AONB has the highest level of landscape protection nationally. The potential to develop within the AONB should not even be entertained without demonstrable evidence that all and every other possibility has been thoroughly and robustly discounted.

The National Planning Policy Framework (updated July 2018) in relation to AONBs requires major development to pass **two** tests. The first of which is that it is an 'exceptional circumstance'. Secondly, and only if it passes the exceptional test, that it is **demonstrated** to be in the public interest. Where it fails (as it would here) then the sites must be rejected as they neither would neither conserve or enhance the landscape or scenic beauty of the AONB.

The evidence provided here, clearly demonstrates that the proposed land allocated (SHELAA Ref: S0027, S0028 & S0078) should be rejected as the principle of development is unacceptable; no exceptional circumstances have been offered or demonstrated, and the development is not in the public interest.

As demonstrated by the opposition of residents, and in the information presented here, the SHELAA sites would not represent development in the interests of the local community or the wider public.

Therefore, the sites should be removed from the SHELAA and any further attempts to promote development at these, or similar sites within the AONB, should be robustly resisted.

When deciding how to vote, we urge Swindon Borough Councillors to carefully consider:

- Their **duty of regard** to defend protected landscape from development.
- That under the seven principles of public life, Councillors should act solely in terms of the public interest and holders of public office must act and take decisions impartially, fairly and on merit, using the best evidence and without discrimination or bias.
- We trust that given the planning policy, the great weight placed on protecting AONBs and in listening to the residents' views presented here, you will remove all three sites from the SHELAA.

References

1. The National Planning Policy Framework Presented to Parliament by the Secretary of State for Ministry of Housing, Communities and Local Government by Command of Her Majesty. July 2018
2. Countryside and Rights of Way Act 2000, Section 85: 'In exercising or performing any functions in relation to, or so as to affect, land in an area of outstanding natural beauty, a relevant authority shall have regard to the purpose of conserving and enhancing the natural beauty of the area of outstanding natural beauty.'

This explicit 'Duty of Regard' is placed on the relevant authorities. A 'relevant authority' includes 'any public body'. Public bodies include local authorities, Parish and Borough Councils.
3. The Planning Inspectorate Appeal Decision (10 January 2012), Appeal Ref: PP/U3935/A/11/2161840
4. Chiseldon Conservation Area Appraisal and Management Plan, adopted February 2009

Comments on Chiseldon Neighbourhood Development Plan

8 March 2024

Authorship

The document says it has been prepared by Andrea Pellegram Ltd. Their website describes their expertise, among other areas, as including '*working ... to address objections ...to secure planning permission*' and '*we support our clients by helping them frame reasoned and defensible representations to locally contentious planning applications*'. Whilst the company also has experience in Neighbourhood Plan preparation, the documents often give the impression that Chiseldon Parish is ripe for development.

We think that Chiseldon Parish is not ripe for development and there is little scope within settlement boundaries for anything other than minor infill.

Chairman's Introduction

The introduction states '*...where and how the area should grow...*' and '*...it is necessary to acknowledge that the Parish cannot remain unchanged for the next 20 years...*'.

This seems to presume that growth is desirable for what is a stable collection of small hamlets and a village. The Parish has remained largely unchanged in terms of housing and village boundaries for the last 40 years, and parishioners have fought long and hard in that period to keep it that way.

Our view is that growth should only occur, as it is doing and has done for 40 years, in and around the large township of Swindon and that villages and countryside should remain as villages and countryside.

As the Introduction states, resident surveys have shown that;

The best things about Chiseldon are:

- *The sense of community*
- *Its rural nature with surrounding countryside*
- *Area of Outstanding Natural Beauty*

Nowhere in the NDP is it stated that Chiseldon is “ripe for development”. All areas will grow and Chiseldon is identified in the Swindon Borough Local Plan. Local Plan policy SD2 supports development in smaller villages such as Chiseldon but outside the village, development in the countryside will be permitted to meet local needs (including where identified in a neighbourhood plan) and for the expansion of tourist and visitor facilities. The NDP is not empowered to change this designation.

Since the NDP does not allocate sites, any allocations will arise through the emerging Swindon Local Plan which will, in that process, consider which sites are most suitable, how much housing should be directed to Chiseldon Parish, and what mitigation (including for traffic) will be required. Comments about future growth should therefore be directed to the emerging local plan and not the NDP which does not propose development.

Our view is that enlargement (which once started is likely to continue unabated) will, as in Wroughton, eventually destroy those attributes given above.

The introduction states:

Areas that need improvement:

- *Enabling residents to stay within the village as their housing needs change*

Tens of thousands of new homes have been and are being built within a 3 to 5 mile radius of the Parish.

Our view is that there is very little need for major housing development to expand Chiseldon village.

- *The traffic congestion*
- *The state of the pavements and streets.*

Our view is that no additional local traffic should therefore be created by new housing developments in the parish.

Para 11 says 'The Neighbourhood Development Plan is being prepared against the policy requirements of the adopted Swindon Borough Local Plan 2026.'

The Swindon Borough Local Plan 2026 says:

'... development proposals in rural and countryside locations outside the rural settlement boundaries as shown on the Policies Map will be permitted where:

- *local needs have been identified and allocated through a Neighbourhood Plan...'*

Swindon Borough Local Plan 2026 does not designate any sites around Chiseldon Parish or the village.

Our view is that no needs have been identified in Chiseldon village or Parish which cannot be met by the tens of thousands of new houses in Swindon Borough. The Chiseldon Neighbourhood Development Plan should say that there should be no development outside settlement boundaries.

This is a matter for strategic local plan policy and not the NDP.

Para 40 'The CNDP has been written to anticipate that major housing is likely to occur'

There is no space for this to happen within settlement boundaries so the CNDP appears to be advocating that settlements will get larger. At present there is no obligation in Swindon Borough policy for this to happen.

Our view is that the Neighbourhood Development Plan should say that there should be no development outside settlement boundaries.

Para 48 Vision for Chiseldon

It says: 'new houses will cater to all sections of the community'.

To be able to cater for all sections of the community this sentence implies significant amounts of new housing in Chiseldon. Tens of thousands of new houses are available in ongoing Swindon expansions.

Our view is that there is no need to expand Chiseldon Parish settlements.

Para 54 says: '...(Swindon) Local Plan policy SD2 supports development in smaller villages such as Chiseldon but outside the village, development in the countryside will be permitted to meet local needs (including where identified in a neighbourhood plan)

This is confusingly written. It can be read to imply that development should be outside the village. It also fails to say that development in the countryside needs both an identified local need **and** allocation of land in a Neighbourhood Plan. **Para 54 should use the text of Swindon's SD2 verbatim** which says:

'...development proposals in rural and countryside locations outside the rural settlement boundaries as shown on the Policies Map will be permitted where:

- local needs have been identified **and** allocated through a Neighbourhood Plan or Neighbourhood Development Order'

Our opinion is that local needs will be met by new developments within 3 to 5 miles and there is no need for our Neighbourhood Plan to allocate any land for development outside the rural settlement boundary.

The NDP does not promote development and therefore land outside the development boundary as defined in the Local Plan is countryside where housing development would not be permitted under most circumstances.

However, there is currently no 5 year housing land supply and places like Chiseldon are vulnerable to speculative housing schemes under para.11 of the NPPF.

[file:///C:/Users/Owner/Downloads/Five_year_housing_land_supply_statement_2023_to_2028_%20\(3\).pdf](file:///C:/Users/Owner/Downloads/Five_year_housing_land_supply_statement_2023_to_2028_%20(3).pdf)

Para 72 says: *'It is likely that the next Swindon Local Plan will allocate land for housing in the parish'*

We think that the Chiseldon Neighbourhood Development Plan should not adopt this statement as it is by no means certain.

Policy 1 Housing Mix

In this section much is made of the needs of residents from a survey of 135 people out of the population of about 2,700. Only about 50 expressed a wish to move within the parish. (If I recall correctly there was no opportunity in the survey to say that developments should not take place). The wish of these 50 has been turned into a 'need'. We don't consider that there is necessarily a need considering that there are tens of thousands of new housing developments to which people who wish could move, within 5 miles. Houses also regularly come up for sale in the parish. In a sought-after, rural settlement with a great community spirit set in outstanding countryside, new houses would still be relatively expensive.

Policy 1 is about housing mix and therefore we neither agree nor disagree as it will only apply if there are major housing developments, which we don't agree are necessary due to their effects on the rural settlements and countryside and due to the availability of new houses in the local area outside the parish.

Policy 2 Sustainable Transport

Figure 13

We think the dangerous exit from the Recreation Ground onto the busy B4005 at a point where there is no pavement should be mentioned.

We think the lack of pavements on the B4005 through Chiseldon particularly should be identified on a full page map also showing the need for pedestrians to keep crossing the road.

The statement in para. 72 reflects the (now withdrawn) Reg. 18 draft local plan which identified a need for housing in the parish. Though the allocation has been pulled, it is safe to assume that the need remains. The NPPF requires local planning authorities to assess the need for housing, to monitor how it is delivered annually, and to identify new sites where there is outstanding need. This is beyond the remit of the NDP.

Noted.

Agree – can the Parish Council please prepare a form of words to highlight this danger and suggest mitigation if possible? The maps generally illustrate either parish-wide matters or policy proposals, not danger spots. However, a map to that effect can be produced should the Parish Council wish to include it.

We think the poor condition and standard of maintenance of the footpath from Chiseldon to the new settlement at Burderop should be mentioned (grass, nettles, overgrown hedges), and the need to cross the B4005 50mph road several times along the roadside path to Burderop.

Figure 15

(Areas A-F have not been identified on the figure).

We think the 'Accident Blackspot' (as noted in other Parish Council Documents) at The Poplars corner where Hodson Road exits the village towards Wroughton should be mentioned.

We think that the Policy should be expanded to include sustainable car transport issues such as electric car charging points.

Policy 3: Biodiversity net gain and local nature recovery

We agree the Policy and have no other comments.

Policy 4 Local Green Spaces

We agree the Policy and have no comments.

Policy 5 Design

We agree the Policy and have no other comments.

Policy 6 No comments

Policy 7 No comments

Policy 8 Community facilities

Note that the social club is currently open.

We agree the Policy and have no other comments.

The Parish Council might wish to add reference to the condition of the footpath and other accident blackspots.

Agreed. Figure 15 should have the areas identified as they were on a previous version.

EV charging is mentioned in section 3.8 of the design guide.

AH and SR

Comments on Chiseldon (& Hamlets) Neighbourhood Plan

March 2024

The team working on the creation of the Chiseldon Neighbourhood Development Plan have, as you are all well aware, invested a huge amount of time and effort on the NP, which is both acknowledged and appreciated.

Having had some experience of NP where I lived previously I share now some general observations about the NP structure, style and delivery and a few specific comments about the policies suggested and others to consider.

We have only been residents in Burderop since the beginning of 2024 and so my comments specific to the plan geographic area are offered with that in mind.

I would seek clarity about the **name of the Neighbourhood Plan**... it is the Neighbourhood Plan for Chiseldon and the five surrounding Hamlets. To refer only to Chiseldon in the title and most of the document is reductive. I suspect this is because it is being driven by the Parish Councillors. This approach might be seen by some as Chiseldon becoming the primary focus of the NP, to the detriment of the Hamlets. I would recommend referring to and clarifying early in the document that the NP covers Chiseldon and the Hamlets, listed by name.

It is important to retain sight of the fact that for any Neighbourhood Plan to be 'sound' there should be clear links between the **issues identified by the community**, and the vision, aims/objectives & the policies in the Neighbourhood Plan.

It is of primary importance to recognise that this NP is being created - and falls within the scope/impact of the 'Swindon Local Plan 2026' - which as we are aware is due to be revised/updated anyway now... and that the Swindon Local Plan is likely to have a significant impact on any Chiseldon+ Neighbourhood Plan.

I mention this, and believe, **the following are each 'high priority' non-NP/non-policy related "Actions" to consider... to not mention the significance of these would be a huge oversight... in my opinion:**

- we need to consider implications of the Swindon Local Plan review on the parish & hamlets particularly in relation to housing need
- **"ACTION"**: Undertake an early review of the Chiseldon Neighbourhood Plan once the new Swindon Local Plan has established a new spatial strategy for the borough undertaken. This will likely take into account the future housing requirements across Swindon district and will set out a strategy for delivering

Chiseldon Parish Council is the qualifying body and the parish of Chiseldon is the neighbourhood area. The NDP therefore refers to "Chiseldon".

The parish council may wish to amend the name of the NDP.

The previous Reg. 18 version of the Swindon Local Plan was withdrawn and the LPA has indicated that it cannot yet provide information on housing requirement. The planning policy context is set out clearly throughout the NDP and specifically in the section Policy Context. Para 40 states that the NDP will be the parish council's starting position for the review of the local plan.

the Chiseldon Neighbourhood area's contribution towards this housing requirement.

- there is a likely to be an even greater risk to the local natural environment, for instance through Government review of the Green Belt & AONB and potentially a loss of green space to development
- **"ACTION"**: Encourage the acquisition of threatened green space, to be vested in the community by designation as 'Local Green Space'... for example the large open space on Burderop Park (between Park Lane and Mansion Drive) which currently is considered only as 'open space', which affords little or no protection from further housing development
- There is limited public parking availability, particularly near New Road/B4005 and limited parking off Stroud's Hill
- **"ACTION"**: Develop a parking strategy with partners, to focus on where additional parking might be made available, including for electric vehicles, and the length of stay most appropriate. Work with enforcement agencies to ensure that parking restrictions are followed
- Need to reduce BOTH traffic impact on air quality AND incidents of speeding
- **"ACTION"**: Explore options to create a low emission zone AND encourage Speedwatch volunteers (& local enforcement officers)
- Assess and then determine the need to tackle the number of HGVs/LGVs driving through residential areas of Chiseldon and on along New Road/B4005 towards Burderop Park and Wroughton
- **"ACTION"**: Work with SBC on freight travel plans/explore option for weight limits on certain roads/ start a lorry watch scheme/ identify public realm amendments that deter lorries/additional signage
- Expand provision of community bus services
- **"ACTION"**: Explore the potential to invest in expanded community bus services which provide publicly available transport to key destinations, including railway stations, local hospitals, shopping centres
- Encourage walking & safe cycling
- **"ACTION"**: Conduct an audit of all existing pavements, gaps in current pavement/footpaths provision with the aim of improving where new pavements are needed as a safety priority (from Burderop Park towards Chiseldon for example is currently a death-trap and accident waiting to happen) and elsewhere create/publicise main pedestrian walkway routes. Develop a walking/cycling guide to the area (rather like Swindon has). Work with partners to investigate the opportunity to introduce a local cycle hire or share scheme
- Need for a more co-ordinated approach to utilities and infrastructure provision to take into account the individual and cumulative impact of development. The

The NDP allocates land for local green space (two types) and open space. A policy anticipates the LNRS (policy 3) which seeks to retain BNG in the parish. These actions have already meet met therefore.

A parking strategy is not material to neighbourhood planning and should be dealt with outside the NDP. This would be a matter for the parish council to agree through LPT4.

Designation of a low emissions zone is not something that a NDP can do. This would be a matter for SBC. The same applies to freight movement.

A community bus service is not a planning matter but something for the community to provide.

It was beyond the scope of the NDP to assess all pavements (which are mainly owned by the Highways Authority). Instead, key infrastructure improvements were identified in policy 2.

The NDP cannot delivered a more coordinated approach to utilities and infrastructure – this is beyond its scope.

impact caused by the series of road closures upon the community and impact on traffic flows and quality of life impact needs assessing

- **"ACTION"**: Work with key partners to understand the cumulative effects of potential development. This could include compiling data on e.g. air quality, traffic flows, parking pressures, flood issues and water management etc.

To return more specifically to the Neighbourhood Plan for Chiseldon (& Hamlets): Firstly the structure of the NP itself.

This document needs to tell the evolving story of the NP. This document will go ultimately to referendum and so the 'story' needs to be compelling and clearly laid out. As such I would recommend considering something like the following structure which may increase 'readability', usage & reference-ease:

Contents

PREFACE

1 INTRODUCTION

- National policy
- Local Policy
- Consultation

2 LOCAL CONTEXT

- Profile of the community today
- Demographics
- ONS data

3 VISION AND OBJECTIVES

- Challenges for the Neighbourhood Plan Area
- Vision for the Neighbourhood Plan
- Neighbourhood Plan Aims & Objectives

4 HOUSING

- Housing requirement
- Housing Site Availability in the Plan Area
- Housing density

5 DESIGN AND HERITAGE

- Character of development
- Design of development
- Environmentally sustainable design

6 LOCAL ECONOMY / BUSINESS

- Convenience Shops
- Supporting recreation and sustainable tourism

The parish council may wish to consider whether the entire NDP is reorganised according to these suggestions

7 NATURAL ENVIRONMENT

- Locally significant views
- Local Green Spaces
- Open Spaces

8 LEISURE AND COMMUNITY

- Allotments and community growing spaces
- Protecting Cultural Venues
- Community hubs
- Public Houses
- Churches/Places of Worship & Burial Grounds (?)

9 HEALTHCARE AND EDUCATION

- Health Services & provision
- Education provision

10 TRANSPORT AND MOVEMENT

11 INFRASTRUCTURE AND UTILITIES

- Broadband

12 IMPLEMENTATION, MONITORING & PLAN REVIEW

13 INFRASTRUCTURE IMPROVEMENTS AND PROVISION

14 NON POLICY ACTIONS

15 POLICIES MAPS

GLOSSARY

EVIDENCE BASE DOCUMENTS

CONCERNING: the vision, aims/objectives & the delivering policies

I believe that the links between 'issues identified within the community' and 'the vision, aims/objectives & the delivering policies' are not as clear as they couldn't be in the Chiseldon+ NP.

My primary comment/observation is concerning **evidence of 'consultation & engagement'**... The plan needs to supply clear evidence of community consultations, issues raised, and methods of engagement. This is a huge challenge I appreciate especially when people have busy lives and other pressing priorities. *More of that later...*

Observation: I believe there would be greater 'engagement' (& potential readership) if the document was fronted with a 'Preface' rather than a

Many NDPs have a Chairman's introduction and in this instance, the Chairman was the most engaged and hard working member of the steering group.

The parish council may wish to amend the title of the Chairman's introduction if it wishes and to use suggested wording.

'Chairmans Introduction'... it is after all a neighbourhood plan not the Chairmans plan and might say something like...

Neighbourhood Plans must conform with development plans set by local authorities and not venture into areas that are the concern of other statutory bodies.

However, it is a time of great change in both Planning and Development right across the country.

Within the context of change 'Neighbourhood Plans' play a crucial role in setting design standards to reflect local character and preferences about the form and appearance of development and the community in which we all live.

Therefore, through the application of xx policies (in separate document perhaps), this Chiseldon+ Neighbourhood Plan seeks to:

- *Define and protect neighbourhood character & promote development that respects their integrity, heritage and established character*
- *Preserve, protect & enhance local green spaces, open spaces, and significant views*
- *Support the development of infrastructure & services*
- *Encourage business whilst offering protection to xx green spaces, open spaces, and significant views*
- *Enhance the health and wellbeing of residents throughout the provision of green spaces, pavement and walkways/paths and cycling routes, to reduce impact on our health from cars/lorries*

It is well known that Government legislation requires that there should continue to be a strong link between where housing development occurs and where funding levied on developers is spent. Currently 25% of this money will come to the Parishes. Using the guidance and the policies contained within this Chiseldon+ Neighbourhood Plan, it would be the Community of Chiseldon (& Hamlets) who will have a say in how this money is spent.

Therefore, this Neighbourhood Plan is not intended to be simple a set of words that can be filed away & forgotten. It is a set of policies which must be applied at every relevant opportunity and the impact monitored & measured as we strive to deliver our shared Vision for Chiseldon.

The Community has helped create this Neighbourhood Plan for Chiseldon (& Hamlets) by thinking proactively about how we wanted our area to develop. Led by Parish representatives, together with the Community we can now make it work.

Other comments/observations...

On the opening page of the NP states:

"The residents said that the best things about Chiseldon+ are..."

This requires a citation... the inspector would surely wish to know 'How many

residents, what proportion, what was the demographic of this who were consulted and who responded!

I am certain any inspector would wish to see this referenced.

Other comments/observations...

The **vision & aims/objectives** of any 'Neighbourhood Plan' is to provide the framework to develop **policies and proposals**, with each '**policy**' relating to a particular objective & wider aims.

In the Chiseldon+ Neighbourhood Plan... I would encourage you to consider including clearer statements of the '**the Purpose**' of the Neighbourhood Plan - which is to deliver the '**Aims**' we all hold for the Parish and then set out each '**Policy**' that will be used to guide & deliver '**Our Vision**'.

I have have dated two such examples below... to illustrate ONLY!

1st example...

Policy 1: Housing mix * *this policy should set out "Housing Need" and not 'Housing Mix' which says little about what is actually 'needed' by the community.*

Policy 1:	Housing Mix (this should say 'housing need' NOT Housing Mix) *
Purpose	Housing Mix Need - sets out the housing land supply in the period to 2031 that will contribute to the wider strategic need as set out in the Swindon Local Plan Core Strategy, and which can be met within the Neighbourhood Plan boundaries, and supports local character, landscape, infrastructure and amenity.

It is not a requirement that NDPs set out aims and purposes but that they are based on consultation with the community. The NDP makes is clear that the policies were based on a community consultation exercise about what people wanted. A full report has been prepared to document this which will be included in the Consultation Statement.

This is not correct. Housing need (the requirement) is set by the LPA (NPPF para. 69) and the housing mix sets out the type of housing that is required. The terms are not interchangeable.

The existig policy 1 is clearer than the alternative proposed.

Recommend no changes.

<p>Policy detail:</p>	<p>During the period 20xx to 2031, proposals will be supported as identified in full Swindon Local plan document, illustrating Housing Site Availability in the Plan Area 20xx to 2031.</p> <p><i>...Development proposals for housing prepared to optimise housing delivery in accordance with the guidance in the Swindon Strategic Housing Market Assessment and the Swindon Borough Housing Strategy (or whatever the 'Swindon Housing Need' study is called that supplies locally housing 'need' analysis???) and in accordance with Policies X and Y of this neighbourhood plan will be supported.</i></p> <p><i>...and that it subscribes to Swindon Local plan policies as far as is practically possible given the Swindon Borough Local Plan Policy HA1 requires housing development to be design led and to respect the character of the surrounding area with a variety of densities, sizes and types to meet local needs as identified within the Swindon Strategic Housing Market Assessment and the Swindon Borough Housing Strategy.</i></p> <p>There should be explicit mention that <i>these studies will now be out of date and the HNA provides more recent evidence.</i></p>
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2nd example...

Policy 4: Local Green Spaces

<p>Policy 4:</p>	<p>Local Green Spaces - the 'policy' should say something high level like... (this should say 'housing need' NOT Housing Mix) *</p>
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Purpose	Local Green Spaces - Protecting green spaces was consistently a top priority for residents in the engagement process for the Neighbourhood Plan. This policy seeks to designate a series of Local Green Spaces that are valued by the community, so that they can be safeguarded for future generations.

<p>Policy detail:</p>	<p>The XX (how many?) areas (<i>surely should specified by area ie. each Hamlet not just Chiseldon?</i>) listed and mapped in Figures X and detailed in Appendix X and defined on the Policies Map (where is it?) are designated as Local Green Spaces.</p> <p>Development proposals which demonstrably accord with development appropriate within a Green Belt / AONB will be supported, subject to compliance with other policies within the Neighbourhood Plan.</p> <p>*NOTE: an additional comment(s)...</p> <p>Awarding a parcel of land "local Green Space" designation is hugely significant. I fail to understand why, of example, the large green space on Burderop Park (designated Open Space) is not included as a call for designation as 'Local Green Space' - which affords it many many more protections than simply being designated 'open space'. I am asking/calling for the Parish Council to consider the land between Mansion Drive and Park Lane on Burderop Park to be nominated as 'Local Green Space'</p> <p>Open Space(s) designated under local plan policy EN3 should be included in the Chiseldon+ NP - to enshrine them for the community</p>
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Would the parish council wish to redesignage the Burderop Estate as Local Green Space?

The demographic characteristics of the community is set out in text pages 11 – 18. The policies map is on Page 3.

Other comments/observations...

'who are the community?' (I would welcome sight of more data... census data, ONS etc).

Evidence is vital - and as an aside, the 'evidence' underpinning the Swindon Borough

Local Plan is also not as clear as it could be in terms of, for example, calls for future 'development land'.

For any Neighbourhood Development Plan to be found sound all planning policy & proposals need to be based on a proper understanding of the place they relate to, Chiseldon+ in this case, if they are to be relevant, realistic and to address local issues effectively.

If the Hamlets have different character, history, design principles etc these need to be set out. An assumption that Chiseldon 'needs' is the same as say Burderop is potentially misleading and can lead to future, as yet unseen issues, being 'broad-brushed' as a solution across the entire NP area.

Other comments/observations...
'evidence?'

I am concerned and wish to highlight that the Chiseldon+ Neighbourhood Plan requires greater robustness in terms of information and analysis of the local area, the community and the evolving 'needs' of that community (ie. the evidence base needs to be beefed up).

In the Chiseldon+ Neighbourhood Plan the evidence of any meaningful review of 'existing evidence' is also not clear - what has been reviewed and what is new - I question what review of 'existing evidence' has been undertaken - this is particularly important to demonstrate that the past present and future needs are considered especially when it comes to planning development of Chiseldon (housing or economic). Existing evidence is now dated and I suspect would be rejected by any inspector as 'out of date' and not 'current'.

A review of evidence supplied for a NP typically includes:

- socio-economic data for Chiseldon (& Hamlets) (census, ONS, etc.)
- technical reports (e.g. business/retail studies)
- transport studies and public transport data
- mapping of local area (unclear whether Burderop and other Hamlets were included in the Chiseldon+ NP consultation stages)
- conservation area appraisals and statutory lists (listed buildings, historic environment record and scheduled ancient monuments)
- details of environmental protection designations, such as tree preservation orders and sites of special scientific interest
- plans from other public or statutory bodies
- analysis of the 'evidence' underpinning the Swindon Local Plan

Has the team working on the Chiseldon+ NP developed any new 'evidence' (or updated the existing 'evidence') at neighbourhood level? If so, this needs to be highlighted.

IN summary this might/should include:

The different characteristics of the settlements in the parish are referred to in the design section and code.

Most of these documents (where they exist) were included in the supporting text so it is unclear why this criticism is being made. New evidence is shown in many of the maps and tables and in the appendixes. This should be obvious to any reader.

References to all data sources are referred to within the text. Would the parish council wish to see a bibliography included?

- **Economic:** business surveys, viability, vacancy/floorspace survey, available sites survey, land values, employment need survey, etc.
- **Social/Community:** housing condition survey, housing needs survey, audit of community facilities, 'Building for Life' assessment of housing, etc.
- **Environmental:** heritage audit, conservation area appraisals, review of local lists, urban design analysis, open space survey & analysis, etc.
- **Infrastructure:** transport linkages, schools capacity, transport capacity analysis, traffic/ pedestrian flow surveys, etc.

In the Chiseldon Neighbourhood Development Plan these could / should be called-out more clearly as they are the important 'context' of the Neighbourhood Plan itself.

Other comments/observations...
'community engagement?'

The next point to highlight is about community engagement in the NP development / review process. Community engagement is necessary and important for several reasons

- It is a requirement of planning legislation including for 'Neighbourhood Plans'
- It is essential in developing consensus & in creating community support

The level of awareness (subjectively assessed from looking at response rates and from chatting with neighbours) would suggest the almost non-existent awareness of the current Chiseldon Neighbourhood Planning Process and astonishing low levels of meaningful engagement from the 2,700 or so population.

'Engagement' is a huge challenge for all involved in the planning process whether that be NP or Local Plans. But for a plan to be found 'sound' there has to be a clear evidence trail of meaningful engagement prior to any referendum stage. This is a concern for me about the Chiseldon NP... the levels of awareness & engagement are woefully low.

How to raise awareness and engagement? There is no simple answer of course but all too often in NPs a common mistake includes things like consulting with the community too late, too little and in a non-consistent manner. The worst case situation is placing a thick document (100 pages plus for Chiseldon) on a stand in the library or on a web site and expecting people to read it.

What might help? It may be useful to produce a concise summary of the plan for those that don't wish to read the full document. That is not achieved by the current 'Chairmans Introduction'.

Also, I would liked to have seen greater evidence of the history of 'consultation' as it is a continuous process and should not be treated as a one-off tick-box exercise... "read this now" (& comment) does not work for most busy people.

Again - a danger to avoid is trying to seek greater levels of engagement by repeating

It is not necessary to include supporting data for issues that are not discussed in the NDP.

The policies in the NDP (and therefore the topics for discussion) are based on what the community stated was important to it. For each of these topics, relevant data was consulted.

The authors have stated that they did not live in the parish when the consultation occurred. It is therefore unclear how they can criticise the NDP and the parish council for undertaking consultatoin in a way that they did not witness.

The Consultation Statement will set out how the community was consulted.

(as i have seen on Social Media) just how few responses have been received... 9 was the latest I had read (1st March 2024).

Meaningful analysis of consultation responses is not about counting the number of consultees making a comment, but considering the depth and range of responses. Are the responses representative of the community? Have all corners of the community been approached and 'engaged' in the NP process?

Other comments/observations...

Now to return to the content - assuming a revised structure as already set out above. Most Neighbourhood Plans are structured as follows... vision/aims, planning policies, site allocations, community proposals, where...

Vision and Aims. The Neighbourhood Plan sets out the community's overall vision for the area and should include overall aims for its future development and growth. These can relate to a wide range of planning and regeneration matters – social, economic and environmental. The vision and aims of the plan can then be translated into detailed policies, guidance and proposals. ***Does the Chiseldon+ NP 'Vision & Aims', as set out, include comprehensively all matters relating to planning and regeneration – social, economic and environmental?***

Planning Policies. A Neighbourhood Plan, once made, will form part of the statutory local development plan for the area and its policies will be used to determine development proposals in the neighbourhood. Planning applications will be determined in accordance with the Neighbourhood Plan's policies unless material considerations indicate otherwise. The policies in the Chiseldon NP could be 'supplemented' if necessary by explanatory text or more maps, illustrations to help with their interpretation. ***Does the Chiseldon+ NP 'Planning Policies', as set out, include comprehensively all available explanatory text or more maps, illustrations to help with their interpretation?***

Site Allocations. The Neighbourhood Plan may identify key sites for specific kinds of development, such as housing, retail, employment or mixed use. **I note that there are no site allocations in the Draft Chiseldon NP.** But instead the draft plan references the AECOM Housing Needs Assessment (HNS) which I assume sets out the 'housing need in the Parish'. (This was commissioned by the parish council and the draft NP states that it forms part of the evidence base for the CNDP.)

The HNA should quite rightly be considered, in detail, by any prospective housing developer/applicant when preparing schemes and by decision-makers in determination of planning permission.

I feel, having read there Draft Chiseldon+ NP several times, that the significance of the HNA is not highlighted clearly or prominently enough. This is an issue for many many people and linked to the most often shared 'issue' in all out all communities - the fear of new housing on their patch.

That is as true in Chiseldon+ as elsewhere.

Thank you that is good to know.

These matters have all been addressed (but in a different order of presentation).

Does the parish council feel that the HNA has not been given sufficient attention and if not, what should be done?

Currently the Chiseldon+ NP advocates that *'It is likely that the next Swindon Local Plan will allocate land for housing in the parish.'*

Cogniscent that the NP is for the local community the needs of residents, from a survey mentioned of 135 people (out of the population of about 2,700), indicated that approx 50 expressed a wish to move within the parish.

It is flawed to say that this is a 'need'. It is nothing of the sort. An aspiration it may be. A 'need' it certainly is not. Supply & demand of housing waxes and wanes. Even a quick review of the local housing listed as for sale suggest that houses of all shapes and sizes regularly come up for sale in the parish.

The details of the study by AECOM need, in my opinion, much much greater prominence in the NP. We cannot ignore the findings, nor recommendations and conclusions provided by AECOM.

Relevant findings in the AECOM study found:

- Chiseldon had a population of 2,667 individuals in the 2011 Census, showing an increase of 68 individuals since the 2001 Census
- The HNA confirmed that 72% of people own their homes in the parish with relatively high house prices that have increased by around 70% in the decade
- The HNA found that the median house price would require an annual income 43% higher than the current average and that average private rents are only affordable to higher earners
- There has been some development in Chiseldon since 2011; Swindon Borough Council's completions data from 2011 to 2021 shows that a total of 18 net dwellings have been delivered since 2011
- The HNA found that the median house price would require an annual income 43% higher than the current average and that average private rents are only affordable to higher earners
- The data also shows that no Affordable Housing has been delivered in the parish since 2011
- The total quantity of dwellings in the NA is estimated to be 1,117
- As of April 2022, outstanding commitments total 88 dwellings including a scheme for 77 dwellings

I feel it is negligent to fail to include the most significant finding from AECOM which stated:

- Pro-rating the SHMA figures to Chiseldon, based on its fair share of the population (1.3% of Swindon's population), produces 5.5 homes per annum (predominately for social/affordable rent) or 77 affordable homes over the Neighbourhood Development Plan period (2022-2036)
- Applying the SHMA tenure split to this figure produces a requirement for 4.3 affordable rented units per annum (60 over CNDP period) and 1.2 affordable home ownership dwellings per annum (17 over the CNDP period)
- These figures give a reasonable guide to the potential scale of need for

The “need” identified for affordable housing is the best evidence available but it is not perfect. However, the HNA is the best estimate available of what is required in Chiseldon based on local circumstances. As stated above, the derivation of the housing requirement (the need) will be prepared by the LPA. The HNA provides a suitable analysis to begin to negotiate with housing providers and developers who will be required to provide affordable housing of the type that the local community is most likely to wish to have.

NDPs should be written succinctly and the outcomes of the HNA have not been copied – it has been assumed that the reader of the NDP will consult the HNA in full.

Would the parish council wish to have further detail about the HNA's findings added to the supporting text of the NDP?

Affordable Housing in Chiseldon and HNA states that every effort should be made to maximise delivery where appropriate

The AECOM study states:

- Applying the SHMA affordable housing need estimates to Chiseldon suggests a need for around 77 affordable dwellings over the CNDP period
- There is currently a housing development approaching completion for 77 dwellings called Burderop Park (which was expected to provide contribution for 25 affordable homes - has it?)
-

The AECOM study also states:

- However, even if these are delivered, past affordable housing delivery and the HRF, mean that the expected level of delivery is unlikely to meet the quantity of demand identified
- SBC advised that it currently has 10 customers on its housing waiting list with connections to Chiseldon

As AECOM concluded themselves that the Chiseldon+ NP must ensure a clear policy exists to meet this unmet requirement wherever possible, and they also call for further avenues for delivering greater quantities of Affordable Housing (such as exception sites) to be explored

Where is the Chiseldon+ NP policy to deliver this within the Chiseldon+ NP?

Finally - AECOM found following a modelling exercise, which looks at the sizes of dwelling occupied by households at different life stages and projects the growth and decline of those household age groups over the plan period, suggests that new development should help boost the supply of smaller homes if the type of development is considered appropriate in terms of character and density.

Where is the Chiseldon+ NP policy to deliver this within the Chiseldon+ NP?

AECOM concluded that "too many additional large homes should be avoided because there is a bias towards these properties, not even accounting for the extensions to existing properties that do not appear in this data. This finding was also reflected in the CNDP's housing needs survey which showed a significant preference for 2 bedroom homes (c. 45%). While already the most common, 3-bedroom properties are likely to continue to be needed as generally the most popular option among many groups"

Chiseldon+ NP should have stated policy(s) to enable delivery of this 'need' and design guidelines and policies that ensure the design guidelines and principles of good design are met.

Community Proposals. Regeneration or enhancement proposals relating to the use and development of land could be included in the plan. For example, it could more prominently include stated policies around improving key public spaces and

This is a good question. The only way that the housing mix would be delivered is if there was a speculative housing scheme provided under the provisions of NPPF Para. 11d , through an exceptions site (100% affordable housing) or through a local plan allocation. In all three cases, Policy 1 would be the starting point to decide the affordable housing mix.

There were no community proposals identified in public consultation or by the parish council and there was therefore no policy to that end.

pedestrian links or allocate sites for new community facilities, such as a community centre.

I appreciate to include 'everything' risks the NP becoming unwieldy. To keep the Neighbourhood Plan concise, focused and clear on what are the proposed "policies", a background document could be created, listing the sources of evidence, summarising any 'new' evidence and describing the outcomes of the community engagement programme at different stages in the plan process.

Other comments/observations...

Understand the use of the term 'development' in this plan...

Firstly... the very many documents that comprise the catalogue of NP documents often hint strongly that Chiseldon Parish is ripe for 'development'.

This term will mean different things to different people and can lead to misunderstandings arising. A clear definition of what is meant by 'development' would help alleviate this issue. ie is it about housing development, is it about growth of the community, is it about protecting our heritage and open spaces/views?

Whilst discussing 'development'... as it is considered by most people to refer to housing-development... in terms of future housing-development I believe Chiseldon Parish (and surrounding Hamlets) has little scope (within current settlement boundaries) for anything other than minor infill even allowing for the recommendations of the AECOM study to expand further would place intolerable burden and pressure on already overstretched and inadequate services (GP, schools, transport, roads etc)

also... currently the 'Chairman's Introduction'

states *'...where and how the area should grow...'* and *'...it is necessary to acknowledge that the Parish cannot remain unchanged for the next 20 years...'*

The Chairmans introduction does not make it clear what they mean when they speak of 'growth' is that growth in population, increase in standard of housing, or 'housing development' etc.

The statement also presumes that growth is desirable. Change whilst not always welcome is invariably desirable if it helps deliver our shared Vision for Chiseldon+.

Growth / change / development will occur, as it is doing now (evidenced by new businesses, new housing, new residents whether home owners or private renters etc). The scale of 'future change' that can be supported by a relatively small parish and surrounding hamlets are dwarfed by large township of Swindon (that draws most investment and attention) and this should be acknowledged. How does this affect Chiseldon+? Simply put being so close to Swindon results in the potential for Chiseldon to be the victim of the lack of investment in essential services locally - schools, GPs, dentists, infrastructure limitations, public transport etc.

The NDP is a planning document and uses the planning definition of development: own and Country Planning Act 1990

You are here:

[UK Public General Acts 1990 c. 8 Part III Meaning of development](#)

Section 55

Would the parish council wish to include a "plain English" definition of "development" along the lines of

Neighbourhood plan policies cover both land use and "development" which is defined in legislation as the carrying out of building, engineering, mining or other operations in, on, over or under land, or the making of any material change in the use of any building or other land including: rebuilding; structural alterations of or additions to buildings; and other operations normally undertaken by a person carrying on business as a builder

<https://www.legislation.gov.uk/ukpga/1990/8/section/55/2006-06-07>

Does the Chairman wish to define what is meant by "growth"?

Yes, I understand from research that the parish (and surrounding Hamlets) have remained largely unchanged in terms of housing & village boundaries for the last 40 years. I also understand that locals have fought long & hard throughout that period to keep it that way. *Change needs to occur, that's life... but the Chairmans words - important as they are - need to be clearer about what 'change' they refer to.*

Other comments/observations..

As the Introduction states, resident surveys have shown that *"the best things about Chiseldon are:*

- The sense of community
- *Its rural nature with surrounding countryside*
- Area of Outstanding Natural Beauty"

***citation needed... how many, when, how researched**

The introduction also states: *Areas that need improvement:*

- Enabling residents to stay within the village as their housing needs change

Major housing development to expand Chiseldon village and / or surrounding Hamlets is not sustainable. Nor has any substantial 'housing need' been determined by AECOM. It must be acknowledged that thousands of new homes have been and are currently being built within a 3 to 5 mile radius of the parish. This results regreatably in a negative impact of quality of life within the community through increased traffic congestion/noise/pollution, poor state of roads and inadequate funding in maintenance of the roads and the shockingly poor state of the pavements (and the absence of them in many places) and streets.

Other comments/observations..

Swindon Borough Local Plan 2026 is in the process of being updated. At this point in time the current Local Plan to 2026 does not designate any sites around Chiseldon Parish or Hamlets with further housing. Who is to know if this will change?

Quite correctly the Chiseldon+ Neighbourhood Plan is being prepared against the policy requirements of the adopted Swindon Borough Local Plan 2026.

The Swindon Borough Local Plan 2026 states that: 'development proposals in rural and countryside locations outside the rural settlement boundaries as shown on the Policies Map will be permitted where local needs have been identified and allocated through a Neighbourhood Plan...'

I do not see any evidence in the data included within the NP of a genuine 'unmet need' for further housing development within the parish/hamlets or indeed outside settlement boundaries.

The 'housing need' policy would do well to acknowledge that there is no evidence to support any expansion of Chiseldon+ Parish settlements boundaries or housing.

....(Swindon) Local Plan policy SD2 supports development in smaller villages such as Chiseldon but outside the village, development in the countryside will be permitted to meet local needs (including where identified in a neighbourhood plan)

This needs to acknowledge that development in the countryside needs both an 'identified local need' and 'allocation of land' in a Neighbourhood Plan.

However, currently the Chiseldon+ NP advocates that settlements will get larger.

I recommend that the Chiseldon+ NP should say... that development be restricted to within settlement boundaries, as the limited local needs will be met by new developments within 3 to 5 miles.

I do consider that to not include any reference to 'potential' sites for future housing is a naive omission. SBC will expect site allocation and a proactive approach to site allocation via the NP would be a sensible consideration - whether these be brownfield sites or landowners offering up (following a call for land from the Parish Council) potential sites for consideration.

The Chiseldon+ NP - Figure 14: Proposed improvements to the cycle and pedestrian network in Chiseldon Parish... where and when are these proposals to see the light of day. Who is funding them? Without a clear plan of implementation these will just become a wish-list at best. The poor condition & apparent lack of maintenance of the footpath from Chiseldon to Burderop Part should draw particular attention as a priority (grass, nettles, overgrown hedges), and the need to cross the B4005 (50mph road) several times along the roadside path to Burderop.

Finally, the draft NP document would benefit from a Glossary to aid readability/ understanding:

"Example GLOSSARY"

- Affordable housing - Social rented, affordable rented, shared equity and intermediate housing, provided to eligible households whose needs are not met by the market
- Ancient woodland: An area that has been wooded continuously since at least 1600 AD. It includes ancient semi-natural woodland and plantations on ancient woodland sites (PAWS)
- Asset of Community Value: land or property of importance to a local community which is subject to additional protection from development under the Localism Act 2011. Voluntary and community organisations can nominate an asset to be included on their local authority's register of Assets of Community Value
- Brownfield land registers: Registers of previously developed land that local

The purpose of the NDP is to add local detail to SBC policies and not to repeat those policies. Where there are already local plan policies in place, for instance where there is a development boundary, then the NDP does not need to repeat all the provisions of that policy. Therefore, it is not necessary to make statements such as those suggested, that either repeat existing policy or seek to introduce strategic policies that restrict development (such as "that development be restricted to within the settlement boundary" because that is already policy. Nor is it appropriate for a NDP to make statements such as "as the limited local needs will be met by new developments within 3 to 5 miles" because this would be a strategic policy (which neighbourhood plans may not contain) and because the NDP does not have evidence of need and provision because the LPA has not prepared this yet in support of the review of the local plan. Nor will the NDP include potential sites without a full site allocation exercise which has not been done.

With regard to Figure 14, this maps indicates where improvements would be beneficial. It will be up to the parish council to seek to secure these improvements (as a priority over other potential improvements) in negotiation on individual planning applications, in response to the local plan review and in response to reconsideration of the local transport plan.

Does the parish council wish to say anything about the nettles at the footpath from Chiseldon to Burderop?

Does the parish council wish to have a glossary and bibliography to be included?

planning authorities consider to be appropriate for residential development, having regard to criteria in the Town and Country Planning (Brownfield Land Registers) Regulations 2017. Local planning authorities will be able to trigger a grant of permission in principle for residential development on suitable sites in their registers where they follow the required procedures

- Community Infrastructure Levy (CIL) – a fixed, non-negotiable contribution that must be made by new development. It is chargeable on each net additional square metre of development built and is set by the District Council. A proportion accrues to the Parish Council
- Community Right to Build Order: An Order made by the local planning authority (under the Town and Country Planning Act 1990) that grants planning permission for a site-specific development proposal or classes of development
- Conservation (for heritage policy): The process of maintaining and managing change to a heritage asset in a way that sustains and, where appropriate, enhances its significance
- Conservation area - an area of notable environmental or historical interest or importance which is protected by law against undesirable changes
- Community Hub: premises which provide space for activities which support the community and different groups within it, including vulnerable and socially isolated people, such as social events, classes, support groups and recreational activities
- Geodiversity: The range of rocks, minerals, fossils, soils and landforms
- Green infrastructure: A network of multi-functional green space, urban and rural, which is capable of delivering a wide range of environmental and quality of life benefits for local communities
- Habitats site: Any site which would be included within the definition at regulation 8 of the Conservation of Habitats and Species Regulations 2017 for the purpose of those regulations, including candidate Special Areas of Conservation, Sites of Community Importance, Special Areas of Conservation, Special Protection Areas and any relevant Marine Sites
- Heritage asset: A building, monument, site, place, area or landscape identified as having a degree of significance meriting consideration in planning decisions, because of its heritage interest. It includes designated heritage assets and assets identified by the local planning authority (including local listing)
- Historic environment: All aspects of the environment resulting from the interaction between people and places through time, including all surviving physical remains of past human activity, whether visible, buried or submerged, and landscaped and planted or managed flora
- Local Enterprise Partnership: A body, designated by the Secretary of State for Housing, Communities and Local Government, established for the purpose of creating or improving the conditions for economic growth in an area
- Local housing need: the number of homes identified as being needed through the application of the standard method set out in national planning guidance, or a justified alternative approach

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- seek to address the needs of the local Neighbourhood Plan community by accommodating households who are either current residents or have an existing family or employment connection. A proportion of market homes may be allowed on the site at the local planning authority's discretion, for example where essential to enable the delivery of affordable units without grant funding
- Section 106 agreement - A mechanism under Section 106 of the Town and Country Planning Act 1990 which makes a development proposal acceptable in planning terms that would not otherwise be acceptable
 - Setting of a heritage asset: The surroundings in which a heritage asset is experienced. Its extent is not fixed and may change as the asset and its surroundings evolve. Elements of a setting may make a positive or negative contribution to the significance of an asset, may affect the ability to appreciate that significance or may be neutral
 - Starter Homes - Homes targeted at first time buyers who would otherwise be priced out of the market. Like shared ownership homes, these should be available to households that need them most, with an income of less than £80,000 (£90,000 for London). Eligible first time buyers will also be required to have a mortgage in order to buy starter homes to stop cash buyers
 - Supplementary planning documents: Documents which add further detail to the policies in the development plan. They can be used to provide further guidance for development on specific sites, or on particular issues, such as design. Supplementary planning documents are capable of being a material consideration in planning decisions but are not part of the development plan
 - Use Class Order - The Town and Country Planning (Use Classes) Order 1987 (As amended) in puts uses of land and buildings into various categories. Planning Permission is not needed for changes of use within the same use class
 - Wildlife corridor: Areas of habitat connecting wildlife populations
 - Windfall sites: Sites not specifically identified in the development plan.

The document would benefit from a List of ALL the Evidence Base Documents to aid readability/understanding:

"Example EVIDENCE BASE DOCUMENTS" list:

All background evidence documents can be found on the section of the Parish website outlining progress with the Neighbourhood Plan:

<https://www.chiseldon-pc.gov.uk/microsites/neighbourhood-plan/>

- Building for Life 12, Birkbeck & Kruczkowski, Nottingham Trent University, 2015
- Any Neighbourhood Plan Design Guidelines, ?
- Any Masterplan Planning Document, ?
- Any Design Statement, ?
- Coast to Capital Rural Statement, Coast to Capital Local Enterprise Partnership, 2016
- Housing and Economic Land Availability Assessment, Swindon Council

- Local Plan 2026, Swindon Council
 - National Planning Policy Framework, 2012 and 2018
 - Any School Organisation Plan, ?
 - Strategic Housing Market Assessment, Turley, 2018
 - Swindon Council Core Strategy, ?
 - Any Swindon Urban Capacity Study, ?
 - Any Swindon Economic Needs Assessment, ?
 - Any Swindon Housing Strategy, ?
 - Any Swindon Landscape Capacity and Sensitivity Study, ?
 - Swindon Local Plan: Detailed Policies, 2026
 - Any Swindon Open Space, Sport and Recreation Facilities Assessments, ?
 - Any Swindon Parking Standards, ?
 - Any Swindon Retail and Leisure Study, ?
 - Any Swindon Town and Local Centre Review, ?
 - All background 'Evidence Reports' from the Neighbourhood Plan Working Groups
 - All table(s) & evidence showing position on brownfield land availability (and past delivery) within the plan area (and Swindon for cross-referencing purposes)
 - All table(s) & evidence showing Housing Site Availability in the Plan Area
-

Resident (DH)

Herewith my few comments on the Chiseldon Development Plan.

Overview: The Plan has a general tone and acceptance that Chiseldon et al is ready for major housing development over the period of the Plan. The comments concerning how residents feel and value Chiseldon are correct, but they are in the main, emotions and as such are subjective. The Plan does not describe the current village layout nor its geographical features or topography, all of which could have a major impact on future development. Moreover, with the recognised effect of climate change, the Plan needs to identify those Development areas which could be affected significantly up to 2031 and importantly beyond. Failure to address the aforementioned points could lead to serious risk to the general positive feelings to the village and in worst case damage to property.

Chiseldon Layout: To a degree Chiseldon is similar to a Linear village in that development overtime has been along main road arteries with in-fill between those main roads. The road and pavement structures, although narrow in some places, are generally appropriate for the current number of residents and vehicles. Roads and pavements would not be suitable if there was significant development that utilised any of these features. For example B4005 (New Rd/Hodson Rd) has 14 tributaries joining from one end of the village to the other. These tributaries are in addition to the dwellings and commercial premises adjoining the roads. Currently, with few exceptions there is no traffic congestion along these roads. Expansion of use of New Rd is not possible and development along this road even with an enhanced junction at A346, would lead to very significant congestion throughout the village. A similar argument is extant for The Ridgeway to the Farm shop junction.

Geographical and Topography: Approximately 25% of Chiseldon is in a dell dropping north off New Rd. Over recent years there has been very

The Design Code describes all areas in detail as does the conservation area masterplan.

It is not clear how the author considers that climate change should be addressed.

The discussion about traffic and tributaries (does this mean estate roads?) is unclear. What change is sought?

Topography is described in the Design Code.

significant and annual flooding of the fields to the south of New Rd. Without doubt the water table level in these fields has changed and in some areas there has been water run off to properties adjoining New Rd. The Met Office Climate Change predictions state that winter rain levels and winter storms will continue as experienced currently. Moreover, if climate temperatures increase above 2* there will be a further 20% increase in winter rainfall amounts. The national planning guidelines states that building on flood plains "should be avoided" because of the risk to the developments and of exacerbating flooding elsewhere in the area. While the fields to the south of New Rd have not yet been formally recognised as flood plains their outflows are already affecting other properties, and with the build of concrete, tarmac etc the situation will be exacerbated as climate change bites.

I have focused my attention on these 2 areas and in Chiseldon only. There are others.

A fully researched Development Plan covering now to 2031 has to provide the planners with limitations and restrictions to a plan and risks that need to be considered, as well as where Development will be appropriate. Not doing so will be to the detriment of the in place community and those looking to join.

Resident (JL)

I have submitted my thoughts on the CNP via the Survey Monkey but then afterwards I had additional thoughts about the building codes and found that I am unable to add these via the Survey Monkey as it says I have already submitted my input. Therefore I wondered if I could route these additional comments through you?

Flooding is shown in Figure 6. There is no suggestion that there should be building in flood plains, but in any event, policies on flooding are left to the Local Plan as the more appropriate level of policy, and also because the NDP does not propose any development in a flood plain or elsewhere. The Design Code discusses low carbon homes (Section 3.8 ff).

Basically I was thinking that as a community we should try to do our bit to reduce the consequences of climate change for the benefit of future generations and I wondered if it would be possible to set standards in the Chiseldon building code for effective insulation, including cavity wall and double glazing of any new builds, that might be more stringent than the current general UK building regs. In addition, could we add the requirement for all new builds to be fitted with solar panels, charging points for electrical cars and air source heat pumps for heating (and no gas boilers)? I realise that this increases the cost of the build but saving money at the outset usually means it costs more in the end.

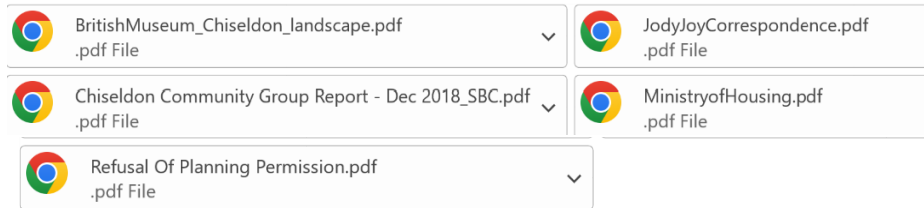
That's it. Please let me know if I need to submit this through a different mechanism.

Unfortunately, insulation is better dealt with through building control codes. This link explains:

<https://www.planningportal.co.uk/permission/common-projects/roof/building-regulations-insulation-and-thermal-elements>

Solar panels are discussed in the Design Code but they cannot be required to be included because they are not required in building regulations. EV charging is included in the Design Code. At present, it is not possible to require air source heat pumps. It may be that these matters will be covered in the Swindon Local Plan review.

Resident (MS)



Firstly, I have read the document but may not have taken in all the detail given its length, however I have made the following comments, these are primarily in response to the survey question:

10. Are there any land use planning matters that were not covered in the plan that you think should have been? Can you please describe what you believe was missing or in need of correction?

Chairman's Introduction

The Chairman's introduction states: *"All the conclusions reached have been based on feedback received from the community and consultation with local groups and professional bodies."*

- Has the North Wessex Downs National Landscape been consulted?
 - Was the Chiseldon Community Group Report (see attached) considered?

Apart from in the list of residents' best things about Chiseldon in the Chairman's introduction, there is little mention of the North Wessex Downs Area of Outstanding Natural Beauty (NWD AONB) AONB or 'National Landscape' (as renamed in November 2023) that Chiseldon sits within. This is probably the most important

We have contacted the AONB team via email but they have failed to respond. They did not respond to this consultation either.

The Chiseldon Community Group response was considered but no changes were made because it speaks about local plan housing allocations and the NDP is not allocating land for housing.

Would the chairman wish to add reference to the AONB in the introduction?

aspect when considering planning in this area and should be mentioned much more strongly throughout the NDP.

Chiseldon Location and description Page 11, point 16.

The term “*The entire parish is washed over by the North Wessex Downs AONB*” does not feel strong enough to represent the strength of the NW National Landscape’s charter.

The wording should be replaced with something along the lines of:

Chiseldon is situated in the North Wessex downs Area of Outstanding Natural Beauty deignated as (AONB) and recently classified as a National Landscape. A National Landscape is a nationally important landscape protected by law. As such it has the highest level of protection along with National Parks. The renaming to National Landscapes has strengthen the protection to preserve these areas. See ‘*Strengthening legislative duties*’ at [this link](#).

Although it is a privilege to live in a National Landscape. It should be acknowledged that being in a National Landscape/AONB does have restrictions for major development. (not just a list of policy numbers).

Historic development of Chiseldon Parish Page 15

A quote from Dr Jody Joy Senior Curator Museum of Archaeology Cambridge University or Dr Julia Farley Curator of British and European Iron Age collections, (British Museam) should be included to strengthen the importance of our village and surrounding landscape.

Both highlight the importance of the area historically, particularly the Iron Age landscape.

The quote could include:

Do the parish council wish for para. 16 to be replace d with:

Chiseldon is situated in the North Wessex downs Area of Outstanding Natural Beauty designated as (AONB) and recently classified as a National Landscape. A National Landscape is a nationally important landscape protected by law. As such it has the highest level of protection along with National Parks. The renaming to National Landscapes has strengthen the protection to preserve these areas. See ‘*Strengthening legislative duties*’ at [this link](#).(footnote)

Would the parish council wish to ask Dr Joy and/or Dr Farley for a quote or suitable text for inclusion? Alternatively, use the following suggested text?

“It is also one of the few places in England where it is possible to gain an impression of a wider Iron Age landscape with views to the Ridgeway and Liddington and Barbury hillforts.”

“It is also one of the few places in England where it is possible to gain an impression of a wider Iron Age landscape with views to the Ridgeway and Liddington and Barbury hillforts.”

Both the letters are attached for your perusal and were written in response to a member of Chiseldon History Group who was concerned about potential development on the land adjacent to New Road and The Ridgeway.

Other comments

Within the document there is no mention of previous planning applications that have been refused on the land around and outside of Development Boundaries.

The most recent application that was refused by SBC S/OUT/18/0703 (13 Dec 2019). The reasons for refusal include: *Its prominent countryside location in the North Wessex downs. And states that the application site is highly visible from key viewpoints. The resulting development would cause significant harm to the landscape character of the AONB.*

These arguments put forward by SBC are still as relevant today as when written. Planning applications have been made and refused (some at appeal by the planning inspectorate) over the last 50 years. To avoid repeatedly having to fight planning applications on land that has previously been rejected for development, earlier unsuccessful applications should be considered, and it should be ensured that the land is not earmarked yet again by the Parish Council/SBC for potential development.

A local community group was formed to fight against previous applications. Most of the village was against these major

This is correct. No planning history has been included.

Would the parish council wish to see a new section showing the planning history (perhaps the past 5 years)?

All planning decisions consider that past planning decisions on any particular site so repeating them here might not be productive.

The AONB protections exist in national policy (NPPF) and the Swindon Local Plan and have not been repeated here because the NDP does not cut across those policies.

developments and building on AONB landscape. This takes a considerable amount of work and creates high levels of stress, affecting everyone's wellbeing. We need to avoid these situations in the future.

The report mentions that "The CNDP has been written to anticipate that major housing is likely to occur". Why is it that a "major housing likely to occur" in an AONB? And surely the CNDP should argue strongly against any 'major housing' development in a protected area and as other housing developments have taken place within the Parish Boundary and in adjoining nearby local areas.

Many thanks for your consideration. I look forward to hearing from you regarding the above.

Attachments:

Letter from Ministry of Housing, Communities & Local Government

Email correspondence from Dr Jody Joy author of "A Celtic Feast: the Iron Age Cauldrons from Chiseldon Wiltshire"

Letter from Dr Julia Farley, British Museum

Appeal Decision dismissing an appeal made by Jephson Homes Housing Association Ltd and Castlewood Investments Inc against the rejection of planning permission by Swindon Borough Council. Citing the NWD AONB under 'Reasons'.

Chiseldon Community Group Report

Major housing development is likely to occur because there is no 5 year housing land supply and Chiseldon (like other areas) is vulnerable to speculative housing development. The (now withdrawn) Reg. 18 local plan identified a need for housing in Chiseldon. Though the proposed site allocation was withdrawn, this does not necessarily mean that the requirement no longer exists. It is therefore likely that major development will occur in the future.

This has been mentioned by a few residents. Does the parish council wish to have further explanation (as above) included to explain why development is likely?

Resident (MS)

I would like to register my comments on the neighbourhood plan 2024.

A number of Butts Road residence expressed concerns over the increase/volume of traffic using the road as a rat run, the excessive speeding and also the use of the road as a car park for both the Business Park (end of Butts Road) and those dumping cars whilst they head off somewhere for the weekend.

I've read through the Neighbourhood Plan and see only one general reference to the rat run on page 21 point 46 which in itself does not really gie any sense of the real problem. I have also looked through the 'questionnaire' and can not find any question pertinent to the problems experience by Butts Roas residents. Therefore I hope at the very least you can take these sentiments written in this email and include them within the final plan for consideration.

I've lived on Butts Road for the last 6 years and have seen a significant increase in the problems I've stated above and can only imagine that this is to be exasperated by further development in the area in the coming years.

I'd like to submit to you my objection to the lack of focus on fixing the problem and would like to propose that Butts Road first and foremost has a 20mph speed limit imposed, this alone would at the very least help to protect the children who live along the road, many of whom walk to and from school along the road at a time when commuters are speeding through the rat run.

I'd also like to see some level of restriction for parking of non residents. I have on many occasions tried to leave or enter off my drive way only to find a non resident vehicle either parked directly

Traffic congestion and rat running is difficult to address in a NDP because this is generally a highways matter. It is best addressed with the location of new development is known so that those specific and identifiable development impact s can be mitigated. It is difficult to have a general policy about general traffic problems on the public highway.

Speed limits is not something material to town planning and this needs to be addressed through a traffic regulation order through Swindon Borough Council as the Highways Authority.

Parking on the public highway is also something that the NDP cannot easily control.

opposite or almost across my driveway causing significant safety and access issues. I understand that Butts Road used to be classed as Access Only, I'm unsure as to the reason this was subsequently ceased but would encourage consideration for its reinstatement.

Resident (DL)

The main comment to make is that Chiseldon does not need any substantial new build expansion. The reasoning is very simple:

1/ the road infrastructure is at its limits already for both the village and through traffic. .

2/ access in and out of the village is bad enough now without the extra vehicles expansion will bring,

3/ medical facilities are disappearing, virtually no consultations take place at the Surgery, and any additional increase in population will overwhelm what we currently have,

4/ given the current and proposed expansion of Swindon, the need for further house building in Chiseldon and the surrounding villages is surely not either necessary or needed.

Small infill sites will probably not cause such problems and may, in fact, enhance the village providing it is suitably controlled. Any development must put the emphasis on housing our young people and keeping them in the Village, thus securing its future.

The NDP is not allocating land for housing nor promoting housing development.

Policy 1 seeks provision of affordable housing for young people.

Resident (PM)

I have submitted some feedback using the form.

In addition I want to add this feedback:-

All of the land release for the Common Head development was previously designated partially at least as being within the Chiseldon Parish area. Since all that development was approved and then the boundaries redrawn surely this village has already made a substantial contribution to the Swindon needs. I do not see any references to that position represented in this plan or consultation.

Resident (SF)

I am extremely disappointed that the Parish Council's 'Vision for the Future' failed to mention or make any reference to the North Wessex Downs Area of Outstanding Natural Beauty (AONB). This is the village's greatest asset.

There should be an additional goal, as a priority on the list provided, to preserve the North Wessex Downs AONB and protect it from urban development.

Housing requirements is something that the review of the Swindon Local Plan will address. SBC are not able to supply advice on housing requirement at this time.

Would the parish council wish to include reference to the North Wessex AONB in the Vision?

The NDP is not the best mechanism for protecting the AONB which is nationally protected and also protected in the Swindon Borough Local Plan. It does not therefore need further protection in the NDP.

Residents (CP and DP)

With reference to the above plan:

The majority of the plan seems to be reasonable to us, although it is fair to say we have struggled to understand some of the extensive detail involved.

We do, however, have serious concerns about the bald statement that there will be "42 dwellings allocated at Land at Hodson Rd. Chiseldon" and strongly object to that being treated as a fait accompli and buried in the minutiae (e.g. "Chiseldon Neighbourhood Development Plan Housing Needs Assessment", page 16).

If indeed 42 is the number of new dwellings that is desirable in the plan, that is one thing, but we believe that there should be appropriate, explicit, consultation with local residents before their location is settled. We do not believe such consultation has yet occurred and so the plan should not specify that location.

Resident (CB)

Very impressed with the plan. Look forward to continued good neighbourhood living in Chiseldon. Only problem is heavy traffic ruining roads.

Resident

The Barbury shooting club is named Badbury not Barbury and one of the questions in the survey is repeated, he's made note of this in their responses.

Resident

EGPA Feb meeting, the tennis club were disappointed that the tennis club/courts were not mentioned more fully in the NHP as an asset.

The HNA was prepared before the housing allocation in the Reg. 18 was withdrawn.

Suggested change – remove this reference from the HNA.

Noted.

Suggested change – make this correction.

Suggested change – add to policy 8.

Planning agent



**Draft Chiseldon Neighbourhood Development
Plan January 2024
Regulation 14 Consultation**

On behalf of Hannick Homes & Developments Limited
March 2024





Broad support noted.

1.0 Introduction

- 1.1 This representation is submitted in response to the Draft Chiseldon Neighbourhood Development Plan (NDP) Regulation 14 consultation, which concludes on Friday 8th March 2024. It has been prepared by Hannick Homes & Developments Limited.
- 1.2 Hannick Homes, an established SME housebuilder based in Swindon, has been trading continuously in the South of England for some 45 years. We continue to have an interest in a wide range of development opportunities and submit wide-ranging representations to ensure that new policies positively reflect national policy and are not unnecessarily restrictive to new development.
- 1.3 Hannick Homes is actively seeking the promotion of land at Hodson Road (Appendix 1) through the Swindon Borough Council Local Plan Process and has previously met with Chiseldon Parish Council and the Steering Group to discuss this site.

2.0 Consultation Response

- 2.1 Hannick commends the Parish Council and Members of the Steering Group on its efforts to bring forward the Neighbourhood Development Plan (NDP) to establish policies that will be used in deciding the future of the Parish and how it will be developed.
- 2.2 Hannick has reviewed the NDP, Design Codes and Guidance and Housing Needs Assessment and can confirm that we broadly support the approach and policies set out in the draft documentation.
- 2.3 Our comments regarding the specific policies within the plan are set out below.



3.0 Policy 1 – Housing Mix

3.1 Policy 1 of the NDP sets out the housing mix required for new development within Chiseldon Parish. We broadly support the wording of the policy 1, its supporting text and evidence, but note that it will be important to ensure that the NDP is deliverable in line with national guidance, as set out in the National Planning Policy Framework (NPPF) and Planning Practise Guidance (PPG), which requires plan makers to consider the viability and deliverability of such policies. The PPG is clear that viability must be considered when preparing Neighbourhood Plan policy requirements and standards sought should not undermine deliverability of development.

Noted.

3.2 Accordingly, we welcome the inclusion in the policy of criterion B1 which sets out that the First Homes discount percentage may by exception vary on a site-by-site basis and that if concerns are raised that the requirements may render development unviable, a viability assessment must be prepared to justify any variation.

4.0 Policy 2 – Sustainable Transport

4.1 Policy 2 sets out that developments should seek to deliver improvements set out in Figures 13 and 14 on pages 30 and 31 of the draft NDP.

Noted.

4.2 Hannick agrees with the wording of Policy 2 and its supporting text and evidence, and it is considered that the development of Land at Hodson Road could facilitate the delivery of some of the improvements identified in Figures 13 and 14, specifically improvements to NCR 45 and the crossing of Hodson Road.





Noted.

5.0 Policy 3 - Biodiversity and Nature Recovery

5.1 Policy 3 requires that applicants for development should, where biodiversity net gain is a requirement, provide evidence in planning applications that demonstrate that biodiversity net gain and local nature recovery has been fully considered in scheme design. The wording, supporting text and evidence for this policy is supported.

5.2 With respect to Land at Hodson Road, Hannick will contact Swindon Borough Council to determine whether work has been done towards the preparation of the Local Nature Recovery Strategy regarding the proposal site and its relationship with the Local Nature Recovery map and seek advice on how best to deliver local nature recovery and biodiversity net gain. Whilst we will endeavour to deliver the required biodiversity net gain on site, if this is not achievable, we will work with Swindon Borough Council to identify ways that off-site biodiversity net gain can be delivered in Chiseldon Parish, focused on the nature recovery areas shown in Figure 15 or the Local Nature Recovery Map shown on page 33 of the draft NDP.

6.0 Policy 4 – Local Green Space

6.1 Policy 4 identifies land (Figure 16 and Appendix 4) as designated Local Green Space. Site 2 in Policy 4, Home Close nature area and wildlife corridor (West), is located adjacent to our site at Hodson Road. The development of the site would seek to maintain the designated Local Green Space in this location.

Noted

7.0 Policy 5 – Design

7.1 Policy 5 requires that all planning applications should demonstrate conformity with the Chiseldon Design Codes and Guidance (2023). Having reviewed the Design Codes and Guidance Document, Hannick broadly supports the policy, its

Noted

supporting text and evidence. Development of Land at Hodson Road would seek to comply with this policy.

8.0 Policy 6 – Non-designated Heritage Assets

8.1 Policy 6 identified non-listed structures and buildings in Chiseldon Parish, which alongside the numerous designated heritage assets, are worthy of protection. We agree with the wording of Policy 6 and its supporting text and evidence and do not propose any amendments or alternative wording.

Noted

9.0 Policy 7 – Play equipment and play areas

9.1 Policy 7 sets out that existing play equipment and play areas in Chiseldon will be preserved according to the requirements of Swindon Borough Local Plan. The policy requires that new play equipment will be designed according to the considerations set out in paragraphs 110 and 111 shown on page 39 of the draft NDP.

Noted

9.2 Hannick broadly supports this policy and any future development at Land at Hodson Road would seek to comply with the requirements of the policy.

10.0 Policy 8 – Community Facilities

10.1 Policy 8 of NDP identifies Community Facilities in Chiseldon Parish. Hannick agrees with the wording of Policy 8 and its supporting text and evidence and does not propose any amendments or alternative wording.

Noted

11.0 Conclusions

11.1 Hannick commends the Parish Council and Members of the Steering Group on its efforts to bring forward the Neighbourhood Development Plan (NDP). Hannick





has reviewed the NDP, Design Codes and Guidance and Housing Needs Assessment and broadly supports the approach and policies set out.

- 11.2 Hannick is actively seeking the promotion of land at Hodson Road (Appendix 1) through the Swindon Borough Council Local Plan Process and has previously met with Chiseldon Parish Council and the Steering Group to discuss this site.
- 11.3 In bringing forward this site we will seek to comply with the policies and guidance set out in the NDP and supporting documentation and evidence and would seek to deliver benefits where appropriate, including sustainable transport improvements, Biodiversity Net Gain and play equipment in line with Policies 2, 3 and 7 of the NDP.
- 11.4 We hope to be able to work collaboratively with the Parish Council and Steering Group to deliver the land at Hodson Road alongside the preparation of the NDP.



Appendix 1 – Site Location Plan, Land at Hodson Road



Resident

Question 1: Do you agree with the Vision for Chiseldon? If not, what alternative wording can you suggest?

In 2037, Chiseldon will be a place where people want to live, play and relax. It will be a healthy and thriving village with a diversity of age ranges and all facilities will be up to date. Residents will enjoy a healthy environment and new houses will cater to all sectors of the community. Local job opportunities and businesses will continue to thrive.

Yes

Question 2: Do you agree with the wording of Policy 1 and its supporting text and evidence? If not, what alternative wording would you propose?

Yes subject to an uplift in infrastructure and an increase in the delivery of local medical care to include doctors & dentists

The delivery of local medical care (doctors and dentists) is not something that the NDP can easily address, particularly since it is not allocating land for housing. However, this matter would be dealt with under policies in the Local Plan.