

CW NP Reg15/ 1 Regulation 15 Submission Statement, December 2022.

Chippenham Without Neighbourhood Plan : Regulation 15 Submission Statement.

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Regulation 15 Submission Statement.

This statement is provided below. Please note: one or two documents at the early stages of the Neighbourhood Plan procedures carry the name 'Allington, Sheldon and Chippenham Without Neighbourhood Plan' but it was decided that 'Chippenham Without Neighbourhood Plan' is a more accurate title. Thus the Neighbourhood Plan is now so titled. Also this Statement is accompanied by a signed Regulation 15 Checklist by Chippenham Without Parish Council and accompanied by a copy of the CWPC Minutes authorising this, along with a signed Regulation 15 Checklist by Chippenham Without Neighbourhood Plan Steering Group.

Regulation 15 : Map of Plan Area.

Accompanying Document:

- CW NP Reg15/3 Regulation 15 Chippenham Without Neighbourhood Plan Map Area.

Regulation 15 : Consultation Statement.

The People and Bodies Consulted, and How They were Consulted.

Accompanying Documents:

- CW NP Reg15/1 Regulation 15 Submission Statement, December 2022.
- CW NP Reg15/2 Regulation 15 Chippenham Without Neighbourhood Plan Final draft version following Reg.14 completion, December 2022.
- CW NP Reg15/3 Regulation 15 Chippenham Without Neighbourhood Plan Map Area.
- CW NP Reg15/4 Regulation 15 Chippenham Without Parish Council Meeting Minute of Parish Council Authorisation of NP Reg.15 submission, August 2022.
- CW NP Reg15/5 Regulation 15 Chippenham Without Parish Council Authorisation of NP Reg.15 submission, signed copy, jpg document, August 2022.
- CW NP Reg15/6 Regulation 15 Chippenham Without NP Steering Group Authorisation of NP Reg.15 submission, signed copy, jpg document, September 2022.
- CW NP Reg15/7 Consultation Letter to Residents, June 2015.
- CW NP Reg15/8 Consultation NP Questionnaire 1 Questions and Answers Analysis, November 2016.
- CW NP Reg15/9 Consultation Housing Needs Survey Invitation to Annual Parish Meeting, April 2018.

- CW NP Reg15/**10** Housing Needs Survey, Final report, October 2018.
- CW NP Reg15/**11** Consultation NP Questionnaire 2 Mailing List, word doc., May 2020.
- CW NP Reg15/**12** Consultation NP Questionnaire 2 Mailing List document 1 jpg May 2020.
- CW NP Reg15/**13** Consultation NP Questionnaire 2 Mailing List document 2 jpg May 2020.
- CW NP Reg15/**14** Consultation NP Questionnaire 2 Mailing List document 3 jpg May 2020.
- CW NP Reg15/**15** Consultation NP Questionnaire 2 Mailing List document 4 jpg May 2020.
- CW NP Reg15/**16** Consultation NP Questionnaire 2 Questions and Answers Analysis, December 2020.
- CW NP Reg15/**17** Regulation 14 SEA Natural England Screening Decision, September 2021.
- CW NP Reg15/**18** Regulation 14 SEA and HRA Wiltshire Council and Environment Agency Screening Decision, October 2021.
- CW NP Reg15/**19** Regulation 14 Consultation NP Questionnaire 3, Mailing List Residents, January 2022.
- CW NP Reg15/**20** Regulation 14 Consultation NP Questionnaire 3, Mailing List Businesses, January 2022.
- CW NP Reg15/**21** Regulation 14 Consultation NP Questionnaire 3, Mailing List External Organisations, January 2022.
- CW NP Reg15/**22** Regulation 14 Consultation NP Questionnaire 3 Questions, January 2022.
- CW NP Reg15/**23** Regulation 14 Consultation NP Questionnaire 3 Answers Summary, April 2022.
- CW NP Reg15/**24** Regulation 14 Consultation NP Questionnaire 3 Chippenham Town Council Questions and Answers, April 2022.
- CW NP Reg15/**25** Regulation 14 Consultation NP Questionnaire 3 Wiltshire Council Questions and Answers, July 2022.
- CW NP Reg15/**26** Regulation 15 Neighbourhood Plan Statement of Conformity with ECHR and Equalities Act, September 2022.
- CW NP Reg15/**27** Regulation 14 Consultation NP Questionnaire 3 Answers and Data Analysis for Residents, Businesses and External Organisations, November 2022.
- CW NP Reg15/**28** Regulation 15 Matrix of Planning Policies and Evidence, NP Annex P, November 2022.

The range and depth of consultation has expanded as the development of the principles and features of the Plan have been formed. When the intent to produce a Plan was first conceived in June 2015 the focus was led principally by residents and from this initial meeting a Steering Group was formed. The chair of the Parish Council (Chippenham Without) hosted this initial meeting so the Parish Council has been appraised of

developments from the outset although, in operational terms, on an arm's length basis. The Steering Group has at all times been operationally independent of the Parish Council in the formulation of the Plan.

During the development and preparation of the Plan there have been three public consultations – 2016, 2020 and 2022 – along with a Housing Needs Assessment in 2018. From the commencement, Wiltshire Council Planning Department have been involved with the evolution of the plan via the appointment of a liaison officer, and have advised on the procedures as this consultation process has evolved. The initial consultation in 2016 involved the residents and major landowners of the parish (the Plan's area being based on the Chippenham Without PC boundaries) and sought to determine the key themes and issues which the Plan should address.

Following this 2016 consultation, and advice/discussion of the outcome with our Wiltshire Council liaison officer, an application was made in 2017 to *My Community – Locality (Groundwork)* for grant assistance with the development of the Plan. This funding was granted and the consultation process followed its funding procedures. This funding enabled us to employ planning consultants – *Ridge and Partners LLP* and also the *Gloucestershire Rural Community Council* to undertake a Housing Needs Survey (HNS).

In the light of the 2016 public questionnaire, the 2018 HNS and discussions with our planning consultant, the NP Steering Group prepared a draft Neighbourhood Plan. This draft was a fully developed Plan, with a vision, policies and appendices with supporting data and matters of context. In 2020 this went out to public consultation with all residents, based on the electoral roll, and they were asked to comment in detail. This consultation and summary of answers received forms part of this Regulation 15 application.

In the light of the 2020 consultation the Steering Group made revisions in consultation with their planning consultant. These revisions embraced refinements of policy, a broader recording of data in support of the Plan, and a wider indication of how the Plan accorded with the Wiltshire Core Strategy. All of these matters were discussed with the Wiltshire Council liaison officer, and advice on progress was rendered throughout to the Parish Council.

This process resulted in the formulation of a draft Plan for a Regulation 14 public consultation. The Steering Group launched the Regulation 14 publication in early 2022. Costs for mailing were supported by the Parish Council and all of the pertinent Regulation 14 consultation documents were placed on the Parish Council website, with Wiltshire Council being advised accordingly. The people and bodies consulted were in accord with Regulation 14 requirements and covered all residents and all businesses within the Plan area and all external bodies/organisations which might have an interest in the Plan. A full record of those consulted is provided with this Regulation 15 application. Notice of the

Regulation 14 consultation along with a paper questionnaire and answer form was sent to all those consulted, and this contained advice on access to the key background documents on the Parish Council website.

The Regulation 14 public consultation recorded near unanimous approval of the Plan and its policies from those who replied in all sectors (residents, businesses and external bodies/organisations – summary details provided). In the case of residents there was a return of 55 responses, 53 of which are strongly supportive. The Plan area has a total of 84 residential properties and all their 151 occupiers were consulted. In terms of the resident response rate, this is 36.4%. The exception in terms of response was Wiltshire Council which provided, through our Wiltshire Council liaison officer, a long and detailed list of questions about all aspects of the Plan. The Steering Group gave detailed consideration to this Wiltshire Council commentary. The outcome has been the production of a detailed response to Wiltshire Council on every point raised. The key principles of this response are that the Steering Group has found the Council's observations of great assistance in strengthening the recording of the evidence base within the Plan and its policies, along with a refinement in wording of the exact meaning and focus of certain policies. This has made the Plan stronger. However this process has not required the reformulation of any of the basic principles or policies of the Plan and, as the Plan has been widely endorsed as satisfactory by all the other respondents consulted, the Steering Group believe there has been no fundamental alteration of the final draft Plan which would necessitate a further public consultation. A copy of the Regulation 14 consultation document (questions and answers) undertaken with Wiltshire Council is provided with this Regulation 15 application.

Summary of the main Issues and Concerns, and how these have been addressed in the Plan.

The main issues and concerns identified by the 2016 Public Consultation focused on the preservation of the rural and heritage character of the plan area, the belief that farming and small rural businesses should remain the central focus of the economy, that housing development should be strictly limited to the needs of the plan area's residents and small businesses, that there should be no breach in development terms of the A350 boundary with Chippenham town – established in Wiltshire Council policies on how Chippenham should expand and develop – and that infrastructure and development proposals within the Plan's area should solely reflect existing need and essential modernisation.

It was on this basis and in conjunction with the 2018 Housing Needs Survey that the Steering Group with the assistance of its planning consultant, *Ridge and Partners LLP*, formulated the vision and detailed policies for the draft plan. This formed the basis of the draft Plan that went out to public consultation in 2020.

Details of these matters – the issues and concerns - can be seen in the Vision and Policies of the 2020/22 versions of the Plan. However in summary these can be recorded as:

- **Historic Environment** : a need to conserve and enhance the distinctive characteristics of the historic rural landscape, a need to conserve the Allington Conservation Area, and a need to protect the plan area's heritage assets. Key to this conservation and protection is the maintenance of the A350 development boundary with Chippenham town, along with the aim after the Plan's adoption to create a working group run by residents to assist in promoting these conservation and protection objectives. The working group would operate under the Parish Council's guidance. A detailed record of the historic assets is provided in the Plan along with onward sources affording even greater detail, along with access to the adopted Allington Conservation Area Statement.
- **Natural Environment** : a need to conserve and enhance the distinctive landscape characteristics of the natural environment in and around the settlements (the plan area has three distinct and separate hamlets – Allington, Sheldon and Lanhill), a need to conserve and enhance the area's green infrastructure, to improve the resilience of the area's natural environment to climate change and, where possible, to improve its biodiversity. The Plan seeks to respond to these needs by a number of approaches – to support the development of farming in a way that acknowledges the importance of these needs and principles; to assist in the good upkeep of the area's footpaths which both connect with Chippenham town and the wider rural area; to promote the role of the plan area as a 'green lung' for the residents of Chippenham with access to the area via the footpaths, walking and cycling along the area's network of lanes, in tandem with encouraging favourable conditions for a strong biodiversity within the area. A working group of residents, along the lines indicated in respect of the historic environment, will be sought to be established following the Plan's adoption. Details of the footpath network are provided in the Plan.
- **Built Environment** : a need to conserve and enhance the distinctive landscape characteristics of the area's built environment by supporting its maintenance whilst also supporting its appropriate development, by encouraging sustainable construction, and by retaining the distinctive characteristics of the area's three settlements. In practical terms this means retention of the A350 boundary with no new externally driven development, keeping the distinct boundaries and rural areas between the three settlements, and preserving the central role in the area of its farms and manors.
- **Economy** : a need to improve the infrastructure and network provision (highway maintenance, broadband connection) in order to support a sustainable working environment, to support such improvement through encouragement of small businesses which can function sustainably, to support investment in sustainable farming and, where opportunity arises, to support the development of community facilities. In practice, this means the provision of broadband throughout the area, thus facilitating home working and the rural location of small businesses, ensuring sound upkeep but no new development of the road network so ensuring that the rural character of the area is preserved, supporting

sustainable farming proposals to reflect the arrival of climate change and the protection/enhancement of biodiversity, and supporting the development of recreational facilities in different forms (the existing rugby/cricket clubs, and possibly a community centre).

- Housing : support for new housing where a genuine need has been demonstrated by the resident population and in accordance with sustainable economic growth which respects the rural nature of the Plan area, and ensuring that such new development embraces sustainable construction principles and is adaptable to enable residents to remain in their homes as long as possible. In policy and practical terms this means encouraging housing on a small scale for young families who have an economic link with the area, to support an extended family and special needs of its members, and to encourage housing that is affordable. No new housing development areas are proposed in the Plan.

All of these issues and concerns have been addressed in detail within the various iterations of the Chippenham Without Neighbourhood Plan, both in terms of policies for the Neighbourhood Plan itself and with reference to the wider policy context provided by the Wiltshire Core Strategy and higher level planning obligations. The formulation of the policies in operational, practical terms are now stated in full in the Regulation 15 version of the Neighbourhood Plan, and the process of how they have been drawn up and modified in response to public consultation responses is documented in full in this Regulation 15 submission.

Regulation 15: The final draft Neighbourhood Plan Document.

Accompanying Documents:

- CW NP Reg15/2 Regulation 15 Chippenham Without Neighbourhood Plan Final draft version following Reg.14 completion, December 2022.
- CW NP Reg15/17 Regulation 14 SEA Natural England Screening Decision, September 2021.
- CW NP Reg15/18 Regulation 14 SEA and HRA Wiltshire Council and Environment Agency Screening Decision, October 2021.

The Strategic Environmental Assessment (SEA) screening opinion, together with the consultation on the need for a Habitats Regulations Assessment (HRA) was undertaken by Wiltshire Council in 2021. This resulted in a statement that neither a SEA nor a HRA was required, see supporting documents and their reference numbers listed above.

Basic Conditions Statement.

Having regard to national policy.

We have taken advice from our planning consultant, *Ridge and Partners LLP*, on the broad scope of national policy, along with advice from our consultant, *Gloucestershire Rural Community Council* on housing needs assessment, and throughout from Wiltshire Council on all issues of national policy as they may affect our Neighbourhood Plan and the planning principles and proposals which the Plan advances. All have advised us that our Neighbourhood Plan is in conformity with national policy. See Regulation 15 accompanying document titled: “CW NP Reg15/28 Regulation 15 Matrix of Planning Policies and Evidence, NP Annex P, November 2022” for conformity with the National Planning Policy Framework 2021 (NPPF 2021) and additional national and local planning policy documents.

How the plan contributes to sustainable development.

As will be observed on reading our Plan, sustainability is at the core of the Plan’s vision, principles and policies.

- The Plan seeks to maintain the area’s historic assets and historic rural landscape, both through identifying those features and advancing policies for their conservation and enhancement.
- The Plan places importance on conserving and enhancing the distinctive rural landscape in and around and between the area’s settlements (Allington, Sheldon and Lanhill) and sees endorsement of farming as central to this, along with the protection and improvement of biodiversity, and access to the Plan area as a ‘green lung’ for the adjacent town of Chippenham by means of good upkeep of the footpath network and the network of lanes for walking and cycling.
- The Plan places importance in its policies on sustainable construction in both new dwellings and the conversion/upgrading of existing dwellings, and importantly seeks to conserve and enhance the distinctive landscape around the area’s settlements both by affirming in planning terms the centrality of the A350 as a boundary for development between the Plan area and the adjacent town of Chippenham, as well as supporting the integrity of key built features represented, in particular, by the area’s manors and farms.
- In economic terms, the Plan sees farming and small businesses as the central features of the area’s economy in the future. These will be supported, as will the ability to work from home by means of endeavouring to ensure that the area has good broadband provision.
- Given the central importance of maintaining the rural nature of the Plan area, the Plan centres its policies for new housing development solely on the expansion of existing built areas to meet the housing needs of existing families as well as persons running small

businesses in the Plan area. This means the Plan has no policies for externally driven housing development.

Thus throughout the broad range of its policies the Plan seeks to maintain the rural character of the area and to encourage the development of activity in the Plan area in such a way that can sustain this rural nature in the future.

Being in conformity with the Wiltshire Core Strategy (Local Plan).

Advice from our planning consultant, *Ridge and Partners LLP*, and our Wiltshire Council liaison officer has been followed throughout in this regard to ensure conformity.

Of particular note to the Chippenham Without Neighbourhood Plan are the following Wiltshire Council Core Policies:

- CP 48 – Supporting Rural Life.
- CP 50 – Biodiversity and Geodiversity.
- CP 51 – Landscape.
- CP 52 – Green Infrastructure.
- CP 58 – Conservation of Historic Environment.

Also, a number of other Wiltshire Council Core Policies have been seen as fundamental to the preparation of the Neighbourhood Plan in order to ensure conformity with the Wiltshire Core Strategy (Local Plan) and details of these are recorded in the Regulation 15 document: Matrix of Planning Policies and Evidence which accompanies this Reg. 15 Consultation Statement.

With regard to CP 48 which places particular emphasis on the provision of dwellings to meet the employment needs of rural areas, the improvement of access to services and improved infrastructure, and the conversion and re-use of rural buildings, the Plan has Economy and Housing principles and policies which meet the need for dwellings associated with the employment needs of local business and farms; the Plan also has principles and policies focused on improved infrastructure (broadband) to assist small business development and working from home; and the Plan has principles and policies focused on the encouragement of appropriate and sustainable development centred on the re-use of existing rural buildings. Indeed, the preservation and promotion of the rural character and life of the Plan area is central to the vision of the Plan.

With regard to CP 50 which places particular emphasis on the protection and enhancement of biodiversity and its existing character, the Plan places great importance on this in its principles and policies on the Natural Environment, and how development (Built Environment) and the Plan's Economy policies must have a fundamental respect for the rural nature of the area. The Plan's aim is to ensure that existing biodiversity, and wherever possible its enhancement, are central to all planning and development decisions. For

example, the Plan has at its heart its endorsement (see NP Annex C) of the Chippenham Sites Allocation Plan, 2017, which establishes the A350 as the rural boundary between Chippenham town with Chippenham Without parish. This enables Chippenham Without to serve as a 'green lung' for the town, both in character and in terms of access, and ensures that the value of biodiversity is sustained for both the populations of the adjacent urban and that of our own Plan area.

With regard to CP 51 which places emphasis on the protection, conservation and enhancement of landscape, the protection of landscape features such as trees and hedgerows, the preservation of the distinctiveness of settlements and the importance of landscape views, this is a principle that is central to the vision of this Neighbourhood Plan. This is evident throughout in the Plan's policies which support development only in so far as it respects the rural nature and landscape of the area, the distinctive rural separation of the area's settlements (Allington, Sheldon and Lanhill) and the important views within and out from the Plan area. Evidence of this can be seen not just in the policies of the Plan but also in the Plan's Annexes cited in support of those policies e.g. Annex N (Allington Conservation Area Statement) and Annex D (Wiltshire, North Wiltshire Landscape Assessments and the Wiltshire Historic Landscape Character Assessment). The rural landscape and its preservation (CP 51) are central to this Plan, ensuring that the area's tranquillity and rural character are conserved.

With regard to CP 52 which places importance on the preservation and development of green infrastructure, the dominant support of the Plan for its farms, rural character and special biodiversity in terms of plants, animals and the habitats which sustain them means that CP 52 is at the heart of the Neighbourhood Plan. Access for the public to share this green infrastructure and for the Plan to enhance it are recorded evidentially in the Plan e.g. Annex J (Rights of Way) along with proposals to establish 'working groups' from residents, once the Plan is adopted, which will seek to conserve and enhance key features of the area's assets. These 'working groups' will operate under the supervision of the Parish Council.

With regard to CP 58 which focuses on the conservation of the historic environment, the Plan has this requirement at its heart. The need under CP 58 to respect nationally significant archaeological remains, buildings of architectural and historic interest, the special character of Conservation Areas along with historic assets in general are all central to the Neighbourhood Plan. This is manifest in the Plan's vision and translates in detail into its principles and policies. It is also evident in the Plan's evidence base, see in particular Annex N (Allington Conservation Area Statement) and Annex O (Listed Scheduled Historic Monuments, with map, and Listed Buildings).

Being compatible with EU obligations, including SEA and HRA.

EU obligations with regard to strategic environmental assessment and the protection of key habitats have all been complied with, and all requirements have been met by this Plan. See earlier evidence provided via the process of the screening decision conducted by Wiltshire Council, ref: SEA HRA Wiltshire Council Screening Decision, October 2021, and SEA HRA Natural England Screening decision, October 2021.

Obligations under the European Convention on Human Rights and the Equalities Act 2010 have been complied with throughout the consultation stages and the formulation of the Plan. A Statement of Conformity is provided.

A full list of the background documents supporting this Regulation 15 submission are provided on the opening page of this submission, and a copy of each document accompanies it.

In summary:

- CW NP Reg15/1 Regulation 15 Submission Statement, December 2022.
- CW NP Reg15/2 Regulation 15 Chippenham Without Neighbourhood Plan Final draft version following Reg.14 completion, December 2022.
- CW NP Reg15/3 Regulation 15 Chippenham Without Neighbourhood Plan Map Area.
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- CW NP Reg15/14 Consultation NP Questionnaire 2 Mailing List document 3 jpg May 2020.
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