

SEMINGTON PARISH COUNCIL

Chairman – Peter Smith

Roger P Coleman
Clerk to the Council

2, The Laurels
Westwood
Wiltshire
BA15 2AX

Tel: 01225 862770

E-Mail: Roger.P.Coleman@btinternet.com

Cllr. N Botterill
Cabinet Office
Wiltshire Council
County Hall
Bythesea Road
TROWBRIDGE
BA148JN

28 July 2021

Your Ref. NB/CD/21249

Dear Mr. Botterill,

Semington Civil Parish and the Trowbridge Housing Market Area

Thank you for your letter of 12th July 2021, in response to mine of 23rd June. Whilst your letter is courteous and well researched, it repeats what we already know.

It does, however, clarify that, when we were switched from Chippenham Housing Market Area (HMA) to Trowbridge HMA, neither the Parish Council nor our local Wiltshire Councillor were explicitly consulted on the issue.

Semington Parish Council considered your letter at its meeting on 14th July 2021. It resolved that I should write again to you to challenge the decision to place us in Trowbridge HMA, at the same time setting out our case for remaining with Chippenham HMA.

That case is contained in the **attached document**. Please read this in full so that you will understand our frustration and our belief that we have been badly served by Wiltshire Council.

You will see from this document that we can see a way in which Wiltshire Council can put matters right, as follows:

1. The pre switch HMA status quo to be honoured i.e. Semington Civil Parish to revert back to the Chippenham HMA prior to the next round of local plans consultation;
2. All 4 parishes to be explicitly consulted about the strength and balance of the evidence supporting moving from or remaining with Chippenham HMA;
3. All comments from those public consultations to be incorporated into the Wiltshire Council report so that decision makers understand the evidence and community views.

It is the view of Semington Parish Council that the manner in which the current HMA decision has been made represents a significant democratic deficit and must be addressed in the manner described above.

Yours sincerely,

Peter Smith, Chairman of Semington Parish Council

Copies: Cllr. Richard Clewer, Leader of the Council.
Cllr. J Seed, Summerham & Seend

The Case for Semington Civil Parish to return to the Chippenham Housing Market Area (HMA)

Background

In 1993, John Chandler, a respected local historian, prepared an independent report for Wiltshire County Council (WCC): "The History of Wiltshire and its Communities". This formed part of the WCC response to the Local Government Review of that time. The aim of the report was to explore and address the historical dimensions of the review.

It was used subsequently to help frame policy regarding community focus in Wiltshire when, in June 1996, WCC issued a provisional volume of profiles for all the Wiltshire communities, including a wide range of comparative data such as population, travel, employment, income, and schools. More data was added later.

In 1998, the same author expanded and reworked his 1993 report, to examine a raft of data on the local communities and build a picture of the local identities and allegiances that emerged. The book is titled "A Sense of Belonging".

From these books, and WCC's data sets, the 19 Community Areas of Wiltshire were identified and refined. WCC used these areas as the basis for developing its localism agenda, with the aim of fostering a community focused approach, so that planning, issues and services could be addressed and delivered locally rather than more remotely (e.g. from County Hall).

When the four district councils and WCC merged in 2009, the 19 Community Areas become the central plank of the new council's local approach.

Semington

In chapter 3 of the 1998 book, John Chandler offers thumbnail portraits of the 19 community areas.

Semington, Great Hinton, Keevil and Bulkington were provisionally placed briefly within the Trowbridge thumbnail. Yet, by the time that the Community Areas were finalised, all 4 of these parishes had been placed within the Melksham Community Area.

This matters, because it means that there was a deliberate and considered decision by WCC and later by Wiltshire Council (WC) to place these parishes within the Melksham Community Area rather than that of Trowbridge .

That decision is wholly endorsed by Semington Parish Council, which has since always opposed attempts to move the parish into the Trowbridge Community Area.

Community Areas and Strategic Planning

Community areas have been adopted by WC as the basic building blocks for analytical work to inform the development of the Structure Plan, including the placement of Community Areas into Housing Market Areas (HMAs). This is why Semington, as part of Melksham Community Area, has always been, until very recently, part of the Chippenham HMA.

But, as a result of a couple of lines about travel patterns within an Opinion Research Services (OPS) report, 4 parishes that were in the Chippenham HMA have been moved to the Trowbridge HMA. Even if Semington Parish Council did agree with this change (and the Council and all its members do not), as an evidential basis for transfer it is simplistic and unconvincing. In particular:

1. The Parish Council has not been allowed to see this travel data that specifically relates to Semington. But we know that bus distance and cycle distance, as well as convenience for supermarket shopping (there are four within 500 metres of each other near Farmers Roundabout) stand in favour of Melksham. When the new Melksham Leisure facilities are completed, more of us will travel there and combine our journeys with shopping and using other town services.
2. We have no sense of why other data, such as that which John Chandler and past councils have used, has been sidelined in favour of the OPS recommendation. For example, secondary school attendance would affirm the link between Semington and Melksham. If most of our children attend Melksham Oak, it seems odd that we should be supplying our share of the housing to Trowbridge HMA rather than Chippenham.
3. No other HMA in the county has been split in this way.

Why do we think this has been done?

Trowbridge HMA has constraints to further housing development to the north, west and south of the town. Thus constrained, it needs to expand north- east.

We have seen, in the Local Plans consultation (sites 4 and 5) how Hilperton Parish is likely to be overwhelmed by a small town to be built on it and out to Whaddon Lane. We have also seen, in the same consultation, a further site proposed (6) that would develop Great Hinton parish land to the northeast of Paxcroft, across Hag Hill and the A350, and on to the Semington parish boundary at Corestreet Lane.

Whilst we note that there are “no plans” to use this latter site for now, WC clearly thinks the site has potential and we expect it to be there for future developments.

But, if Great Hinton were not in the Trowbridge HMA, this build into Great Hinton would not happen, since Trowbridge would have to look elsewhere and there is no plausible reason for Melksham to seek to build its share of houses on the fringes of a small rural village.

So, to satisfy the housing site needs of a constrained town, it is very convenient that an obscure line in a report by consultants who have long fled the scene can be used to annex new territory for development.

Why does this matter to Semington?

We can see that, as Trowbridge struggles to meet its housing allocations over the coming 25 years, it will arrive at the Semington boundary looking to continue building north and east. We will, if we remain in the Trowbridge HMA, become part of “Greater Trowbridge”. We are strongly opposed to this future for our community.

So this matters very much to all who live here, but particularly to the younger parishioners who will have to deal with the consequences of WC planners' decision to switch us to the Trowbridge HMA.

Wiltshire Council leaders will know of the strength of community feeling about this, since they received 75 letters on the subject during the winter consultation. To add to our sense that there is a collective will within Wiltshire Council to ignore this issue, the latest Local Plan feedback for Trowbridge HMA reports some 350 responses for the area. Not once, despite these 75 letters, is the HMA issue mentioned in the feedback. To ignore an issue in about 20% of responses has to be a deliberate act by those analysing and/or reporting the data, and only adds to our sense of mistrust and betrayal.

Consultation

With so much riding on the HMA switch, we would have thought it both courteous and necessary for all 4 parishes and the local Wiltshire councillor to have had their attention explicitly drawn to this change. All the replies so far from Wiltshire councillors and officials confirm that such explicit consultation never happened.

Instead, we are told that we had our chance through invitations to events and access to written data contained in appendices and poorly defined maps. This was so far under the radar that we missed it, and so did our local councillor.

We feel very badly served by the way this has been done.

Had we been explicitly consulted, including the evidence to justify the switch, we could have had a proper dialogue with our parishioners and our Wiltshire councillor, and challenged the move to Trowbridge HMA.

What next?

Semington Parish Council resolved unanimously that the following action be taken by Wiltshire Council:

1. The pre switch HMA status quo to be honoured i.e. Semington Civil Parish to revert back to the Chippenham HMA prior to the next round of local plans consultation;
2. All 4 parishes to be explicitly consulted about the strength and balance of the evidence supporting moving from or remaining with Chippenham HMA;
3. All comments from those public consultations to be incorporated into the Wiltshire Council report so that decision makers understand the evidence and community views.

This might still result in a decision that remains unpalatable to Semington PC and its members, but it will at least have been made following a proper, open and advertised consultation and will have the democratic legitimacy that we all seek.

It is the view of Semington Parish Council that the manner in which the current HMA decision has been made represents a significant democratic deficit and must be addressed in the manner described above.