



A36/A350 Corridor Alliance
Minutes of Joint Meeting with WHA
Zoom
13th May 2021

www.corridor-alliance.co.uk

Present: Chris Gillham, Cate Mack, Andrew Nicolson, Lisa Otter-Barry, Ken McCall, Steve Perry

Apologies: Pat Kinnersly, Lynne Fish, Dom Verschoyle, Marilyn Mackay, Jenny Raggett, Leo Aylen, Margaret Willmot, Adrian Temple-Brown, Richard Covington, William Kenealy

Chair: Cate Mack

Minutes: Chris Gillham

1. National Policy

COP26: As we approach COP26 it becomes more and more obvious that the UK Government has no plan to meet our decarbonisation pledges. Shapps' *Decarbonisation of Transport* document seemed to carry the right sort of words, but read it and you find that there is no plan. To understand how a government can ludicrously claim to be a world leader in tackling climate change and simultaneously have a gigantic road programme and press for airport expansion, one must appreciate that there is a new form of climate change denial at No. 10. Johnson does not deny the facts of human-caused climate change, but believes that technology will miraculously solve everything – behaviour change is unnecessary. Indeed his Micawber-like belief that magic bullets will just 'turn up' means that he can actually plan to make things worse now because they will all be made better later.

Most dangerously, the government points to its targets (for example the phasing out of ICE vehicles) as evidence of a plan. Critically the burden of meeting these targets falls on a future administration. It may be argued that at least these are targets that are supposed to bind future administrations, so they are good for something. But the obverse of this coin is that the present government thinks it can go on expanding carbon activity in the short-term. This is entirely to miss the point about carbon emissions. It is cumulative carbon that matters and the imperative is to cut carbon massively now, not at some point in the future. The trajectory for a sane government policy would be a steep fall in carbon now – the Johnson trajectory is clearly to have no fall at all during his administration and even increase emissions if it fits his *Build Build Build* fantasies and leave future administrations to somehow meet a target with cliff-edge policies. But the integral of this trajectory is a large burden of extra carbon for the planet.

The Climate Change Committee has made it very clear recently that it also sees fancy targets but no plan. CCC Chairman, Lord Deben (Selwyn Gummer as was, and no friend of environmentalists in the past) has said: *"[The targets] are remarkable and have set a major example [to the world]. But the policy is just not there. It's very clear we need to step up very rapidly."*

JR Challenges: Two legal challenges were set to be heard in June. The Stonehenge Alliance would be challenging Shapps' decision to wreck the WHS, overruling the advice of the Examining Authority and TAN would be challenging the RIS2 programme. Of course the challenges will not be on the overwhelming transport, heritage or environmental arguments, but on whether Shapps exceeds his legal powers. We wait to see.

2. Chippenham - Local Plan Review

Steve reported that all three Parish Councils around Chippenham voted not to support the Local Plan review. In all but one case it was a unanimous decision. As a result of the elections Chippenham Town Council now has 10 independent councillors out of 23. The Independents are now in the majority with LibDems second with 8 councillors and the Tories are reduced to 5. One Green was also elected. Apparently the Conservative group, including especially Michelle Donelan, are concerned by their poor performance. Steve thinks that maybe Donelan will now get off the fence and come out against the road. She has previously supported the HIF bid, but has now written to say she is considering withdrawing her support as promises she was made in relation to it have not materialised. They couldn't materialise because some of them were illegal or simply false – like 100% of 'roof tax' would redound to Chippenham projects which they cannot ensure.

Steve reported the good news that Philip Whitehead had resigned and hoped that his replacement, Richard Clewer, might listen more to all the people who have been concerned about the Council's behaviour. The previous portfolio holder for Climate Change, Conservative Ashley O'Neill, has been a supporter of CAUSE and opposed to the Local Plan Review. We don't yet know whether he will retain that portfolio.

Steve reported that their campaign was doing well; their petition now had over 6000 signatures. Meanwhile the Council continues to ride roughshod over all concerns; the farmer for Council-owned Harden's Farm, Chippenham has been given notice, though he is coming up for retirement (Council farms are supposed to be for young farmers). Steve says they have

started a campaign for the land to be retained as a community farm.

Steve thinks that if the Local Plan Review proceeds without major changes there is plenty of ground for Judicial Review. They are breaking rules everywhere. For example at Rawling's Farm, in the EiP of the last Local Plan, the inspectorate stipulated that there would have to be a 'country park' on the north-east side to shelter the development from the neighbouring villages. The development and condition have lapsed but the Council appears now to consider that the development can proceed as if the condition did not exist.

Andrew pointed out that the Clewer argument for the Chippenham development is that it concentrates all the development in one place as a kind of garden town. Cate pointed out that a garden town only makes sense if it includes a distinct localised employment. That is not what is proposed.

Cate asked how the Council is squaring all its development plans with its carbon commitments. Steve said the Council has no plans to meet carbon objectives within the Local Plan Review, nor has it a transport plan. In fact Whitehead and Clewer declared at a recent meeting that the Council's commitment to carbon neutrality by 2030 applied only to their own estate, a simple falsehood. In fact where they have definite powers to impose carbon conditions on developers they have refused to do so.

Andrew said there were two motions passed in relation to the Declaration of Climate Emergency. One was the LibDem motion which was for the County to be carbon neutral by 2030, which was accidentally passed and the Tory one for the Council's own estate to be carbon neutral and to appoint a toothless person to implement that decision (though Steve pointed out that Ashley O'Neill has actually actively voted against the Chippenham plan, so not entirely toothless). Ever since, the Council has only been working to the Conservative motion. For some reason they believe they are not bound by the other vote.

Andrew said there had been a 'consultation' on route options for the road, regardless of the development proposals. He had pointed out that the 'consultation' had not offered a 'no road' option. He had further asked to see the responses to the consultation but this had been refused. He had appealed the decision and is waiting for the result of that appeal.

Ken reminded the meeting that James Gray had said at a site meeting that 'this road and this development has to be stopped'. Steve pointed out with some amusement that the Conservative Council election manifesto claimed that they had reduced the amount of housing planning in West Wiltshire by 5000, omitting to point out that 5000 house was what they had added to the government's requirement.

Chris asked how much of the CAUSE campaign was against the housing and how much against the road. Steve said it was really both. CAUSE was not opposed to housing, but it was opposed to the deliberate creation of expensive commuter housing that had nothing to do with local need. The developers saw Chippenham as having two advantages for commuting – the proximity to M4:Junction 17 and the station.

3. Melksham

Cate asked how the Council is planning to fund the Melksham Bypass-Bypass. Is there any housing development that they are hoping to get HIF and developer funding from? Chris thought they were still assuming that MRN funding or LGF funding would be available. Had anyone seen an estimate of the cost of this scheme?

Post-meeting notes:

The website (<https://www.wiltshire.gov.uk/article/3146/A350-Melksham-bypass>) does answer these questions:

Cost?: If approved, and depending on the details of the final scheme the construction costs are expected to be in the region of £135 million, and there would be contingency and inflation costs. The Business case will consider the total cost of the scheme and the potential benefits to determine whether it would offer value for money in economic terms.

Who funds?: Wiltshire Council would not be able to fund a scheme of this type from its own resources. It would be necessary to bid for funding from the Department of Transport (DfT) and to make the case for the scheme by preparing a business case which would include the cost and economic benefits. The decision regarding funding for the scheme would be made by the DfT after considering the business case.

Housing related?: No. Funding contributions from developers have not been identified at this stage. Any planning applications by others will be considered on their merits in accordance with the regulations and relevant guidance and policy. The policy position at present reflects the adopted Core Strategy and this is being reviewed and will result in a revised Local Plan scheduled to be adopted before commencement of works on site to deliver the scheme.

Through development of the Local Plan, a transport evidence base will be produced, and this will propose

mitigation measures to support housing development being brought forward. Should the evidence base provide a direct linkage between housing delivery and the need for Wiltshire's A350 improvement schemes, such as the bypass, then Local Plan policy may reflect this and provide material support for the collection of contributions towards the cost of the scheme.

A new consultation on route options (not the sanity of the general proposal) has a deadline of the 8th of August. It seems we should be aiming to rubbish the Business Case, which shouldn't be very difficult.

4. Wellhead Valley Development

Ken reported on the latest retrospective application which he considers is as big a threat to the Wellhead Valley as the Westbury EBP. There had been quite a good public response to the first application. The applicants continue to proceed as if planning law does not affect them – extending a toilet block, extending a pathway and siting a caravan. Ken reported that Charlie Hopkins said that this was quite a common tactic these days. Cate asked Ken if objectors had considered Judicial Review. Ken thought that was to risk major money, whereas Cate thought that there are ways of limiting financial exposure and sometimes just the threat of JR can have an effect. Chris thought a JR should really only be considered as a 'last resort' and at the moment they were not at that stage, with a planning application undetermined. Cate said that if the application is approved that Ken (and Colin and Penny) have a good case for JR because they have been drawing attention to the applicant's improper behaviour for two years.

Ken understands that various Councillors are on-side with this and if the officers make a decision to approve the application, Town Councillor Gordon King will ask to call it in for Council debate. On the previous application it did not get called in because the applicant withdrew it, though that does not seem to have prevented them from carrying on with works. Ken said that Wessex Water's objection was substantial, though only a holding objection at the moment. They are going in for further examination of the site – the new toilet block is actually very close to their high pressure water main. The applicant had been told months ago either to move the building or pay Wessex Water to move the main. The Environment Agency had been unaware of the application and its implication for the sewage outfall until campaigners had informed it. The EA wrote a strong letter saying they had no information and were very concerned, especially that the Council had not informed them.

Ken pointed out how important it was to stop this scheme from the point of view of it not compromising getting an AONB extension. Andrew pointed out that the decision date was the 15th June.

5. Wiltshire Climate Alliance:

Andrew reported that the Climate Alliance had put most of its recent effort into the local elections, lobbying and questioning candidates. The transport campaign had been on hold, but the group was meeting later that month and would probably be looking at what they could do in pressing bus transport into the Melksham mix and in pressing the LEP to see what it should be doing on rail and other public transport.

6. A303

Cate had written to Wera Hobhouse with her concerns about the A303 in general and Stonehenge in particular, expecting that the LibDems would share those concerns, but was disturbed to receive a reply saying that the LibDems have always supported the A303 dualling including the Stonehenge scheme. Cate reminded us that she was on the Somerset County Council, as the Chair of the Transport Planning Committee in the late 1990s where they objected strongly to the proposed dualling of the A303 and the same when it came up again in about 2007. They also got opposition to the dualling through the Regional Assembly before that was wound up. Nobody had told the Council (a LibDem authority) at the time, that the LibDem MPs were likely to support the dualling. Chris was not surprised since he remembered Nick Clegg saying, on the Today programme, that the Stonehenge scheme was so important he wanted to go straight down there with a spade and start digging himself. Chris also pointed out that a LibDem Council (Eastleigh) in Hampshire has given planning permission for the expansion of Southampton Airport. Another LibDem Council (Winchester) there has started its Climate Emergency Action by approving a large new multi-storey car park. Beware the orange shade of greenwash almost as much as the blue one.

Cate suspects that the LibDem pro-road agenda was being pushed by David Heath (LD Somerset and Frome and Minister in the Coalition Government). The letter Cate is now writing to all the LibDem MPs is to explain the Council and Regional assembly decisions of the time and pointing out that especially in a time of Climate Emergency regional connectivity is obviously best served by investment in the railway.

Andrew remarked that Wera Hobhouse was not proving a 'safe pair of hands' on road matters, with her support for the petition in Bath in relation to the Cleveland Bridge, tying itself to support for the A350 as an alternative route. Cate said that she believed Wera Hobhouse had since 'seen the light' on this.

Stonehenge: The Judicial Review date was set for the 23rd-24th June, a week before the TAN challenge to the RIS2 programme. Cate pointed out a good article by Kate Fielden on the CPRE website: <https://www.cpre.org.uk/opinions/the->

[high-court-challenge-to-the-stonehenge-tunnel/](#). **Post-meeting note:** UNESCO's World Heritage Centre has an Agenda Item for their next meeting:

The approved A303 improvement scheme threatens the integrity of the property within the meaning of Paragraph 179(b) of the Operational Guidelines. It is therefore, recommended that the Committee consider the inscription of the property on the List of World Heritage in Danger in the event that DCO consent was confirmed by the High Court. Such a decision would exacerbate this threat.

In other words what the Taliban have done to Bamiyan or ISIS to Palmyra, the UK Government, Heritage England and the National Trust can do to Europe's foremost prehistoric site.

7. Alternatives

Bus Back Better: The Government's new bus strategy may sound like the usual Johnsonian bluster, but it is quite important and can be good or bad depending on what local authorities do with it. The bad news is that all government current support for bus services, including all that put in place for COVID, ends in July. The better news is that there is new money to be had for bus support, though obviously compared with the vast subsidies to private motoring this does not amount to very much. The best news is that local authorities are being encouraged much more to involve themselves in determining the bus services needed by their communities, either through forming 'enhanced partnerships' with bus companies or franchising arrangements.

The offer is £3B (over an unspecified number of years) for 77 transport authorities across the nation. Up front is £25M to authorities to write plans and form 'partnerships'. There is also £1.2M for schemes to provide on-board journey information. Against this is the removal of the current £260M per year subsidy for fuel. The bus services support grant for the COVID emergency ends on the 1st July, there will be no new discretionary funding and there will be reductions in some other transport scheme funding. The conditions imposed are:

"By the end of June 2021, we expect all LTAs ... to commit to establishing Enhanced Partnerships across their entire areas under the Bus Services Act, and all operators to co-operate with the LTA throughout the process. LTAs which also wish to pursue franchising may do so – but they should commit to implementing Enhanced Partnerships in the meantime."

Local Authorities have to prepare a Bus Improvement Plan by 31st October with a view to implementation of their schemes by April 2022

Definitions:

An Enhanced Partnership (EP) is an agreement between a local transport authority and the majority of their local bus operators to work together to improve local bus services. It includes a clear vision of the improvements that the EP is aiming for (known as an EP plan) and accompanying actions to achieve them (set out in one or more EP schemes), it can include:

Better routes

Better connections

Better frequencies.

And

"In a franchising scheme, local authorities will determine the details of the services to be provided – where they run, when they run and the standards of the services. Typically bus operators provide their services under contract to the local authority who can let whatever sort of contract they feel is appropriate. No other services can operate in the franchised area without the agreement of the franchising authority."

Cate says that BANES is preparing a plan. Andrew said that a Melksham train group, Option 24/7 (<http://option247.uk/>) has been working on possible bus partnership ideas, working with Wiltshire planners – they have reached out to Wiltshire Climate Alliance for their views and are pressing Wiltshire to act quickly. Obviously the fear is that the Council will see a pot of money and come up with some half-baked plan to spend it. Cate thought that with Graham Ellis being involved WC would be made to focus on real improvements.

Cate mentioned a policy paper she and Richard Lloyd had prepared for national CPRE on integration of transport from active to public transport, which has largely been ignored as they have gone for their hourly service for every village approach, which Cate considers is unaffordable.

Action May21/1: Cate to send the policy paper to Andrew.

Stations: Andrew reported that Wiltshire Council has submitted bids to the Department for Transport (DfT) for funding to develop feasibility studies for two new stations in Wilton and Corsham, as part of the Restoring Your Railway Ideas Fund to link the two towns to the national rail network. Cllr Bridget Wayman had suggested the Wilton bid to Cllr Pauline Church who seems to be saying that the project is 'shovel ready'. These two stations were a long way down the list of potential ideas, whereas Porton, which is much further up the list and should have been studied, has missed the bidding process.

Cate said that the Council were pushing very strongly for the Devizes Parkway station (see last minutes).

Active Travel: Andrew said that WCA was going to have a meeting with Parvis Khansari on cycling in Wiltshire, initially discussing the defective consultation on cycle lanes. But he hopes to also get answers to why there has been no walking strategy in LTP3?; when is LTP4 going to come out? And why are they not considering spending just some the huge sums of money they are planning for roads on providing the network of routes they were promising in 2012 under LTP3?

Andrew thought that Margaret would be involved in a separate meeting with Khansari to talk about cycling in Salisbury.

Chris asked what sort of process is going on with LTP4 – had there been any consultation. Andrew said that they had not, but that they had suddenly realised with the Local Plan Review that they ought to have been drawing up a new LTP, so they have hastily cobbled together what they called a Local Plan Transport Review which was just an assemblage of statistics together with a bit of forecasting that Atkins had done for them for the Chippenham HIF bid. Andrew wondered whether we should try and put together a document to show what a local transport plan should look like.

Chris asked if there were a value to quoting to Wiltshire what is going on elsewhere. In Hampshire the initial consultation on LTP4 has some very good words in it, however much we may distrust what the intentions are (the words are always useful to quote back to them). Cate said that the Bath plan was also starting out well in its wording.

Action May21/2: Chris to send HCC LTP4 consultation documents to Andrew; Cate to similar point to BANES LTP4 material.

8. Statutory Protections:

SSSI: Lisa had worked with Pat to produce a ‘potted history’ of the communications related to the request to designate Green Lane and Biss Woods as SSSIs (NE refers to these now as Trowbridge Woods, but includes the Picket and Clanger woods – these already have SSSI status, but are not so far designated on the basis of bat populations). Potted history is hardly an appropriate term since the communications form a substantial compendium and Lisa and especially Pat should be congratulated for all the effort that has been involved over more than a decade. Chris had used the information to write a Freedom of Information request to Natural England to get some kind of explanation of its dragging of feet. He had written the FoIA request with the intention of sending it jointly to the Director of NE (Marian Spain) and the Chair, Tony Juniper, but he was concerned that it was a long and cumbersome letter and might be better divided into separate letters to the two recipients. **Post-meeting note:** The request was divided into two parts – the basic request for answers to Marian Spain and a letter to Tony Juniper explaining the road campaigning background.

AONB Extension: Ken pointed out that the Wellhead Valley application showed the vulnerability arising from the limited SLA protection there. He continues to chase Andrew Murrison re the AONB extension. Cate reported on the Cotswold meeting she had attended that day, where they were told that decisions on AONB extensions were about to be made. The meeting felt that we should be putting forward a further FoIA request for information on the delays to the extension of the AONB. **Post-meeting note:** Though Chris raised the AONB concern in a conversation with Charles Routh over the SSSI FoIA request, it was felt by Chris and Pat that maybe we should wait a while before stirring the muddy waters again with NE, in the hope that now they know we are watching them, they may change their priorities a bit. To be discussed at our next meeting.

9. Finance

Margaret reported: *‘No movement on the account, balance currently stands at £1902.31. Many thanks to Pat for keeping the finances in such good order during his many years of service as Treasurer!’*

10. Next Meeting:

Thursday 8th July at 19:00, by Zoom; Jointly with WHA.

Glossary:

Organisations and things:

B&NES - Bath and North East Somerset Council

BID – Business Improvement District

CAUSE – Campaign Against Urban Sprawl to the East (of Chippenham)

CCV – Chippenham Community Voice

CfABT – Campaign for a Better Trowbridge

CBT/CfBT – Campaign for Better Transport

CIL – Community Infrastructure Levy

CPO - Compulsory Purchase Order

CTC – Cyclists Touring Club

DCO – Development Consent Order

DEFRA – Department for Environment, Farming and Rural Affairs

DorCC - Dorset County Council

DfT – Department for Transport

EIA – Environmental Impact Assessment

EiP - Examination in Public

FIT – Foundation for Integrated Transport

FoIA – Freedom of Information Act

GPIF – Growing Places Infrastructure Fund

HE – Highways England

HRA – Habitats Regulations Assessment

ICOMOS – International Committee on Monuments and Sites

LEP – Local Enterprise Partnership
LGF – Local Growth Fund
LNP – Local Nature Partnership
LTP - Local Transport Plan
LTT – Local Transport Today
MHCLG – Ministry for Housing, Communities and Local Government
MRN – Major Route Network
NDDC – North Dorset District Council
NE – Natural England
NPPF – National Planning Policy Framework
NSIP – Nationally Significant Infrastructure Projects
PI – Planning Inspectorate
Ramsar – Wetlands Convention (Ramsar, Iran 1971)
SalCfBT – Salisbury Campaign for Better Transport

SAC – Special Area for Conservation
SEA – Strategic Environmental Assessment
SPA – Special Protection Area (for birds)
SRA - Strategic Rail Authority
SRN – Strategic Route Network
TAB – Trowbridge Area Board
TAN - Transport Action Network
TCPA – Town and Country Planning Association
TWCPRP - Trans Wilts Community Rail Partnership
WC - Wiltshire Council
WHA – White Horse Alliance
WHSAP – Wiltshire Housing Sites Allocation Plan
WWT – Wiltshire Wildlife Trust
XR – Extinction Rebellion

People:

Georgina Clampitt-Dix *Head of Spatial Planning WC*; Richard Clewer – *WC Deputy Leader*; Allan Creedy – *WC Head of ‘Sustainable’ (!) Transport*; Alistair Cunningham *WC Assoc. Dir. Economic Development and Planning Services*; Peter Dawson (ex GOSW) – *Transport & Planning Officer B&NES*; Michelle Donelan – *Con MP for Chippenham*; James Gray – *Con MP for North Wilts*; Wera Hobhouse – *Lib Dem MP for Bath*; Charlie Hopkins - *Earth Rights ACA-retained solicitor*; Gary Mantle – *Director, Wiltshire Wildlife Trust*; Rob Murphy, *WC Principal Transport Planner – Sustainable Transport Group*; Andrew Murrison - *Con MP for South West Wiltshire*; Charles Routh - *NE officer for Wiltshire*; Chris Todd – *Transport Action Network*; Philip Whitehead – *Leader WC*