



Wilts & Berks Canal Trust

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Patron: Her Majesty the Queen

10th October 2026

Wiltshire Planning Department
County Hall
Bythesea Road
Trowbridge
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Dear Sirs,

**Response to planning application PL/2026/04823
Land at Forest Farm, Chippenham – outline application for up to 600 dwellings**

1. Introduction

The Wilts & Berks Canal Trust (WBCT) welcomes the opportunity to comment on the outline application for up to 600 dwellings, land for a local centre (Use Classes E and F), open space, landscaping and associated infrastructure, with all matters reserved except access from the A4/London Road.

WBCT does not object to the principle of development. If permission is granted, it should secure a continuous, physically deliverable canal corridor, positive integration with the development, and the land, works and contributions needed to deliver the associated access and green infrastructure benefits.

This response develops the points raised in WBCT's earlier response to the joint Gleeson and Gallagher consultation. The submitted illustrative masterplan recognises potential canal restoration land, but the parameter plans and draft heads of terms do not yet secure the corridor or its delivery. The relationship between canal restoration, the A4 access works, drainage, utilities and archaeological mitigation also requires resolution.

The comments below concern Forest Farm. They draw on WBCT's September 2026 Wiltshire Local Plan Scoping Consultation Response and the accompanying Policy Framework and Developer Contribution Framework, applying their safeguarding, design and delivery principles to the circumstances of this application.

2. Planning policy and supporting framework

Core Policy 53 of the Wiltshire Core Strategy supports canal restoration and safeguards historic alignments against development that would destroy them or make restoration more difficult. The Planning Statement incorrectly identifies Core Policy 53 as an air quality policy. WBCT requests correction and an express assessment of the proposals against the canal policy.



Core Policy 3 provides for the necessary on-site and, where appropriate, off-site infrastructure arising from development, through direct delivery and/or financial contributions. Core Policy 52 supports retention and enhancement of green infrastructure. These policies provide a basis for considering the canal land, access and infrastructure needed to serve Forest Farm.

Policy GI4 of the Chippenham Neighbourhood Plan identifies the Wilts & Berks Canal as a Strategic Green Corridor. It seeks to protect corridor functions, connect new open space and improve movement for people and wildlife. It also supports developer contributions to improve corridor quality, establish missing links and resolve poor connections. These objectives are directly relevant to integrating Forest Farm with the canal and the wider network.

The National Planning Policy Framework (NPPF), August 2026, also supports these objectives. Its glossary expressly includes canals within green infrastructure. Policy DP3(1) and (2)(c)–(d) supports integration with historic site features, accessible multifunctional green infrastructure and connections which prioritise walking, wheeling and cycling.

WBCT's Wiltshire Local Plan Scoping Consultation Response, September 2026, explains why safeguarding must preserve physical deliverability as well as the mapped route. The accompanying Suggested Framework for Local Plan Policies Supporting the Restoration of the Wilts & Berks Canal, September 2026, develops this through proposed policies WB1–WB6 on safeguarding, infrastructure delivery, waterside design, active travel, green and blue infrastructure, and heritage. Proposed policies WB7–WB9 address towpath accessibility, development-related improvements and user safety.

The accompanying Proposed Local Plan Policy and Developer Contribution Framework, 28 September 2026, Rev 5, explains the infrastructure relationship between new development and canal restoration, and an approach to defining and securing development-related works. These documents are WBCT's proposals for plan-making, rather than adopted policies. The requests in this response are supported by the existing development plan and the particular effects and infrastructure needs of Forest Farm.

3. Canal corridor and site layout

The Illustrative Masterplan, TOR-SK009 revision C, identifies potential canal restoration land. However, paragraph 4.26 of the Planning Statement places restoration outside the application, and neither Parameter Plan Land Use and Landscape, TOR-PP-002, nor Parameter Plan Access and Movement, TOR-PP-004 revision A, expressly defines the restoration corridor. An illustrative opportunity within general green infrastructure does not secure the land and engineering requirements needed for a navigable canal.

WBCT requests a revised parameter plan or separate safeguarding plan expressly secured through the outline permission. It should identify the main canal route within the application boundary, connections at both site boundaries, the historic Chippenham Branch and junction, and sufficient land for the channel, banks, towpath, earthworks, structures and maintenance access. The extent should be informed by route evidence and coordinated survey and engineering work, rather than a uniform width.

The potential link road is expressly safeguarded on the parameter plans. Equivalent clarity is required for the canal. Road alignments, crossings, earthworks, utility corridors and drainage features should be shown together to demonstrate that their delivery would not sever or sterilise the restoration route. Any identified water-storage, feeder or pumping requirements should be accommodated.



The earlier consultation response also raised the proximity of roads to the canal and the effects on tranquillity and wildlife movement. The layout should provide suitable separation, planting and crossing arrangements, with lighting and boundary treatment designed to preserve corridor continuity. Canal-facing development and public spaces should provide an attractive, accessible setting and natural surveillance rather than rear servicing or blank boundaries.

These matters should establish the safeguards and design principles for later reserved matters. Detailed canal design can be refined subsequently, but route continuity and compatibility with infrastructure fixed by the outline permission should be demonstrated before determination.

4. A4 access and future canal crossing

Access is being determined at outline stage. Proposed Site Access Arrangements New A4 London Road Roundabout, ITB19912-GA-102 revision C, shows the south side of the roundabout approximately 600 mm below the existing carriageway, while the north side remains close to existing levels, with a small increase consistent with a surfacing overlay. It also shows an indicative Exolum pipeline diversion. These details must be considered with Site Access Arrangements Long Section, ITB19912-GA-107 revision A, and Primary Street Long Section, ITB19912-GA-108 revision A, against future canal crossing requirements.

The extent of any overlap between future canal bridge approaches and the proposed access works depends on highway design standards and detailed levels. Preliminary engineering work identifies a potential conflict requiring assessment. WBCT requests a coordinated assessment demonstrating that the roundabout, approach roads, utility diversion and earthworks would accommodate a feasible future navigable crossing. It should establish indicative canal bed and water levels, highway levels, structural clearances, approach lengths and land requirements, with walking, wheeling and cycling provision and consideration of wildlife connectivity.

The earlier consultation response sought an A4 canal bridge. At this stage, the essential requirement is to safeguard a deliverable crossing and prevent the approved access works from obstructing it. WBCT is not requesting a fully detailed bridge design or assuming that Forest Farm must fund the whole future bridge. The Council should establish a coordinated funding and delivery strategy, including proportionate contributions from future development within the South Chippenham masterplan area where justified by its relationship with the crossing. An interim pedestrian crossing should provide safe access to the network north of the A4, but would not replace safeguarding for navigation and the associated towpath.

5. Drainage utilities and ground conditions

The Flood Risk Assessment and Drainage Strategy, June 2026, includes Proposed Surface Water Drainage Strategy, GLFORESTFARM.23/23 revision P7, and Overland Exceedance Flow Plan, GLFORESTFARM.23/24 revision P4. The drainage consultation dated 17/09/2026 raises no objection subject to conditions. WBCT requests a coordinated plan demonstrating compatibility between the canal corridor and basin footprints, levels, outfalls, culverts, exceedance routes and maintenance access, both before and after restoration.

As set out in the Policy Framework, suitable SuDS discharges should in the first instance be considered for direction to the restored canal where technically and environmentally appropriate. This could



integrate water management with the canal rather than treating the two independently. The assessment should address available water, treatment and quality, hydraulic capacity, seasonal operation, flood risk and maintenance. Housing drainage must remain satisfactory if canal restoration follows later. Policy F8(1)–(2) supports multifunctional sustainable drainage delivering water-quality, biodiversity and amenity benefits, with maintenance arrangements for the lifetime of the development.

The Utility Assessment Report, February 2025, identifies the Exolum pipeline diversion and undergrounding of 11 kV electricity infrastructure using earlier layout information. The drainage strategy also identifies diversion of a Wessex Water rising main. WBCT requests an updated coordinated utility plan for the current scheme, including the foul drainage infrastructure described in Environmental Statement Chapter 10. Assets, diversions, easements and access arrangements should permit canal excavation, rewatering, structures and maintenance.

The BRD Geo-Environmental Site Investigation, November 2023, in Appendix D of the flood risk assessment, includes investigation of the infilled canal. It records made ground and identifies excavation stability and groundwater considerations. WBCT requests an excavation and materials strategy addressing these findings, any further investigation needed for canal works, suitable reuse and any treatment or disposal requirements. The applicant's specialist should resolve the report's waste classification and coding before disposal assumptions are relied upon.

6. Heritage ecology and public access

The Archaeological Desk-based Assessment and the Pre-Construct Archaeology evaluation, revised January 2026, identify surviving canal evidence and archaeological remains. The evaluation records an urned cremation and a possible unurned cremation in Trench 120, with potential for further burials. The assessment proposes green space intended to preserve possible burials in situ. WBCT requests that the mitigation strategy addresses canal excavation and associated earthworks, using the trench and feature plans alongside the safeguarded canal alignment to establish compatibility.

The historic Chippenham Branch and junction were highlighted in the earlier consultation response and should be recognised in the site's heritage and green infrastructure strategy. Their alignment and surviving evidence should be safeguarded and incorporated into walking and cycling connections where appropriate. WBCT is not seeking full reconstruction of the Branch through this application. The main canal corridor should retain its potential for navigation. Policies HE4(1) and HE5(1) support conservation appropriate to heritage significance, informed by proportionate assessment of affected assets and their settings.

Canal restoration provides opportunities for habitat creation and ecological connectivity. Landscaping, ecological mitigation and biodiversity management should accommodate future excavation and rewatering. Permanent habitat commitments or planting within the corridor should not prevent the works that the safeguarding is intended to allow. Canal edges, buffers, lighting and crossings should be designed coherently for wildlife and public access. Policy N2(1)(c), (e) and (g) supports connected ecological networks, multifunctional green infrastructure and appropriate long-term management.

The earlier response identified connections to existing rights of way, including BREM47 and DHST82, and opportunities to connect with National Cycle Route 403. WBCT requests that the movement



strategy shows continuous walking, wheeling and cycling routes through the site and to Pewsham Locks, the wider rights of way network and the A4 crossing. Links to the local centre, open spaces and other community destinations should be direct and accessible. These should be coordinated with the connectivity work sought in the active travel consultation dated 16/09/2026.

Towpaths and links should have suitable width, surfacing, step-free access where practicable, safe crossings and clear wayfinding. Natural surveillance and the design of shared routes should address user safety without unnecessary lighting or harm to ecological function. The permission should also secure construction and maintenance access to the canal land. These requests accord with Policy TR4(1)(a)–(c) on active travel and safe, inclusive routes, and Policy TR8(1) on protecting, enhancing and connecting public rights of way.

Where canal restoration separates open space from the development, a lift bridge should maintain navigation and inclusive public access. At the original Chippenham Branch junction, the layout should safeguard sufficient land and canal width for a 70 ft (approximately 21.3 m) canal boat to turn, with detailed geometry informed by engineering design.

Community and visitor facilities associated with Pewsham Locks were promoted in the earlier consultation response. For Forest Farm, the local centre and open-space strategy should complement the accessible heritage and recreational network, with clear connections to the canal and Locks.

7. Works and contributions sought

The draft heads of terms in section 9 of the Planning Statement do not expressly identify canal works or a contribution. WBCT requests the following package to be included in the outline permission and planning obligations.

On-site canal and towpath. The preferred approach is direct developer excavation and construction of the canal section and towpath within the application site, coordinated with development earthworks, drainage and crossings. The development directly affects this land and would otherwise determine its levels, services and surrounding layout. Delivery alongside the development would integrate the corridor with its open space and movement network and avoid leaving restoration dependent on reopening completed infrastructure.

Connected canal and towpath works. WBCT seeks a proportionate financial contribution towards the connected sections between Pewsham Top Lock and the A4. These would connect the on-site corridor to Pewsham Locks and the wider recreation and active-travel network. Up to 600 additional households would generate use of that network, while the value of the on-site canal and towpath to residents depends on continuity beyond the site boundary. The contribution should therefore relate to the defined works providing those connections and their capacity to serve Forest Farm.

Access structures and the interim A4 crossing. Appropriate provision is requested for access to open space separated by the restored canal and a safe pedestrian crossing of the A4. The former responds to severance arising from canal integration within the site; the latter would help residents reach the network north of the A4. Their design and delivery should be coordinated with the development's own access and active-travel measures, giving credit for infrastructure already provided through those measures.



Land and maintenance. WBCT's preferred arrangement is transfer of the canal corridor and relevant open space within the application site separated by restoration to the Trust. This should be accompanied by defined access rights, permitted uses, liabilities and maintenance responsibilities, with appropriate funding for the infrastructure serving the development. These arrangements would secure the public access and long-term management on which the proposed benefits depend.

This package implements the approach in the Developer Contribution Framework: infrastructure is identified by its relationship with development, rather than by a general restoration funding target. Core Policies 3, 52 and 53 and Policy GI4 support the combined safeguarding, green infrastructure and connectivity objectives. The specific requests address land affected by the proposal, connections serving its residents and access requirements created by the site layout.

WBCT seeks direct delivery of on-site canal works provisionally valued at £187,500, together with a financial contribution of approximately £445,000 towards the remaining canal, lift bridge and interim pedestrian crossing works. The combined £632,500 represents half of the £1,265,000 external funding requirement, after deducting £165,000 of volunteer input. This split reflects the earlier joint proposal for approximately 600 homes at each development. Figures remain subject to cost and volunteer checks, Gallagher's proposals and the agreed works, with credit for other funding for the same items. This applies the methodology in sections 6–8 of the Developer Contribution Framework; each obligation must satisfy Regulation 122.

8. Securing delivery

The canal safeguarding plan, boundary connections and A4 compatibility requirements should be established before the outline decision. Conditions should secure compliance with the approved corridor and require later layout, infrastructure, drainage, utilities, landscape and ecological submissions to demonstrate that they retain canal deliverability. Detailed technical submissions can be phased, provided the outline permission does not fix incompatible access arrangements or leave the essential safeguards unresolved.

This approach reflects Policy DM6: conditions should be necessary, relevant, precise, enforceable and reasonable; obligations should address matters that cannot be resolved through conditions. Policy DM6(2)(a)–(b) excludes financial payments and formal land transfers from conditions, supporting their inclusion in the Section 106 agreement.

The Section 106 agreement should secure the land transfer and access rights, defined direct works, financial contribution, delivery responsibilities and maintenance arrangements. It should identify the relevant land on a plan and include specifications or an approval process for works, completion and handover requirements, and appropriate triggers linked to development phases and occupation. Canal construction and towpath delivery should be coordinated with the site's earthworks and open-space programme.

Financial contributions should be assigned to specified canal, towpath and access works, with payment timing, indexation, expenditure periods and appropriate provisions if those works cannot proceed. Triggers should permit infrastructure to be delivered when needed by residents. Any off-site component should have a credible programme and delivery arrangements before the obligation is settled; it should not depend solely on an undefined future restoration project.

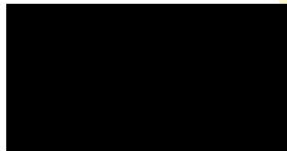


Highway works, including the pedestrian crossing, should be secured through the appropriate highway agreement and coordinated with the outline access approval. The conditions, Section 106 obligations and highway agreement should address their respective functions without charging twice for the same works. WBCT requests consultation on the safeguarding plan, canal-related conditions and heads of terms before permission is granted.

9. Requested next steps

WBCT requests that the applicant and Council resolve the canal corridor and A4 access compatibility before determination; demonstrate coordination with drainage, utilities, archaeology and ecological mitigation; and include the land, direct works, connected infrastructure contributions and maintenance arrangements in the permission and associated agreements. Later reserved matters should develop the agreed canal and waterside design principles. WBCT welcomes a focused discussion with the applicant and relevant officers and requests further consultation on amended plans and proposed canal-related conditions and heads of terms.

Yours faithfully,



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