



Sustainable Development
Topic Group meeting
12^h January 2021

Agenda

1. Welcome
2. Introductions
3. Group objectives
4. TG co-ordinator(s)
5. Wiltshire Local Plan consultation
6. Other plans, policies, investments
7. Actions
8. AOB
9. Date of next meeting



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The Wiltshire Local Plan Consultation

What the Local Plan is about:

- The extent of development (housing numbers)
- Where it should go (site allocations)
- What form it should take (policies)
- Basis for planning permission

Neighbourhood Plans:

- Also carry weight as part of the Local Plan (once adopted)
- Should be taken account of in the Local Plan
- Wilts Council claims to be committed to Neighbourhood Planning (and has one of highest number of any local authority)



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The Wiltshire Local Plan Consultation

Local Plan (2016-36)

**Consultation running from Wednesday 13th January 2021
to Tuesday 9th March 2021**

Local Plan Review:

<https://www.wiltshire.gov.uk/planning-policy-local-plan-review>

Cabinet Paper on Local Plan Review Consultation:

<https://cms.wiltshire.gov.uk/ieListDocuments.aspx?CId=141&MId=13087&Ver=4>

On line consultation events booking form:

https://forms.office.com/Pages/ResponsePage.aspx?id=XudGVeE7E0iw_yZlHqL-GSHf4zXZ6chNp_0GHTuWxRIUM0VVRzc1QkFBVENLWEs2UFA3MFZUQzA0WC4u



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The Wiltshire Local Plan Consultation

Timeline for the Local Plan Review on WC website (*with questions*):

- **Initial consultation on the scope of plan:** Commenced Nov 2017
Question: Who was consulted? Not the public
- **Plan preparation** (including informal consultations 2017-21)
Question: Why no public consultation until Jan 2021? Plan seems to have been predetermined
- **Publication of plan for pre-submission consultation:** Quarter 4 2021
- **Submission to Secretary of State:** Quarter 3 2022
- **Examination** (including hearing and receipt of Inspector's report): Commencing Quarter 4 2022
- **Adoption:** Quarter 2 2023



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Local Plan Review (2016-36)
Proposed housing market area
(HMA) 'allocations'

	Chippenham HMA	Salisbury HMA	Swindon HMA	Trowbridge HMA	TOTAL
Principal Settlements	9,225	5,240	-	5,830	20,295
Market Towns	8,370	3,190	1,935	4,220	17,715
Local Service Centres	100	1,470	530	-	2,100
Large Villages	1,435	880	540	655	3,510
Rest of the rural area	1,265	190	445	295	2,195
TOTAL	20,395	10,970	3,450	11,000	45,815

Housing targets:

- include *house prices* as a predictor of 'local demand';
- bear no relation to local housing needs;
- are artificially high for rural counties like Wiltshire;
- take no account of employment in the area;
- require new roads/ car dependency to facilitate;
- result in env. destruction/ release of carbon/ loss of carbon sinks;
- result in in-migration and out-commuting;
- are fuelling a wholly unsustainable development model.



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Local Plan is prioritising housing numbers over Climate Emergency and genuinely Sustainable Development

What National Planning Policy Framework (NPPF) says on Climate Change

- National Planning Policy Framework context (paragraphs 18 and 19):

The planning system **should support the transition to a low carbon future in a changing climate**...It should help to: shape places in ways that contribute to radical reductions in greenhouse gas emissions, minimise vulnerability and improve resilience; encourage the reuse of existing resources, including the conversion of existing buildings; and support renewable and low carbon energy and associated infrastructure.

Plans should take a **proactive approach to mitigating and adapting to climate change**, taking into account the long-term implications for flood risk, coastal change, water supply, biodiversity and landscapes, and the risk of overheating from rising temperatures (in line with The Climate Change Act 2008).



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What Client Earth has said to Wiltshire Council



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By email

2 September 2019

In view of these key legal and policy requirements, there is a duty on decision makers to ensure that Local Plan policies are designed to secure emissions reductions that are at least consistent with the UK's national and international commitments. Doing so requires:

- i. **setting a local carbon target framework based on a comprehensive assessment of local carbon reduction potential, taking into account national and international climate targets;**
- ii. **demonstrating proposed planning policies' consistency with this local target framework; and**
- iii. **monitoring performance on at least an annual basis using relevant indicators.**

Wiltshire Council is not doing this...



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Warm words, lack of substance

What the Local Plan Review says on Climate Change

- Make best use of existing infrastructure;
- Reduce the need to travel, and travel by the private car;
- Maximise development that re-uses previously developed land;
- Limiting the loss of countryside wherever possible;
- Promoting sustainable transport and improving air quality;
- Promoting renewable energy generation;
- Develop evidence for new policies to tackle climate change.

How does that compare to the actual proposals?

Chippenham example: Preferred sites to East and South plus distributor road

- Requires railway bridge and two river crossings plus new distributor road;
- Obliterates the Bremhill Neighbourhood Plan and its green buffer;
- Creates an out-of-town, car dependent, commuter extension;
- All of it on locally distinctive countryside and high quality farmland;
- Releasing carbon from the soil and trees;
- Permanently removing existing carbon sinks;
- Promoting emissions through long distance commuting & local congestion.



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Some initial questions on the Local Plan

- Why has Wiltshire Council taken on 5,000 more houses than the Govt. requested?
- Has the Council calculated total carbon emissions associated with the Local Plan proposals and the different options?
- How can building commuter town extensions help reduce carbon emissions?
- Has the Council thought about a carbon reduction strategy for its Local Plan?
- Has the Council developed a local carbon reduction framework that will enable its Local Plan to comply with the NPPF/ Climate Change Act and national targets?
- How does its spatial strategy fit within this framework/ meet its targets?
- How will the Local Plan take account of the Council's own Climate Emergency Task Group recommendations?
- Aren't these proposals simply 'business as usual'? (more roads, more commuters, more environmental destruction?)



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Other plans/ strategies to consider

Executive response to Climate Emergency Task Group (on 13th Jan 21)

- Won't deliver net zero carbon via Stone Circle
- Will only invest in renewable energy if ROI is better than alternatives
- Approaching active travel investment via supplementary grant route (i.e. piecemeal rather than using Transport Budget)

Carbon implications of other Plans, policies and strategies to consider:

- Local Transport Plan (LTP4)?
- General reserves and other strategic investments?
- Waste Strategy?
- EV infrastructure strategy (absence of).



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Next meeting 4.30 pm 29th January 2021