

# Consultation Statement

## CHISELDON PARISH NEIGHBOURHOOD DEVELOPMENT PLAN 2022 – 2037

## Purpose

1. This Consultation Statement has been prepared in support of the Chiseldon Parish neighbourhood development plan (NDP) as part of its submission to Swindon Borough Council under Regulation 15 of the Neighbourhood Planning (General) Regulations 2012.

2. Regulation 15 states:

*15.—(1) Where a qualifying body submits a plan proposal to the local planning authority, it must include—*

*(b)a consultation statement;*

In this regulation “consultation statement” means a document which—

*(a)contains details of the persons and n who were consulted about the proposed neighbourhood development plan;*

*(b)explains how they were consulted;*

*(c)summarises the main issues and concerns raised by the persons consulted; and*

*(d)describes how these issues and concerns have been considered and, where relevant, addressed in the proposed neighbourhood development plan.*

3. This statement has been prepared by Chiseldon Parish Council (“the qualifying body”).

## Community Vision and the agreement of which policies to prepare

4. Swindon Borough Council designated the Chiseldon Neighbourhood Area on 8 February 2022. This was the start date for the preparation of the NDP.
5. However, in anticipation of the neighbourhood area designation being granted, the parish council commissioned Andrea Pellegram Ltd. to meet with the community to learn about what local people wished for the neighbourhood plan and locally determined planning policies.
6. On 13 December 2021, a community event was held in the Chiseldon House Hotel. Approximately 40 people from the village attended plus the Parish Council. All participated in the discussion. At the end of the event, villagers came forward who expressed an interest in joining the Steering Group. The event was led by Andrea Pellegram who gave a half hour presentation on neighbourhood planning and what it could and could not achieve, a short review of the current planning context, and undertook an exercise exploring the Strengths/Weaknesses/Opportunities/Threats (SWOT) of Chiseldon, agreeing main issues for the community vision for the future and finally a discussion about potential planning policies for the NDP.
7. A report of the event was produced that outlined evidence gathering requirements for the steering group to pursue. Most of these policy themes have been delivered in the NDP with the exception of a masterplan for Hodson’s Road. This policy was dropped because during the preparation of the NDP, Swindon Borough Council withdrew its Submission Draft Plan, and therefore that proposed allocation. Instead, as will be explained below, the parish council consulted that site proposer separately.
8. The full report of the vision event is copied in **Appendix 1**.

(a) contains details of the persons and bodies who were consulted about the proposed neighbourhood development plan

(b) explains how they were consulted

Evidence gathering (Pre-Reg.14)

9. The majority of the evidence gathering was by the Steering Group working with the consultants. The steering group was managed by the Clerk and the Chair who consulted others in the community widely throughout the process. Emails and meetings were used to maintain contact with the planning authority who provided advice and support throughout the process. Landowners were consulted directly over such matters as local green space designations and possible housing development (this will be discussed below).
10. The main consultants were Andrea Pellegrini Ltd. and AECOM (through Locality).

Local Green Spaces (Pre-Reg.14)

11. All landowners of potential local green spaces were contacted by email before Regulation 14 consultation commenced. The list of landowners is shown in Table 1.

**Table 1: landowners consulted regarding the potential identification of their land as Local Green Space (names redacted for GDPR)**

			Date		2nd contact
1	Rec field	Not needed. Owned by CPC			
2	Home Close	Not needed. Owned by SBC			
3	Washpool.	Sent to Ben at Savills and Charlie xxx	1.6.23	Need to follow up to make sure email received.	Emailed Ben and Charlie 12.6.23 to confirm they had received the first email
4	Strouds Hill	Not needed. Owned by SBC			
5	Holy Cross Church	Sent to Father xxx to ask him to pass on. He is sending to Church Wardens	1.6.23	Need to follow up to make sure the right people have received this.	Emailed Nick xxxxx and Colin xxxxx the 2 wardens `12.6.23 to make sure they has received the email
6	Sir Henty Calley	Not needed. Owned by CPC			

7	Butts Road cemetery	Not needed. Owned by CPC			
8	Castle View Play area	Not needed. Owned by SBC			
9	Chiseldon Primary School	Not needed. Owned by SBC			
10	Manor House Grounds	No contact details known so posted to the address.	1.6.23	Asked them to email me for a copy of the NHP	
11	Chiseldon House hotel	Sent to sales@chiseldonhouse.com	1.6.23	Need to follow up to make sure email received.	Emailed Sales again to check email received and passed on 12.6.23
12	Canney Green	Not needed. Owned by SBC			
13	Allotments and Milenium Wood	Not needed. Owned by CPC			
14	Railway path track	Not needed. Owned by SBC			
15	Green space Aisne Road	Sent to Neil xxx <xxx@yahoo.co.uk>	1.6.23	Need to follow up to make sure email received.	Emailed Neil again. 12.6.23
16	Green space Draycot Close	Not needed. Owned by SBC			
17	Green Space School Close	Not needed. Owned by SBC			
18	Green verges Downs Road	Not needed. Owned by SBC			
19	Field near Butts business park	Sent to Ben at Savills and Charlie xxx	1.6.23	Need to follow up to make sure email received.	As above.

20	Verges. South East Chiseldon	Not needed. Owned by SBC			
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12. The verges in the LGS amenity policy are believed to be owned by the Highways Authority (Swindon Borough Council) who were consulted but did not respond and were consulted again at Regulation 14 and did not respond then either. The letter originally sent to the Council is copied in **Appendix 4**.
13. As the list of local green spaces was being finalised, it became clear that some of the land ownership boundaries had been misunderstood. There was a series of map corrections and correspondence (not included but available on request).
14. The landowner of Chiseldon House objected to the land being included and this was removed from the list of sites.
15. One substantive letter was received which is copied in **Appendix 5**.
16. This representation considered that land at Washpool was extensive and therefore failed the test of NPPF 2023 para 106 b. This views was rejected by the steering group because the land was in public use with the consent of the landowner, there were contractual agreements between the landowner and the parish council regarding the public use of this land, and that its steep and biodiverse nature would make it unsuitable for development under almost all circumstances. This site was retained. The representation objected to inclusion of land adjacent to Butts Road business park as this was deemed to be countryside. This site was not included (removed).
17. Following all consultation, the following sites were excluded:
  - Chiseldon House
  - Manor house and garden
  - The paddock field next to the church is private with no public access, and therefore should be removed (similar to the Manor House)
18. Regulation 14 consultation and subsequent discussion within the steering group suggested that local green space be included at Burderop Park (site 16). The clerk contacted the land owner with the proposed site outline and this was agreed to in an email exchange (not included but available on request).

#### Prospective housing developer and land owner (Pre-Reg.14)

19. At the time that the NDP evidence gathering was underway, the emerging local plan (review) had identified a site for a housing allocation (this is explained in Appendix 1 and discussed in the Vision report). The emerging local plan review was halted and has not recommenced to Reg. 18 stage at the time of writing (June 2024).
20. However, at the time of evidence gathering, there was no five year housing land supply and the Swindon Borough Local Plan 2026 was out of date. The landowner of the withdrawn proposal site indicated that it was likely that the site would be submitted for planning permission (under para. 11d of the NPPF 2023) or would be resubmitted in the local plan review as a development site.

21. The steering group had originally intended to work with the landowner to agree a masterplan for inclusion in the NDP. However, this was no longer appropriate and the steering group instead prepared detailed policies that would apply at the time that any proposal for a major housing scheme might come forward as either an allocation or as a planning application.
22. The Clerk, the Chairman and the parish council's planning consultant visited the offices of Hannick Homes (the proposer) to discuss the NDP policies before Regulation 14 consultation commenced. Some concerns were raised by Hannick Homes regarding viability (particularly around housing mix) and amendments to the wording of the policies was agreed. Hannick Homes responded to Reg. 14 consultation and did not raise any objections (see below).

#### Local Nature Recovery (Pre-Reg.14)

23. At the time of submission (July 2024) the Local Nature Recovery Strategy (LNRS) was in preparation but had not been prepared, nor had draft LNRS maps been made available with priorities and measures.
24. In order to provide applicants using the NDP with the best opportunities of meeting the emerging LNRS, the Wiltshire and Swindon Biological Records Centre (WSBRC) was contacted and a series of base map information was provided to support Policy 3 and appendix 3.
25. Andrea Pellegrini Ltd. is also a member of the Wiltshire LNRS steering group and was therefore able to keep close track of how the emerging LNRS and the NDP should represent one another.

#### Screening opinion by LPA on SEA and HRA (Pre-Reg.14)

26. The parish council requested Swindon Borough Council to provide a screening opinion on whether Strategic Environmental Assessment (SEA) or Habitats Regulations Assessment (HRA) would be required for the NDP to meet the basic conditions. The report which will be discussed in the Basic Conditions Statement concluded that neither SEA nor HRA would be required.

#### Regulation 14

27. Andrea Pellegrini Ltd. provided a briefing note to the Clerk explaining how to undertake Regulation 14 consultation. This is copied in **Appendix 2**. This note was followed closely by the clerk and explains how the consultation was undertaken. Appendix 2 shows the text of the online survey which was done using *Survey Monkey*.
28. The full list of email addresses for those consulted at Regulation 14 stage of the NDP's preparation are listed in **Appendix 3**. This list was provided by Swindon Borough Council.
29. The consultation was open between **Monday 8<sup>th</sup> January 2024 to Friday 8<sup>th</sup> March 2024**. However, in practice, the period was significantly extended since some consultees, such as the local planning authority, were not able to comment within the 8 week period. The Clerk took great pains to remind statutory consultees to respond by sending reminder emails but some, such as the North Wessex Downs AONB management board, failed to submit any comments.
30. The Clerk collated all responses and submitted them to the planning consultant. The consultant considered all responses received, to be discussed below, and suggested how they might be addressed. These recommendations were discussed and final changes were agreed in the Parish Council meeting of the Planning Committee on 30 May 2024.

(c) summarises the main issues and concerns raised by the persons consulted

31. The following bodies responded to the Regulation 14 consultation:

- SWINDON BOROUGH COUNCIL
- STATUTORY CONSULTEES
  - Thames Water
  - Natural England
  - British Museum
  - Historic England (David Stuart Historic Places Adviser)
  - National Highways
- OTHER STAKEHOLDERS
  - Burderop Estate
  - Chiseldon Community Group
  - Planning agent
- RESIDENTS (15 in total)

32. The issues raised were generally matters of accuracy which were addressed and a concern about the amount of development that had occurred. This has been rectified by undertaking an analysis of planning permissions from 2029 to 2024. This is included in **Appendix 6** for information and is reflected in the updated text.

(d) describes how these issues and concerns have been considered and, where relevant, addressed in the proposed neighbourhood development plan.

33. The information in Appendixes 4 and 5 shows in the right hand column how the responses were considered by the consultant (black and red), responded to by the parish council (green). All consultation responses are shown in full and it has been made clear where changes to the NDP text and policies were made.

## Appendix 1: Copy of report of Vision event 13 December 2021



## Report of Vision Event

Chiseldon House, 13 December 2021

### Chiseldon Parish Council

(16 December 2021)



Andrea Pellegram Ltd. 6 Chesterton Park, Cirencester, GL7 1XU  
[www.pellegram.co.uk](http://www.pellegram.co.uk)

## Report of Vision Event held on 13 December 2021

### Introduction

An inception meeting of the Steering Group (mainly the Parish Council at this stage) was held on 22 September 2021, where it was decided to start the neighbourhood plan process with a public meeting in December.

Accordingly, the Chiseldon House Hotel was booked for the event on 13 December, 2021 from 19.00 to 21.00. Approximately 40 people from the village attended plus the Parish Council. All participated in the discussion. At the end of the event, villagers came forward who expressed an interest in joining the Steering Group.

This document sets out the responses from the discussion, including agreed policy themes, and a draft vision.

At the end of the document, a brief review of the planning policy context for the Chiseldon Neighbourhood Development Plan (CNDP) will be used as a means of identifying what planning evidence should be gathered.

Advice is given to the Steering Group on what to do next.

### Presentation

A half hour presentation was given to the audience (attached as Appendix A) which explained the neighbourhood planning process and discussed emerging Swindon Local Plan policies.

### Strengths, Weaknesses and Opportunities

An interactive exercise was then undertaken – it was to consider Strengths, Weaknesses and Opportunities (there was no time to consider the “threats”).

#### Strengths

- Chiseldon Parish is not over developed. Areas such as Badbury Park which was allowed on appeal was considered by the audience to be over developed. See air photo of Badbury Park in Appendix B.
- Access to countryside walking across the Marlborough Downs.
- There is a primary school that children and parents can walk to (though many parents drive).
- There are good public amenities such as tennis courts, sports facilities, pubs, and a doctor’s surgery.
- There is good access by road to many major urban areas such as Swindon, Bristol, Reading and smaller towns such as Marlborough. It is easy to get to the Swindon Railway station.
- There is good community spirit and new residents are welcomed.
- The countryside is quiet and tranquil and there is abundant wildlife such as deer and squirrels.

## Report of Vision Event held on 13 December 2021

- House designs are all different reflecting many historical styles from thatched cottages to 1960's bungalows.
- There is a lot of local history.
- The Sustrans route provides access to Marlborough and Swindon.
- There is low crime (150 incidents a year).
- Chiseldon's Washpool nature reserve and old village.

### Weaknesses

- M4 brings people to Chiseldon.
- Rat running from the A436 to B4005 through the village.
- Industrial estates outside the parish and the HGV test centre give rise to traffic.
- The population is older than average.
- Speeding and lack of traffic calming.
- Lorries driving on pavements and parking on pavements make the streets generally unsafe for pedestrians.
- Larger developments lead to environmental degradation.
- Under-resourced planning department means that there is inadequate enforcement and a reliance on retrospective planning permission to resolve breaches in planning control.
- Affordable housing is required for the younger generation, and there is a need for more starter homes. Older people also need homes that are suitable for their needs and affordable housing that is built does not seem to go to local people.
- Local people are being priced out of the housing market.
- Not enough housing for people with disabilities.

### Opportunities

- A new/revamped community centre with indoor and outdoor sports activities, opportunities for young people and group gatherings, catering facilities. This should be paid for in part from developer contributions. The current facilities are falling apart.
- Detailed design for emerging Local Plan Policy LA22.
- Affordable housing for local people.
- Provision of specialist housing types such as bungalows.
- Play facilities to meet the needs of all ages of children.
- More eco-friendly development that is carbon neutral.
- Provision for self-build.

## Potential policy themes

The audience agreed that the following policy themes would be appropriate:

- Detail for emerging Local Plan policy LA22
- Housing mix
- Sustainable transport
- Biodiversity and green infrastructure

## Report of Vision Event held on 13 December 2021

- Local Green Spaces
- Design code (parking, density, green space, play, materials, etc.)

## Vision for 2036

The Vision was set to use the same plan period as the emerging Swindon Local Plan and was suggested to be:

In 2036, 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 are 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.

## The Development Plan

The Development Plan for Chiseldon is the:

- Swindon Borough Local Plan 2026 (adopted March 2015)
- Wiltshire and Swindon Minerals Core Strategy 2006-26 (adopted 2009) (but there are no policies for Chiseldon)
- The Wiltshire and Swindon Waste Core Strategy 2006-26 (adopted 2009) (but there are no policies for Chiseldon)

In addition, the Local Plan is being reviewed.

Appendix C summarises the main Local Plan and Emerging Local Plan policies that are relevant to the proposed policy themes.

## Next Steps

Taking account of the community consultation and the policy framework discussed in Appendix C, the following tasks and activities are recommended to be undertaken by the Steering Group. It may be helpful to have an online meeting with Andrea to discuss how to do these things which can happen in January 2022.

### Masterplan for Hodson's Road

1. Clerk to seek to obtain contact details for the site owner to alert them to the fact that the CNDP will be considering the site and to invite them or their agent to participate in the preparation of the policy. It may be necessary to contact Swindon BC to ask them to contact the site proposer in order to comply with GDPR.
2. Assess the condition of pavements leading to Hodson's Road to understand if any improvements are required to allow for walking access from the site to the rest of the village.
3. Consider the site in relation to views, natural features, wildlife, trees, hedges etc. and map out all features of value or importance.

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4. Consider the relation of the site to the Sustrans route and proposed picnic area – define what the scheme should offer for this.
5. Consider the location and type of open space provision and how landscaping should be designed.
6. Consider what type of play space would be most suitable and consider the Parish Council's future role in maintenance. What sort of equipment, who installs it, who owns it, etc. Consider the requirements in emerging plan Appendix 2.
7. Map out best routes from the site to the village and main amenities and identify any deficiencies so that walking and cycling is an attractive alternative to driving. This includes routes to the primary school.
8. Ensure that the CNDP Design Code is suitable for this scheme.
9. Agree with the landowner/promoter/developer how they will work with the CNDP and community in the preparation of the masterplan and future planning application(s) if possible.
10. Consider a community design event where villagers can comment on the emerging masterplan before it is finalised.
11. Parish Council to agree necessary community infrastructure requirements arising from the scheme. Agree this with the planning authority and the land owner.

### Housing Mix

1. Clerk to apply to Locality for Technical Support: Housing Needs Assessment. Andrea will assist/advise and project manage this.
2. Consider the results and prepare a separate policy.

### Sustainable Transport

1. Contact the local walking group (if such exists) and seek to have them assess the quality of the walking network from the definitive map shown in the policy review. The objective is to produce a map that is colour coded (red=missing link or blockage, amber = needs improvement, green = functional) with a list of improvements required.
2. Assessment of Sustrans Route – are there any improvements required?
3. Contact the primary school to find a way to learn about parent behaviour with regard to school drop off and pick up. Is there any way to reduce traffic impacts and promote more walking to school?
4. Rat-running – is there anything that the community feels could be done to reduce rat-running? This needs to be related to development and can not be a highways management or engineering matter but something could be put into the supporting text to highlight issues and concerns.

## Report of Vision Event held on 13 December 2021

### Local Green Spaces

1. Identify all green spaces including designated open spaces, cemeteries, church yards, playing fields, larger pieces of unadopted green spaces along roads, village greens, etc that the community would like to see protected.
2. Prepare a table with a simple assessment to comply with NPPF para. 102. Andrea will advise.
3. Map out all the green spaces. Andrea will assist.

### Design Code

1. Convene a sub-group that is interested in design matters.
2. Prepare a Character Assessment for each of the main character areas (based on historic periods of development) which will assess the existing character of the area so that key positive design features can be identified. Andrea has a methodology to use and will support the group. This will mainly be a photography exercise linked to maps.
3. Andrea will work with the group to develop design principles that can be applied to smaller applications (extensions and modifications) as well as to Hodson's Road.
4. Review all online sources for additional support including Historic England register.
5. It may be helpful to contact Swindon BC to see if any assistance may be available.
6. This work will need to work closely with existing and emerging Swindon policies and be careful to only "add local detail" and not cut across the policies.

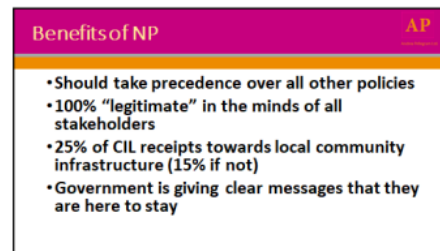
Report of Vision Event held on 13 December 2021

Appendix A: Presentation



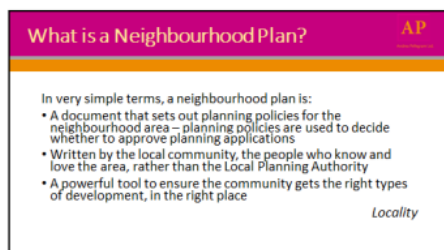
AP  
Chiseldon Neighbourhood  
Development Plan  
Chiseldon Vision  
Chiseldon House, 13 December 2021  
andrea@pellegrini.co.uk

1



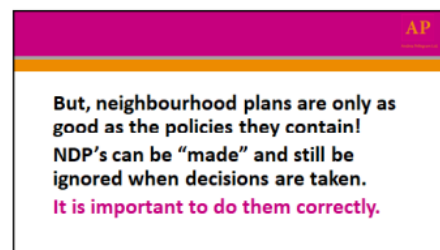
AP  
Benefits of NP  
• Should take precedence over all other policies  
• 100% “legitimate” in the minds of all stakeholders  
• 25% of CIL receipts towards local community infrastructure (15% if not)  
• Government is giving clear messages that they are here to stay

4



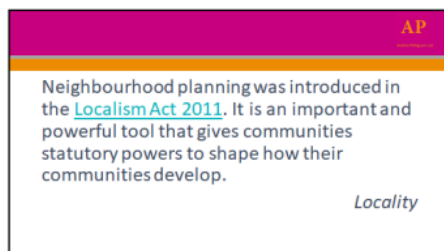
AP  
What is a Neighbourhood Plan?  
In very simple terms, a neighbourhood plan is:  
• A document that sets out planning policies for the neighbourhood area – planning policies are used to decide whether to approve planning applications  
• Written by the local community, the people who know and love the area, rather than the Local Planning Authority  
• A powerful tool to ensure the community gets the right types of development, in the right place  
*Locality*

2



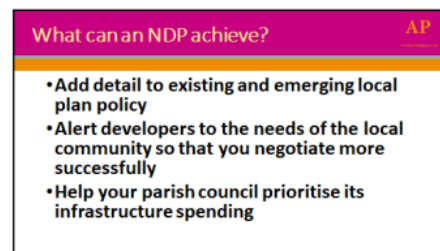
AP  
But, neighbourhood plans are only as good as the policies they contain!  
NDP’s can be “made” and still be ignored when decisions are taken.  
**It is important to do them correctly.**

5



AP  
Neighbourhood planning was introduced in the [Localism Act 2011](#). It is an important and powerful tool that gives communities statutory powers to shape how their communities develop.  
*Locality*

3



AP  
What can an NDP achieve?  
• Add detail to existing and emerging local plan policy  
• Alert developers to the needs of the local community so that you negotiate more successfully  
• Help your parish council prioritise its infrastructure spending

6

Report of Vision Event held on 13 December 2021

**What can it NOT do?**

- Prevent allocated development (especially housing) from proceeding
- Change or conflict with higher tier policies
- Deal with anything that is not material to the planning system
- Over-ride the powers of statutory undertakers

7

**Masterplan policy?**

Masterplan policy for Hodson Road

- Map out walking and cycling routes (including Sustrans route) to rest of settlement and other villages
- Inter-relationship with wildlife site and set out required biodiversity net gain
- Design/focus of public open space, picnic area, etc.
- Specification of public art

10

**Draft Local Plan Review 2036**

**Policy LA 22**  
**Land west of Hodson Road, Chiseldon**

Land west of Hodson Road is allocated for residential development about 40 dwellings as shown on the purple map and should make provision for:

- 1 a complete point of access from Hodson Road that provides the best existing access and access to the development site. A safe pedestrian connection to the existing bus stop on Hodson Road is also required.
- 2 a high quality landscape with an appropriate level of tree cover and a mix of tree species. High quality landscaping should be provided to the east of the site and along the road frontage. A mix of tree species should be used to provide a high quality landscape.
- 3 a high quality landscape with an appropriate level of tree cover and a mix of tree species. High quality landscaping should be provided to the east of the site and along the road frontage. A mix of tree species should be used to provide a high quality landscape.
- 4 a high quality landscape with an appropriate level of tree cover and a mix of tree species. High quality landscaping should be provided to the east of the site and along the road frontage. A mix of tree species should be used to provide a high quality landscape.

8

**Developer contributions**

- Set out clear developer contributions so that development delivers completely and on time

11

**Draft Local Plan Review 2036**

**Land at Hodson Road**  
**Hodson Road, Chiseldon**

9


**Sustainable development and design**

- Design policy to ensure new development is in keeping with existing character
- Seek to ensure that new development meets expectations of climate emergency

12




## Report of Vision Event held on 13 December 2021

**Sustainable transport** 

- Footway and cycle way improvements
- Signage improvements and way marking
- Where possible, manage impacts from A436

13



Any questions?

16

**Local Green Spaces** 


- Identify and protect local green spaces from development pressure
  - Playing fields
  - Recreation ground
  - Smaller green spaces

14



What do you think?

17

**Biodiversity and the natural environment** 

- Identify wildlife corridors
- Set out how biodiversity net gain should be delivered
- Identify any special species or features that require special attention

15

**SWOT exercise** 

- Strengths
- Weaknesses
- Opportunities
- Threats

18

## Appendix B: Badbury Park (as an example of over development)



**Report of Vision Event held on 13 December 2021**

## **Appendix C: Planning policy summary relating to the proposed policy themes**

This appendix considers the adopted Swindon Borough Local Plan 2026 and the Revised Proposed Submission Draft Swindon Borough Local Plan 2036 (the emerging plan).

### **General background**

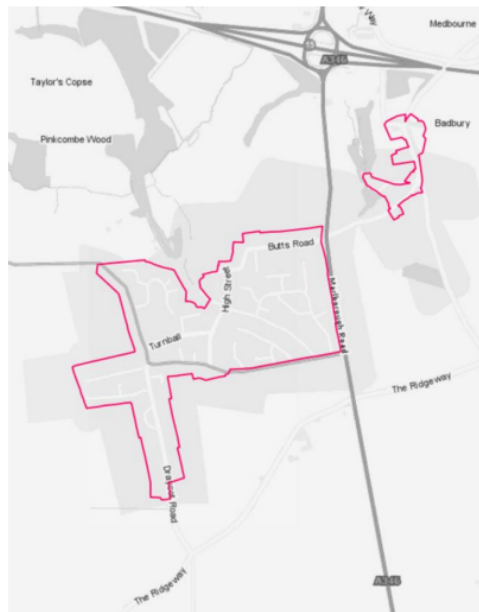
Key Diagram in Figure 6 shows that Chiseldon is in the North Wessex Area of Outstanding Natural Beauty.

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.

Emerging policy SP2 sets out the overall housing requirement for Swindon to 2036 and indicates that a strategic allocation was proposed for Chiseldon for 42 dwellings at Hodson Road, amplified in emerging Policy LA22.

Policy LN1: Local and Neighbourhood Planning sets out how the Borough will engage in the neighbourhood planning process.

Chiseldon has a Rural Settlement Boundary (Policy SD2):



## Report of Vision Event held on 13 December 2021

### Detail for emerging Local Plan policy LA22

The adopted Local Plan does not allocate land for housing in Chiseldon.

Emerging Policy LA22 sets out specific requirements for the proposed allocation in Chiseldon and this should be the starting point for any neighbourhood plan policy. Though the site is not yet formally allocated, and will not be allocated until the emerging plan is adopted, it is likely that the allocation will proceed. It will therefore be prudent for the CNDP to prepare so that when the allocation comes on stream, the CNDP has policies in place to manage the development.

#### Policy LA 22

Land east of Hodson Road, Chiseldon

Land east of Hodson Road is allocated for residential development about 42 dwellings as shown on the policies map and should make provision for:

- a. a single point of access from Hodson Road that combines the two existing accesses and access to the development site. A safe pedestrian connection to the existing footway provision on Hodson Road is also required;
  - b. a high quality entrance with no development near to the SW corner. At the more open NE corner any development must stay back from sensitive edge and manage impacts on adjacent wildlife site. Additional perimeter vegetation to southern and eastern boundaries to respect Sustrans route should be considered;
  - c. at least 0.3ha of useable public open space (in addition to landscaping areas). This should be provided adjacent to Sustrans Route 45 which passes along the eastern edge of the site;
  - d. enhancement to the Sustrans route through a public art installation and provision of benches/a picnic area and interpretation board on the history of Chiseldon;
  - e. a local level equipped Play Space;
  - f. Ensure any contamination from historic landfill does not pollute groundwater and any require remediation is carried out to the required standard; and
  - g. pedestrian connectivity to the existing village and via the existing route through Home Close, with the opportunity taken to improve this route.
- A Landscape and Visual Impact Assessment must be submitted with any application to identify ecologically and visually sensitive areas where there should be no development. Additionally, an archaeological assessment will be necessary.

Report of Vision Event held on 13 December 2021

**Land at Hodson Road**  
Hodson Road, Chiseldon



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Key

 Local Site Allocation

0 100 200 m

Scale 1:5,000 

Emerging policy SP1: Sustainable Planning Principles and Adaptions to Climate Change updates policy SD1. The updated policy requires large development proposals to be shaped and guided by and overarching Vision, masterplan and design code and should demonstrate significant community engagement in their conception. This is important for the CNDP because it establishes the principle that the plan can seek to influence the design of strategic allocation LA22. In addition, the policy requires that there be a management strategy to secure the long term maintenance of green and community infrastructure with specific reference to the role of parish councils. It will therefore be in the spirit of this policy for the PC to seek to work with the promoters of the LA22 scheme in the neighbourhood planning stage.

Emerging policy DM1: Design also requires that larger development are prepared using a masterplan with significant amounts of public consultation and an assessment by Design Review. The policy and supporting text in the emerging plan should be closely consulted by the Steering Group in the preparation of any CNDP policies for LA22.

Policy SD1 Sustainable Development Principles requires all development to be of high quality design to promote healthy, safe and inclusive communities and respect conserve and enhance the natural built and historic environment. Development should also be accessible by walking and cycling. Emerging policy SP1 largely adopts and updates SD1.

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Policy EN3: Open space sets out how development shall provide play and open space according to set standards which includes children and teenagers play areas, outdoor sports facilities, general recreational areas and allotments for all development over 25 dwellings. Emerging policy DM29 updates this policy and provides updated open space standards in Appendix 2. The emerging standards should be used in preparing the CNDP masterplan policy for LA22.

Emerging policy DM25 supports expanded community facilities where they are located within an existing settlement and are accessible to the whole community and is co-located with other community uses.

### **Housing mix**

Policy HA1: Mix, Types and Density 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. However, these studies will now be out of date and it may be necessary to use newer information, particularly in the light of the potential housing allocation in the emerging Local Plan (LA22). The policy has a requirement to consider the contribution of self-build.

Emerging policy DM5 states that unit size of market housing will be determined in response to market demand but should provide a variety of dwelling sizes. If the CNDP undertakes a housing needs assessment, this will provide evidence for local (Chiseldon) market demand in support of this policy.

Policy HA 2: Affordable housing requires that all developments of 15 homes or more have a target to deliver 30% affordable homes on site and mixed with other homes in the development. Emerging policy DM6 says that 10% of the dwellings on LA22 should be affordable home ownership and 20% as affordable rent.

Policy HA3: Wheelchair Accessible Housing requires that for proposals for 50 dwellings or more at least 2% should be suitable for wheelchair users. The proposed allocation LA22 is for 42 dwellings and so falls below this threshold but if the Steering Groups considers this to be important, it may be possible to apply this policy if evidence can be provided to justify the exception.

Emerging policy DM8 requires that for LA22, at least 10% of the dwellings should be accessible to wheelchair users.

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### **Sustainable transport**

Policy TR1: Sustainable Transport Networks seeks to maximise opportunities to walk and cycle and reduce the dominance of the car on the street scene. Green infrastructure should be integrated into the design of transport schemes.

Emerging policy DM19: Transport and development requires new development to reduce the need to travel and to facilitate the highest feasible use of sustainable transport modes and should prioritise walking and cycling.

Policy CM2: Active, Healthy and Safe Lifestyles will be enabled by increasing opportunities to walk and cycle and improving access to green spaces.

### **Biodiversity and green infrastructure**

Policy EN1: Green Infrastructure Network, in accordance with the Swindon Borough Green Infrastructure Strategy requires that development shall protect and enhance green infrastructure including trees, hedges and woodlands, habitats. Development shall provide and design green infrastructure to integrate with existing green corridors identified in the Policies map.

Emerging policy DM26: Green infrastructure requires new development to maintain and enhance green infrastructure to provide recreation, climate change mitigation, water management, connectivity and accessibility by walking and cycling and to sustain and increase ecological networks. The policy is detailed and should be considered carefully by the steering group.

The policy is supported by evidence in:

- Swindon Borough Green Infrastructure Strategy
- Open Space Audit (2014)
- Green Infrastructure Supplementary Planning Document
- Wiltshire Wildlife Trust

Policy EN2: Community Forest requires development to contribute towards the aims and objectives of the Great Western Community Forest which covers the whole of Swindon Borough which requires new tree planting and habitat creation with improved access. This policy is carried forward in emerging policy DM27.

Policy EN4: Biodiversity and Geodiversity requires development to avoid direct and indirect negative on sites identified on the policies map and damage or disturbance to local sites will generally be unacceptable. All development should provide biodiversity net gain which is now defined in the Environment Act as a 10% net improvement.

Emerging policy DM30: Biodiversity raises the former requirement for net gain to 20% net gain improvements.

The Definitive Map shows footpaths and bridleways for Chiseldon

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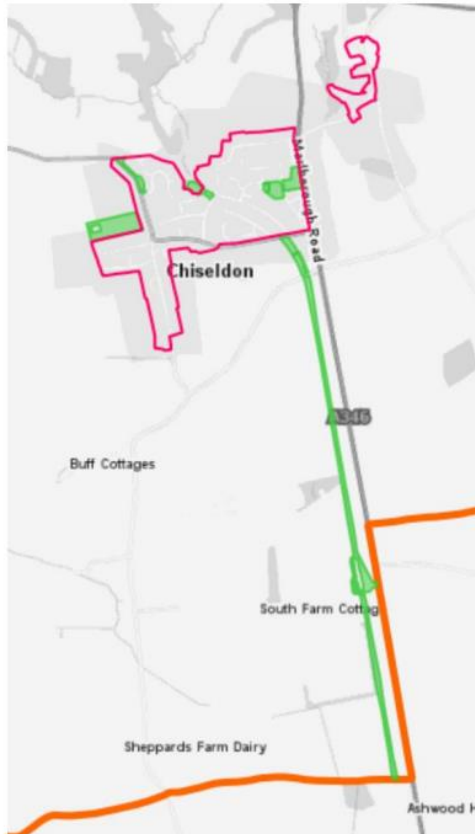
**Local Green Spaces**

Policy EN3: Open Space protects protected open space from loss.

Policy EN3: Open Space has designations in Chiseldon.



### Report of Vision Event held on 13 December 2021



Emerging policy DM28: Protecting Open Space protects open spaces on the policies map from development.

National Planning Policy Framework policies apply for this:

**101.** *The designation of land as Local Green Space through local and neighbourhood plans allows communities to identify and protect green areas of particular importance to them. Designating land as Local Green Space should be consistent with the local planning of sustainable development and complement investment in sufficient homes, jobs and other essential services. Local Green Spaces should only be designated when a plan is prepared or updated, and be capable of enduring beyond the end of the plan period.*

**102.** *The Local Green Space designation should only be used where the green space is:*

- (a) in reasonably close proximity to the community it serves;*
- (b) demonstrably special to a local community and holds a particular local significance, for example because of its beauty, historic significance, recreational value (including as a playing field), tranquillity or richness of its wildlife; and*

## Report of Vision Event held on 13 December 2021



*(c) local in character and is not an extensive tract of land.*

**103.** Policies for managing development within a Local Green Space should be consistent with those for Green Belts.

## Design code

Policy DE1: High Quality Design requires high standards of design for all types of development and proposals should address the objectives of sustainable development through design principles:

- a) Context and character
- b) Layout, form and function
- c) Amenity
- d) Quality of the public realm.

Policy DE1 is supported by the Swindon Design Toolkit which should be consulted in the preparation of a design code. This approach is largely carried forward in emerging policy DM1: Placemaking which requires that large developments are prepared using a masterplan.

Policy DE2: Sustainable Construction sets out detailed methods to encourage new development to be as carbon neutral as possible and it is suggested that the CNDP does not therefore need to consider this.

Emerging policy CC1: Adaptation to Climate Change is a comprehensive policy and should be sufficient so that the CNDP would not need to add any further detail.

Emerging policy DM2: Design of Buildings sets out specific design aspirations but the most relevant for CNDP will be how the design responds to and harmonises with the existing character – the CNDP can define what “existing character” is in this context.

Policy TR2: Transport and Development requires parking provision including secure cycle and motorcycle parking to be provided in accordance with the Council’s adopted parking standards. Emerging policy DM19 and Appendix 1 of the emerging plan set out the parking standards.

Policy EN5: Landscape Character and Historic Landscape protects the intrinsic character, diversity and local distinctiveness of landscape and requires the design of development and materials to be sym The North Wessex Downs Area of Outstanding Natural Beauty (AONB) is a nationally recognised area of landscape protection. Proposals within the Borough which are within and or abuts the North Wessex Downs AONB must accord with relevant criteria set out in the AONB Management Plan and paragraph 115 and 116 of the NPPF. Proposals outside the AONB should not adversely affect its setting.

The North Wessex Downs Management Plan sets out a planning and management approach to the North Wessex Downs.

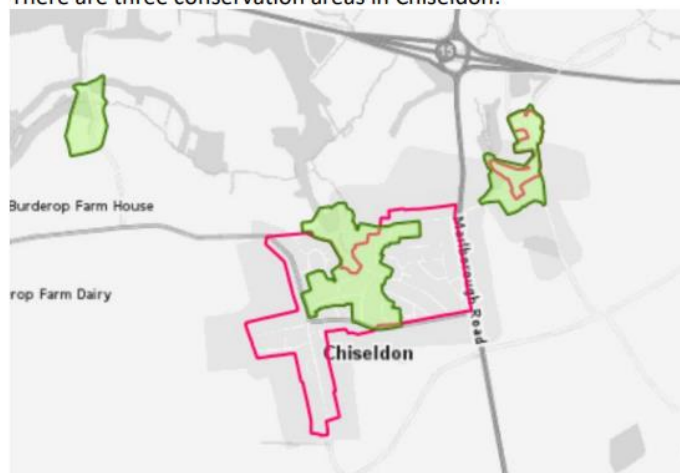
### Report of Vision Event held on 13 December 2021



Emerging policy DM31 on landscape sets out revised requirements for development in the AONB which the CNDP should take account of including for light pollution into the countryside.

Policy EN10: Historic Environment and Heritage Assets states that Swindon Borough's historic environment shall be sustained and enhanced. This includes all heritage assets including historic buildings, conservation areas, historic parks and gardens, landscape and archaeology. This policy is updated in emerging policy DM32 and this should be taken into account in the CNDP.

There are three conservation areas in Chiseldon:



There are a number of significant unscheduled archaeologies features under policy EN10.



## Appendix 2: Guidance note on how to undertake Regulation 14 consultation

### BRIEFING NOTE ON REGULATION 14 CONSULTATION OF THE CHISELDON NEIGHBOURHOOD DEVELOPMENT PLAN

Prepared by Andrea Pellegrini, MRTPI

5 December 2023

1. The Regulation 14 Draft Neighbourhood Development Plan (NDP) for the Parish of Chiseldon Parish in Swindon Borough was prepared under the Neighbourhood Planning Regulations (2012).
2. The Regulation 14 consultation Neighbourhood planning regulations requires the draft neighbourhood plan proposal to be the subject of a pre-submission consultation before it is submitted to the local authority for independent examination. The consultation should last at least 6 weeks.
3. The regulations say:

#### Pre-submission consultation and publicity

**14.** Before submitting a plan proposal to the local planning authority, a qualifying body must—

*(a) publicise, in a manner that is likely to bring it to the attention of people who live, work or carry on business in the neighbourhood area—*

*(i) details of the proposals for a neighbourhood development plan;*

*(ii) details of where and when the proposals for a neighbourhood development plan may be inspected;*

*(iii) details of how to make representations; and*

*(iv) the date by which those representations must be received, being not less than 6 weeks from the date on which the draft proposal is first publicised;*

*(b) consult any consultation body referred to in paragraph 1 of Schedule 1 whose interests the qualifying body considers may be affected by the proposals for a neighbourhood development plan; and*

*(c) send a copy of the proposals for a neighbourhood development plan to the local planning authority.*

4. This briefing note provides instructions to Chiseldon Parish Clerk how to undertake the Regulation 14 consultation.

## PREPARATION

5. The consultation may be a large exercise, depending on the number of responses and their complexity. It will be a requirement of the Consultation Statement that a full record is kept of the responses made, with an indication of how the comments were addressed in the next draft of the NDP (the Submission Draft to the Local Planning Authority under Regulations 15/16).
6. Therefore, it is recommended that the following checklist is considered before the consultation is started:
  - (a) Agree the consultation process and messages with Chiseldon Parish Council as appropriate;
  - (b) Identify a suitable 6-week period for the consultation, probably starting in **January 2024 running into middle February 2024**;
  - (c) The Parish Clerk will be the first point of contact for the consultation and will be responsible for undertaking the publicity arrangements and collation of results.
7. Once these matters have been resolved, it will be necessary to prepare for publicity activities outlined below and to amend all messages to include the consultation period.

## PUBLICITY

8. The Regulations require that the draft NDP is widely publicised. It is recommended therefore that the Parish Council undertakes the following activities:

### Survey form and leaflet

9. Wherever possible, respondents should be encouraged to use the standardised survey form shown in **Appendix 1**. A sample leaflet is set out in **Appendix 2**. However, it is normal for statutory consultees and developers to send a letter and this is acceptable practice.
10. It is recommended that where electronic copies of the survey form are made available, that these are either in Word format or in some other editable format so that respondents can add their comments electronically, rather than in written form or other formats that cannot be cut-and-pasted. An electronic survey form can be arranged but there will be a cost for this (which can be covered under the Main Locality Grant if money remains).

### Hard copies

11. It is recommended that the leaflet is printed and distributed to all households and businesses in the parish. In this way, it can be certain that all residents and people who do business in Chiseldon have the opportunity to respond electronically or by viewing a hard copy.
12. At least 3 hard copies of the draft NDP should be made available for public inspection under normal circumstances. The leaflet should provide a telephone

number where responders can leave their address to receive a paper copy in the post. Therefore, the Parish Council should have at least 3 printed hard copies of both the NDP and supporting documents (or have provision to produce copies when required).

13. All hard copy survey forms should be collected for future reference.

## Emails

14. Wherever possible, respondents should be encouraged to look at a digital version of the NDP and to complete the digital response form. It would be helpful to make a copy available on the Parish Council website.
15. The Parish Council should send an updated version of the email text in **Appendix 3** on day 1 of the consultation.
16. The list of consultees should include the consultees identified by Swindon Borough Council, all elected members of Chiseldon Parish Council, Clerks of neighbouring parishes, Swindon Borough Councillors who may take an interest, local community groups and local businesses.
17. The email should have the following attachments or link: the NDP, maps, background documents, the survey form.

## Parish Council Website

18. The Parish Council's website should be updated to include a prominent notification that the NDP is subject to the Regulation 14 consultation. Draft text is shown in **Appendix 2**. **It should also have all the consultation materials loaded: the NDP, maps, background documents, the survey form. These will be sent to you by WeTransfer.**

## Advertisement in local newspaper and other commercial publications

19. If the Parish Council regularly advertises in the local commercial press, a short notice should be placed advertising the Regulation 14 consultation and pointing readers to the Parish Council's website. **Draft text is in Appendix 2.**

## Parish communications

20. All normal communications channels used by the Parish Council such as newsletters, notice boards and phone messages should highlight the consultation and point residents towards the Parish Council's website.

## The Planning Authority

21. An electronic copy of the NDP, background documents (including maps) and this note should be sent to the planning authority.

## AFTER THE END OF THE CONSULTATION PERIOD

22. Once the consultation period has ended, the Parish Clerk should hand all correspondence to Andrea Pellegrini for further consideration. Please do not try to “help” by collating the responses!

## PREPARATION FOR CONSULTATION STATEMENT (for Submission)

23. When the NDP has been amended to take account of comments for the Regulation 14 consultation, it will be submitted to the planning authority.
24. Regulation 15 of the Neighbourhood Planning Regulations states that:  
*15.—(1) Where a qualifying body submits a plan proposal to the local planning authority, it must include—*
  - (b)a consultation statement*(2) In this regulation “consultation statement” means a document which—*
  - (a)contains details of the persons and bodies who were consulted about the proposed neighbourhood development plan;
  - (b)explains how they were consulted;
  - (c)summarises the main issues and concerns raised by the persons consulted; and
  - (d)describes how these issues and concerns have been considered and, where relevant, addressed in the proposed neighbourhood development plan.
25. The **Consultation Statement** will need to set out a list of all forms of consultation and describe how they were taken into account. Though the Regulation 14 consultation is important, all other forms of consultation are also important and must be included in the Consultation Statement. **It is necessary therefore to keep accurate records of the Regulation 14 consultation.**

## Appendix 1: Standard Survey form

Neighbourhood planning gives communities the power to prepare a shared development vision for their area. This neighbourhood plan seeks to shape, direct and help to deliver sustainable development by influencing the planning policies and decisions made by Swindon Borough Council.

Neighbourhood plans must be in general conformity with local plan policies and can amplify the planning decision-making framework.

This neighbourhood plan will help ensure that planning proposals take account of Chiseldon's circumstances and needs.

Decisions about planning applications must conform with policies in the Development Plan. In Chiseldon, this means that planning decisions must pay heed to the policies in this neighbourhood plan when adopted ("made") and in the Swindon Borough Local Plan.

The plan has been prepared by a Steering group of Parish Councillors and Chiseldon residents and has had input from members of the public and local businesses.

WE WANT YOUR VIEWS ON THE DRAFT POLICIES IN THE PLAN SO THAT WE KNOW THAT WE ARE SUBMITTING OUR FINAL PROPOSAL TO SWINDON BOROUGH COUNCIL IN LINE WITH OUR COMMUNITY'S EXPECTATIONS.

Please look at a copy of the plan and the questionnaire by clicking [this LINK](#). If you wish to have a paper copy, please call this number and we will send you a copy in the post. XXXXXX Hard copy responses should be sent to this address: XXXXXX

The consultation runs from DATE 1 AND DATE 2.

**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.

**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?



## **Policy 1: Housing mix**

**When meeting the requirements of Swindon Borough Local Plan policies HA1, HA2 and HA3, the following mix of housing will be required in Chiseldon Parish:**

- A. A minimum of 30% required affordable housing will be provided of which at least 25% will be First Homes.**
- B. First Homes will have a 50% discount applied and will be offered first to people with a local connection to Chiseldon Parish.**
  - 1. The First Homes discount percentage may by exception vary on a site-by-site basis, taking into account viability. In the event that concerns are raised that the requirements may render development unviable, a viability assessment must be prepared to justify any variation.**
  - 2. A local connection can be proven by demonstrating: current residency, employment requirements, family connections or special circumstances, such as caring responsibilities. Buyers with a local connection should be given priority over non-local residents for a minimum marketing period of 3 months.**
- C. Dwelling sizes of market and affordable housing should be predominantly 2-3 bedrooms, will conform to the nationally described space standard and should be adaptable for wheel chair use on the ground floor.**

Question 3: Do you agree with the wording of Policy 2 and its supporting text and evidence? If not, what alternative wording would you propose?

## **Policy 2: Sustainable Transport**

**Developments that seek to fulfil requirements in Swindon Borough Local Plan policies TM1 and CR2 will deliver improvements set out in Figures 13 and 14.**

Question 4: Do you agree with the wording of Policy 3 and its supporting text and evidence? If not, what alternative wording would you propose?

## **Policy 3: Biodiversity net gain and local nature recovery**

**Proposals that are required to provide biodiversity net gain must demonstrate that those requirements have been fully addressed as follows:**

- 1. 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 delivery local nature recovery and biodiversity net gain.**
- 2. Where biodiversity net gain cannot be delivered on site, applicants must work with Swindon Borough Council to identify ways that off-site biodiversity net gain can be delivered in Chiseldon Parish.**
- 3. Where off-site biodiversity gain is proposed, this should be focused on the nature recovery areas shown in Figure 15 or the Local Nature Recovery Map.**
- 4. Expert ecological advice should accompany planning applications to demonstrate how long-term biodiversity net gains on-site or off-site will be delivered with enduring benefits and long-term management where necessary.**
- 5. Only where off-site biodiversity improvements can be proven impossible to deliver within the parish can off-site and out-of-parish biodiversity improvements be considered.**
- 6. Planning proposals must demonstrate that landowners of sites where biodiversity net gain is proposed agree to the proposals and will cooperate in their delivery.**

Question 5: Do you agree with the wording of Policy 4 and its supporting text and evidence? If not, what alternative wording would you propose?

### **Policy 4: Local Green Spaces**

**A. Land identified in Figure 16 and Appendix 4 is designated as Local Green Space in Chiseldon Parish.**

1. Recreation Field
2. Home Close nature area and wildlife corridor (West)
3. Home Close nature area and wildlife corridor (East)
4. Washpool
5. Strouds Hill Green
6. Holy Cross church graveyard
7. Sir Henry Calley Memorial Garden
8. Butts Road cemetery and garden of remembrance
9. Castle View Play Area
10. Chiseldon Primary School playing field
11. Canney Green
12. Allotments and “Millennium Copse”
13. Old railway track path
14. Green space at Aisne Road, Ridgeway View
15. Green space at Draycot Close, Draycot Foliat

**B. Land identified as Local Green Space (amenity) in Figure 17 and Appendix 5 will retain its green and open character and will remain free of hard surfacing, except for the purposes of pedestrian access.**

Question 6: Do you agree with the wording of Policy 1 and its supporting text and evidence? If not, what alternative wording would you propose?

### **Policy 5: Design**

**All planning applications should demonstrate conformity with the Chiseldon Design Codes and Guidance (2023).**

Question 7: Do you agree with the wording of Policy 6 and its supporting text and evidence? If not, what alternative wording would you propose?

## **Policy 6: Non-designated Heritage Assets**

**For the purposes of Swindon Local Plan Policy EN10, non-designated heritage assets are listed below, shown in Figure 18 and described in Appendix 6.**

- 1. Well preserved old style post box in attractive corner building with brick wall enclosure.**
- 2. Centuries old bridge believed to be Saxon. Reinforced by US troops in the 1940's.**
- 3. Church remains at Draycot Foliat**
- 4. Commemorative Stone at Chiseldon Camp**
- 5. Chiseldon Camp at Ridgeway View 1915 – 1974**
- 6. Stone and Brick walls**
- 7,8 Old brick railway bridges from Marlborough to Swindon line. Includes Cuckoo bridge at Washpool**
- 9. Historic building dating to 1877. Was once a Chapel and then morgue. Now the site of the Parish Council offices and local museum. These buildings are not listed. Unique purpose and design in the local area.**
- 10. Millstone near Butts Road Cemetery.**
- 11. Steps between Church Street and Washpool**
- 12. Iron bench and gate at entrance to washpool from Strouds Hill**
- 13. Stone at Strouds Hill carpark entrance**
- 14. Remains of train station wall at Strouds Hill**
- 15. Jubilee tree guard at Rec ground with time capsule buried underneath**
- 16. Coronation Gates at Recreation Ground**
- 17. Old stone walls along Turnball**
- 18. War Memorial on New Road**
- 19. Brick wall at Canney Green. Chiseldon**
- 20. Red BT box at Badbury**
- 21. Royal Mail post box in listed wall at Badbury**
- 22. Stone and Brick walls**

Question 8: Do you agree with the wording of Policy 7 and its supporting text and evidence? If not, what alternative wording would you propose?

### **Policy 7: Play equipment and play areas**

- A. Existing play equipment and play areas in Chiseldon will be preserved according to the requirements of Swindon Borough Local Plan policy EN3.**
- B. New play equipment will be designed according to the considerations set out in paragraph 110 above.**

Question 9: Do you agree with the wording of Policy 8 and its supporting text and evidence? If not, what alternative wording would you propose?

## Policy 8: Community Facilities

The facilities listed below should be considered when fulfilling the requirements of Swindon Borough Local Plan policy CM4.

Community facilities as defined in the Swindon Borough Local Plan	Facilities in Chiseldon Parish
Public Halls (including community/youth centres),	<ul style="list-style-type: none"> <li>Chapel office (Butts Road)</li> <li>Memorial Hall (Draycot Road)</li> <li>Social Club – currently closed (Draycot Road)</li> <li>Religious building (New Road)</li> </ul>
Church Halls;	<ul style="list-style-type: none"> <li>Holy Cross Church hall (Church Street)</li> </ul>
Post Offices;	<ul style="list-style-type: none"> <li>Spar (High Street)</li> </ul>
Local shops within both urban and rural areas;	<ul style="list-style-type: none"> <li>Spar (High Street)</li> <li>Meadow Stores (New Road)</li> <li>Three Trees Farm Shop and cafe (Ridgeway)</li> <li>Esso Fuel station and forecourt shop, including Subway (New Road/A346)</li> </ul>
Indoor and outdoor sports facilities;	Recreation ground and club house
Schools and non-residential education and training centres;	<ul style="list-style-type: none"> <li>Chiseldon Primary School (Castle View Road)</li> <li>Badbury Shooting School &amp; café (Badbury)</li> </ul>
Places of worship;	<ul style="list-style-type: none"> <li>Holy Cross Church (Church Street)</li> </ul>
consulting rooms (including GP surgeries and dental practices);	<ul style="list-style-type: none"> <li>Doctors Surgery (Station Road)</li> </ul>
Museums,	<ul style="list-style-type: none"> <li>Museum (Butts Road)</li> </ul>
Public Houses;	<ul style="list-style-type: none"> <li>Patriots' Arms pub (Draycot Road/New Road)</li> <li>Plough on the Hill pub (A346 Badbury)</li> <li>Bakers Arms pub (Berricot Lane, Badbury)</li> <li>Calley Arms pub (Broome Manor Lane, Hodson)</li> </ul>

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?

## Appendix 2: Draft text for notifications and leaflet

(amend as appropriate):

HAVE YOUR SAY ON PLANNING POLICIES FOR CHISELDON PARISH

The Parish Council have completed their first draft of the Chiseldon Neighbourhood Development Plan.

We would like to know what you think of the policies and proposals and welcome your feedback.

Please look at a copy of the plan and the questionnaire by clicking this [LINK](#). If you wish to have a paper copy, please call this number and we will send you a copy in the post. [XXXXXX](#)

You can either make your comments on paper (collect a survey form [from the desk](#)), or you can do it online when you look at the draft Neighbourhood Plan.

The consultation is open between [DATE1 and DATE 2](#).

Responses can be sent to [XXXXXXXXX](#).

Draft text for website and press advertisement (amend as appropriate):

HAVE YOUR SAY ON PLANNING POLICIES FOR CHISELDON!

The Parish Council have completed their first draft of the Chiseldon Neighbourhood Development Plan.

Neighbourhood planning gives communities the power to prepare a shared development vision for their area. This neighbourhood plan seeks to shape, direct and help to deliver sustainable development by influencing the planning policies and decisions made by Swindon Borough Council.

We would like to know what you think of the policies and proposals and welcome your feedback.

Please look at a copy of the plan and the questionnaire by clicking this [LINK](#). If you wish to have a paper copy, please call this number and we will send you a copy in the post. [XXXXXX](#)

The consultation is open between [DATE1 and DATE 2](#).

Responses can be sent to [XXXXXXXXX](#).

## Appendix 3: Text for email on day 1 of consultation

HAVE YOUR SAY ON PLANNING POLICIES FOR CHISELDON!

The Parish Council have completed their first draft of the Chiseldon Neighbourhood Development Plan.

Neighbourhood planning gives communities the power to prepare a shared development vision for their area. This neighbourhood plan seeks to shape, direct and help to deliver sustainable development by influencing the planning policies and decisions made by Swindon Borough Council.

We would like to know what you think of the policies and proposals and welcome your feedback.

Please look at a copy of the plan and the questionnaire by clicking this [LINK](#). If you wish to have a paper copy, please call this number and we will send you a copy in the post. XXXXXX

The consultation is open between DATE1 and DATE 2.

Responses can be sent to XXXXXXXX.



## Appendix 3: Email contacts of those consulted at Regulation 14

The Neighbourhood Planning (General) Regulations 2012 - Schedule 1 para 1 - Consultation Bodies	Contact email	Date emailed
(a) where the local planning authority is a London borough council, the Mayor of London;	n/a	NA
(b) a local planning authority, county council or parish council any part of whose area is in or adjoins the area of the local planning authority;	<p><a href="mailto:ForwardPlanning@swindon.gov.uk">ForwardPlanning@swindon.gov.uk</a>;  <a href="mailto:spatialplanningpolicy@wiltshire.gov.uk">spatialplanningpolicy@wiltshire.gov.uk</a>;  <a href="mailto:james.brain@cotswold.gov.uk">james.brain@cotswold.gov.uk</a>;  <a href="mailto:Robert.Paddison1@westberks.gov.uk">Robert.Paddison1@westberks.gov.uk</a>;                      used this email from website -  <a href="mailto:planapps@westberks.gov.uk">planapps@westberks.gov.uk</a></p> <p><a href="mailto:planningpolicy@southandvale.gov.uk">planningpolicy@southandvale.gov.uk</a> –                      used this email from website.  <a href="mailto:planning.policy@southandvale.gov.uk">planning.policy@southandvale.gov.uk</a></p>	<p>22.1.24                      22.1.24                      22.1.24                      23.1.24 – bounced back                      Resent 23.1.24</p> <p>23.1.24 – bounced back                      Resent 23.1.24</p>
(c) the Coal Authority	n/a	NA
(d) the Homes and Communities Agency	<a href="mailto:enquiries@homesengland.gov.uk">enquiries@homesengland.gov.uk</a>	23.1.24
(e) Natural England	<a href="mailto:consultations@naturalengland.org.uk">consultations@naturalengland.org.uk</a>	23.1.24
(f) the Environment Agency	<a href="mailto:planning_THM@environment-agency.gov.uk">planning_THM@environment-agency.gov.uk</a>	23.1.24
(g) the Historic Buildings and Monuments Commission for England (known as English Heritage)	<a href="mailto:e-swest@HistoricEngland.org.uk">e-swest@HistoricEngland.org.uk</a>	23.1.24
(h) Network Rail Infrastructure Limited (company number 2904587);	<a href="mailto:townplanningwestern@networkrail.co.uk">townplanningwestern@networkrail.co.uk</a>	23.1.24
(i) a strategic highways company any part of whose area is in or adjoins the neighbourhood area;	<a href="mailto:planningsw@highwaysengland.co.uk">planningsw@highwaysengland.co.uk</a>	23.1.24

(ia) where the Secretary of State is the highway authority for any road in the area of a local planning authority any part of whose area is in or adjoins the neighbourhood area, the Secretary of State for Transport;	n/a	NA
(j) the Marine Management Organisation	n/a	NA
(k)(i) to whom the electronic communications code applies by virtue of a direction given under section 106(3)(a) of the Communications Act 2003;  Cannot currently send email.	Mobile Operators Association c/o Mono Consultants <a href="mailto:ginny.hall@monoconsultants.com">ginny.hall@monoconsultants.com</a>	23.1.24 – bounced back. Website for monoconsultants.com not accessible. Asking Christopher for alt email. 23.1.24. Company may have been bought out??
(k)(ii) who owns or controls electronic communications apparatus situated in any part of the area of the local planning authority;		NA
(l) where it exercises functions in any part of the neighbourhood area—		
(l)(i) an integrated care board established under Chapter A3 of Part 2 of the National Health Service Act 2006	<a href="mailto:lee.rockingham2@nhs.net">lee.rockingham2@nhs.net</a> (engagement lead)	23.1.24
(l)(ia) the National Health Service Commissioning Board;	<a href="mailto:lee.rockingham2@nhs.net">lee.rockingham2@nhs.net</a> (engagement lead)	23.1.24
(l)(ii) a person to whom a licence has been granted under section 6(1)(b) and (c) of the Electricity Act 1989	<a href="mailto:GE@ssen.co.uk">GE@ssen.co.uk</a>	23.1.24
(l)(iii) a person to whom a licence has been granted under section 7(2) of the Gas Act 1986	<a href="mailto:Enquiries@wwutilities.co.uk">Enquiries@wwutilities.co.uk</a>	23.1.24
(l)(iv) a sewerage undertaker	<a href="mailto:Devcon.Team@thameswater.co.uk">Devcon.Team@thameswater.co.uk</a>	23.1.24
(l)(v) a water undertaker;	<a href="mailto:Devcon.Team@thameswater.co.uk">Devcon.Team@thameswater.co.uk</a>	23.1.24

(m) voluntary bodies some or all of whose activities benefit all or any part of the neighbourhood area;	NP forum to determine	
(n) bodies which represent the interests of different racial, ethnic or national groups in the neighbourhood area;	NP forum to determine	
(o) bodies which represent the interests of different religious groups in the neighbourhood area;	NP forum to determine	
(p) bodies which represent the interests of persons carrying on business in the neighbourhood area;	NP forum to determine	
(q) bodies which represent the interests of disabled persons in the neighbourhood area.	NP forum to determine	

Wroughton. <a href="mailto:clerk@wroughton-gov.uk">clerk@wroughton-gov.uk</a>	Emailed 22.1.24
Liddington <a href="mailto:parishclerk@liddington.org">parishclerk@liddington.org</a>	Emailed 22.1.24
South Swindon <a href="mailto:admin@southswindon-pc.gov.uk">admin@southswindon-pc.gov.uk</a>	Emailed 22.1.24
Ogbourne St George	Emailed 23.1.24
Aldbourne	Emailed 23.1.24

## Appendix 4: letter sent to Swindon Borough Council regarding land it owns and the proposed local green space designation



17.10.23

Dear Molly

Chiseldon Parish Council is in the process of preparing a Neighbourhood Development Plan (NDP) for the parish which, when made (adopted) will provide locally relevant planning policy, in addition to national and Swindon Council planning policies.

One of the policies in the current draft NDP is "Local Green Spaces" where individual tracts of land in the parish are being proposed as Local Green Spaces. You are receiving this letter because you own land that is proposed for this designation.

The Local Green Spaces proposed designation is provided for in national planning policy in the National Planning Policy Framework 2021 in paragraphs 101 – 103:

*101. The designation of land as Local Green Space through local and neighbourhood plans allows communities to identify and protect green areas of particular importance to them. Designating land as Local Green Space should be consistent with the local planning of sustainable development and complement investment in sufficient homes, jobs and other essential services. Local Green Spaces should only be designated when a plan is prepared or updated, and be capable of enduring beyond the end of the plan period.*

*102. The Local Green Space designation should only be used where the green space is:*

*(a) in reasonably close proximity to the community it serves;  
(b) demonstrably special to a local community and holds a particular local significance, for example because of its beauty, historic significance, recreational value (including as a playing field), tranquillity or richness of its wildlife; and*

*(c) local in character and is not an extensive tract of land.*

*103. Policies for managing development within a Local Green Space should be consistent with those for Green Belts.*

Please provide any comments you may have on this proposed designation on or before 28<sup>th</sup> November 2023 so that your views can be taken into account before the document is provided in a more public format in the community consultation which will take place later this year or early 2024. Please send any comments you may have to [clerk@chiseldon-pc.gov.uk](mailto:clerk@chiseldon-pc.gov.uk)  
Yours sincerely

Clair Wilkinson  
Parish Clerk

 01793 740744  
 [clerk@chiseldon-pc.gov.uk](mailto:clerk@chiseldon-pc.gov.uk)  
 Chiseldon Parish Council Notices  
 [www.chiseldon-pc.gov.uk](http://www.chiseldon-pc.gov.uk)  
 Chiseldon Parish Council, The Old Chapel, Butts Road, Chiseldon, Wiltshire, SN4 0NW



## Appendix 5: letter of representation regarding proposed local green spaces

### Howard Cole

Town & Country Planning

Mrs Clair Wilkinson

Parish Clerk for Chiseldon Parish Council

13<sup>th</sup> July 2023

By Email

Dear Mrs Wilkinson

#### Chiseldon Neighbourhood Plan Consultation with landowners regarding potential Local Green Space

Thank you for your letter to local landowners dated 1<sup>st</sup> June 2023 which seeks views on the draft Local Green Space (LGS) proposals contained in the Draft Chiseldon NDP V5 of June 2023.

I am responding to that consultation on behalf of the Burderop Estate in relation to the LGS proposals for Washpool and the field adjacent to Butts Road business park.

As your letter helpfully points out, the National Planning Policy Framework (NPPF) at paragraph 102 sets out three essential criteria for the designation of LGS and these are supplemented by the National Planning Practice Guidance (NPPG).

I note that the NPPG states that ‘...the qualifying body (in the case of neighbourhood plan making) should contact landowners at an early stage about proposals to designate any part of their land as Local Green Space.’ On that basis, your letter meets the expectations of the NPPG in that regard.

I have looked at the Chiseldon NDP evidence base including the Local Green Spaces-NHP-list and note that there are differences between the documents, though I am unable to locate any material to explain the changes.

These comments relate to the assessment and identification of proposed LGS at Washpool and the field adjacent to Butts Road business park.

#### *Land at Washpool*

The proposed Washpool LGS comprises some 1.5ha of predominantly wooded valley landscape. Whether 1.5ha is an extensive tract of land, in the context of Chiseldon, is a matter for serious consideration, particularly as the proposed LGS area has expanded from the evidence base plan, to be contiguous with proposed LGS at Home Close and ~~Strouds~~ Hill Green (1.9 and 0.6has respectively). In the context of Chiseldon, 4ha is considered to be an extensive tract of land, contrary to the NPPF (see attached).

#### *Land adjacent to Butts Road Business Park*

The proposed ‘amenity Local Green Space’ adjacent to Butts Road Business Park comprises some 0.5 ha and not considered to be an extensive tract of land. It clearly relates and is part of

the wider farmland beyond However, it has no 'amenity' value and 'amenity' is not a qualifying status according to NPPF Paragraph 102.

Furthermore, the NPPG is clear that '*...blanket designation of open countryside adjacent to settlements will not be appropriate. In particular, designation should not be proposed as a 'back door' way to try to achieve what would amount to a new area of Green Belt by another name.*'

In summary, the proposed LGS at Washpool and the field adjacent to Butts Road business park do not meet the detailed requirements of the NPPF and NPPG and The Burderop Estes reserves the right to make further comments should these proposed designations appear in the Regulation 14 version of the Chiseldon Neighbourhood Development Plan.

Yours sincerely

*Jamie Lewis*

Jamie Lewis MRTPI  
**Partner**

E: [jamie.lewis@howardcole.net](mailto:jamie.lewis@howardcole.net)  
T: 07377883004  
W: [www.howardcole.net](http://www.howardcole.net)

CC: Andrea Pellegram MRTPI, Andrea Pellegram Ltd

## Appendix 6: Response to Regulation 14 consultation from Swindon Borough Council

Section / Paragraph / Page	Topic	Comments from SBC	RESPONSE TO COMMENTS FROM CHISELDON PC
			<p>Red – consultant’s suggested response</p> <p>Green – Parish Council’s final decision</p>
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 responders 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 <b>AGREE</b>
P.7 Para 7	Plan weighting	<p>Some complexities regarding plan weighting – worth noting the national guidance on this matter:</p> <p>NPPG Paragraph: 007 Reference ID: 41-007-20190509</p>	Para 7 will be rewritten accordingly when the NDP is submitted under Reg. 15. <b>AGREE</b>
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	Noted but no specific dates will be published in the Reg. 15 version of the CNDP in case SBC dates change.

		the Secretary of State before 30 <sup>th</sup> June 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.	No changes proposed. <b>AGREE</b>
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 <sup>st</sup> 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 13.  No changes proposed. <b>AGREED –</b>
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. The implications of this are discussed in the Housing Needs Assessment.  No changes proposed. <b>AGREED</b>



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. <b>No. Voted on at April 2024 planning meeting.</b>
P23	Extent of development in the countryside	<p>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:</p> <p>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</p> <p>a rural service centre; or</p> <p>it is in accordance with other policies in this Plan permitting specific development in the countryside.</p>	<p>Agree – tighten up the wording to better reflect SD2. <b>AGREED in the committee in May.</b></p> <p>I will do at the LPA asks here. There is no harm to use more precise wording. (30/5/24)</p>
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	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

	<p>Wheel chair use adaptable.</p> <p>Viability</p>	<p>1 in terms of first homes and related, including practical experience from is 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>conflicts with Policy 1, the new LP will take precedence in weight according to 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>Keep at 100% however need to define what the provision should be.</p> <p>Light switches and plugs not at ground level.</p> <p>Wider doors for wheelchair access</p> <p>Easy access to the property – no steps/minimal steps.</p> <p>Voted on in April planning meeting.</p> <p>AGREED – 30/5/24</p>
<p>Policy 2</p>	<p>Sustainable Transport</p>	<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>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</p>

		<p>The adopted Swindon Local Cycling and Walking Infrastructure Plan LCWIP) does not currently include 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>improvements in S106 agreements should be sought.</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?) <b>All maps were enlarged and the document reformatted to improve legibility and avoid need to consult external maps.</b></p> <p>Agreed that schemes would need to be tested individually.</p> <p>No changes proposed except formatting. AGREED. HAS SUSTANS MADE IMPROVEMENTS TO ROUTE 45 LOCALLY OUT OF INTEREST??? It has maintained the area but we cannot think of any improvements.</p>
<p>Policy 3</p>	<p>BNG and LNRS</p>	<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 Pellegrini</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>(advising Chiseldon) is involved in LNRS so can update. Call it “LNRS” consistently.</p> <p>Supporting text around Policy 3 needs to be edited down and supported by evidence. It’s currently largely aspirational. It is unclear 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>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 and it will therefore be necessary for this policy to be aspirational but linked to the completed LNRS. <b>AGREE</b></p>
<p>Policy 4</p>	<p>LGS</p>	<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</p>	<p>All <b>landowners</b> 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. <b>Agree</b></p>

		demonstrate how they meet the criteria.	
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 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</p>	<p>The design code has been finalised.</p> <p>WOULD THE PARISH COUNCIL WISH TO HAVE THE TEXT IN THE NPD CLARIFY WHAT IS MANDATORY AND WHAT IS ADVISORY? <b>Yes.</b> <b>Take to committee and ask AP for guidance AT MAY MEETING</b></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 and the NDP does not “agree a broad quantum of growth”. When the adopted reviewed Local Plan allocates sites, 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</p>

		<p>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>outside the development boundaries and in limited circumstances in the countryside. The Design Code is fit for those purposes.</p> <p>No changes proposed. <b>AGREE</b></p>
<p>Policy 6</p>	<p>ND Heritage Assets</p>	<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 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</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 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” identified in the Local Plan– the assets were chosen because they had community relevance and value.</p> <p>When will the Council assist with the NDHA list? That is</p>

		<p>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</p> <p>(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) 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>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>NO CHANGE.</p> <p>I added a change to para. 105 to explain that listed buildings are designated heritage assets. I modified wording for items 1 and 21 in policy 6.</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 – no building have been included in Policy 6.</p> <p>Agree to include a reference to the HER. <b>Agree</b></p> <p>NDHAs are considered social objectives. However, can also add environmental to Table 2. <b>Agreed May meeting.</b></p>
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Policy 8 / p.41 / para 114	Community Facilities	<p>Number of exclusions under GPDO – maybe just refer to and leave at that.</p> <p><a href="#">The Town and Country Planning (General Permitted Development etc.) (England) (Amendment) Order 2021 (legislation.gov.uk)</a></p>	<p>Agree to made clearer reference to GDPO. <b>AGREE</b></p>





## Appendix 7: All other responses received to Regulation 14 consultation

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## STATUTORY CONSULTEES

### Thames Water



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

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

1<sup>st</sup> Floor West  
Clearwater Court  
Valetorn 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 policy to insert text provided in this letter. **AGREED**

**“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.

# Consultation Statement

## Chiseldon Parish Neighbourhood Development Plan 2022 – 2037



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.

# Consultation Statement

## Chiseldon Parish Neighbourhood Development Plan 2022 – 2037



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

Consultation Statement  
Chiseldon Parish Neighbourhood Development Plan 2022 – 2037



Natural England

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

Clair Wilkinson  
clerk@chiseldon-pc.gov.uk

**BY EMAIL ONLY**



Hornbeam 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](mailto: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. **AGREED**

Consultation Statement  
Chiseldon Parish Neighbourhood Development Plan 2022 – 2037



Yours sincerely

Kimberley McDowell  
Consultations Team

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

##### **Natural environment information sources**

The [Magic<sup>1</sup>](#) 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<sup>2</sup>](#). 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<sup>3</sup>](#).

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<sup>4</sup>](#) website and also from the [LandIS website<sup>5</sup>](#), which contains more information about obtaining soil data.

##### **Natural environment issues to consider**

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

<sup>1</sup> <http://magic.defra.gov.uk/>

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

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

<sup>4</sup> <http://magic.defra.gov.uk/>

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

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

<sup>7</sup> <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](#)<sup>8</sup>), such as Sites of Special Scientific Interest or [Ancient woodland](#)<sup>9</sup>. 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](#)<sup>10</sup>) or protected species. To help you do this, Natural England has produced advice [here](#)<sup>11</sup> 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](#)<sup>12</sup>.

#### **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.

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

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

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

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

<sup>12</sup> <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](#)<sup>13</sup>).
- 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).

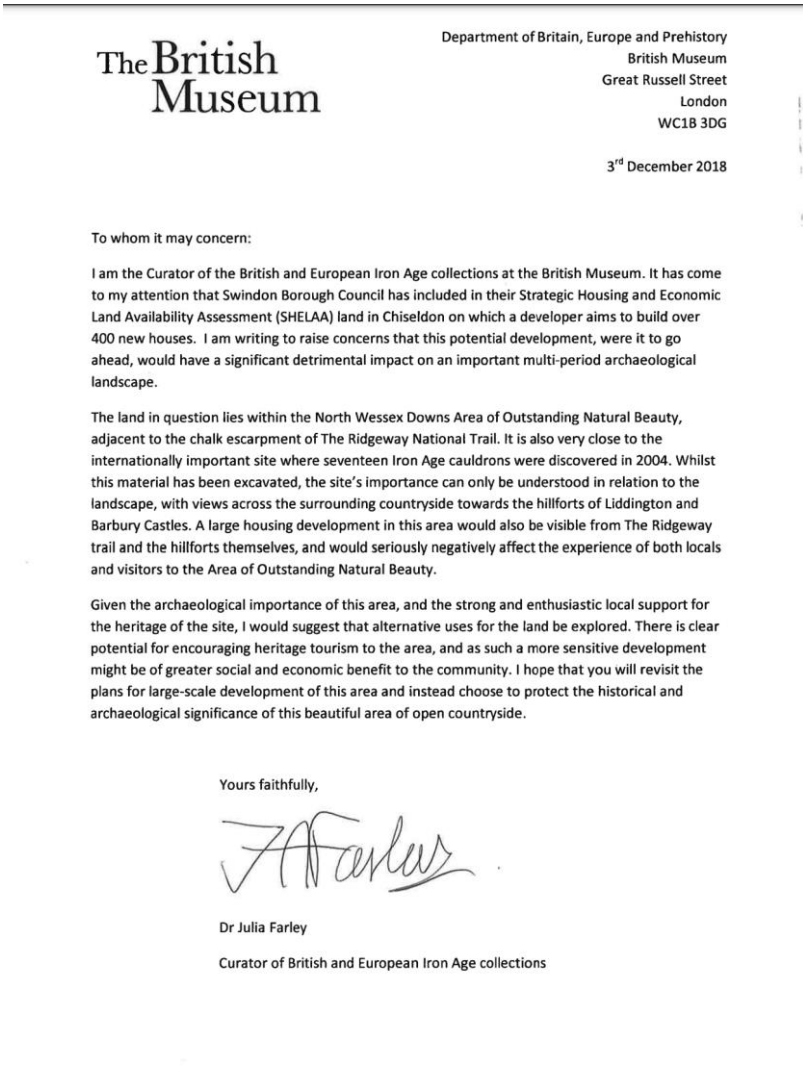
Natural England's [Environmental Benefits from Nature tool](#) may be used to identify opportunities to enhance wider benefits from nature and to avoid and minimise any negative impacts. It is designed to work alongside [Defra's Biodiversity Metric](#) and is available as a beta test version.

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



British Museum



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. **AGREED**



### 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 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

Kind regards

David

David Stuart | Historic Places Adviser

Historic England had no specific comments to make.

No changes proposed. **AGREED**



## 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. **AGREED**



services including GP's, schools, roads and transport has not been considered.

## 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



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.

AGREED IN PRINCIPLE – Data obtained from crash website and included with new text.: [Crash Map](#)



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 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.”



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.

Planning permissions for the previous 5 years were considered and updated figures were included in the text. The figures will be included in the Basic Conditions Statement.



Detailed Response to NDP

Consultee heading Section	Consultee Sub- Section / Policy	Consultee Comments	Qualifying Body response
Chairman’s Introduction		<p>This section would have greater impact if it started with the “Our Vision” paragraph.</p> <p>The 2<sup>nd</sup> 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?</p> <p>It should be signed by the Chair not the company contracted to write the plan.</p> <p>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 <b>would</b> inevitably overwhelm the infrastructure and impact the desirability of the village.</p> <p>Traffic congestion is mentioned – which should immediately preclude any minor developments.</p>	<p>Proposed changes – Chair to add name to the Chairman’s introduction and make other modifications as he sees fit. <b>AGREED TO ADD NAME AND A SHORT VISION STATEMENT. OTHER ITEMS TO BE DISCUSSED WITH ANDREA AT MAY MEETING</b></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		<p>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</p>	<p>Most of the development referred to has occurred within the development boundaries and is therefore infill or windfall development. The NDP was not</p>



Consultee heading Section	Consultee Sub-Section / Policy	Consultee Comments	Qualifying Body response
		<p>about 4 times the amount from the housing needs analysis. Chiseldon has been doing its part to support development above and beyond what was expected.</p> <p>Paragraph 4 states “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.” The Parish Council should be ensuring then that the document contains unambiguous and clear statements including preserving the development boundary of the village.</p> <p>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>	<p>prepared with a specific housing target because it did not allocate land 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>
Chapter 2 Chiseldon Parish		<p>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.</p>	<p>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>



Consultee heading Section	Consultee Sub- Section / Policy	Consultee Comments	Qualifying Body response
Chapter 3 Vision and Context		<p>Traditionally, the vision should come first?</p> <p>There should be a stronger statement about not expanding outside the existing development boundaries.</p> <p>Paragraph 38 – 74 new dwellings have been created in 4 years – this is hardly insignificant. Suggest this is removed as Chiseldon has expanded.</p> <p>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.</p> <p>Paragraph 41 – policies do not adequately reflect this in the CNDP – development which impacts water run-off or biodiverse areas should be prevented.</p> <p>Paragraph 49 – sustainable transport is not just cycling and walking. What about residents and potential residents that can do neither?</p>	<p><b>Would the Parish Council prefer to move the vision to the start of the document? If so, where?</b> CHAIRMAN TO UPDATE CHAIRMANS INTRO TO INCLUDE SIGNPOSTING TO VISION STATEMENT. LEAVE MAIN VISION STATEMENT INFO WHERE IT IS. NEW CHAIRMANS INTRO TO BE VOTED ON IN MAY MEETING</p> <p>Would the Parish Council wish to modify para. 38? COMMITTEE TO DECIDE. ADDED PARA38 BELOW. SHOULD WE ADD NUMBER OF DWELLINGS/LOCATION OF RECENT DWELLINGS? <b>Yes, new figures created and included in final draft</b></p> <p>No changes agreed</p>



Consultee heading Section	Consultee Sub-Section / Policy	Consultee Comments	Qualifying Body response
		<p>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?</p> <p>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 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><b>Key challenges and development objectives</b></p> <p>38. Chiseldon Parish has remained remarkably stable over the centuries and the recent push for major development in Swindon town to the north has largely not affected it. This is due to, and also reflected in, the parish's location in the North Wessex Downs AONB, the significant level of heritage protection arising from the conservation area and historic building designations, and the countryside status expressed in Swindon Borough Local Plan's settlement hierarchy in the Sustainable Development Strategy (Policy SD2).</p> <p>Most of the new housing provision has been infill within the development boundary as explained above except Burderop Park..</p> <p>These matters are covered in policy 3.</p>



Consultee heading Section	Consultee Sub-Section / Policy	Consultee Comments	Qualifying Body response
			<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 is not a “loophole” but a reference to the development plan policy context.</p>
Chapter 4 Policies	Policy 1: Housing Mix	<p>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?</p> <p>Q1 – 25 people wanted to move</p> <p>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</p> <p>Q5 – indicates only 18 requirements for affordable houses</p>	<p>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.</p>



Consultee heading Section	Consultee Sub-Section / Policy	Consultee Comments	Qualifying Body response
		<p>This would indicate 18 affordable houses are required. No more. This should be reflected in the CNDP and stated clearly and unambiguously.</p> <p>Paragraph 56 – more dwellings than this were delivered?</p> <p>Paragraph 72 – if land is allocated will it be compatible with the housing needs assessment and affordability?</p> <p>Policy lettering is used here rather than numbering. Should be consistent.</p>	<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.</p>
	<p>Policy 2: Sustainable Transport</p>	<p>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.</p> <p>Pavement provision or safe walking space between Chiseldon and Hodson is not mentioned.</p> <p>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.</p>	<p>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.</p> <p>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> <p><b>Would the Parish Council wish to address any of these points?</b> TO ADD CLARIFICATION TO CHAIRMANS INTRO TO SAY WHAT NHP CANNOT DO FOR TRAFFIC AND PAVEMENTS. Approved April meeting</p>





Consultee heading Section	Consultee Sub-Section / Policy	Consultee Comments	Qualifying Body response
		<p>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.</p> <p>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.</p> <p>Paragraph 76 – where is the needs analysis to make this such a significant part of the document? Will it be published?</p> <p>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).</p> <p>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</p>	<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 (provision) 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. This might be delivered through</p>



Consultee heading Section	Consultee Sub-Section / Policy	Consultee Comments	Qualifying Body response
		create a very dangerous accident blackspot like the Marlborough Road.	planning conditions, developer contributions or by SBC as the Highways Authority.
	Policy 3: Biodiversity and nature recovery	<p>This does not go far enough in protecting areas of biodiversity need.</p> <p>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.</p> <p>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> <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>	<p>When the LRNS is published, it will identify priorities and measures that will become constraints to development. However, this does not exist yet and this is an interim policy.</p> <p>The action in point 1 is that any applicant who must deliver BNG should do so within the context of the LRNS (and not according to other measures).</p> <p>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.</p> <p>All other aspects of this policy will probably be rewritten when the LRNS is issued (at least in draft form in summer 2024).</p> <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>AGREED – AP TO RE-WRITE AS PER OFFICIAL GUIDANCE ON BNG AND LRNS.</p>

Consultee heading Section	Consultee Sub-Section / Policy	Consultee Comments	Qualifying Body response
		<p>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> <p>Point Number 4 does not really state any definition of expert nor define long term management.</p> <p>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.</p> <p>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>	<p>This is not within the purview of the planning system. However, the LRNS will address where LNRS priorities lie.</p> <p>LA22 has been withdrawn and is redundant. The LNRS will address where priorities lie.</p>
	Policy 4: Local Green Spaces	The wording should be updated to reflect detrimental impact to Local Green Spaces of adjacent development which would impact them detrimentally.	The provisions for LGS in the NPPF does not make reference to adjacent development.
	Policy 5: Design	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	Agree. Change “should” to “will”. <b>AGREED</b>

Consultee heading Section	Consultee Sub-Section / Policy	Consultee Comments	Qualifying Body response
		enforce as much as possible planning deigns and decisions.	
	Policy 6: Non-designated Heritage Assets	No Comments.	
	Policy 7: New play equipment	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.	Agree – change reference to para 110 to 111 (115). <b>AGREED</b>
	Policy 8: Community Facilities	Policy wording could be stronger. “Must” rather than “Should”	Agree – change “should” to “will”. <b>AGREED</b>
	Appendices	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	The WSBRC holds the most up to date information available.



Consultee heading Section	Consultee Sub-Section / Policy	Consultee Comments	Qualifying Body response
		designated arable. On Page 58 the land is designated as arable.	

### 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

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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 the 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.



Consultation Statement  
Chiseldon Parish Neighbourhood Development Plan 2022 – 2037



Chiseldon Community Group

## Chiseldon Community Group

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



# Consultation Statement

## Chiseldon Parish Neighbourhood Development Plan 2022 – 2037



### 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 15<sup>th</sup> 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. **AGREED**

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#### 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 NPPF<sup>1</sup> 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 2000<sup>2</sup> 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 2012<sup>3</sup>. 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 Plan<sup>4</sup>, 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

# Consultation Statement

## Chiseldon Parish Neighbourhood Development Plan 2022 – 2037



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.

# Consultation Statement

## Chiseldon Parish Neighbourhood Development Plan 2022 – 2037



### 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.

# Consultation Statement

## Chiseldon Parish Neighbourhood Development Plan 2022 – 2037



### 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





WM/MR

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. See local plan policy SD2.

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. [Housing land supply and monitoring | Monitoring and evidence base | Swindon Borough Council](#)



**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. **AP consulted crashmap and collated figures on accidents (not much happened!).**



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. TO LIST THE MAIN ISSUES AND STATE THAT NOT PART OF NHP BUT PC WILL CONTINUE TO WORK WITH HIGHWAYS AUTHORITY TO RESOLVE. COMMITTEE TO VOTE IN MAY MEETING ON THE WORDING.

Agreed. Figure 15 should have the areas identified as they were on a previous version. CW WILL LOOK AT THIS AND UPDATE AS REQUIRED.

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

NOTE for ANDREA – Very brief mention of EV charging – should it include more on section 3.8? CAN DISCUSS AT MAY MEETING  
Agreed no action to be taken. Decided to not include because already in building regs.



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.**

ALREADY IN CHAIRMANS STATEMENT WHAT AREAS ARE COVERED. COULD CHANGE NAME OF NHP TO CHISELDON PARISH? COMMITTEE TO DISCUSS AND VOTE. YES – AP TO CHANGE DOCUMENT NAME TO "CHISELDON PARISH NP".

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 met 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 deliver a more coordinated approach to utilities and infrastructure – this is beyond its scope.



The parish council may wish to consider whether the entire NDP is reorganised according to these suggestions . **April planning meeting voted to leave the content order the same.**

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.

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**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





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

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**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. **TO BE DISCUSSED. Chairman WILL UPDATE AS REQUIRED AND COMMITTEE TO VOTE ON NEW VERSION AT MAY MEETING.**

# Consultation Statement

## Chiseldon Parish Neighbourhood Development Plan 2022 – 2037



**'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.*

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### **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.**

<b>Policy 1:</b>	<b>Housing Mix (this should say 'housing need' NOT Housing Mix) *</b>
<b>Purpose</b>	<b>Housing Mix Need</b> - 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 it 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. AGREED**



<p><b>Policy detail:</b></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 <b>Swindon Local plan policies as far as is practically possible given</b> 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 <b><i>these studies will now be out of date and the HNA provides more recent evidence.</i></b></p>
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2nd example...

**Policy 4: Local Green Spaces**

<p><b>Policy 4:</b></p>	<p><b>Local Green Spaces - the 'policy' should say something high level like... (this should say 'housing need' NOT Housing Mix) *</b></p>
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<b>Purpose</b>	<b>Local Green Spaces</b> - 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.
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<b>Policy detail:</b>	<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><b>*NOTE: an additional comment(s)...</b></p> <p><b>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'</b></p> <p><b>Open Space(s) designated under local plan policy EN3 should be included in the Chiseldon+ NP - to enshrine them for the community</b></p>
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**Would the parish council wish to redesignate the Burderop Estate as Local Green Space? YES. CLAIR TO RE-DRAW THE MAP AND CONTACT OWNER. CHECK WITH AP TO MAKE SURE PROCESS IS CORRECT. MAY COMMITTEE MEETING TO APPROVE CHANGE.**

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

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



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.

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**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' under-pinning 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:

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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? **TO BE DISCUSSED BY COMMITTEE AND VOTED ON. YES, THE PC WOULD LIKE A BIBLIOGRAPHY INCLUDED**

# Consultation Statement

## Chiseldon Parish Neighbourhood Development Plan 2022 – 2037



- **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.

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### 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 sets out how the community was consulted.



Consultation Statement  
Chiseldon Parish Neighbourhood Development Plan 2022 – 2037



(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? **Already on page 25, para 63 and 64. Changes to be:**

On the title of the section add "(Formed from the HNA)" in brackets. No changes made - did not understand the instruction. The title of the section is "Housing mix" and the text makes it clear that the AECOM HNA was referred to.

Ask AP to check figure of 31 houses in para 56. 74 houses is referenced later in doc. **Have updated the housing delivery figures....**

Can we get a list of the 31 houses?

Add to the document something like "As a result of the HNA being created, policy 1 Housing Mix was created. See appendix XX for the NHA document in full. Agreed in April meeting to make these changes. **This is already made clear in the supporting text.**



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? [SEE ABOVE.](#)



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 these 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.

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**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)

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**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: Town and Country Planning Act 1990

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

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>

YES - AP to add the above.

**Does the Chairman wish to define what is meant by "growth"? CAN AP HELP WITH A SUGGESTED DEFINITION. WILL ADD GROWTH SOMEHOW AS PART OF THE CHAIRMANS STATEMENT AND COMMITTEE CAN APPROVE IT AT MAY MEETING.**

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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.*

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**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.

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**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.

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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 since 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 and planning authority 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 Chseldon toBurderop? **No. Voted on at April meeting.**

Does the parish council wish to have a glossary and bibliography to be included? **Yes. Voted on at April meeting**

- 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

- 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.

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**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 appraisal.

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.

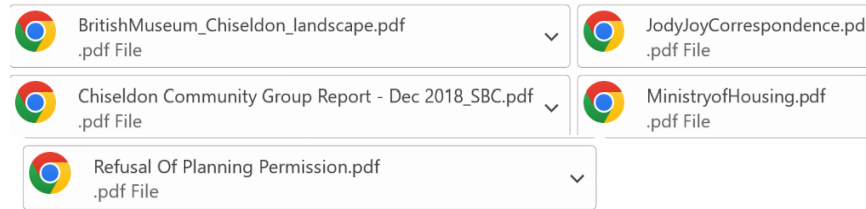
Unfortunately, insulation is better dealt with through building control codes. This link explains:

<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)



AONB or ‘National Landscape’ (as renamed in November 2023) that Chiseldon sits within. This is probably the most important

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 little mention of the North Wessex Downs Area of Outstanding Natural Beauty (NWD AONB)



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? **Yes. IK TO RE-WRITE FOR COMMITTEE APPROVAL IN MAY**



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 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](#).

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 Museum) 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 replaced 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) YES. AP to update. Voted on in April meeting.

ANDREA PAGE 11 para 15 of NHP needs Draycot Foliat, and Burderop Park adding please.

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? No. Voted on in April meeting.

“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.” yes. AP to add. Voted on in April meeting.



“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

Would the parish council wish to see a new section showing the planning history (perhaps the past 5 years)? **AP has provided according to instruction at May meeting**

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? **ADD TO CHAIRMANS INTRODUCTION FOR COMMITTEE TO VOTE ON at MAY MEETING.**



## 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 when the location of new large scale development is known so that those specific and identifiable development impacts 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? **Yes to be added by IK for committee to vote on at MAY meeting.**

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.

Wording on past planning permissions updated. **AGREED**

Noted.

Suggested change – make this correction. **AGREED**

Suggested change – add to policy 8. **AGREED**



Planning agent

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

On behalf of Hannick Homes & Developments Limited  
March 2024



Consultation Statement  
Chiseldon Parish Neighbourhood Development Plan 2022 – 2037



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 8<sup>th</sup> 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.





**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.

**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.

Noted

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.

## Appendix 7: Revised planning history which was reflected in the submission draft.

1 April 2019 to 1 April 2024 -Decided

Decision date	Address	Description of development	Reference	New buildings
Tue 26 Sep 2023	Burderop Park House Burderop Park Wroughton Swindon SN4 0QD	Demolition of the pavilions, change of use of offices and ancillary buildings to 25no. apartments/dwellings, erection of 52no. dwellings, construction of new access and associated works without compliance with Condition 14 (Closure of Access) of previous permission S/19/1765 - Variation of Condition 14 from Previously Approved Planning Application S/21/1920.	S/23/0139	25 apartments 52 dwellings
S/22/1008	Chiseldon Farm Barns Ypres Road Draycot Foliat Swindon	Change of use of redundant farm buildings to office (Class E, formerly Class B1a)/light industrial (Class E, formerly Class B1c)/storage and distribution (Class B8) and associated internal and external works.	Mon 24 Apr 2023	New office, light industrial and storage.
Mon 24 Apr 2023	Walled Garden At Burderop Park Mansion	Erection of a tented structure to provide temporary residential accommodation (for approx. 3 years)	Fri 10 Nov 2023	1 dwelling (temporary)

	Drive Swindon	and, thereafter, as a plant nursery office.		
S/22/0595	The Bothy Burderop Park Mansion Drive Swindon	Change of use and extension of gardener's Bothy to a dwelling and walled garden as wholesale nursery and associated works.	Thu 09 Nov 2023	1 dwelling
S/21/1237	Draycott Farm Draycot Foliat Lane Draycot Foliat Swindon SN4 0HX	Change of use from agricultural buildings to storage, distribution and ancillary offices (class B8).	Tue 01 Feb 2022	Storage and offices
S/21/1126	Burderop Park House Burderop Park Wroughton Swindon SN4 0QD	Erection of 6no. additional dwellings - without compliance with condition 13 following previous permission S/19/1892.	Thu 16 Mar 2023	6 dwellings
S/21/0518	National Data Centre Old Burderop Hospital Site Brimble Hill Wroughton Swindon SN4 0RQ	Erection of a replacement Data Centre (containing data halls, associated electrical and AHU Plant Rooms, loading bay, maintenance and storage space, office administration areas and plant at roof level), emergency back-up generators and emission stacks, diesel tanks and filling area, electrical switchroom, a water sprinkler pump	Mon 09 Aug 2021	Replacement data centre

		room and storage tank, a gate house, site access, internal access roads, hard/soft landscaping, and rainwater infiltration pond.		
S/20/1324	Burderop Park House Burderop Park Wroughton Swindon SN4 0QD	Change of use of the mansion, tudor wing and north wing from offices (Use Class B1(a)) to a dwelling (Use Class C3) with guest apartment, 3 bedroom annexe and games room, installation of swimming pool in north wing, erection of a detached garage and associated works.	Fri 28 May 2021	1 dwelling 1 guest apartment
S/20/0114	Three Trees Farm Shop The Ridgeway Chiseldon Swindon SN4 0HT	Erection of a two storey building incorporating a cafe and single storey extension to existing shop.	Wed 18 Mar 2020	Café extension to existing shop
S/19/1582	Barbury Shooting School Wroughton Swindon SN4 0QZ	Erection of a single storey extension to clubhouse and single storey ancillary building.	Thu 09 Apr 2020	Single storey ancillary building to clubhouse
S/18/1160	Land At Badbury House Farm Badbury Lane Badbury Swindon SN4 0EU	Erection of 5no. dwellings with parking and associated works.	Thu 22 Apr 2021	5 dwellings



