

CALNE17

Spatial Planning
Wiltshire Council
County Hall
Bythesea Road
Trowbridge
BA14 8JN



26 February 2021

Ref: 002156/L005

Dear Sir/Madam,

WILTSHIRE LOCAL PLAN REVIEW – MARKET TOWN CONSULTATION RESPONSE: CALNE

We write on behalf of Lidl Great Britain Limited to provide consultation comments on the draft Local Plan Review: Planning For Calne report (January 2021), which seeks to guide future development in the market town over the next 15-year period. The comments relate specifically to economic development and the allocation of sites to accommodate such development.

Approach to Site Allocation

At paragraph 19, the Planning For Calne report advises that:

'On current evidence, 4ha employment land is needed at Calne. This recognises a need to address concerns about job growth corresponding to the recent increase in new homes being built at the town. Land is already allocated for employment in the existing Wiltshire Core Strategy, but further employment land is now required.'

Figure 1 subsequently identifies eight separate sites that are considered by the Council to have development potential to meet future development needs. The selected sites are all located outside the development boundary of Calne, as recently revised by the Housing Site Allocations Plan.

Further details on the site selection process are provided on page 5 of the Site Selection Report for Calne, which confirms that the potential allocations have been drawn from a review of the Strategic Housing and Employment Land Availability Assessment (SHELAA).

Objection to Approach to Site Selection

Core Policy 8 of the adopted Core Strategy confirms that 6ha of new employment land is needed in Calne to meet the needs over the period 2006 to 2026. A 3.2ha site is subsequently allocated to accommodate employment development to the east of Beversbrook Farm and Porte Marsh Industrial Estate. No development has currently been delivered on this allocated site.

The Local Plan Emerging Spatial Strategy advises that there is a need for 9ha of new employment land within the Chippenham Housing Market Area (including Calne) to meet needs generated over the period 2016 to 2036, of which 4ha is to be delivered in Calne. The Planning For Calne report subsequently confirms this need for 4ha of employment land.

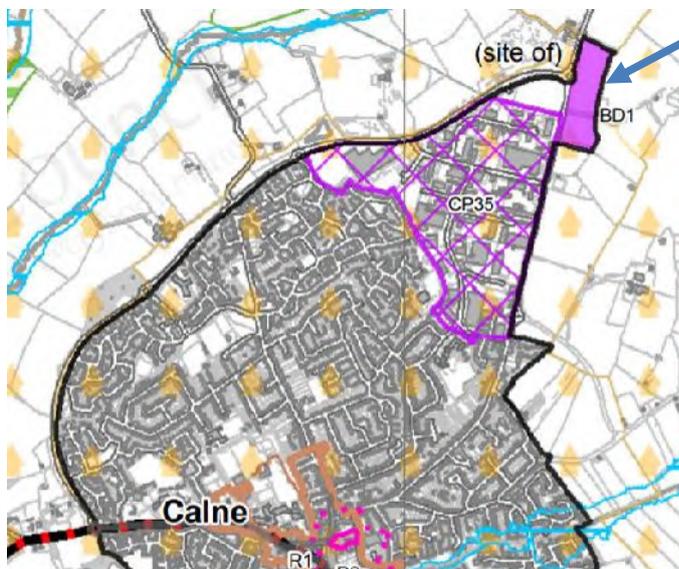
Given the 10-year overlap in the Core Strategy and emerging Local Plan periods, it is unclear how much of the employment land requirement will be satisfied by existing site allocations and how much will need to be delivered on new site allocations. Accordingly, the strategy for allocating new sites is not clearly presented. For example, will the delivery of employment development on existing site allocations contribute towards the 4ha requirement and reduce the need to allocate additional land for employment development over the Local Plan period?

This lack of clarity is further compounded by failure to acknowledge any existing employment land allocations in Calne that remain available to accommodate future development, which we comment on further below.

Paragraph 9 of the Site Selection Report states that Figure 1 in the Planning For Calne report ‘shows the entire site selection process’, with further details of the Stage 1 and Stage 2 process provided. It is confirmed that the Strategic Housing and Employment Land Availability Assessment (SHELAA) provides a pool of sites from which the Site Selection Report has selected suitable sites for development. However, the range of sites identified by Figure 1 highlights a significant flaw in the site selection process, as explained below.

The site selection process is fundamentally based upon the 2017 SHELAA prepared by the Council, which confirms that the methodology seeks to follow the Government’s Planning Practice Guidance. At paragraph 4.5, the SHELAA confirms that the pool of sites considered includes existing economic development allocations without planning permission. However, there is no evidence to confirm that the SHELAA has actually included an assessment of such existing allocations in Calne.

Wiltshire Core Strategy Core Policy 8 allocates a site of 3.2ha located to the east of Beversbrook Farm and Porte Marsh Industrial Estate to accommodate new employment development (see site BD1 below). The site is also acknowledged in the made Calne Community Neighbourhood Plan.



Site BD1

Extract from Chippenham,
Corsham and Calne Community Area
Policies Map

There is, however, no evidence that allocation BD1 has been taken into account in the SHELAA, with it not featuring in Appendix 5.2, which comprises plans and initial assessments of the sites considered for future development in Calne. Whilst it may not be a significant omission for the SHELAA not to take an allocated site into account, it is a significant flaw in methodology if future site allocations are only then drawn from the SHELAA.

By excluding consideration of existing site allocations without planning permission, the adopted methodology for identifying land for allocation to meet future employment requirements in the emerging Local Plan is unsound.

In addition to this, Figure 2 in the Calne Site Selections Report fails to identify allocation BD1 as an existing Development Plan Allocation. It also fails to acknowledge the existing Tesco store located off Beversbrook Lane on the northern edge of Calne as a '*Planning Permission/Completion*'.

Notwithstanding the above, it is apparent that all of the potential development sites for assessment are located outside the settlement boundary, as recently updated in the Housing Site Allocations Plan. Accordingly, the allocation of new land for development will conflict with the settlement boundary, generating a requirement to revise the boundaries again through the emerging Local Plan.

Remedy to Address Objection

In order to address the grounds of objection identified above, the following remedies are proposed:

1. Provide clarity on the needs for additional employment land, how this figure has been calculated and the contribution that existing undeveloped site allocations will make towards achieving it;
2. Correctly identify and acknowledge all existing site allocations, to include site BD1, in the Planning For Calne report and take full account of all such sites in the process of identifying sites to accommodate future development;
3. Revise the settlement boundary in Calne to include existing and any new site allocations and address shortfalls in the application of the methodology adopted in the Housing Site Allocations Plan. For example, the existing residential development located to the west of Oxford Road, the Tesco store on Beversbrook Lane and any other implemented planning approvals in Calne should be included within the settlement boundary.

Response to Consultation Questions

Responses to the three questions asked in the Potential Development Site section of the Planning For Calne report are presented below.

Question CA3: Is this the right pool of potential development sites? Are there any other sites we should be considering?

Response: No. The pool of potential development sites should include all existing Core Strategy site allocations, to include employment allocation BD1 to the east of Beversbrook Farm.

Question CA4: What land do you think is the most appropriate upon which to build? What type and form of development should be brought forward at the town?

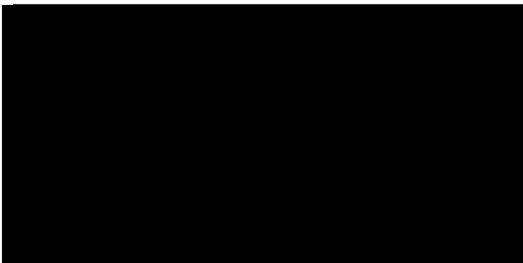
Response: New development should be focused upon the north eastern edge of Calne. This will reflect existing patterns of growth and enable the town's expansion to be accessible from the A3102, thereby reducing the highways impact upon the town centre.

Question CA5: Are there important social, economic or environmental factors you think we've missed that need to be considered generally or in respect of individual sites?

Response: The allocation of new sites for employment use should not be pursued until existing Core Strategy allocations have been taken-up.

We trust that the above comments will be taken into full consideration as part of the consultation exercise.

Yours faithfully,



CALNE38a,b,c,d

Market Town Consultation Response Form

Ref:	(For official use only)
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A series of 'Planning for' documents break down the work undertaken so far for each Principal Settlement and Market Town. Within these documents, information is presented, and questions asked to help shape proposals for each place.

To view these documents please visit the Council's Local Plan Review Consultation page on its website at: <https://www.wiltshire.gov.uk/planning-policy-local-plan-review-consultation>

Please return to Wiltshire Council, by 5pm on Monday 8th March 2021.

By post to: Spatial Planning, Economic Development and Planning, Wiltshire Council, County Hall, Bythesea Road, Trowbridge, Wiltshire, BA14 8JN.

By e-mail to: spatialplanningpolicy@wiltshire.gov.uk

This form has two sections:

Section One – Personal details

Section Two – Your response to the questions. Please use a separate sheet for each representation.

Section One – Personal details

*if an agent is appointed, please fill in your Title, Name and Organisation but the full contact details of the agent must be completed.

	1. Personal details	2. Agent's details (if applicable)*
Title	[REDACTED]	Handwritten signature
First name		Handwritten signature
Last name		Handwritten signature
Job title (where relevant)		Handwritten signature
Organisation (where relevant)		Handwritten signature
Address Line 1		
Address Line 2		
Address Line 3		
Address Line 4		

Postcode	
Telephone Number	
Email Address	

Section Two – Questions

Which Market Town does your response relate to?

Answer:

CALNE

1. What do you think to the scale of growth? Should there be a brownfield target? Should it be higher or lower?

Answer:

BROWNFIELD SITES SHOULD NOT BE IGNORED & SHOULD BE USED BEFORE GREENFIELD SITES. A BROWNFIELD TARGET WOULD FOCUS ATTENTION ON SUCH SITES & SHOULD BE USED.

2. Are these the right priorities? What priorities may be missing? How might these place shaping priorities be achieved?

Answer:

GREATER EMPHASIS IS REQUIRED ON INFRASTRUCTURE, PARTICULARLY SCHOOLS, HEALTH & PROVIDING A ROAD SYSTEM THAT CAN COPE WITH INCREASED POPULATION. AIR QUALITY & AFFECT ON LIFESTYLE MUST BE PROTECTED, WHICH ADDITIONAL HOUSING WOULD SERIOUSLY AFFECT.

3. Is this the right pool of potential development sites?

Are there any other sites we should be considering?

Answer:

BROWNFIELD SITES WITHIN THE TOWN CENTRE e.g. OLD CO-OP SITE SHOULD BE DEVELOPED FIRST.

4. What land do you think is the most appropriate upon which to build?

What type and form of development should be brought forward at the town?

Answer:

EXISTING ROADS MUST BE ABLE TO COPE WITH ADDITIONAL HOUSING. FOR EXAMPLE THE NORTH BYPASS (BEVERS BROOK) COULD COPE WITH ADDITIONAL TRAFFIC. COULD THIS BE EXTENDED TO SUPPORT DEVELOPMENT OF SITES 1, 2, 3 + 4?

5. Are there important social, economic or environmental factors you think we've missed that need to be considered generally or in respect of individual sites?

Answer:

NEED TO ENSURE THERE IS SUFFICIENT OPEN SPACE, THAT EXISTING PROPERTIES ARE NOT OVERLOOKED, AND THAT THERE ARE SPORTS & SOCIAL FACILITIES AVAILABLE e.g. BEVERS BROOK.

6. Are there any issues or infrastructure requirements that should be identified?

Other than that already identified within the 'Planning for' document?

Answer:

ENSURING THERE ARE SMALL NEIGHBOURHOOD SHOPS BUILT INTO ANY PLANNING.

If you have any further comments you wish to make, please detail them below.

Future notification

I wish to be notified of any future updates relating to the Local Plan Review:

YES: NO:

Clicking yes will add you to the planning policy contact database. This will mean you are kept informed of any future planning policy updates and consultations.

Further information on how the Spatial Planning Department treats your personally identifiable information can be found by reading the privacy notice available via the link below:

<https://www.wiltshire.gov.uk/planning-privacy-notice>

Here you will also find information about how and why your data may be processed and your rights under the Data Subject Information Notice section further down the page.

Signature:



Date:

Thank you for completing this form.

Data Protection

Wiltshire Council has a duty to protect personal information and will process personal data in accordance with Data Protection legislation. The personal data you provide on this form will only be used for the purpose of the Wiltshire Development Framework. It may also be used for the prevention or detection of fraud or crime and in an anonymised form for statistical purposes. The data will be stored on computer and/or manual files. You have a right to a copy of your information held by any organisation, with some exemptions. To gain access to your personal data held by Wiltshire Council or if you have any Data Protection concerns please contact Wiltshire Council's Data Protection Officer on 01225 713000 (switchboard) or e-mail to dataprotection@wiltshire.gov.uk ."

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Subject:
Date:
Attachments:

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Dear Planning Team,

I wish to respond to the above Local Plan for Calne , with particular concern for one site in particular.

In the 2018 Calne Neighbourhood Plan site 6 (SHELAA site 3254) had been previously investigated and reported by the prestigious AECOM as NOT suitable to be carried forward as a suitable development site. (see original report attached)

Now in 2021 this site has been resurrected but omitting the part of the AECOM report which cited reasons such as Heritage , proximity to listed farmhouse , wildlife , ecology , services , distance from facilities , for not proceeding with this site.

Since this original AECOM report was written our own estate [REDACTED] has been completed , with residents such as ourselves many of whom like us who came to Calne from other Towns and Counties across the country, very much appreciating Rookery Farm as a veritable haven of Oxygenating trees , supporting Rooks , kites , woodpeckers , a barn owl , plus a display of bats seen in the evening , great crested newts. Indeed it was one of the factors which made our decision to leave our home in Chippenham to come to Calne, as was the case with many other residents here.

The very name Rookery Farm is testament to the centuries of a colony of Rooks who along with the Kites occupy the tall trees on the Farm.

The old Victorian Farmhouse itself dating back to approx 1835 has a lovely carved ornate barge board apex roof and has itself been a home to one of Calne's noted Sculptors. As such it is part of Calne's Heritage and should be retained intact as such.

Our own estate [REDACTED] has been a huge improvement to the hitherto derelict concrete and asbestos pig farm on contaminated land that stood here before , and has now become a local park - type centre of recreational exercise for the whole Community and is on the route of several Calne public footpaths. As such I believe it sets a blueprint for future Calne development combining large recreational areas , ponds , tree plantations alongside new housing.

The close proximity of Rookery Farm to not only [REDACTED] Residents but also the many public footpaths which both adjoin the farm and also cross its driveway entrance, means that the Farm has become a lovely centre of wildlife which is appreciated as an amenity for the Community.

Additionally the choice of this site goes against several of the priorities stated in the 2018 and also 2021 Neighbourhood Plans in that there should be no development without infrastructure improvements to the local road network, a reduction in traffic congestion and an improvement in air quality.

Since the 2018 plan there has been no improvement to the traffic congestion or air quality through the town , indeed the addition of Cherhill View plus Silver Street developments

have further deteriorated both congestion and air quality particularly at the White Hart junction.

Furthermore the recent addition of Tesco Plus Lidl on the Northern side means that residents of Stockley Lane estates plus Silver Street ,many of whom previously drove along Stockley Lane to shop in Melksham Lidl and Aldi will now travel through Calne Town to reach the large grocery stores.

For the above reasons in my / our [REDACTED] opinion/s the future sites to be carried forward must be those closest to (a) employment on Porte Marsh (b) out of town shopping (c) by - pass to Chippenham (d) easy access to Swindon Road.

Therefore sites 1,2,3, potentially 4 would fulfil these requirements.

There would be the potential for a future North /Eastern by pass from Quemerford to the Swindon Road by linking roads from the above sites , to Sand Pit Road at one end , and possibly joining the A4 at Quemerford.

There have been impact constraints cited on these sites , however I believe that each site could have large areas of water , ie one or more lakes or large ponds , which will , in addition to supporting much wildlife ,act as surface water attenuation for the new houses to prevent flash flooding , parks , tree plantations , and a new cycle and pedestrian footpath routing from Quemerford to the Oxford Road.

The whole area could become a very attractive wildlife and ecological addition to Calne and would further attract people such as ourselves from other areas to the town in addition to providing housing for local residents.

By this sort of planning I believe the Residents of Calne will benefit from the required increase of land supply for housing plus a large and very attractive recreational area supporting bio diversity and wildlife , with new tree planting added to improve air quality and further attract wildlife.

Hence whereas at present only very few can appreciate the natural wildlife of the area , by providing large recreational park and wildlife areas along with new housing the whole Community would benefit.

The Calne Referendum on future sites which was carried out recently showed 62% in favour of development of these Northern sites and not those to the South.

I believe that a future Calne Plan should show proposals for large areas of open recreational space and cycle paths , together with new housing along sites 1,2,3,4. This should be put to the Calne Community as a Referendum.



CALNE87

05 MAR 2021



Market Town Consultation Response Form

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First name		
Last name		
Job title (where relevant)		
Organisation (where relevant)		
Address Line 1		

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NO:

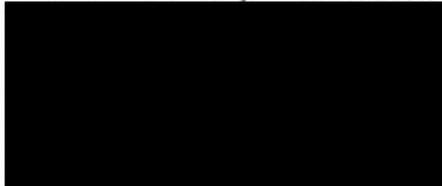
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Signature:



Date: 4 / 3 / 2021

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Address Line 2	
Address Line 3	
Address Line 4	
Postcode	
Telephone Number	
Email Address	

Section Two – Questions

Which Market Town does your response relate to?

Answer: CALNE

- What do you think to the scale of growth? Should there be a brownfield target? Should it be higher or lower?

Answer: THE SCALE OF GROWTH IS TOO HIGH FOR A RURAL TOWN RELYING ON AN OLD ROMAN ROAD (A2) DESIGNED FOR MUCH LOWER VOLUMES OF TRAFFIC. I MYSELF MOVED OUT OF LONDON, THEN OUT OF CHILDEHAM due to OVER CONGESTED HOUSING AND ROADS. CALNE HAS (TO DATE) MANAGED TO KEEP A GOOD BALANCE OF QUALITY SEMI-RURAL LIFE AND PRESERVATION OF COUNTRYSIDE WHICH HAS DRAWN MOST OF US ON THIS ESTATE TO CALNE. THIS ESTATE HAS REPLACED AN OLD DERELICT RIG FARM AND SO WAS BROWN FIELD.

Are these the right priorities? What priorities may be missing? How might these place shaping priorities be achieved?

Answer: THE RIGHT PRIORITIES SEEM TO ME TO HAVE BEEN SUCCINCTLY SUMMED UP IN THE CALNE 2018 NEIGHBOURHOOD PLAN. IE :-

- PRESERVATION OF CALNE HERITAGE & HISTORY
 - PRESERVATION OF BIO-DIVERSITY
 - SITES MUST NOT EXACERBATE TRAFFIC AND AIR POLLUTION
- THIS IS ACHIEVABLE BY BY-PASSING THE TOWN CENTRE WITH ROADS TAKING TRAFFIC TO AREAS OF EMPLOYMENT AND NEW SITES (TESCOS, LIDL, ASDA) WITHOUT GOING THROUGH TOWN CENTRE, IE VIA A BY-PASS.

- Is this the right pool of potential development sites?

Are there any other sites we should be considering?

Answer: THIS IS MOST DEFINITELY NOT THE RIGHT POOL OF SITES. CALNE TOWN COUNCIL EMPLOYED THE DISTINGUISHED AECOM TO REVIEW AND REPORT ON A LIST OF POTENTIAL SITES IN 2016/17 WHICH STATED THAT SITE 6 ROOKERY FARM (PREVIOUSLY SITE 3254) WAS NOT APPROPRIATE TO BE TAKEN FORWARD FOR THE CCNP. IT CITED DISTANCE FROM COMMUNITY FACILITIES, SERVICES, HERITAGE CONSTRAINTS, CLOSE PROXIMITY TO LISTED FARMHOUSE, HABITATS FOR PROTECTED SPECIES, REPTILES, BATS, TREES.

UPON A PREVIOUSLY DIS-USED & DERELICT PIG-FARM AND HAS BEEN TURNED INTO A PARK-TYPE ESTATE WITH R.O.W. FOOTPATHS LEADING AROUND ROOKERY FARM. HENCE THE FARM CONTRIBUTES IMMENSELY AS AN AMENITY TO ALL IN THE COMMUNITY WHO USE THE WALKS AND WHO LIVE IN THE AREA. IT IS FULL OF WILDLIFE WHICH NEEDS TO BE PROTECTED FROM OVER DEVELOPMENT THE TREES OF ROOKERY FARM PROVIDE OXYGEN AT A TIME OF POLLUTION AND VITAL TO THE AIR QUALITY OF THE AREA. THE FARMHOUSE ITSELF DATES BACK TO VICTORIAN TIMES AND EXHIBITS AN ATTRACTIVE VICTORIAN CARVED ORNATE GABLE BOARD ALEX ROOF. HENCE THIS SITE SHOULD BE REMOVED FROM THE LATEST 2021 LIST OF POTENTIAL SITES.

- What land do you think is the most appropriate upon which to build?

What type and form of development should be bought forward at the town?

Answer: FROM THE LIST OF SITES, ALL SITES NORTH OF QUEMERFORD

DUE TO THE POSSIBILITY, NEAR OF LONG TERM, OF LINKING THE SITES WITH ROADWAYS TO TAKE TRAFFIC, BY-PASSING THE TOWN CENTRE, UP TO EMPLOYMENT AREAS (PORTE MARSH), NEW SHOPS (TESCO'S, LIDL ETC) AND TO THE NORTH (SWINDON). IT COULD BE POSSIBLE TO LINK UP FROM THE A14 QUEMERFORD TO SAND PIT ROAD BY LINKING SITES 2, 3 AND 4 VIA NEW DEVELOPMENT ROADS (NOTE THIS WAS DONE SUCCESSFULLY IN PENHAM, CHILPENHAM

- Are there important social, economic or environmental factors you think we've missed that need to be considered generally or in respect of individual sites?

Answer: SITE 6 ROOKERY FARM DEVELOPMENT WOULD MAJELY HARM OR DESTROY IMPORTANT HERITAGE AND ENVIRONMENT, WITH LITTLE OR NO ADDED BENEFIT TO THE COMMUNITY, USING THE SAME PARKLAND SETTING AS USED ON CHERTILL VIEW AS AN EXAMPLE, EACH NEW DEVELOPMENT ON SITES 1, 2, 3, 4 SHOULD MAXIMISE THE NATURAL SURROUNDINGS, BY LARGE AREAS OF FOOTPATHS, A CYCLE PATH FROM QUEMERFORD TO THE NORTH, IMPROVE EXISTING R.O.W FOOTPATHS; ADD MANY TREES, COMMUNITY ORCHARDS ETC

- Are there any issues or infrastructure requirements that should be identified?

Other than that already identified within the 'Planning for' document?

THE EXISTING ROAD ROUTES FROM STICKLEY LANE, QUEMERFORD.

Answer: THROUGH CAENE IS ALREADY A CONGESTION AND POLLUTION ISSUE. THIS WOULD WORSEN BY ADDING MORE DEVELOPMENTS TO SITES 5, 6, 7. AS SAID ABOVE A NEW ROUTE UP FROM THE A14 TO NORTH CAENE WOULD ALLEVIATE MANY EXISTING AND FUTURE ISSUES IN TOWN CENTRE. THIS COULD BE ACHIEVED IN TIME BY PLANNING DEVELOPMENTS 1, 2, 3, 4 WITH ROADS LINKED TOGETHER WHICH COULD FORM A NEW NORTHERN BY-PASS.

If you have any further comments you wish to make, please detail them below.

SPEAKING FOR MYSELF, WIFE AND MANY RESIDENTS ON [REDACTED] WHO MOVED INTO CAENE FROM; CHILPENHAM, SURREY, NORTHAMPTON, LONDON, MOST OF US WERE NOT CAENE RESIDENTS. THIS REDROW ESTATE WAS PARTICULARLY ATTRACTIVE DUE TO ITS BEAUTIFUL SURROUNDINGS AND PARK TYPE SETTING. WE ARE ALL VERY CONCERNED WITH THE POTENTIAL DESTRUCTION OF TREES, WILDLIFE AND NATURAL HABITATS WHICH WOULD ENSUE BY DEVELOPMENT OF SITE 6, ROOKERY FARM (IT IS ONE OF THE ONLY FARMS ACTUALLY NAMED AFTER A SPECIES) - FOR A REASON - THE ROOKS, KITES, OWLS, NEWTS, BATS HAVE OCCUPIED THE

CALNE118a

Calne Without Parish Council

Station House, Black Dog, Calne, Wiltshire SN11 0LU
Email: clerk@calnewwithout-pc.gov.uk Tel. [REDACTED]

Spatial Planning
Wiltshire Council

By email spatialplanningpolicy@wiltshire.gov.uk

8th March 2021

Dear [REDACTED]

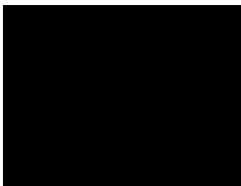
Wiltshire Local Plan Consultation

Please find attached the response of Calne Without Parish Council to the consultation on the Wiltshire Local Plan. These are the views of the Council taken on the information available to it at the time and with a severely restricted ability to consult with the local community.

The Council would also like to draw your attention to its concerns over the consultation process being carried out during a period of national lockdown.

Many members of the public have expressed difficulties in finding the appropriate section of the Council website where they can access the documentation and in taking an active part in the presentations. Those who do not have internet access or limited ability to use it have not been told about the consultation, have not been able to read the draft plan or take part in the presentations.

Yours sincerely,

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CALNE118b

CALNE WITHOUT PARISH COUNCIL RESPONSE TO WILTSHIRE LOCAL PLAN CONSULTATION

8th March 2021

1. Calne Without Parish Council is grateful for the opportunity to respond to the consultation initiated by Wiltshire Council initiated on 13th January 2021 about the Wiltshire Local Plan. These comments represent the views of the current Parish Council and could be subject to change following the election of a new Council in May 2021 and the emergence of further details as outlined in the next steps section of the consultation documents.
2. The requirement to provide comments by 9th March 2021, is a relatively short period of consultation for such significant and wide-ranging proposals with major implications for our area and residents. The very limited time and Covid restrictions has constrained our ability to consult widely within the Calne Without Parish community. This must therefore detract from the whole process and call into question the efficacy of the consultation process and the associated timetable. We are concerned that it does not meet the statutory requirements for consultation on a Local Plan, particularly in respect of publicity, notification and access for those with limited or no capability to participate through online media.
3. Notwithstanding our concerns about the process, which we are aware has been formally questioned, we acknowledge that this is a first stage in the process and that Wiltshire Council will review the emerging strategy in the light of all the comments that it receives to the consultation and that proposals could therefore change.
4. The commitment to draft and finalise place shaping priorities for each main settlement in consultation with the relevant Town and Parish Councils and that these will help to shape the form and location of development proposals in the draft plan is welcomed. The further consultation at the end of 2022 will allow this Council to engage further with its' community on the emerging proposals and modify, if appropriate, its response. Adequate time should be allowed for appropriate community consultation.
5. We consider the pledge to undertake further sustainability appraisals to develop effective mitigation measures to ensure the most benefits possible from the development of each site to be a key component of further work. As is the commitment to ensure they are delivered properly coordinated with the infrastructure necessary to support them. Assuming that infrastructure is considered in the broadest sense.
6. We recognise that this consultation (January 2021) requires responses to some specific questions, and these are addressed below. However, we would wish to offer some general comments as an introduction to each component.

SPATIAL STRATEGY

7. In considering the Spatial Strategy Calne Without Parish Council recognises the continuing requirement for housing and the need to plan for growth across Wiltshire as well as elsewhere in the country. As a rural based Parish, we welcome the commitment in the Spatial Strategy that the focus on development will continue to be on protecting the countryside and to only pursue development to meet local needs (para 1.3). We also welcome the statement that it is a priority to re-use previously developed land to limit countryside loss (para 1.4).
8. The Council also welcomes the delivery principle (4) that each community will be encouraged to determine for itself where additional development takes place. This is a welcome improvement. We also support the principle that consideration should be given to how Town Centres might be better used in future; a potentially underutilised resource for housing that could help regenerate areas where there is limited life beyond normal working hours.
9. To some degree the emphasis on housing detracts from other, equally important factors that are not given due priority. For example, the focus appears to be on how much should towns and villages grow and potential development sites, but with little regard for sustainable job creation and community development. Focusing on headline house building numbers and but not building a sense of cohesive community. Building many hundreds of very similar dormitory houses for people who work, shop, seek entertainment etc outside their immediate area does not help the people who live within that community. It just increases the volume of commuter traffic and vans delivering goods of all description from outside the area to isolated individuals and families who have no stake in their local communities and have no encouragement to be part of it.
10. The vague allocation of 'employment land' is insufficient; it emphasises a key component missing from the Local Plan to address the employment needs and an associated Industrial Strategy aimed at identifying which industries the county wishes to attract, how this will be achieved and how it ties into proposed housing development. If the aim is to minimise commuting, there should be a correlation between job creation and house building; one should not proceed without the other. This just results in speculative development. There needs to be clear incentives – on a risk and reward basis – for all developers to aid job creation. A key factor in this should be the necessary investment in the appropriate technological infrastructure for job creation.
11. A major omission is the inclusion of any modelling of the likely traffic impacts of the proposed developments across the county, within the immediate vicinity but just as importantly more broadly. There have been too many instances when this had been ignored or not planned for and the laws of unintended consequences result in congestion and rat running, blighting small villages and communities not associated with the original development proposals.

12. The challenges associated with meeting the ambitious target to make the county of Wiltshire carbon neutral by 2030 are not be underestimated. It is encouraging that the Local Plan is seeking to address climate change and biodiversity net gain. However, the concern of this council is a lack of coherence between the ambitious nature of measures to deliver the change necessary to address climate change and improve biodiversity whilst planning for significant urban growth and loss of countryside. We will monitor very carefully how these two elements develop in the next iterations but at present there appears to be a fundamental disconnect between the scale of development and the changes being sought to deliver improvements.

EMPOWERING LOCAL COMMUNITIES

13. As a predominantly rural parish this element of the plan has greater relevance to Calne Without Parish Council. Nevertheless, as the Parish is adjacent to both Chippenham and Calne the proposals for their development also have a significant impact on the Parish and are also of relevance for our communities.

14. Calne Without Parish Council is encouraged by the commitment in the proposals to empower local communities by establishing a scale of development to provide certainty whilst allowing those communities to allocate the land they want to see built on (9).

15. Involving the community in assessing Rural Housing Needs and providing the necessary support to conduct surveys to support this is a positive initiative. It is particularly important that such surveys address the broad interests of the community to ensure all housing needs are met – particularly those that provide accommodation for locally employed people, i.e. within the boundaries of the community as well as other sectors including entry level, elderly, key workers and sheltered accommodation.

16. The Council wishes to challenge the proposed housing allocation of 80 houses for Derry Hill and Studley, a 13% increase, identified at Table 2.4 (Chippenham HMA Large Village indicative housing requirements). This appears to be excessive and not meet the criteria of the overall spatial strategy of protecting the countryside and satisfying local needs; there has been no survey to demonstrate what these local needs are.

17. The proposed allocation of 80 houses is amongst the highest in Wiltshire and ignores the major constraint to the village being centred on a heavily trafficked crossroads. The main access road to the village is already operating at 120% of capacity with the resultant delays, congestion, safety issues with 'rat running' traffic levels recorded of up to 65%. There is no scope to address these problems and the consultation document makes no reference to these issues. There has been significant growth in Derry Hill and Studley over recent years of more than 100 residences. There should be a period of consolidation for these to be absorbed, particularly given the potential impact of the "Future Chippenham" proposals which could involve significant

development only a short distance along the A4.

18. A minimum allocation of 60 houses, much of which has already been met by the recently completed development at Studley Gardens, would still represent a 10% growth. But the residual part of such an allocation (minimum 4 houses) would be manageable within the existing boundaries of Derry Hill and Studley if we were, with appropriate community consultation, to develop a plan to satisfy this through developing gaps within the existing footprints of the villages to maintain the ribbon type nature of these. The commitment of Wiltshire to support such an approach, alongside the recognition of a need to protect the countryside through the core policy of developing existing sites within settlement boundaries is helpful in this regard.
19. Responses have been invited to a series of specific questions. The responses of Calne Without Parish Council are set out below:
 - a. *Do you agree there should be a target of 40% affordable homes on all new schemes or more of five dwellings? What other approaches might there be (Page 5)?*

In responding we make the assumption that the definition applied to affordable homes is the standard government definition: **Affordable housing** is social rented, **affordable** rented and intermediate **housing**, provided to eligible households whose needs are not met by the market. Eligibility is determined by local incomes and local house prices.

The council supports the target of 40% (or 2 in 5) affordable homes on all new schemes or more of five dwellings. The council is particularly keen to ensure adequate housing is available to long standing residents and their families, particularly where they are employed locally and have no need of significant travel to work.

- b. *Do you think this approach (Page 5)– one policy and one point of reference for assessing planning proposals to meet local housing needs and potentially limiting development rights on smaller properties – is worth pursuing? What local evidence would be needed to justify applying restrictions like these.*

Simplifying and standardising the approach to assessing planning proposals for rural communities would be helpful as long as standards are maintained, and these are applied consistently. Should it be decided to apply restrictions on the expansion of small homes, consistent application of the rules would be required. It could encourage perverse behaviours where an expanding family employed within the community is forced to leave to meet their housing need and then commute back for work. This does not seem particularly sustainable.

- c. **Core Policy 44** (Page 6): *Do you agree with the approach set out in the suggested revised Core Policy 44? If not, why not? How could it be improved?*

The revised Core Policy 44 provides a good basis for the provision of Community Led Housing and designating Rural Exception Sites. One element of concern is bullet iii 'The proposal is within, adjoining or well related to the existing settlement without reliance on travel by car'. How will 'adjoining or well related to' be defined? This requires greater clarity. We support the 'without reliance on travel by car' requirement but suspect this is largely impossible for many rural communities given the poor public transport links.

- d. **New Core Policy** (Page 10): *What do you think to the housing requirements for Local Service Centres and Large Villages? Should requirements be higher or lower? If so which ones and why?*

The only large village within the parish of Calne Without designated for further development is Derry Hill and Studley. We have already commented on the allocation of some 80 dwellings and the incorrect premise on which this allocation has been made. A minimum allocation of 60 houses, much of which has already been met by the recently completed development at Studley Gardens, may be justified subject to clarification about the calculation of the needs based on the criteria to minimise environmental impact, reliance on commuting and satisfy the housing needs of those employed. Should the requirement be confirmed as justified the revised core policy does appear to provide a suitable basis for satisfying housing requirements. In particular, small sites within settlement boundaries would assist in retaining the character and style of the existing villages.

PLANNING FOR CALNE AND SITE SELECTION

20. Calne Without Parish encircles Calne and is keenly aware that any expansion to the boundaries of Calne will impact the Parish. It is for Calne Town Council to provide detailed responses to the questions asked about the potential development of Calne within the existing boundaries. A key concern of this council is that any growth should be sustainable and have minimal impact on the surrounding rural communities. To that end we would expect any further housing development to be supported by a comparable amount of employment land and opportunities to minimise, and ideally reduce, the significant levels of commuting that result from dormitory developments as is currently the case. Commuting has a major impact on the surrounding environment through ever increasing traffic. A significant omission is any credible modelling of the likely traffic impact of the proposed developments, not only in the immediate vicinity but more broadly.
21. There may be scope for some well-designed, very small-scale developments in the smaller villages. Many small villages lost housing stock in the last century, and there are potential brownfield sites where houses used to be located which could be

considered for development again. Any infill development in the small villages should be well designed and also of a size to meet local needs, smaller houses to tempt the children of villagers to stay within the community, ideally within easy reach of employment.

22. The site selection shows little consideration of how the proposed extra houses will fit into the whole. Some of the sites mentioned in Calne may have some merit as they pull together existing randomly positioned housing developments into something that looks more cohesive. But the work needs to be done through the Calne/Calne Without neighbourhood plan refresh before any firm proposals are made.
23. As mentioned in our views on the spatial strategy houses on their own are detrimental to a local area without associated employment opportunities and infrastructure, not limited to roads. There must be a clear deliverable plan to provide key components on community development with facilities and spaces to provide social development and interaction for both children and adults. As well as the key components for communication and the ability to support work from home e.g. 5G mobile services and very fast broadband services.
24. Air quality linked to traffic congestion, is an issue in Calne, which is somewhat counter-intuitive given its rural surroundings. Traffic volumes in the rural communities that are used more and more as 'rat-runs' is also an issue. Building more houses in and around Calne, including thousands in nearby Chippenham and Melksham will only add to the problem. If more road infrastructure is considered an answer to the problem, which it is difficult to accept given the associated environmental issues, and no evidence that more roads reduce congestion it should not come at the expense of more houses to pay for it.
25. The consultation document suggests (point 17) – "In Calne, the Town and Parish Councils may also be able to progress higher growth options through the neighbourhood plan that have local community support, for example, to deliver specific types of infrastructure". We consider that no decision on this should be made until the new version of the neighbourhood plan has been completed.
26. In terms of the specific questions related to Calne, Calne Without Parish Council would offer the following:

CA1 (Page 4) What do you think to this scale of growth? Should there be a brownfield target? Should it be higher or lower?

The scale of growth needs to be matched to deliverable employment opportunities underpinned by an Industrial Strategy to ensure coherence and evidence to support any proposed development. We agree there should be a brownfield target, ideally identified through the neighbourhood plan.

CA2 (Page 5). *Are these the right priorities? What priorities are missing? How might these place shaping priorities be achieved?*

The priorities should be determined in the neighbourhood plan. All of the items proposed seem relevant and should be included with the addition of technology infrastructure. Calne Town Centre development should be driven by deliverable funded plans.

CA3 (Page 6) *Is this the right pool of potential development sites?*

Not necessarily, the planned update of the local neighbourhood plan should not be tied by these sites. The target of 360 houses, if agreed, should be fed into the neighbourhood plan production process and the sites evaluated as part of this.

CA4 (Page 6) *What land do you think is the most appropriate upon which to build? What type and form of development should be brought forward at the town?*

It would seem appropriate to examine the feasibility of joining together the fragmented development that has already occurred expanding in new areas. In the villages very small-scale developments should be considered on the sites where housing used to be. Focus should be made on job creation in Calne and the villages before houses are built. The houses should be of a design that we will be proud of in the future. The houses should be of a size that local young families can afford. The county has aspirations to build and promote tourism based on existing heritage and wonderful countryside, this will not be achieved by having tightly packed villages and towns full of houses with no local character or distinction. Design considerations will be very important.

CA5 (page 6) *Are there important social, economic or environmental factors you think we have missed that need to be considered generally or in respect of individual sites?*

Yes. Calne and the surrounding villages are largely dormitories. Through the Local Plan we must develop the infrastructure, facilities and environment to encourage people to live, work and play where they live. We need to ensure that the technological infrastructure supports the development of industries that can exploit this and supports effective home working – both home-based businesses and working from home for a larger business; a likely post Covid norm. Environmental factors applied to house building techniques must be a key requirement and incentive, if we are to advance the carbon neutral agenda.

CA6 (Page 9) Are there any issues or infrastructure requirements that should be identified?

Although the report suggests adequate infrastructure exists or is planned to satisfy any development requirements in terms of education, health and leisure this council has concerns that it will not meet all the needs for the expansions planned.

A major omission is consideration of the impact on roads and the highway network, not just adjacent to the proposed developments but more broadly. This must be modelled so that key risks and issues can be identified, and mitigations planned and budgeted for so that delivery is coherent and sustainable.

PLANNING FOR CHIPPENHAM AND SITE SELECTION

27. The proposed significant expansion of Chippenham and the creation of a new suburb (Site 1 and to some degree Site 2) to the east and south east is a concern to Calne Without Parish Council given the inevitable impact on our communities from the resultant increase in traffic, loss of countryside and the associated habitat. The developments will create an urban sprawl reducing the delineation between the villages of Derry Hill, Studley and Chippenham which, when considered alongside the proposed Solar Farm at Forest Gate, will be reduced further resulting in Derry Hill and Studley becoming suburbs for an expanded Chippenham.
28. The proposed expansion of Chippenham and allocation of houses is far in excess of the requirement. Wiltshire Council has voluntarily increased its own baseline target for housing growth by nearly 5000 homes, many of which appear to be proposed for Chippenham. There needs to be greater clarity of the reasoning behind such a significant expansion; particularly given it will require infrastructure investment and need to attract major employment opportunities if the goal of encouraging people to live close to employment is to be realised, a major factor in reducing commuting and providing environmental benefits.
29. Answers to the specific questions arising from the consultation are set out below:

CP1 (Page 5) What do you think to this scale of growth? Should there be a brownfield target? Should they be higher or lower?

The scale of growth appears disproportionate to the requirement and appears to run counter to a strategy of providing housing to match employment to ensure the majority of the local population live where they work. This is clearly not the case and the allocation of land for employment within proposed developments will not meet this core requirement. The brownfield site target should be higher, ensuring brownfield land supply is exhausted before green field sites are considered.

CP2 (Page 6) Are these the right priorities? What priorities are missing? How might these place shaping priorities be achieved?

To a large degree yes. Development to provide new employment to redress the existing levels of net out-commuting must be the key priority before considering additional housing and this is supported. Although counter intuitive to the proposed expansion, improving access to Chippenham Railway Station and Cocklebury Road should be a priority to complement the proposed improvements and attract further investment in a location close to the Town Centre.

There is little evidence that linking the A4 to the A350 will provide a more resilient local network to address traffic congestion. The proposed link or distributor road (which this council does not support) will do nothing to stop those with local knowledge seeking to use the most direct routes through the town.

New roads increase traffic and do not decrease it. There is published evidence that new roads create more traffic rather than reducing congestion. In 1994 the Standing Advisory Committee on Trunk Road Assessment showed that average traffic flow on 151 improved roads was 10.4% higher than forecast and 16.4% higher than forecast on the 85 adjacent routes that the improvements had been intended to relieve. In a dozen more cases the increase in traffic ranged from 9% to 44% in the short run and 20% to 178% in the longer run. The conclusion was: 'An average road improvement...will see an additional 10% of base traffic in the short term and 20% in the long term'. This has been accepted by the Department of Transport and other reports from elsewhere have demonstrated similar results. Furthermore, studies of bypasses such as that in Newbury have shown that reductions in town centre traffic levels were less than originally forecast and the subsequent regrowth in traffic levels on the bypassed roads and the new road resulted in a considerable overall increase in traffic.

Any suggestion the proposed link road will reduce congestion is wrong and the opposite has been shown to be the case. As the consultation document makes clear, these houses will be marketed at people working along the M4 corridor and, as the stated aim of the road is to ease access to the M4, then it is obvious that the Council intends to increase traffic on this and surrounding roads as the residents' travel to their jobs; in direct conflict with the spatial strategy suggesting homes should be close to places of work. If any of the residents of the new houses wish to use the train to get to work then they will have to drive into town because many of these houses, especially in the south of the development, will be too far from the station to walk or cycle, particularly in our inclement climate. Thus, congestion in the town centre and especially on Station Hill/Cocklebury Road will be made worse.

CP3 (Page 7) Do you agree these sites are most appropriate upon which to build? If not, why not?

Calne Without Parish Council is concerned about Site 1 and to a degree Site 2 given both border the parish. We do not agree they are the most appropriate on which to build. The developments will create an urban sprawl reducing the delineation between the villages of Derry Hill, Studley and Chippenham which, when considered alongside the proposed Solar Farm at Forest Gate, will be reduced further resulting in Derry Hill and Studley becoming suburbs for an expanded Chippenham.

The site selection report acknowledges for both Site 1 and Site the proposed developments will impact the landscape setting of Derry Hill, we would contend that this would also apply to Studley for Site 1 and to the Pewsham Ward of Calne Without for Site 2.

Further arguments against the selection of these sites relate to loss of productive farmland at a time when we need to be focusing on improving sustainability, the environmental implications associated with such a major development and the loss of green space and the access to this.

Removing such a large amount of productive farmland reduces our capacity for sustainability in the light of the increasing requirement for domestic production of foodstuffs. There is an increasing desire for more UK produced rather than imported produce to reduce the reliance on imports and support a more sustainable environment; something that should contribute to the climate emergency declared by Wiltshire Council. Furthermore, there is still a lack of clarity on the effect that Brexit may have on imports and food security which may result in a requirement to increase UK food production.

A housing development on the scale proposed at Site 1 and Site 2 will also have a catastrophic effect on wildlife as habitats that will be totally lost – the plans make little or no provision for the retention of these or to ensure sustainability of the existing flora, fauna, pollinators or wildlife. There is little evidence that this has been considered in any detail. There are no clear plans for re-wilding or wildlife corridors.

The construction of a new town on this scale will have a massive effect on the water table. Water will not be able to soak into the farmland and will therefore exacerbate the flooding along Maud Heath's Causeway and at Langley Burrell. The flooding that occurs with increasing frequency at Westmead will worsen and is likely to be more far-reaching along the River Avon by this development, which it must be assumed will act as a surface water drain. In addition to causing additional flood risk to Chippenham the downstream impact for the proposed developments beyond Rowden and to the existing settlements at Reybridge, Lacock and Melksham is likely to be significant without major investment in flood defences and management.

A further concern with Site 1 is the impact on the Marden River Valley. The open character of the landscape and strong association with the rivers and floodplain are important characteristics to safeguard. Development in this area will reduce the separation between Tytherton Lucas and Chippenham and reduce its remote and tranquil character. In addition, development, as acknowledged in the consultation documents, would be visually prominent from surrounding high ground and will make this edge of Chippenham considerably more notable in the surrounding countryside. The options which broach the North Wiltshire Rivers Route have a higher potential to reduce separation between Chippenham and Tytherton Lucas.

The Marden River Valley can only be accessed from a public footpath and is an undisturbed site for a number of important species of mammals, birds, aquatic life, flora and fauna. It has been identified as a priority habitat in the Wiltshire and Swindon Bio-diversity action plan, protection also supported by Core Policy 50 Biodiversity and Geodiversity in the Wiltshire Core Strategy.

In addition to the loss of farmland, habitat and the increased flood risk the environmental impact of building so many new homes and the associated infrastructure will be significant, further undermining Wiltshire Council's effort to be carbon neutral by 2030. A new build home will release an average of 43 tonnes of CO₂e into the atmosphere, so the development at Site 1 would release over 300,000 tonnes of CO₂e into the environment which we would require 645 hectares of woodlands to absorb before the homes are even occupied. The effect of building on this scale could only be mitigated by ensuring that only the most environmentally friendly and insulating construction materials were used and that every house had solar panels and heat pumps. There is nothing in the plans about offsetting the carbon implications.

Covid 19 has shown how important green spaces are for our mental and physical health. People taking their daily exercise along the Sustrans cycle route and the Wilts & Berks Canal will find themselves not walking through a green space where the only sounds are those of the natural world but will find themselves walking under concrete flyovers with the resultant effects of air pollution, noise pollution, litter and dark water run-off. The views that users of these amenities will see once this development is completed will not be woodland and fields but congested roads and houses.

CP4 (Page 7) What are the most important aspects to consider if these sites are going to be built on?

The question starts with the premise that the sites will be built on. If that is the case, why is this being presented as a consultation?

The response provided to CP2 and CP3 set out the concerns of Calne Without Parish Council and identifies key considerations: the impact of the proposed

new link roads that will not reduce traffic, the loss of productive farmland, the environmental impact including loss of habitat and flooding, loss of amenity space, the impact on the delineation between Derry Hill, Studley, Pewsham and Chippenham resulting in a continuous urban sprawl.

Traffic is a key consideration. The consultation provides no evidence of the amount traffic generated by the proposed developments its distribution and assignment to routes in the network. It is not clear what traffic flows will be anywhere on the network or whether the wider area east of Chippenham including Calne has even been modelled in any detail. This is of huge concern to Calne Without Parish Council; there should be detailed information on the impact on the parish and the town of Calne where traffic conditions and air quality are poor. It should be remembered that Derry Hill and Studley are much nearer the proposed distributor road and the associated developments than Chippenham town centre and there are already have major capacity issues at Studley Crossroads.

A proposed development of 7500 houses, 1m square feet of employment provision and a major distributor road connecting to the A350 to both the north and south, will inevitably generate high levels of new traffic and attract rerouting of existing traffic to the A4 though Calne and our parish. The main junctions in Calne and on the A4 west of the town are already congested and operating close to or at their capacity. An example is Studley Crossroads where a relatively small development of 53 houses on the Studley side of the crossroads and which generated relatively low additional traffic movements on the Derry Hill side caused there to be significant queues and delays of over 8 minutes. The developers own traffic consultant showed that peak hour traffic flow on the Derry Hill arm of the junction is 120% of the capacity. This already exceeds all the junctions in Chippenham that have been analysed as part of the consultation and yet Studley Crossroads has not been considered. This and is a major omission for a junction so close to the proposed distributor road and a 7500-house development. Studley Crossroads already has traffic flows on the A4 of 16000 vehicles a day, any increase in A4 flows will reduce the ability of Derry Hill traffic to turn into the A4 with delays increasing exponentially.

These traffic issues and the impact of the development and new road on Studley Crossroads, Curzon St, Silver St in Calne and Sandy Lane must be analysed and properly considered as part of the consultation. Without this information the proposals should be rejected and not deferred to a later stage to consider mitigating measures. Mitigating improvements are likely to be considered and rejected as impractical or prohibitively expensive. Studley Crossroads for example has been developed on all sides so there is very little room for improvement and as mentioned earlier is now a major rat run for drivers avoiding congestion on the A3102 in Calne. The only factor suppressing demand for greater use the route as a rat run is the current difficulty in turning right onto the A4. Any improvement in capacity on the

Derry Hill arm at Studley Crossroads will attract a corresponding increase in rat running traffic to an unsuitable route with environmental and safety issues. Any delays introduced to the currently free flowing A4 traffic will create unacceptable noise and air pollution problems close to the new residential developments at Studley Gardens and Chapel Street.

Developments of the scale proposed require much more detailed examination of the wider area affected which must include Calne Without Parish, Bremhill Parish and Calne town centre and the area between Calne and Chippenham, including from the A3102 through Sandy Lane.

CP5 (Page 19) How can these concepts be improved?

Addressing Sites 1 and 2 and whilst in no way accepting the premise that development should go ahead for the reasons stated in response to questions CP2, CP3 and CP4. Constraining the development to be contained within a boundary created by the proposed link or distributor road would provide a natural boundary – as long as there was a long-term commitment to protect the land outside this boundary from further development – for say 50 years. In addition, the concepts should include further environmental mitigations through the planting of copses, the provision of wildlife corridors and re-wilding some of the area.

There must a comprehensive review of the traffic implications and a fully funded mitigation strategy developed to ensure there is no adverse impact on surrounding communities and roads.

CP6 (Page 19) Do you agree with the range of uses proposed, what other uses should be considered?

The land designated for employment seems inadequate to address the principal of providing housing to match employment to ensure the majority of the local population live where they work. It would seem most appropriate to locate employment land close to the A350 to allow ease of access to the M4 and reduce distributor road traffic given the proposed road is single carriageway, with many junctions and with speed restricted, potentially as low as 20mph in some sections.

CP7 (Page 19) Do you agree with the location of the proposed uses? What should be located where and why?

See the response to CP6.

CP8 (Page 19) Do you agree with the location and amount of employment provided on Sites 1 and 2?

No. See the response to CP6.

CP9 (Page 19) Do you agree with the proposed locations for self-build and custom build housing? Would you prefer alternative locations?

We have no view on the proposed locations but assume this is underpinned by research, which is not present in the consultation, that these would be desirable and marketable sites for such initiatives. It is surprising that the pockets are quite limited. Although for Site 1 these fall outside this council's suggestion for the boundary of development.

It is surprising there is no ambition stated to encourage the use of land in villages for self-build homes – particularly where this may encourage locally employed families to build close to places of work.

CP10 (Page 19) Do you agree with the proposed sites for renewable energy? Is there a particular type of renewable energy that should be provided?

The sites seem limited in size and scale when compared to the proposal currently being suggested for Forest Gate at Pewsham. Based on what this council has been advised about the Forest Gate site the proposed sites would not appear to be commercially viable. There is also the question of proximity to housing developments. We have sought, but not been provided with, details about such sites close to residential developments in connection with Forest Gate. We assume Wiltshire Council has looked at this for the proposed developments at Site 1 and Site 2. Whilst in principal provision for renewable energy must be considered a positive proposal, it is difficult to comment on the type.

CP11 (Page 19) Site 1 Do you agree with the proposal for some housing to be located north of the North Rivers cycle path?

No. Calne Without Parish Council is not in favour of the proposed development at Site 1 and Site 2. If it were to proceed, we would wish it constrained by the proposed link/distributor road and also not north of the existing cycle route.

Furthermore, the unspoilt countryside between the North Rivers cycle path and the River Marden is protected in the Bremhill Neighbourhood Plan. In 2020 over 5,000 people objected to the potential closure to the cycle path demonstrating that it is a much-appreciated asset by the existing inhabitants of Chippenham for access to the countryside. The proposals would have development on both sides and a road crossing it, as well as destroying the countryside that people access around it.

CP12 (Page 19) Site 1 – Are there any uses that would be most suitable for Hardens Farm and New Leazes Farm?

Calne Without Parish Council starts from the position that it is opposed to the loss of productive farmland and the associated infrastructure. Re-wilding might be a potential proposition.

CP13 (Page 19) Is there anything we have missed that needs to be considered in planning for Chippenham.

As highlighted in comments on the spatial strategy there is a lack of balance between house numbers and industrial strategy to create employment opportunities to ensure any development is sustainable.

ADDRESSING CLIMATE CHANGE AND BIODIVERSITY NET GAIN

30. Calne Without Parish Council acknowledges the challenges arising from climate change and is supportive of the Wiltshire Council initiative to make the county of Wiltshire carbon neutral by 2030. But this support assumes this must be delivered through sustainable development designed to tackle and adapt to and mitigate the effects of our changing climate, whilst ensuring our communities are desirable and safe places to live and work.

31. Answers to the specific questions arising from the consultation are set out below:

A1 (Page 9) Land-use policies need to be evidence based, realistic viable and achievable. Is it reasonable to assume that the Local Plan can deliver outcomes that significantly reverse existing carbon trends before 2030?

Not based on the scale and scope of development plans proposed. It is a sound assumption and reasonable to expect carbon reduction outcomes that are deliverable, given sustainable growth in the right locations. In fact, it is a requirement of planning legislation and the National Planning Policy Framework (NPPF) that local plans are aligned with the Climate Change Act and the Government's net zero carbon by 2050, and 68% reduction (on a 1990 emissions baseline) by 2030, national target. This is a clear legal duty under Section 19 of the 2004 Planning and Compulsory Purchase Act, as amended by the 2008 Planning Act, requiring that, taken as whole, Local Plan policy contributes to the mitigation of, and adaptation to, climate change. In other words, Wiltshire's Local Plan not only has to 'deliver outcomes that significantly reverse existing carbon emission trends before 2030' but needs to, as a minimum), align and demonstrate this alignment with these national targets.

A2 (Page 9) What practical and achievable steps should the Local Plan take to significantly reduce carbon emissions by 2030?

The plan should be employment led to radically reduce the need for additional commuting. This would mean abandoning the policy of unsustainable growth that simply attracts relocation from along the M3, M4

and A350 corridors, with its associated dependency on commuting. It would mean housing numbers that genuinely meet local need and are linked to local employment opportunities, so that more people can live near their place of employment without the necessity to commute long distances.

A plan with lower, sustainable housing numbers would not require the kind of extensive road infrastructure being proposed for example, in Chippenham with extended river crossings (up to 0.5km long each) across a flood plain, and bridges over the Wilts-Berks canal, all of which would have a huge associated carbon footprint. Neither would there be the need for extensive destruction of land that acts as a carbon sink, which would release huge quantities of carbon and remove the potential to capture carbon in future. Nor would the Plan thereby embed vast quantities of emissions for years to come as a result of the commuting that will inevitably result, as has happened with previous urban expansion, causing the current level of congestion and tailpipe emissions.

Appropriate and sustainable housing numbers supported by investment in attracting suitable employers, bringing skilled jobs into the area, will have the effect of reducing commuting and private car dependency

Any new housing and industrial development must be designed and constructed in compliance with the highest sustainable and environmental standards, and these must be enforced to ensure there are no emissions and potentially negative emissions, associated with all spatial development, which will have the added benefit of removing the need for costly retrofit later. This is likely to require the installation of heat exchange pumps, solar power generation capability coupled with efficient insulation.

Existing housing stock should be brought to a zero-carbon standard by providing financial incentives to encourage the installation of heat exchange pumps, solar power and insulation.

The reliance on use of carbon fuelled vehicles must be reduced, possibly by use of road pricing at peak times, and using the revenue to invest in low-cost sustainable public transport options with the necessary links and frequency that ensure high volume use. There should be major investment in the infrastructure necessary for charging of electric vehicles, which might attract a road pricing discount.

In short, to deliver outcomes that significantly reverse existing carbon emission trends, the planners need to radically change their approach to carbon fuelled vehicle dependency and ensure future development does not increase, and ultimately reduces carbon emissions (e.g. through renewable energy generation and carbon sequestration).

There is plenty of evidence for the viability of Local Plan net zero carbon or 'carbon neutral' development policies in other Local Authority plans that have adopted or are in the final stages of development and adoption.

Despite the intention outlined in the plan to address climate change and biodiversity, and the Climate Emergency declaration in which the Council commits to seek to decarbonise the county, the Local Plan proposals would substantially increase the county's carbon emissions and lock in emissions for years to come (i.e. precisely the opposite of the intention).

A3 (Page 9) How should these actions be delivered and measured?

See A2 – The Local Plan should include an industrial strategy to identify and attract suitable employment to minimise the requirements for commuting.

For any development the plan must provide sufficient incentives and controls to ensure developers deliver any new buildings (domestic and industrial) to the required zero carbon standards. Similarly, there will need to be appropriate incentives to motivate the community to switch to electric powered vehicles, with appropriate infrastructure providing convenient and accessible charging points. It may be necessary to make arrangements for the disposal of petrol/diesel vehicles at no cost to the public.

Support and incentives should be provided to help people convert existing buildings to be carbon neutral by installing heat exchange pumps, solar panels, efficient insulation and charging points. A review should be undertaken of current public transport (buses) to ensure rural communities can enjoy regular and reliable electric powered buses.

Carbon emissions should be measured widely by placing monitors in appropriate locations; with the readings regularly published so that the community is able to monitor the impact of the measures being introduced. Similarly, home-owners and tenants should be provided with means of monitoring carbon emissions; possibly using similar technology to that employed by Smart Meters to enable ease of collection and publication.

B1 (Page 16) If we are to successfully tackle flood risk and promote sustainable water management, would the measures set out above go far enough?

There must be a concern about committing to building in Flood Zone 1, even with flood resilient design methods. Is it practical to expect people to commit to purchase properties where a flood risk exists, or will the council be providing insurance to cover this risk that may not be available commercially at reasonable prices?

Flood risk will be exacerbated by projected climate change and whilst flood risk may be mitigatable for some sites, building on these sites can increase the risk elsewhere. It is therefore better to avoid building on low-lying land adjacent to existing flood plains (e.g. Site 1 to the East of Chippenham) in order to reduce the risk of future downstream flooding (e.g. of Chippenham and other communities such as Melksham, Bradford-on-Avon and Bath).

All new development must incorporate Sustainable Drainage Systems – where this is not technically feasible it should not be allowed to proceed, thus ensuring water run-off is fully managed. Providing a loophole for developers to claim a solution is not technically feasible is a licence for avoidance.

B2 (Page 16) If we are to successfully enhance our natural capital through place shaping and nature-based solutions, would the measures set out above go far enough?

This is a reasonable statement of ambition, but the question appears to be based on a false premise since natural capital would generally not be enhanced by any proposed development, and would be spectacularly damaged by siting development, for example to the East of Chippenham in the Avon and Marden valley.

Any measures to incorporate ‘nature’ within the proposed urban conurbations would be tokenistic relative to the loss of natural capital caused. It is also far from clear what Wiltshire Council’s Blue and Green Infrastructure Strategy is, or the nature-based solutions mentioned under Policy Theme 2 would actually comprise of, apart from statements about benefiting carbon sequestration, air quality improvements, passive cooling, health and wellbeing and biodiversity enhancement, which are precisely what the proposed development would destroy.

Final judgment should be reserved until the Green Blue Infrastructure (GBI) strategy is published.

B3 (Page 17) If we are to successfully plan for net zero carbon future through sustainable design and construction, would the measures set out above go far enough?

The measures are a reasonable baseline. However, there must be concern about the statement that ‘...standards would need to be clear, easily implemented and not put at risk the viability of the development’. This appears to be a charter for avoidance and an obvious loophole for developers to exploit. If it is not viable to build sustainable homes that have zero impact, planning should not be approved.

Furthermore, successfully enhancing natural capital requires it isn't destroyed in the first place. Hence the need to avoid building on valuable habitats and carbon sinks, such as the land to the East of Chippenham. High quality pasture and river valleys are finite and irreplaceable, and need to be protected and enhanced in their current state.

An estimate of the carbon emissions and the natural capital loss associated with the proposed sites would be a good starting point in being transparent about the damage to the climate and environment that would result.

A key omission is any clarity on how support might be afforded to low-income households who are unable to convert existing dwellings to achieve a zero-carbon rating. This issue is likely to be accentuated as a result of the current pandemic and the consequences for many low-income households.

B4 (Page 17) *Is the move to a position where all new development is rated as zero carbon achievable from the date the Local Plan is adopted (i.e. from 2023)? How might this be achievable and if not, why not?*

Yes. By undertaking viability assessments on strategic sites as part of the revised Plan, as is now required, the viability of proposed development will be clear from the outset and developers will price any additional costs associated with compliance with zero carbon standards into their land purchase. Once a clear policy has been set, the additional costs of carbon neutral development will fall rapidly, as this becomes the standard method of building and developing sites. Government net zero carbon targets require this to happen as soon as possible, and a net zero carbon policy needs to be adopted as soon as possible (i.e. from 2023 at the latest and preferably sooner).

B5 (Page 17) *Would a move to support the delivery of zero carbon new development materially affect scheme viability?*

It should not, the commitment to a carbon neutral environment requires it to be viable, otherwise why make the commitment. Commercial viability, as opposed to social viability, will be dependent on the developers and their appetite for risk and innovation. Potentially, a developer who can deliver to the necessary high standards to achieve a measurable zero-carbon result will be very well placed to secure further work in many locations. It would seem an ideal challenge and business opportunity.

There needs to be a balance between viability and acceptance of the need to change so the focus should be on:

- developing a carbon neutral spatial strategy;
- putting net zero carbon development policy in place;
- actively promoting renewable energy development;

- supporting the transition to ultra low emission vehicles (principally Electric Vehicles).

B6 (Page 17) *In terms of performance standards for new buildings, what method(s) should the Council aim to implement?*

The performance standards should be of the highest order with no compromises. Wiltshire might set itself a stretch target of delivering to standards higher than that dictated by central Government.

Targets might include, retrofit of insulation (including double glazing) and renewable energy generation devices (e.g. solar panels and ground source heat pumps) in conservation areas and listed buildings, subject to other relevant local planning requirements.

B7 (Page 17) *How should the Council support retrofitting and modernisation of existing buildings to achieve higher performance and reduce carbon emissions?*

By the introduction and use of incentivised schemes (cost and risk share). Provision will need to be made to support low-income households to meet the necessary standards.

B8 (Page 18) *If we are to make headway in terms of decarbonising energy production, consumption and emissions, would the measures outlined above go far enough? If not, what are we missing and how would additional measures be delivered?*

This appears to be a relatively challenging list of goals. Wiltshire is a county that could benefit from energy produced by wind generators. This should be considered and researched as a viable alternative energy source. Where new buildings are being planned, they should be incorporating solar tiles in the design stage.

B9 (Page 18) *Should the Council set out policies that favour particular technologies, or should it encourage all technologies to provide green energy for Wiltshire?*

The key must be to encourage and support all technologies that reduce emissions and provide sustainable energy at a reasonable cost i.e. no greater than existing sources.

B10 (Page 18) *Should the Local Plan set targets for the production and use of renewable energy? If so, what might they be and how would they be measured?*

Yes, and these should be consistent with those suggested by the Committee on Climate Change i.e. between 30% and 45% by 2030.

B11 (Page 19) *What steps should be taken to retrofit existing buildings with ultra-low or zero carbon forms of energy production? In particular, how could such technology be incorporated into buildings with sensitive locations such as conservation areas and/or listed buildings?*

There should be support (financial, technical and practical) to retrofit and adapt existing buildings to accommodate ultra-low carbon or zero carbon forms of energy production and use. In conservation areas it may be sensible to look at providing incentives to incorporate such technologies in a sympathetic manner.

In listed buildings considerable care will be needed to ensure the character of the buildings is not changed. In some situations, in Wiltshire listed buildings will be thatched and solar panels will not be an option; so remote and discrete ground siting may be an option or by the use Air and Ground source pumps for heating. In all cases consultation must take place with the owners of older buildings to ensure a sensible and sensitive solution is achieved. Given the unique nature of some small villages in Wiltshire the local community will need to be consulted to ensure they are supportive of changes that could result in a significant change to the character of their community.

B12 (Page 19) *If we are to tackle issues associated with air quality would the measures set out above go far enough and be effective in improving air quality in Wiltshire? If not, what measures are we missing and how should they be framed in land-use planning policy?*

The paper states that “the Council considers that increasing the level of self-containment within Wiltshire’s settlements offers the best solution for tackling unsustainable, carbon-based travel patterns.” It further states that “to achieve this goal, the Local Plan will likely need to set out policies for reducing travel and the use of private carbon fuelled vehicles.”

Despite this, the spatial strategy promotes large urban commuter extensions, requiring climate damaging infrastructure and locking in tailpipe emissions and pollution for many years to come. The spatial strategy also promotes additional air pollution in Chippenham and neighbouring Calne by them becoming dormitory communities for people working in the M4 corridor. A licence to travel and pollute.

A more organic and local employment-led development approach, with supporting policies, would prevent large scale commuting and associated emissions/ air pollution. Sustainable (active and battery enhanced) travel options within sites would reduce the need to use cars for local journeys. Employment development should promote high skilled jobs in order to minimise out-commuting and allow people to live near their place of work.

Policies and incentives to reduce travel e.g. road or congestion charging, and the use of private carbon fuelled travel patterns may help achieve the goal. This should be allied with to a fundamental review of public provision. For many rural communities the bus service has been reduced to an absolute minimum. To support delivery of improved air quality and reliance on individual vehicles this will need to change, with more buses, extra bus routes serviced by a reliable and comfortable zero carbon service at competitive prices. Similarly, careful attention must be given to relieve certain areas of traffic congestion if we are to have any chance of reducing air pollution.

B13 (Page 19) What practical policy steps should the Local Plan take to significantly increase modal shift to public active transport, and speed up the transition to greener fuelled vehicles?

See B12. The provision of an appropriate accessible infrastructure (publicly and within homes) for greener fuelled vehicles coupled with disincentives – road charging for carbon fuelled vehicles.

B14 (Page 19) The electricity grid system may not be able to cope with a rapid take up of electric vehicles and the charging infrastructure needed to power them. What measures should the Council explore with Distribution Network Operators/Distribution Service Operators to resolve this?

All new developments should come with a levy on the developer to provide adequate access to the charging infrastructure necessary to support green vehicles. It should be a condition that no new site can be occupied until the developer has secured sustainable energy supplies to ensure that electric vehicles can be used and charged at that development. This should incentivise the developers to work with the Distribution Network Operators and Distribution Service Operators to provide the necessary supply. The responsibility should not necessarily fall to the council.

B15 (Page 20) If all new development is to be future proof, promote zero carbon production and consumption terms, what impact would this have on the design and viability of schemes?

There needs to be a fundamental re-think. Wiltshire Council needs to:

- develop a genuinely sustainable spatial strategy that is not dependent on commuting;

- take an employment led approach;
- reduce housing numbers to allow for more organic growth that will not cause the substantial harm associated with the current proposed strategy;
- measure the carbon emissions associated with the proposed spatial strategy options and prioritise minimising current and future emissions;
- develop a framework for aligning the Local Plan with the Government's and Wiltshire's carbon reduction targets;
- place proper value on natural capital and account for it in the Plan;
- develop and implement net zero carbon development policies and low carbon, sustainable construction policies;
- develop and implement supportive renewable energy development policies;
- develop and implement supportive Electric Vehicle infrastructure policies;
- develop and implement supportive integrated public transport and active/
- battery assisted travel infrastructure development policies.

In the end the viability of any scheme is a judgment to be made by the developer. The challenge is to ensure that there are sufficient incentives for the developer to meet the zero carbon requirements set by the council that provide a reasonable return for the investment made. It is likely that high environmental and sustainability standards, at least initially, will be more expensive. However, the broader adoption of such standards and new ways of working is likely to drive down costs in the long term. Therefore, the pursuit of the high standards necessary to achieve the Council's environmental and climate change goals should not be compromised in favour immediate results and profit.

CALNE119a

Market Town Consultation Response Form

Ref:

(For official use only)

A series of 'Planning for' documents break down the work undertaken so far for each Principal Settlement and Market Town. Within these documents, information is presented, and questions asked to help shape proposals for each place.

To view these documents please visit the Council's Local Plan Review Consultation page on its website at: <https://www.wiltshire.gov.uk/planning-policy-local-plan-review-consultation>

Please return to Wiltshire Council by Tuesday 9th March 2021.

By post to: Spatial Planning, Economic Development and Planning, Wiltshire Council, County Hall, Bythesea Road, Trowbridge, Wiltshire, BA14 8JN.

By e-mail to: spatialplanningpolicy@wiltshire.gov.uk

This form has two sections:

Section One – Personal details

Section Two – Your response to the questions. Please use a separate sheet for each representation.

Section One – Personal details

*if an agent is appointed, please fill in your Title, Name and Organisation but the full contact details of the agent must be completed.

	1. Personal details	2. Agent's details (if applicable)*
Title		
First name		
Last name		
Job title (where relevant)		
Organisation (where relevant)		
Address Line 1		
Address Line 2		
Address Line 3		
Address Line 4		

Postcode	[REDACTED]	
Telephone Number		
Email Address		

Section Two – Questions

Which Market Town does your response relate to?

Answer:

Calne

1. What do you think to the scale of growth? Should there be a brownfield target? Should it be higher or lower?

Answer:

Given the general absence of land use constraints across much of Wiltshire when compared with adjoining Authorities, the housing targets are only ever likely to increase and therefore a greater focus will need to be placed on continually identifying additional 'windfall' sites which are suitable and achievable.

It is important that recognition is given to the role that existing brownfield sites or previously developed land that lie on the edge of existing settlements may play in assisting in the spatial strategy in delivering on the housing targets set out. 'Windfall' sites represent a significant opportunity across Wiltshire and whilst they are not specifically allocated in the Local Plan, it is right that such allocations are made and ultimately supported by the Council.

The current target of 60 homes over the 10 year period would appear to be quite low given the emphasis that is placed on Brownfield sites over the loss of greenfield land. The target needs to be realistically achievable, but a higher level should be set at this stage in the review process and they should not be restricted to sites located within settlement boundaries as there are sites that are suitable and available that may lie outside of these boundaries that could still play a role in delivering on the targets set by the Council.

We are the owners of a site just to the north of Calne on the Oxford Road which is a Brownfield site and has yet to be recorded on your register. This has the capacity for at least 5 new homes which would meet 8% of the 10 year target immediately.

2. Are these the right priorities? What priorities may be missing? How might these place shaping priorities be achieved?

Answer:

Housing and employment opportunities should remain the key priorities albeit creating sustainable communities must underpin these.

3. Is this the right pool of potential development sites?

Are there any other sites we should be considering?

Answer:

As noted, we are the owners of a brownfield site on land at Woodbine Cottages that is located just to the north of Calne on the Oxford Road. This has yet to be considered as part of the Council's Review or the SHELAA. This can deliver at least 5 new homes and given the approved and planned growth and expansion of the north side of Calne along the Oxford Road, the redevelopment of our site for residential use would be appropriate and would clearly assist in meeting the 'Brownfield' or Windfall targets set out in the emerging strategy.

The Site is considered to be suitable, available and achievable within the next Plan period if not sooner and a concurrent submission under the 'Call for Site' has been prepared to support this.

4. What land do you think is the most appropriate upon which to build?

What type and form of development should be brought forward at the town?

Answer:

As noted, we recognise the pressure to deliver on housing and employment targets whilst protecting greenfield land. Brownfield or previously developed land, even if this is located outside of defined settlement boundaries, should be identified and supported for development.

5. Are there important social, economic or environmental factors you think we've missed that need to be considered generally or in respect of individual sites?

Answer:

N/A

6. Are there any issues or infrastructure requirements that should be identified?

Other than that already identified within the 'Planning for' document?

Answer:

N/A

If you have any further comments you wish to make, please detail them below.

N/A

Future notification

I wish to be notified of any future updates relating to the Local Plan Review:

YES:

Clicking yes will add you to the planning policy contact database. This will mean you are kept informed of any future planning policy updates and consultations.

Further information on how the Spatial Planning Department treats your personally identifiable information can be found by reading the privacy notice available via the link below:

<https://www.wiltshire.gov.uk/planning-privacy-notice>

Here you will also find information about how and why your data may be processed and your rights under the Data Subject Information Notice section further down the page.

Signature:



Date:

07.03.21

Thank you for completing this form.

Data Protection

Wiltshire Council has a duty to protect personal information and will process personal data in accordance with Data Protection legislation. The personal data you provide on this form will only be used for the purpose of the Wiltshire Development Framework. It may also be used for the prevention or detection of fraud or crime and in an anonymised form for statistical purposes. The data will be stored on computer and/or manual files. You have a right to a copy of your information held by any organisation, with some exemptions. To gain access to your personal data held by Wiltshire Council or if you have any Data Protection concerns please contact Wiltshire Council's Data Protection Officer on 01225 713000 (switchboard) or e-mail to dataprotection@wiltshire.gov.uk ."

CALNE119b



Spatial Planning
Economic Development and Planning
Wiltshire Council
County Hall
Bythesea Road
Trowbridge
Wiltshire BA14 8JN

07 March 2021

Dear Sirs

WILTSHIRE LOCAL PLAN REVIEW CONSULTATION 2021

We write in respect to the current consultation as part of the Wiltshire Local Plan Review and as owners of the land at Woodbine Cottages located on the west side of the Oxford Road on the northern outskirts of Calne (refer to enclosed plan). This submission comprises our comments on the emerging documents and reflects our intention to secure support for the redevelopment of our site in line with the emerging Local Plan strategy and the demand for additional housing sites across the Plan area.

We have enclosed the requisite submission forms in respect to the 'Emerging Spatial Strategy' and 'Market Town - Calne' which provide a series of comments on the emerging plan and the more site-specific reference to our site in Calne. In order to further support our submission, we have provided a more detailed assessment below.

Local Plan Approach

The emerging Local Plan and the spatial strategy identifies that there is a requirement to deliver more housing than previously planned in order to meet the growing demand and support Central Government's aspirations which have been further reinforced in the recent Planning White Paper. This is reflected in the forecast provided in the consultation reports which state that between 40,840 and 45,630 new homes will be required through to 2036 within Wiltshire. On a more local scale, the Plan identifies a requirement for 1,610 new homes in Calne albeit some of these have already been 'reserved'. Given the general absence of land use constraints across much of Wiltshire when compared with adjoining Authorities, the housing targets are only ever likely to increase and therefore a greater focus will need to be placed on continually identifying additional 'windfall' sites which are suitable and achievable.

The most recent SHELAA for Wiltshire was published in July 2017 and at that time we did not seek to promote our site in Calne for residential development. However, given the growing pressures identified above and the location and characteristics of the site which would readily lend itself for residential use, we are now proposing the site be considered for residential

development concurrently through this Local Plan review and also the ongoing ‘call for sites’ process that informs the annual review of the SHELAA.

Site Summary

The site at Woodbine Cottages measures approximately 0.5ha and benefits from two established means of access onto the A3102 Oxford Road. The site comprises several small commercial units with a larger open yard and has been used for a variety of uses for the past 20 years. The site was originally purchased in the late 1970’s when it comprised a number of residential cottages and as such there is a historic precedent for residential use on what is to be considered previously developed land or a brownfield site

Whilst the site is located just to the north of the Calne Settlement Boundary, this does not preclude the development opportunity that the site presents. This is reinforced by the planning permissions granted by the Council over the last few years on land to the east and south of the site which have effectively extended Calne to the north and alongside our site on the Oxford Road. We have also noted the very recent planning application on behalf of Lidl (Ref: 21/00081/FUL) which is bringing forward significant development adjacent to our site on the eastern side of the Oxford Road.

Whilst these sites were identified in earlier and ‘saved’ versions of the District Local Plans, the continued expansion of Calne is supported in the ‘Planning for Calne’ and the ‘Site Selection Report for Calne’ documents that form part of this current consultation. Indeed, these documents identify a number of other sites that are comparable to our site and in some cases are demonstrably not as well located, as accessible, as sustainable or as suitable for residential development. Our site is also not located in any of the areas or categories identified as ‘Exclusionary Constraints’ applied by the Council in the 2017 SHELAA.

The 2017 SHELAA notes that sites that are included within the assessment should be drawn from the call for sites as well as a number of sources which include, vacant and derelict land and buildings, additional opportunities in established, sites in rural locations and sites in and adjoining villages or rural settlements. Our site would readily fall into one or more of these categories and should therefore be considered suitable.

In addition, the SHELAA sets out that there are three components to the assessment of sites and broad locations, and these are assessed as follows –

- a. Suitability - The site is suitable for residential development given its historic residential use and the location and proximity to Calne such that facilities and services are provided nearby without the need for extensive travel.
- b. Availability - The site is within our sole ownership and is therefore available for redevelopment subject to securing the appropriate planning permission.
- c. Achievability – There are no impediments to delivering and achieving residential use on the site given its location, existing access, historic use and absence of any explicit planning constraints on land use or redevelopment.

It is noted that the southern boundary of the site adjoins the site identified as a Scheduled Ancient Monument but the sensitive and appropriate redevelopment of the site would have a

negligible impact on the setting of the SAM given the necessary assessments and studies that would accompany any future planning application.

As noted, we have submitted our site as part of the 'call for sites' for the next iteration of the SHELAA, but for the sake of completeness and to assist the Council is considering our site for residential use, we have summarised the site below against the key criteria applied by the Council -

Accessibility - The site benefits from two existing access points providing direct access onto the A3012 Oxford Road. The site is approximately 100m from the 'Town Centre' providing immediate access to facilities including the Tesco foodstore and the large retail and business park. This will be further enhanced if the proposed Lidl store opposite our site is approved and built out.

Flood Risk - The site is not located within Flood Zones 2 or 3 and is therefore considered to be appropriate for residential development

Heritage - The site is not constrained by Conservation Areas or Listed Buildings. As noted, there is a SAM on the site adjacent but given the scale of the SAM, it is not considered that residential use of the site would compromise or threaten its setting or character.

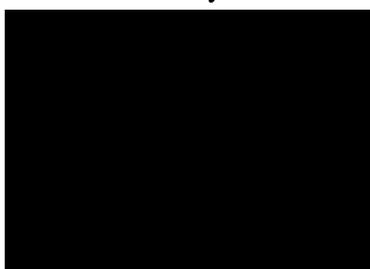
Landscape – The site is already in use as a brownfield site and its redevelopment for residential use should be seen as an opportunity to enhance its setting and character. Given the extensive planting, tree cover and topography of the land, the site is not visible in longer views.

Traffic – The redevelopment of the site for residential use is unlikely to generate any more traffic movements on the local highway network than the current use.

In summary, the site meets the five assessment 'tests' and should therefore be considered suitable for, and promoted as, residential development as part of the evolution of the Local Plan alongside review of the SHELAA. The development of the site could deliver at least 8% of the identified brownfield housing targets set out in the 'Planning for Calne' report.

We would be grateful if you could consider this representation as part of your review process and we look forward to further engagement and consultation as the Local Plan process continues. Should you wish to discuss this matter further or require any additional information then please do not hesitate to us.

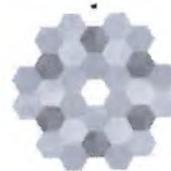
Yours faithfully



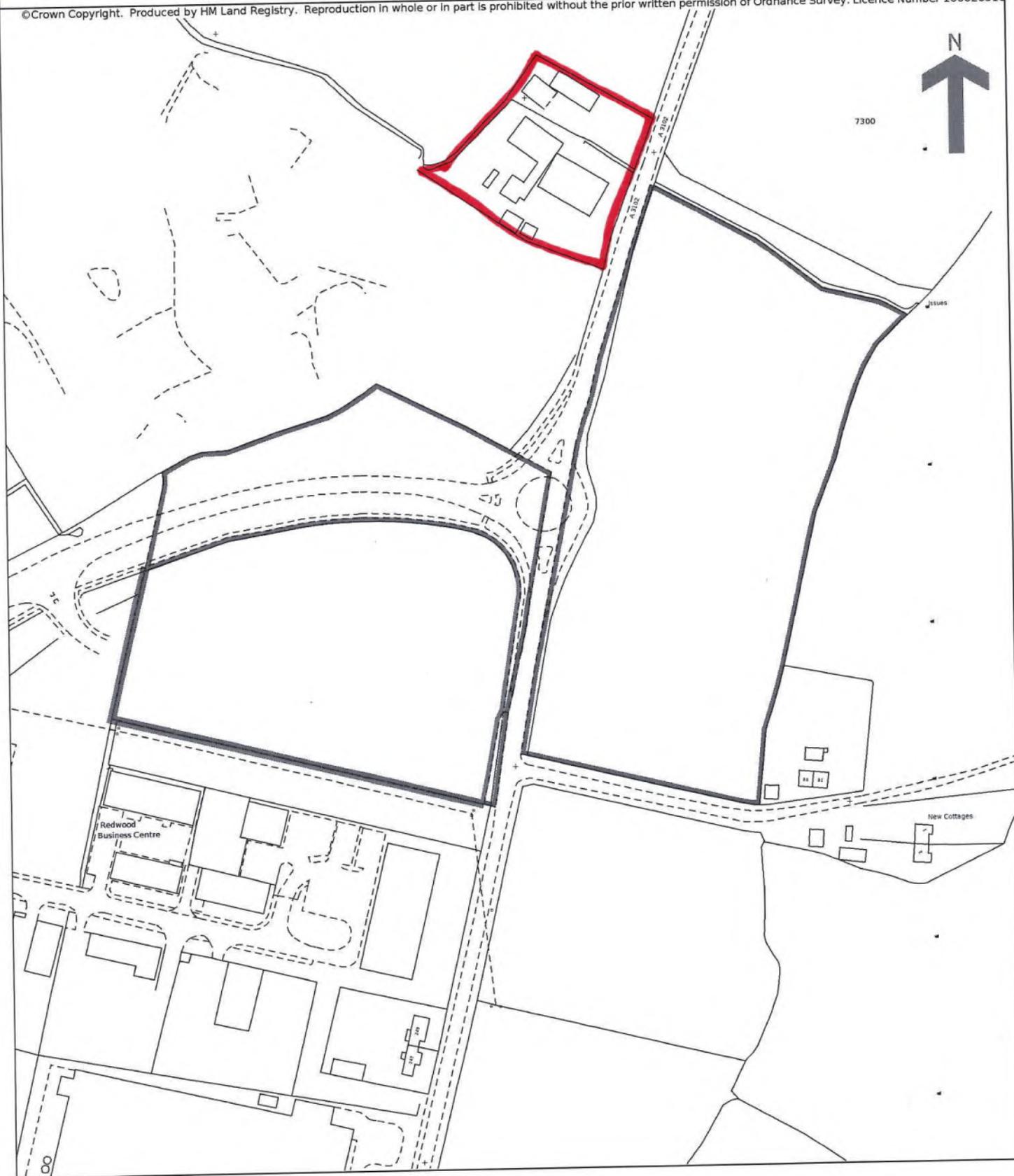
CALNE119c

HM Land Registry Official copy of title plan

Title number [REDACTED]
Ordnance Survey map reference **SU0072NE**
Scale **1:2500**
Administrative area **Wiltshire**



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CALNE124a

THE WILTSHIRE LOCAL PLAN REVIEW CONSULTATION

Omission Site – Land north of Low Lane (Site 9)

Representations Prepared by Pro Vision on behalf of Hills UK Ltd

February 2021

OMISSION SITE – LAND NORTH OF LOW LANE (SITE 9)
THE WILTSHIRE LOCAL PLAN REVIEW CONSULTATION
PROJECT NO. 2423

PREPARED BY:



CHECKED BY:

DATE:

FEBRUARY 2021

PRO VISION
THE LODGE
HIGHCROFT ROAD
WINCHESTER
HAMPSHIRE
SO22 5GU

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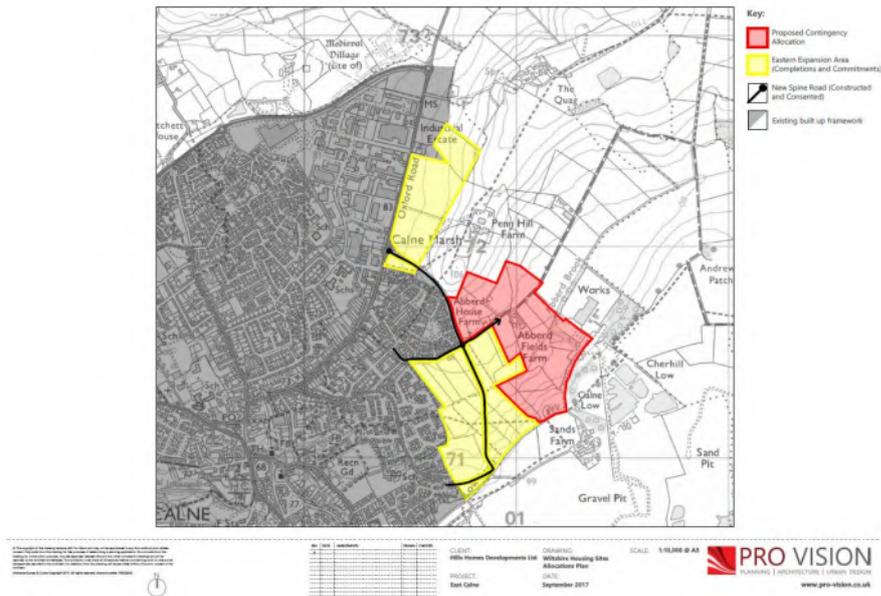
1.0 Introduction

1.1 This representation is made on behalf of Hills UK Limited in relation to land in their sole ownership north of Low Lane, Calne (The Site). It is in response to Wiltshire Council’s Regulation 18 Consultation on the emerging draft of the Wiltshire Local Plan Review (LPR) to 2036.

1.2 The location and extent of the Site is shown shaded yellow on the Plan below. It has an area of approximately 5 hectares.



1.3 The Site was first promoted for development in conjunction with adjoining land to the north, when duly made representations were submitted on the pre-submission draft of the Wiltshire Housing Site Allocation Plan in July 2017 (see Appendix A). In the event, that Plan deferred to the Neighbourhood Plan to make housing allocations at Calne and did not adopt the principle of making a contingency allocation as we had proposed. The extent of the proposed allocation put forward at that time is illustrated below.



1.4 In the context of the SHELAA and generally to contribute to the evidence base of the Local Plan Review, a more detailed representation was submitted in respect of the Site alone on the 16th of April 2020. This included a series of Urban Design Studies demonstrating its suitability for development in the manner proposed.

1.5 Nevertheless, the Site was not included in the Council’s SHELAA (2017) nor, apparently has it been considered in the emerging LPR. It is not therefore included in the “Pool” of potential sites identified in the LPR, notwithstanding it is sandwiched between land that has been included in the Pool to the north and south (Sites 3 and 4) and adjoins the Town’s recently extended built up area to the west. The exclusion of the Site from site selection exercise is irrational and its omission from the Planning for Calne Pool of sites a serious oversight in the plan making process.

1.6 In response to the Council’s consultation on the Local Plan Review this representation:

- examines whether the emerging preferred spatial strategy for the Chippenham MHA will be effective.
- In the context of “Planning for Calne” considers the potential directions for growth

- Reviews the Council's Site Selection Report for Calne.
- Explains why land north of Low Lane should be included in the Pool of sites. A Landscape and Visual Impact Assessment undertaken by WHL is submitted to support this representation.

2.0 Emerging Spatial Strategy

- 2.1 The preferred spatial strategy for the Chippenham HMA is to concentrate almost half of the planned growth at Chippenham.
- 2.2 The current strategy 2006-2026, set out in the Wiltshire Core Strategy, identifies a requirement at Chippenham for 4510 homes (225 dpa). The new strategy proposes a step change in housing delivery with a requirement of 9,225 homes for the plan period 2016-2036 (461 dpa); more than doubling the scale and rate of growth of the Town.
- 2.3 The adopted Chippenham Site Allocation DPD (CSA) (adopted May 2017) allocated two strategic sites (Rawlings Green and South West Chippenham) to accommodate approximately 1,650 dwellings, which were in addition to two existing commitments at North Chippenham and Hunter's Moon (now nearing completion). The emerging LPR therefore identifies a proposed residual requirement (ie overall housing requirement for plan period less existing commitments) of circa 5,100 dwellings.
- 2.4 The residual requirement is proposed to be delivered mainly from two major urban extensions to the north east and south of the Town, which together are expected to deliver about 5400 dwellings. No delivery trajectory is provided (although there is an acknowledgement that deliver of strategic sites at this scale is likely to extend beyond the Plan period).
- 2.5 Doubling the scale and rate of growth at Chippenham is neither justified nor is it an effective strategy for the HMA for the following reasons:
 - No delivery trajectory is provided. However, for the period 2020 to 2036 the Plan appears to propose the delivery of 7,325 dwellings (HAS allocations + LPR allocations). That is an implied sales rate of 458 dpa (8.8 units per week) which is entirely unrealistic.
 - The lead in time for major strategic sites is known to be substantial. For 2000+ dwelling sites it is typically 8.4 yrs (see Lichfield's Start to Finish (2nd Edition) - How Quickly to Large-Scale Housing Sites Deliver, February 2020). The LPR is not expected to be adopted Q2 2023 so first completions cannot be expected before 2032/ 2033. Even taking a optimistic delivery rate of last 5 years of the plan at 160 dpa (again the average rate for a 2.000 + dwellings). At best that would be 800 dwellings from each site in this plan period.

- It is telling that neither of the two HSA sites have commenced on site nearly 4 years following the adaption of the Plan.
- It is therefore entirely predictable that the proposed spatial strategy will fail to deliver even the minimum housing requirement for the plan period.
- The emerging spatial strategy also allows no meaningful scope for Neighbourhood Planning notwithstanding the consultation draft states that *“Both Chippenham and Melksham communities are actively engaged in neighbourhood planning and these too will play an important part in guiding growth”*.

2.6 The preferred spatial strategy proposes to “divert the scale of new housing away from the main settlements that are more environmentally constrained or sensitive (Calne, Corsham, Devizes and Malmesbury)”. But Calne is no more, and arguably significantly less, environmentally constrained/sensitive than Chippenham. As we show below, the Town demonstrably has substantial capacity to accommodate additional housing in conjunction with the new employment allocation (that the LPR proposes).

2.7 Not only would increasing the scale of growth at Calne enable a more achievable scale of growth to be planned for Chippenham, but it would also have the significant planning benefit of providing a means of dealing with town centre traffic congestion (and associated poor air quality); issues which the emerging LPR acknowledges but fails to address. Certainly, the scale of growth for Calne proposed by the LPR would be inadequate to meaningfully address these problems.

2.8 The emerging strategy proposes an overall housing requirement for Calne for the period 2016-2036 of 1610 dwellings (80.5 dwellings per annum). After taking into account completions and commitments, the residual required to be accommodated by the LPR is 360 dwellings. In addition, a requirement for 4 ha of employment land is identified.

2.9 627 dwellings were completed at Calne between 2016 – 2019 – that is an average of 209 dwellings per annum. Assuming that the existing commitments of 625 dwellings (as at April 2019) will be built-out at a similar rate, the emerging LPR’s strategy is, in effect, for the rate of house building in Calne to fall to 25 dwellings per year between 2022 and 2036 (notwithstanding that the headline figure for the whole plan period (2016 – 2036) is about 12% greater than for the previous 20 year plan period (2006-2026). That reduction in growth in the second half of the plan period is wholly unjustified and unnecessary, and

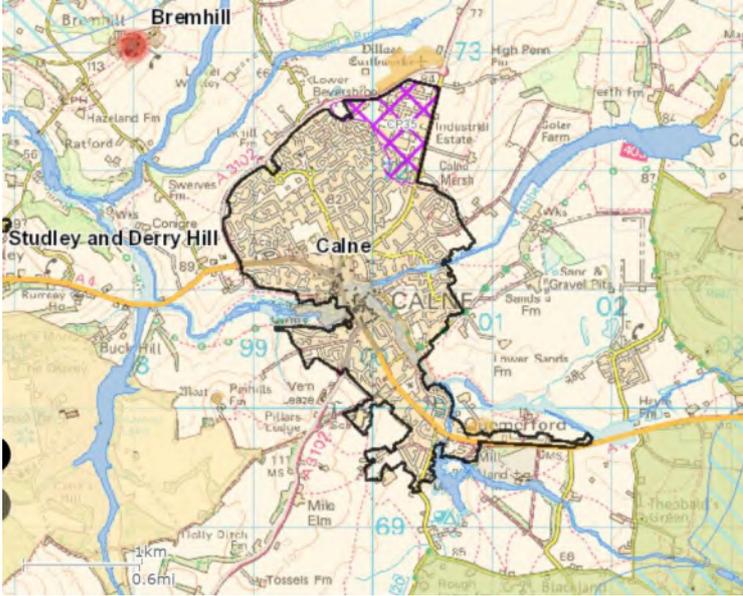
entirely inconsistent with the Government’s objective to “significantly boost the supply of homes”.

			Overall Housing Requirement (Dwellings)		Overall Employment Requirement (Hectares)
	Wiltshire Core Strategy 2006-2026	Brownfield target 2021-2031	Emerging Strategy 2016-2036	Residual at 1 April 2019	
Calne	1440	60	1610	360	4

2.10 The LPR’s evidence base identifies the environmental constraints that could potentially restrict or shape the further growth of Calne (see map below). In summary these are:

- None of the land adjoining the town is subject to any formal planning designation (save for its designation as countryside beyond the current Settlement Policy Boundary).
- The western edge of the North Wessex Downs AONB lies about 1.5 km to the east of Calne. Land on the southern and eastern edge of Quemerford would probably be regarded as being of landscape value because it forms part of the setting of the AONB, but the influence of the AONB does not extend further.
- To the west of the Town Bowood House and Park (important heritage assets) would significantly constrain major expansion in this direction.
- The outer impact zones of two designated Sites of Special Scientific Importance (Calstone and Cherill Downs to the south east and Bencroft Hill Meadow SSSI to north west).
- CS County Wildlife Site at Penn Wood and Crab Tree Copse
- Concentration of listed buildings in old town (a designated Conservation Area)
- Scheduled Ancient Monument Lower Beversbrook
- A narrow Flood Zone 2 and 3 along Abberd Brook (and Fishers Brook to the north)
- Grade 2 Agricultural Land to the west and south east

2.11 Whilst these environmental constraints will undoubtedly shape the form and direction of further growth, they do not amount to a level of environmental constraint that would justify a spatial strategy that severely restricts the overall scale of growth for the Calne.



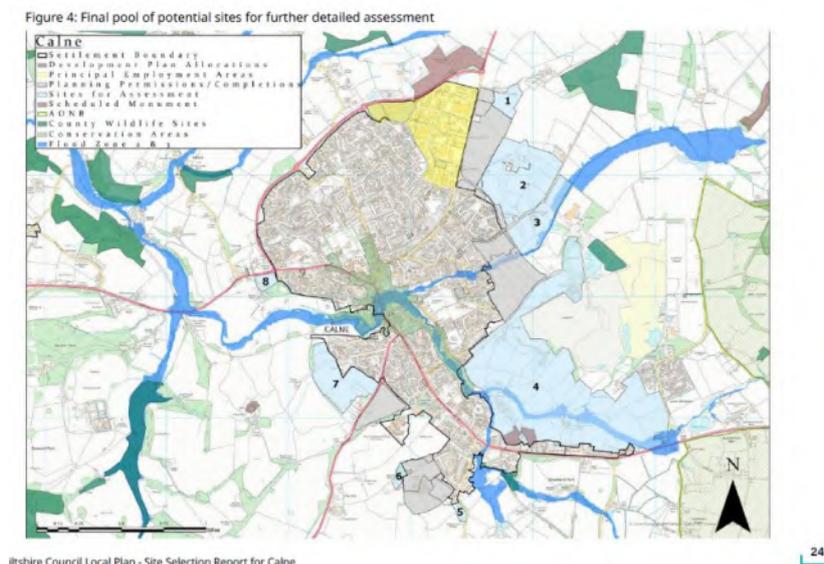
Extract from Wiltshire’s online policy map

3.0 Planning for Calne – Direction of Growth

- 3.1 We have shown above that at a strategic level Calne clearly has capacity for further growth without breaching high level environmental thresholds. Nevertheless, large-scale growth in certain directions is constrained.
- 3.2 The Town generally is contained below the 95 m contour to the west and east. To maintain the character of the town and to avoid visual intrusion on its landscape setting, further development should not take place above that contour.
- 3.3 To the west, the scale of growth is constrained by Bowood House and Park; the steep slopes rising above the existing edge of the built-up area; and the disused canal which forms a green lung leading into the centre of the Town and which forms an important part of the designated Conservation Area (and its setting).
- 3.4 Growth in a northerly direction would extend development into open countryside breaching a clearly established defensible boundary (the A3102); involve the loss of Grade 2 Agricultural Land; impact on a scheduled ancient monument; potentially impact on an area regarded as being a “Strategic Nature Area” (Wiltshire Local Plan Planning for Calne); and be relatively distant from the Town Centre.
- 3.5 To the south, development is constrained by the site of the medieval rural settlement at Quemerford (a scheduled ancient monument); the setting of the AONB; Grade 2 agricultural land; Flood Zones 2 and 3 and distance from and connectivity to the Town Centre.
- 3.6 It is therefore the Town’s eastern flank, the established direction of growth in recent years (including a Neighbourhood Plan allocation), which has the greatest environmentally unconstrained capacity, and which is well connected and accessible. Whilst, the pattern of further development would be shaped by the higher ground, this clearly remains the logical direction for further strategic growth.

4.0 Planning for Calne – Selection of “Pool” Sites

4.1 The Site Selection Report for Calne identified a “Pool” of eight potential sites (see Figure 4 - copy below).



4.2 We have critically reviewed the assessment of each site and added our comments on the Council’s assessment in red below:

Site 1: Land south of High Penn Track, Calne (SHELAA site 3616)

- Potential for heritage impacts as the site is close to the scheduled medieval settlement site at Beversbrook. **Agreed**
- New housing development is being built-out adjacent to the western boundary of the site.
- The site could form a suitable urban / rural edge if the north of the site is set out as planted green infrastructure linking in with the local nature reserve to the east. **But the consented site to the south (now being built out) already provides an extensive area of open space along its eastern and northern boundaries which provides an attractive and functional edge to the built-up area. Site 1 would represent development beyond this planned urban edge.**
- **The Impact on Penn Wood Local Wildlife Site does not appear to have been assessed.**

Site 2: Land to the west of Spitfire Rd (SHELAA sites 495, 3610)

- Potential for access onto Spitfire Road or Sand Pit Road. **Agreed**
- Likely low flood risk and heritage impacts. **Agreed**
- In landscape terms, site will need further assessment of impacts on the Area of Outstanding Natural Beauty (AONB) to the east. **Development on the prominent “finger” of high ground above the 95m contour would have an unacceptable landscape and visual impact. The north part of the site (approximately 50% of the total site area) is therefore unsuitable for development)**

Site 3: Land to the east of Spitfire Rd (SHELAA sites 488, 489, 451, 3168)

- Areas of flood risk associated with Abberd Brook along southern boundary.
- The site is closer to the AONB than some other sites and therefore may be more sensitive to development. **There is no evidence that this site forms part of setting of the AONB.**
- The site is in close proximity to Hills Quarry Products operations, therefore there will be potential noise and dust issues which will require further assessment. **The existing Hills Quarry Products operations on the adjoining site do not give rise to noise or dust issues that cannot be adequately mitigated by providing for an intervening landscaped buffer area (see below).**

Site 4: Land to the north of Quemerford (SHELAA sites 3642, 487, 1104a/b/c)

- A large split site which has the potential for landscape impacts, particularly towards the eastern part of the site. **Agreed. Development will have an impact on the AONB.**
- Potential for impacts on the existing mitigation and enhancement of the former extraction and landfill at Sands Farm and on Sands Farm. **Agreed**
- Quarry County Wildlife Site. **Impact can be mitigated and there is scope for enhancement.**
- Some areas of flood risk through the southern part of the site. **Agreed**
- Potential impacts on the scheduled monument (medieval rural settlement at Quemerford) and on the setting of Grade I listed Hayle Farm on the eastern edge. **These are very substantial constraints.**
- Site may need to provide an access onto the A4 to the south. **Development on this scale would require access to the north and south (effectively providing an eastern by-pass for the Town)**
- **Potential loss of Grade 1 and 2 Agricultural Land**

Site 5: Land at Stockley Lane (SHELAA site 700)

- Access onto Stockley Lane.
- The site is open to views out to the countryside to the west but relatively well screened to the east.
- Development of the site could be seen as encroachment into the countryside. The AONB is approximately 330m to the south and an assessment of impacts on the AONB **will** be needed.
- **The site is poorly related to the existing pattern of development.**
- **The site is too small to make a meaningful contribution to meeting local housing need.**

Site 6: Rookery Farm (SHELAA site 3254)

- Access could be achieved onto Cherhill Way.
- Site is adjacent to new housing at Marden Farm.
- Site is well screened by existing trees and hedgerows – these features would need to be retained on-site where possible.
- **The site is too small to make a meaningful contribution to meeting local housing need but could be allocated to help meet requirement for small sites.**

Site 7: Land off Wenhill Lane (SHELAA sites 709, 3211, 3251, 3312)

- Access would need to be provided onto the A3102. **Would require a secondary (emergency access)**
- Potential for impacts on the Bowood House and Gardens to the west and on the setting of Grade II* listed Vernleaze. **Avoiding harm to the setting of the listed building is a significant constraint.**
- Existing landscaping would need protection and enhancement to provide suitable screening on this urban / rural edge out to the west.
- **Development above the 95m contour would result in unacceptable visual and landscape impact. Development on the lower west facing slopes would be poorly related to the existing built-up area.**

Site 8: Land South of Chilvester Hill (SHELAA site 3172)

- Potential to access A4/A3102 via existing roundabout.

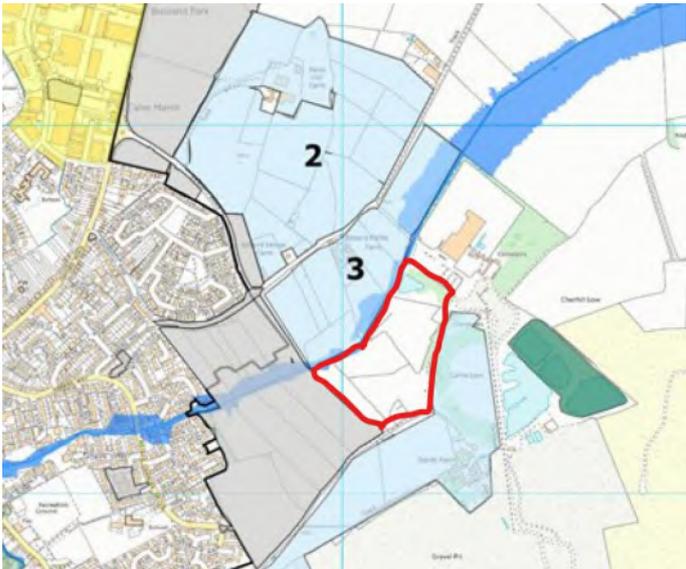
- Site relatively well screened to the south and west although there are long distance broken views to the east of Cherhill escarpment.
- Potential heritage impacts on Grade II listed Berhills Farm.

4.3 In conclusion, the Calne Site selection Pool should be limited to:

- Site 2 (part)
- Site 3
- Site 4 (part)
- Site 6
- Site 8 and
- Land at Low Lane (Site 9), for the reasons set out below.

5.0 Land at Low Lane

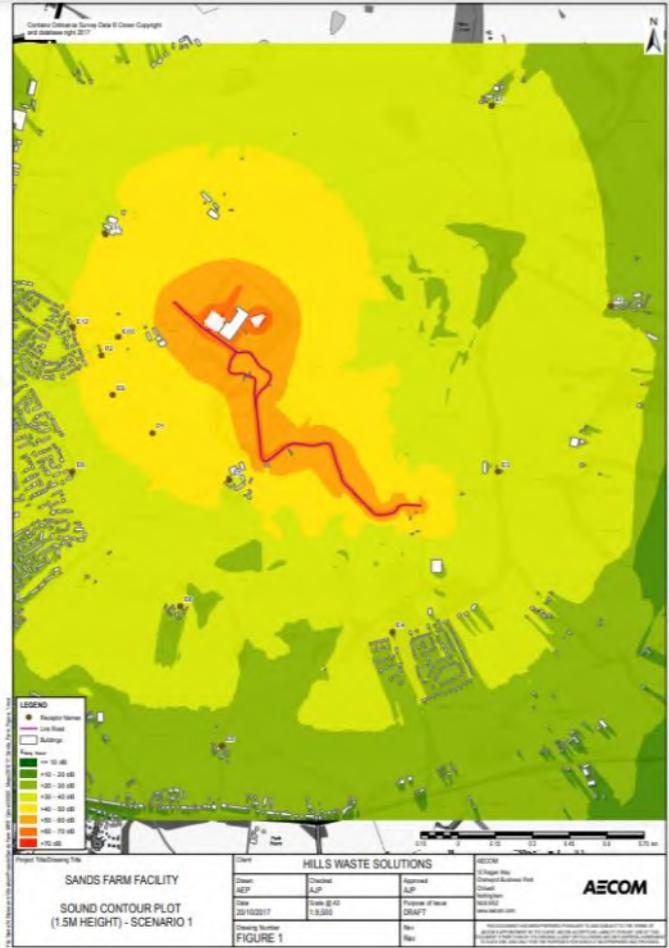
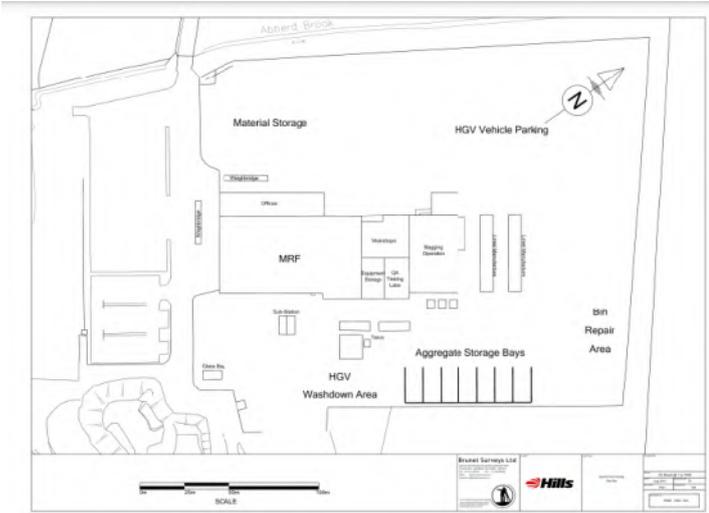
- 5.1 The Site is a very roughly rectangular shaped parcel of land lying immediately adjacent to the most recent parcel of new housing on the eastern edge of Calne (known as Phase 3 Land north of Low Lane). Its location and extent are shown edged red below.
- 5.2 It forms part of a mosaic of small pastures that are laid out on the low valley of the Abberd Brook, with land rising to above 95m OD to the north (at Penn Hill Farm) and to the south (at Sands Farm). Abberd Brook itself runs along the Site's northern boundary. The Site rises to the south east, gently at first and then more steeply to Low Lane which follows the 95m contour.
- 5.3 To the north east the Site adjoins the former Concrete Products site which is accessed via Spitfire Road. This site is in the process of being re-purposed to accommodate a Materials Recovery Facility (MRF) (formerly located at Lower Compton), in accordance with the planning permission granted in August 2018 (17/10554/WCM). A condition of that planning permission was the construction of an HGV relief road (Linking Sandpit Road to Lower Compton) which substantially reduces HGV movements through the town Centre AQMA.
- 5.4 The Site Selection Report for Calne includes land to the north (Sites 2 and 3) and to the south (part of Site 4) within the "Pool" of potential development sites. The Site is therefore entirely enclosed by existing development to the north and south and by planned development to the east and west. It would be entirely irrational to exclude this land from any comprehensive plan for further growth in this direction.



Extract from The Site Selection Report for Calne

- 5.5 The Site has very few known constraints. It partly falls with the Calstone and Cherill Downs SSSI outer impact zone and the Calne Low Local Nature Reserve lies to the east. Development on the more steeply sloping parts of the site will need to be carefully planned to avoid ridge lines breaking the skyline. The narrow flood zone 2 and 3 along the Abberd Brook affects the north western edge of the Site.
- 5.6 The proximity of the Hill Quarry Products site is however a potential constraint that will require careful assessment and consideration as part of the master planning of the Site. In addition to the new MRF, there is one small active sand quarrying operation approximately 100m of the Site's north eastern corner.
- 5.7 The planning permission for the MRF identifies a range of associated uses including aggregate bagging plant, material test laboratory, vehicle depot and workshop, Lintel manufacturing and offices. The MRF and all these associated uses are carried out within the existing building. The only external uses are therefore vehicle wash down, parking, and limited external storage – as illustrated on the approved site layout drawing below. The approved scheme includes landscape and ecological mitigation and enhancement, noise and dust control and management (including new landscaped bunds), hours of operating restrictions and an Access Road Maintenance Plan.
- 5.8 As part of the submitted Environmental Statement in support of the MRF /HGV Relief Road proposals, noise and air quality impacts were assessed.
- 5.9 Operational sound levels to sensitive receptors were calculated for the operation of the site and internal link road. Under normal operation of the site, the impacts at sensitive receptors were assessed to be of very low adverse impact resulting in a negligible significance of effect at the majority of receptors. For the remaining receptors the impacts were of low adverse impact resulting in minor significance of effect. Of course, the promotion site (and the adjoining SHELAA sites 488, 489, 451, 3168) were not identified as being sensitive receptors, but the noise contour modelling (see for example below) demonstrates that predicted noise levels in the range of 40-50 dB (LAeq 1hour). Whilst further detailed assessment would be required at the master planning stage, there is no reason to believe that the Site cannot be developed to achieve a satisfactory noise environment (internally and externally).

5.10 Overall, the operational air quality effects of the proposed development, with the approved mitigation measures in place, were judged to be 'not significant'.



5.11 The site is capable of being well connected to the surrounding existing and planned residential neighbourhoods and to the town centre. The Abberd Brook has been identified as forming an important link in the “Green and Blue Infrastructure Corridors” that radiate from the Town. The development of the Site would provide the opportunity to enhance this infrastructure. Vehicular, pedestrian and cycle access can be provided to the west via the existing development area (the site layout allows for such a connection – see below)



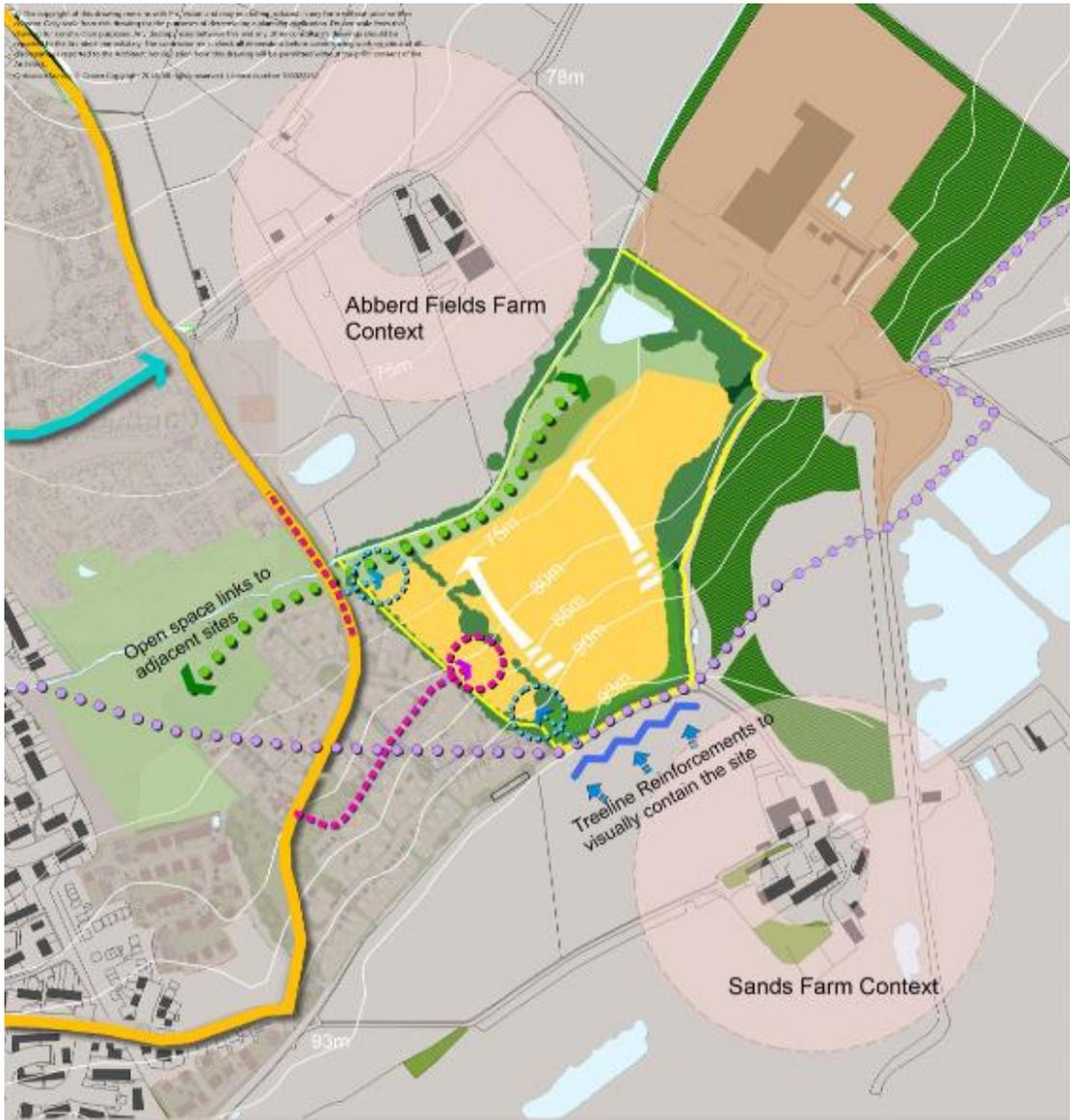
Approved layout 20/00481/REM with potential point of access

5.12 Landscape Consultants WHL prepared a “Preliminary Landscape and Visual Assessment of the Site in January 2019. This is reproduced at Appendix A. The development constraints diagram from that Report is reproduced below.



5.13 The Proposed Development Principles and Parameters for the Site can be summarised as follows (and are illustrated below):

- Principal access to the west via the recent housing development.
- Pedestrian cycle access to Low Lane.
- Green corridor along the northern boundary adjoining Abberd Brook forming part of the “Green and Blue Corridor Strategy”.
- Green buffer between new residential development and the industrial activities to the north (with appropriate noise mitigation strategy).
- Lower density development on the more steeply rising land to the south east.
- The developable area is likely to be limited to about 4ha with a capacity to accommodate up to about 120 dwellings.



Constraints and Opportunities Analysis

- | | | |
|---|---|--|
|  Opportunity for Residential Development |  Sands Farm Landfill Site |  Gateway Opportunity |
|  Existing settlement |  Woodland |  Pedestrian connections to footpaths and PROW |
|  Recent housing applications |  Existing and reinforced trees and hedgerows |  Link to emerging Public Open Space |
|  5m contours |  Existing Footpath (CALW16) |  Contain views into site with reinforcements and preserve the setting |
| |  Watercourse |  Proposed vehicular connection |



6.0 Conclusion

- 6.1 The LPR's proposed strategy of delivering a step change in the rate of growth at Chippenham will not be effective and has not been justified.
- 6.2 The LPR's proposed strategy of suppressing the level of growth at Calne is not justified. The Town is neither so environmentally constrained nor so sensitive that it cannot accommodate further strategic growth - particularly to the east.
- 6.3 The exclusion of the Site from the "Pool" of potential sites at Calne in the Site Selection Report for Calne is irrational and unjustified. The Site is clearly suitable for development in the manner proposed, either on its own or in conjunction with the adjoining sites that were included in the Pool. It would be entirely irrational to exclude this land from any comprehensive plan for further growth in this direction.

CALNE124b

LAND NORTH-EAST OF CALNE, WILTSHIRE

**PRELIMINARY LANDSCAPE AND VISUAL RESPONSE
FOR
PROPOSED RESIDENTIAL DEVELOPMENT**

**On behalf of
HILLS UK LTD**

January 2019

REF: 18.687

REV:



WH Landscape Consultancy Ltd
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APPOINTMENT

WH Landscape Consultancy Ltd (**WHLandscape**) has been appointed by Pro Vision on behalf of Hills UK Ltd to undertake a Preliminary Response to the Landscape and Visual Impacts, in respect of the proposed housing development on land to the north-east of Calne, Wiltshire.

WHLandscape has an established track record of appraising development proposals. The Practice has considerable experience in the field of landscape and visual assessment and uses tried and tested techniques developed and recognised by the Landscape Institute, Institute of Environmental Management and Assessment, and Natural England.

This appraisal has been undertaken by: [REDACTED]

Checked by: [REDACTED]

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1. INTRODUCTION

1.1 This report provides an initial response to the landscape and visual effects associated with a proposal for a residential allocation on up to approximately 8.5 hectares (ha) of land to the North-east of Calne, Wiltshire. The site is in the administrative area of Wiltshire Council, specifically Wiltshire Council North Area.

1.2 The proposals will include residential development as part of the eastern expansion of Calne, with the site currently proposed as a contingency allocation. Access to the site is likely to be achieved via an approved residential development (Planning Application Ref. 17/00679/OUT) that is yet to be built on the adjacent land to the west.

1.3 The policy context is taken from the National Planning Policy Framework (NPPF) (2018) and the Wiltshire Core Strategy (2015). The baseline landscape character has been taken from Natural England National Character Area Profile (NCA): 117. Avon Vales (2013), the Wiltshire Landscape Character Assessment (2005), and the North Wiltshire Landscape Character Assessment (2004).

2. BASELINE LANDSCAPE AND VISUAL STUDY

2.1 LOCATION AND CONTEXT

2.1.1 The site is located on the urban/rural interface at the edge of the town of Calne, in the county of Wiltshire. The land covers approximately 8.5ha comprising of four fields of grass pasture for livestock grazing and hay or silage production. Tree belts, hedgerows, and topography, as well as a quarrying site and industrial works to the east of the development area contains the site within the wider landscape. The site is not located within the North Wessex Down Area of Outstanding Natural Beauty (AONB), but it lies within its setting. The site is accessed via field gates on Low Lane which runs in tandem with Footpath CALW16 on the southern boundary, and connects the site to Calne to the west.

2.2 POLICY CONTEXT

2.2.1 NATIONAL PLANNING POLICY FRAMEWORK

2.2.1.1 Published in July 2018, the NPPF sets out the Government's planning policies for England and how these should be applied. It provides a framework within which locally-prepared plans for housing and other development can be produced. Of particular relevance to this appraisal is Section 15. Conserving and Enhancing the Natural Environment, paragraph 170, which states that "Planning policies and decisions should contribute to and enhance the natural and local environment by":

- *protecting and enhancing valued landscapes, sites of biodiversity or geological value and soils (in a manner commensurate with their statutory status or identified quality in the development plan);*

and:

- *recognising the intrinsic character and beauty of the countryside, and the wider benefits from natural capital and ecosystem services – including the economic and other benefits of the best and most versatile agricultural land, and of trees and woodland;*

2.2.1.2 Also of relevance to this project is Section 12. Achieving Well-designed Places, specifically paragraph 127, which states:

Planning policies and decisions should ensure that developments:

- a) will function well and add to the overall quality of the area, not just for the short term but over the lifetime of the development;*
- b) are visually attractive as a result of good architecture, layout and appropriate and effective landscaping;*

- c) are sympathetic to local character and history, including the surrounding built environment and landscape setting, while not preventing or discouraging appropriate innovation or change (such as increased densities);*

2.2.2 WILTSHIRE CORE STRATEGY

2.2.2.1 Adopted by Wiltshire Council in January 2015, the Wiltshire Core Strategy replaced the four local plans that covered Wiltshire. The Core Strategy provides a positive and flexible overarching planning policy framework for Wiltshire for the period up to 2026 in order to ensure that any proposed development is of a high standard and is compatible with the character and visual qualities of the area.

CORE POLICY 50 – BIODIVERSITY AND GEODIVERSITY

PROTECTION

Development proposals must demonstrate how they protect features of nature conservation and geological value as part of the design rationale. There is an expectation that such features shall be retained, buffered, and managed favourably in order to maintain their ecological value, connectivity and functionality in the long-term. Where it has been demonstrated that such features cannot be retained, removal or damage shall only be acceptable in circumstances where the anticipated ecological impacts have been mitigated as far as possible and appropriate compensatory measures can be secured to ensure no net loss of the local biodiversity resource, and secure the integrity of local ecological networks and provision of ecosystem services.

All development proposals shall incorporate appropriate measures to avoid and reduce disturbance of sensitive wildlife species and habitats throughout the lifetime of the development.

Any development potentially affecting a Natura 2000 site must provide avoidance measures in accordance with the strategic plans of guidance set out in paragraphs 6.75-6.77 above where possible [Elsewhere in Wiltshire Core Strategy], otherwise bespoke measures must be provided to demonstrate that the proposals would have no adverse effect upon the Natura 2000 network. Any development that would have an adverse effect on the integrity of a European nature conservation site will not be in accordance with the Core Strategy.

BIODIVERSITY ENHANCEMENT

All development should seek opportunities to enhance biodiversity. Major development in particular must include measures to deliver biodiversity gains through opportunities to restore,

enhance and create valuable habitats, ecological networks and ecosystem services. Such enhancement measures will contribute to the objectives and targets of the Biodiversity Action Plan (BAP) or River Basin/Catchment Management Plan, particularly through landscape scale projects, and be relevant to the local landscape character.

LOCAL SITES

Sustainable development will avoid direct and indirect impacts upon local sites through sensitive site location and layout, and by maintaining sufficient buffers and ecological connectivity with the wider environment. Damage or disturbance to local sites will generally be unacceptable, other than in exceptional circumstances where it has been demonstrated that such impacts:

- i. cannot reasonably be avoided*
- ii. are reduced as far as possible*
- iii. are outweighed by other planning considerations in the public interest*
- iv. where appropriate compensation measures can be secured through planning obligations or agreements.*

Development proposals affecting local sites must make a reasonable contribution to their favourable management in the long-term.

CORE POLICY 51 – LANDSCAPE

Development should protect, conserve and where possible enhance landscape character and must not have a harmful impact upon landscape character, while any negative impacts must be mitigated as far as possible through sensitive design and landscape measures. Proposals should be informed by and sympathetic to the distinctive character areas identified in the relevant Landscape Character Assessment(s) and any other relevant assessments and studies. In particular, proposals will need to demonstrate that the following aspects of landscape character have been conserved and where possible enhanced through sensitive design, landscape mitigation and enhancement measures:

- i. The locally distinctive pattern and species composition of natural features such as trees, hedgerows, woodland, field boundaries, watercourses and waterbodies.*
- ii. The locally distinctive character of settlements and their landscape settings.*
- iii. The separate identity of settlements and the transition between man-made and natural landscapes at the urban fringe.*
- iv. Visually sensitive skylines, soils, geographical and topological features.*

- v. ***Landscape features of cultural, historic and heritage value.***
- vi. ***Important views and visual amenity.***
- vii. ***Tranquillity and the need to protect against intrusion from light pollution, noise and motion.***
- viii. ***Landscape functions including places to live, work, relax and recreate.***
- ix. ***Special qualities of Areas of Outstanding Natural Beauty (AONBs) and the New Forest National Park, where great weight will be afforded to conserving and enhancing landscapes and scenic beauty.***

Proposals for development within or affecting the Areas of Outstanding Natural Beauty (AONBs), New Forest National Park (NFNP) or Stonehenge and Avebury World Heritage Site (WHS) shall demonstrate that they have taken account of the objectives, policies and actions set out in the relevant Management Plans for these areas. Proposals for development outside of an AONB that is sufficiently prominent (in terms of its siting or scale) to have an impact on the area's special qualities (as set out in the relevant management plan), must also demonstrate that it would not adversely affect its setting.

CORE POLICY 52 – GREEN INFRASTRUCTURE

Development shall make provision for the retention and enhancement of Wiltshire's green infrastructure network, and shall ensure that suitable links to the network are provided and maintained. Where development is permitted developers will be required to:

- i. ***Retain and enhance existing on site green infrastructure***
- ii. ***Make provision for accessible open spaces in accordance with the requirements of the adopted Wiltshire Open Space Standards.***
- iii. ***Put measures in place to ensure appropriate long-term management of any green infrastructure directly related to the development.***
- iv. ***Provide appropriate contributions towards the delivery of the Wiltshire Green Infrastructure Strategy***
- v. ***Identify and provide opportunities to enhance and improve linkages between the natural and historic landscapes of Wiltshire.***

If damage or loss of existing green infrastructure is unavoidable, the creation of new or replacement green infrastructure equal to or above its current value and quality, that maintains the integrity and functionality of the green infrastructure network, will be required.

Proposals for major development should be accompanied by an audit of the existing green infrastructure within and around the site and a statement demonstrating how this will be retained and enhanced through the development process.

Development will not adversely affect the integrity and value of the green infrastructure network, prejudice the delivery of the Wiltshire Green Infrastructure Strategy, or provide inadequate green infrastructure mitigation.

Green infrastructure projects and initiatives that contribute to the delivery of a high quality and highly valued multi-functional green infrastructure network in accordance with the Wiltshire Green Infrastructure Strategy will be supported. Contributions (financial or other) to support such projects and initiatives will be required where appropriate from developers

CORE POLICY 57 – ENSURING HIGH QUALITY DESIGN AND PLACE SHAPING

A high standard of design is required in all new developments, including extensions, alterations, and changes of use of existing buildings. Development is expected to create a strong sense of place through drawing on the local context and being complementary to the locality. Applications for new development must be accompanied by appropriate information to demonstrate how the proposal will make a positive contribution to the character of Wiltshire through:

- i. Enhancing local distinctiveness by responding to the value of the natural and historic environment, relating positively to its landscape setting and the existing pattern of development and responding to local topography by ensuring that important views into, within and out of the site are to be retained and enhanced.*
- ii. The retention and enhancement of existing important landscaping and natural features, (e.g. trees, hedges, banks and watercourses), in order to take opportunities to enhance biodiversity, create wildlife and recreational corridors, effectively integrate the development into its setting and to justify and mitigate against any losses that may occur through the development.*
- iii. Responding positively to the existing townscape and landscape features in terms of building layouts, built form, height, mass, scale, building line, plot size, elevational design, materials, streetscape and rooflines to effectively integrate the building into its setting.*
- iv. Being sympathetic to and conserving historic buildings and historic landscapes.*
- v. The maximisation of opportunities for sustainable construction techniques, use of renewable energy sources and ensuring buildings and spaces are orientated to gain*

- maximum benefit from sunlight and passive solar energy, in accordance with Core Policy 41 (Sustainable Construction and Low Carbon Energy).*
- vi. Making efficient use of land whilst taking account of the characteristics of the site and the local context to deliver an appropriate development which relates effectively to the immediate setting and to the wider character of the area.*
 - vii. Having regard to the compatibility of adjoining buildings and uses, the impact on the amenities of existing occupants, and ensuring that appropriate levels of amenity are achievable within the development itself, including the consideration of privacy, overshadowing, vibration, and pollution (e.g. light intrusion, noise, smoke, fumes, effluent, waste or litter).*
 - viii. Incorporating measures to reduce any actual or perceived opportunities for crime or antisocial behaviour on the site and in the surrounding area through the creation of visually attractive frontages that have windows and doors located to assist in the informal surveillance of public and shared areas by occupants of the site.*
 - ix. Ensuring that the public realm, including new roads and other rights of way, are designed to create places of character which are legible, safe and accessible in accordance with Core Policy 66 (Strategic Transport Network).*
 - x. The sensitive design of advertisements and signage, which are appropriate and sympathetic to their local setting by means of scale, design, lighting and materials.*
 - xi. Taking account of the needs of potential occupants, through planning for diversity and adaptability, and considering how buildings and space will be used in the immediate and long term future.*
 - xii. The use of high standards of building materials, finishes and landscaping, including the provision of street furniture and the integration of art and design in the public realm.*
 - xiii. The case of major developments, ensuring they are accompanied by a detailed design statement and masterplan, which is based on an analysis of the local context and assessment of constraints and opportunities of the site and is informed by a development concept, including clearly stated design principles, which will underpin the character of the new place.*
 - xiv. Meeting the requirements of Core Policy 61 (Transport and New Development).*

2.3 LANDSCAPE CHARACTER

2.3.1 The following Landscape Character Assessments have been used to establish the baseline character of study area:

- NCA: 117. Avon Vales
- Wiltshire Landscape Character Assessment

- North Wiltshire Landscape Character Assessment

2.3.2 The study area is covered by NCA: 117. Avon Vales. However, due to the broad level of assessment, the identified key characteristics are too general to be relevant to the site. For this appraisal, the most detailed Landscape Character Assessment (Wiltshire Landscape Character Assessment, and North Wiltshire Landscape Character Assessment) will be used to help establish the site's unique landscape character as well as to determine its contribution to the landscape character, elements, and features which define the wider landscape.

2.3.3 Only information pertaining to the Landscape Character Areas (LCAs) and Landscape Character Types (LCTs) in which the site is located has been listed. Due to the extent of individual LCAs/LCTs, some of the listed information may not be wholly relevant to the site and surrounding landscape.

WILTSHIRE LANDSCAPE CHARACTER ASSESSMENT

2.3.4 In December 2005, Land Use Consultants, on behalf of Wiltshire County Council, published the Wiltshire Landscape Character Assessment. The site falls within Landscape Character Type 11: Rolling Clay Lowland, specifically Landscape Character Area 11A: Calne Rolling Clay Lowland, the key characteristics of which are shown below.

LCT 11: ROLLING CLAY LOWLAND

Key Characteristics:

- *Gently rolling lowland based on Clay.*
- *Mixed arable and pastoral land use with pasture concentrated around the water courses.*
- *Variable field pattern with network of full hedgerows and mature hedgerow trees.*
- *Presence of streams marked by lines of willows and crossed by modest bridges.*
- *Woodland blocks including some ancient woodland and wet woodland of high ecological value plus scattered mature trees.*
- *Small number of meadows of neutral and unimproved grassland.*
- *Scattered settlement of towns, small villages and farmsteads, many using vernacular materials of brick, half timber, stone, tiles and thatch.*
- *Roads largely minor and rural with a few trunk roads and sections of motorway.*
- *Views vary from semi-enclosed by intact hedgerows, riparian vegetation and woodland blocks to more open with views to the rising scarps of the chalk uplands.*
- *A largely peaceful, rural landscape.*

LCA 11A: SWINDON-CALNE ROLLING CLAY LOWLAND

The Swindon-Calne Rolling Clay Lowland is a long, narrow gently undulating area sandwiched between the uplands of 4A: Avebury Plain and 8A: Swindon-Lyneham Limestone Ridge. Views to the surrounding hills and chalk scarp emphasise the comparatively level and open character of the area. The Swindon-Calne Rolling Clay Lowland is a mix of arable and pasture with the former more prominent to the north above Swindon. The arable fields tend to be large scale and rectangular with a mix of medium sized irregular fields and small regular strips to the south. Fields are bounded by hedgerows although these have been replaced by fences in some areas and hedgerow trees are sparse. The hedges, scattered small woodland blocks (some ancient) and riparian vegetation particularly willows, give a more enclosed and rural feel to the landscape in some sections. There are also remnant areas of hay meadow of high ecological value such as Goldburgh Farm SSSI. Around Swindon large scale buildings on the outskirts dominate immediate views but the area to the north which is very sparsely settled retains a rural remote feel. To the south views of the modern built edges of Calne influence the surrounding landscape, although this is mitigated to some extent by woodland cover. Elsewhere there is little settlement and rural roads criss cross the area giving access to the uplands to east and west.

Positive landscape features of significance

- *Largely rural, tranquil landscape.*
- *Strong pattern of hedgerows and mature hedgerow trees.*
- *Many streams with rich riparian vegetation.*
- *Woodland blocks of high ecological value.*
- *Small scattered villages of traditional pattern and vernacular materials.*
- *Views to Chalk scarps and Limestone ridge.*

Forces for change

- *Agricultural intensification and introduction of arable rotation threatens the remaining medieval field patterns and traditional pastoral landscape.*
- *Hedgerow trees are generally mature with few new trees to replace them.*
- *Elm loss of 1970s.*
- *Need for sustainable woodland management including traditional maintenance techniques where appropriate to maintain ancient woodlands and particularly areas of coppice and wood pasture.*
- *Pressure for further expansion of settlement and new development threatening the character of the small villages and scattered farmsteads.*
- *Pressure to build new roads and upgrade existing roads through additional kerbing and signage to accommodate an increase in traffic volume.*

Inherent landscape sensitivities

- *Rural tranquillity.*
- *Hedgerow pattern.*
- *Watercourses and streamside willows and other riparian vegetation.*
- *Isolated remnant hay meadows.*
- *Woodlands of ecological value.*
- *Views to the scarp slopes of the adjacent chalk downlands.*
- *Settlement pattern of nucleated villages with variety of vernacular building materials.*

NORTH WILTSHIRE LANDSCAPE CHARACTER ASSESSMENT

2.3.5 In 2004, White Consultants, under the appointment of North Wiltshire District Council, produced the North Wiltshire Landscape Character Assessment. The site falls within Landscape Character Type Lowland Clay Farmland which is defined as:

A gently undulating lowland landscape on heavy clay soils forming a transition between the valley bottom and higher ground. Mixed farming and a dispersed settlement pattern enclosed by hedges with trees. Watercourses influence lower lying areas.

Specifically, the site is located in Landscape Character Area 14: Hilmarton Rolling Lowland, the key characteristics of which are shown below.

LCA 14: HILMARTON ROLLING LOWLAND

Main characteristics:

- *Low lying mixed agriculture, between 70m AOD and 130m AOD on geology dominated by clays.*
- *Scattered dwellings and small settlements away from Calne.*
- *Areas of valley bottom, dominated by wet grassland and willows.*
- *Patchwork of small to medium sized fields, mainly pasture but with arable on lighter soils.*
- *Hedged boundaries predominantly well managed, but becoming discontinuous on more intensively farmed land.*
- *Mix of brick and stone buildings, the core of Calne predominantly built from Freestone Oolitic limestone.*
- *Broad expansive views.*
- *Peaceful rural character.*

Management Strategy Actions

Short Term:

- *Encourage repair, replanting and extension of hedgerows and development of hedgerow trees where hedgerows are in poor condition.*
- *Conserve mature trees, woodland clumps and shelterbelts.*
- *Enhance the valley bottom character along watercourses by planting willows in informal groups and broken lines.*
- *Consider where development related to Calne is most appropriate in terms of landscape and visual effects.*
- *Discourage development in the rural parts of the area.*
- *Conserve and maintain river corridors, valley bottom pasture and meadows and riparian vegetation.*
- *Encourage less intensive farming on arable land introducing headlands and margins.*

Long Term:

- *Repair landscapes, identify and seek opportunities to create new woodland belts and copses, in particular to help screen and contain development.*

Key Views management strategy:

Indicators of change from chosen viewpoints within this character area might include:

- *Loss of or deteriorating condition of hedgerows*
- *Loss of mature trees in hedgerows, shelterbelts and woodland clumps*
- *Screening of development edges*
- *Condition of watercourses and associated riparian vegetation e.g. willows.*

Landscape Sensitivity:

Much of the area has a rural character with small, scattered settlements and individual dwellings. Vegetation generally prevents extensive views. This area has an essentially tranquil and pastoral character.

The proximity to Swindon brings with it particular pressure for development. The landscape is therefore vulnerable to change either through cumulative small scale development which over time will change the area's character or through larger scale developments which have a more obvious immediate effect.

Only small-scale, sensitively designed development, appropriately associated with existing built form, could be successfully accommodated without adverse landscape impacts.

Around Calne, the original settlement in the valley bottom has expanded up the valley sides. These areas are exposed to wider views and are sensitive to further development. The south western fringes bordering Bowood are sensitive due to the character of the valley and its relationship with the parkland area. The setting of Cherhill Downs to the east is an important consideration.

2.4 THE SITE AND STUDY AREA

2.4.1 Topographically, the study area presents as an undulating landform, within a shallow valley landscape. The site itself is located on a gently sloping side of a shallow valley, with its highest point being at 95m Above Ordnance Datum (AOD) on its southern boundary. The lowest point of the site is located on the valley floor at Abberd Brook, at <75m AOD on the northern boundary. The surrounding land offers a high level of containment for the site within the study area. The most notable high points in the study area are: to the east at 115m AOD which is on a section of ascending land; and to the north of the site at 110m AOD at The Quag, and is part of a ridgeline which provides containment to the north of the site. The lowest point is located on the western boundary of the study area at <70m AOD. In the wider landscape the landform rises to 130m AOD at Bremhill to the north-west; to 175m AOD to the east at Cherhill Field; to 205m AOD to the south-east at Cherhill Hill close to the Cherhill Monument; and to 250m AOD to the south at Morgan's Hill.

2.4.2 The bedrock across the study area is a mix of mudstone, sandstone, limestone and chalk. The change in bedrock is closely associated with the distinct topography of the area; with the more elevated land having a bedrock of chalk, limestone and sandstone. This is due to an environment previously dominated by warm shallow seas. The lower regions within the study area have a bedrock of mudstone, with a superficial deposit of alluvium, which is typical of a wet valley floor location, and runs in tandem with Abberd Brook. The site itself is a combination of sandstone on its more elevated southern section, and mudstone on its lower northern section.

2.4.3 The soil types present within the study area broadly reflect the bedrock of the area, with the majority of the study area, including the site, comprising acidic loamy soils. The site itself is covered by two soil types that run in tandem with the underlying bedrock. The elevated southern section is overlain with slightly acid loamy and clayey soils with impeded drainage; and the lower northern section is overlain with slightly acid but base-rich loamy and clayey soils, which are slowly permeable and seasonally wet. The majority of the study area has been identified as ALC Grade 3 (Moderate - sub-grade not specified), which also covers part of the site. Part of the site is also identified as Grade

2 (Very Good) land; with areas of Grade 4 (Poor) and Grade 5 (Very Poor) located to the north, and south-east. The landuse of the study area is a combination of agricultural, industrial and residential.

2.4.4 Several small woodland blocks and belts break up the landscape, and where located in the vicinity of the site, offer a high level of containment, particularly from the east and south. Additionally, tree belts are a common feature in the area, being present along both field and road boundaries, providing a sense of enclosure, especially in the lower areas of the surrounding landscape. Hedgerow cover is generally strong across the study area with a notable element of tree cover typically found along land ownership boundaries, alongside tracks and PRowS, and transport corridors, with fields also generally being well hedged. There are some areas of fragmentation present where the hedges have been replaced with fencing, however, the overall hedgerow network is complete with a generally dense structure. There is also a notable amount of riparian vegetation following watercourses within the study area.

2.4.5 Several woodland blocks in the study area are designated as County Wildlife Sites, however, beyond this, there are no other natural environment designations within the study area. It must be noted however, that a recent Tree Preservation Order (TPO) has been made on 8 trees and one group of trees on land directly adjacent to the west of the site. This includes one sycamore (T4 in the tree schedule) which stands within the hedgerow boundary in the southern corner of the site. The TPO, administered by Wiltshire Council, was issued in March 2017 and is titled: Land North of Low Lane, Calne Wiltshire. TPO reference number: 2017/00004/MIXED. A copy of the TPO is included in Appendix 4.

2.4.6 There is a high level of vegetation cover on the site. The fields within the site are largely defined and bordered by mixed native hedgerows with the occasional standard native broadleaf trees. A small copse of native woodland stands on the eastern boundary with an adjacent farm track. A fenced off area on the northern edge of the site contains a small man-made pond, with a row of mixed native standard trees to its rear on the boundary with adjacent industrial uses. Abberds Brook defines the north-western boundary of the site, along with a broken hedgerow and standard, native, broadleaf trees. Agricultural pastures and a small farmyard complex of barns lies beyond the brook. The fields to the west of the hedged boundary are arable land used for crop production.

2.4.7 Three clearly defined and continuous hedgerows break the site up into four fields of varying sizes. A very small enclosed paddock area that appears unused for any agricultural purpose stands

adjacent to Low lane on the southern boundary, and is bordered by a high hedgerow and standard trees. A small copse of trees comprises mixed native species on the eastern boundary and is fenced from the adjacent fields to restrict access by livestock, and appears to not to have been managed in any significant way for many years. The fenced off area of land to the north of the site, which contains the pond, appears to have been established as a conservation and wildlife habitat area and is also fenced. As the land drops down towards the brook it becomes increasingly marshy which is reflected in the tree species along this lower section of the site, which comprise principally riparian species such as willow and alder.

2.4.8 The landscape has been settled and managed over time, with the present-day field pattern of the study area generally being characteristic of enclosure during the later 18th and 19th centuries leading to a characteristic regularity within the landscape with large open fields, straight field boundaries and tracks. It is likely that the study area and wider landscape has Anglo-Saxon influences.

2.4.9 In terms of historic designations with the study area, they are as follows: one Grade II* listed building, *The Church of St Peter* to the south of the site within Blackland Park; a number of Grade II listed buildings, also located largely to the south, with the closest being *Sands Farmhouse*, which is the only historic designation within 500m of the site; the Calne conservation area located within Calne to the south-west; and two Scheduled Ancient Monuments within the study area, both of which consist of Medieval settlement, to the north-west and south of the site.

2.4.10 Present day settlement within the study area is defined by Quemerford, Lower Compton, and the eastern edge of Calne, which are the most distinct areas of built-form within the landscape. It should be noted that the eastern edge of Calne is currently undergoing an expansion to provide residential development (See Appendix 2). Therefore, although the site is currently isolated from the edge of Calne, post-construction of the already approved development on the site's western boundary, the site will be integrated into the expansion. Aside from these larger areas of built-form, other settlement in the study area consists of isolated farmsteads. The local area has historically been agricultural, with some historic and current quarrying use. The modern quarry is located within close proximity to the sites' eastern and southern boundaries, and can be used to provide a more defendable and defining edge for Calne. In more recent years the landscape has also included renewable energy, with a Solar Farm located to the north of the site. There are no historic designations covering the site.

2.4.11 Access through the study area is provided largely by a series of minor roads and tracks, with the A4 Quemerford Road and A3102 being the main roads and transport corridors providing links from Calne to the surrounding landscape. The A4 is located to the south of the site, and the A3102 is located to the north-west. The site is currently accessed via Low Lane adjacent to its southern boundary, and connecting it to the southern edge of Calne.

2.4.12 A network of footpaths and bridleways provide access into the surrounding countryside. The closest routes are Footpath CALW16 located adjacent to the southern boundary and providing a link to Calne to the east; and Bridleway CALW56 located close to the northern boundary. In several instances PROWs connect with the minor roads and tracks, which in turn are used as links between the various pedestrian routes which cross the landscape. Although not located within the immediate study area, it should be noted that the White Horse Trail, and Wessex Ridgeway Recreational Routes run in tandem on the elevated land to the south of the site at North Down. The White Horse Trail Recreational Route also runs along the elevated land in a north-south direction to the south-east of the site at Cherhill Hill.

3. SITE APPRAISAL

3.1 VISUAL CONSIDERATIONS AND VIEWPOINTS

3.1.1 The consideration of the proposed housing development on visual amenity is initially undertaken as part of the desk study, and then tested on site. As a preliminary response to the proposed development it was identified that there would be close views of the site from Low Lane/Footpath CALW16 to the south, adjacent to the site, and Footpath CALW63 also to the south; Footpath CLAN40 to the west on the edge of Calne; and Abberd Lane/Spitfire Lane/Bridleway CLAN63 to the north. It was also considered that there would be potential medium distance views from Footpath CALW61, and Bridleway CALW56 to the north; and the road leading to Freeth Farm to the north-east. There is also a need to give consideration to residential views from the urban edge of Calne to the east. Beyond 1500m from the site the land undulates, first falling away, before rising again to the north-west, east, south-east and south of the site. Therefore, potential elevated views were identified at Cherhill Hill to the south-east, to the south at North Down, and to the north-west at Bremhill.

3.2 VIEWPOINT FINDINGS

3.2.1 The viewpoints recorded for this preliminary response can be used to predict possible effects from Public Rights of Way (PRoWs), roads, publicly accessible areas and residential properties within the study area. A more thorough assessment will be carried out in a supporting Landscape and Visual Impact Assessment, that will need to be undertaken at a later date and will include additional viewpoints from the surrounding area where necessary. The recorded viewpoints have been determined from where the desk study suggested that the development areas may be visible, as well as observations during the field survey. The recorded viewpoints are considered appropriate for the scale of the development and the prevailing topography and land cover. All photographs were taken using a digital equivalent of a 50mm focal length traditional 35mm SLR lens to represent most accurately the views as seen by the human eye.

3.2.2 For the purpose of this appraisal, close views are between 0m – 500m from the proposed development, medium views are between 500m – 1500m, and long views from further than 1500m. Where appropriate, specific viewpoints have been organised into groups to help better determine the visual impact of the proposed development. Views are representative and not totally exclusive. (See Appendix 2: Viewpoint Photographs for enlarged copies of the selected viewpoints).

3.2.3 The Viewpoints were visited in November 2018 when leaf cover was in decline. The Seasonal differences (seasonality), in respect of potential effects arising from the varying degree of screening/filtering of views by vegetation that will apply in summer and winter, have been considered in the appraisal of all recorded viewpoints; as per the recommendation of GLVIA3. It is important to note that the recording of viewpoints during different seasons is not a prerequisite of the consideration of seasonality, as GLVIA3 states:

The timing of the assessment work and the project programme will also influence the practicality of covering more than one season.

VIEWPOINT 1

Approximate distance from site: 195m

OS map elevation: >95m AOD



A close distance view north towards the site from Footpath CALW63. This is a filtered partial view onto the elevated southern boundary of the site. The majority of the development area is obscured from view due to the valley landform falling away to the north, from the southern boundary of the site. The elevated southern section of the site is largely open from this view, with some filtering into the site provided by a hedge with trees. Beyond the site, rising land further to the north provides a backdrop, with a solar farm being seen on the southern facing slope.

VIEWPOINT 2

Approximate distance from site: Adjacent

OS map elevation: >95m AOD



An adjacent view north-west into the site from a junction of Footpath CALW16 and farm tracks, on the south-east corner of the site. This is an open view across the elevated southern section of the site, with the majority of the site further to the north obscured by sloping landform. This elevated viewpoint location allows for views across the town of Calne on the valley floor towards the elevated land at Bremhill in the background, and Penn Hill in the foreground. Any development on the southern section of the site will be dominant and will obscure the views across the valley landform.

VIEWPOINT 3

Approximate distance from site: 1.02km

OS map elevation: Between 100-105m AOD



A medium distance view south-west towards the site from Bridleway CALW56 adjacent to the solar farm. The majority of the site is obscured by intervening vegetation, particularly during the summer months when leaf cover is at its peak. The buildings associated with the quarry works also help to obscure the site. However, part of the southern section of the site can be seen due to its elevated position on the ridgeline of the valley side. Any development on this section of the site would be seen against a backdrop of hills.

VIEWPOINT 4

Approximate distance from site: 355m

OS map elevation: Between 100-105m AOD



A medium distance view south towards the site from Footpath CALW61. The eastern part of the site is obscured by intervening landform, whereas the elevated southern-most field, and the western-most field is open in the view. There is a filtered view onto one of the fields on the northern boundary, however during the summer months when leaf cover is at its peak, this field will be obscured from view. Any residential construction on this site will be seen in the context of the proposed development on the edge of Calne (to the right of the site in the photograph); and will be seen against the backdrop of trees and rising land.

VIEWPOINT 5

Approximate distance from site: 295m

OS map elevation: <75m AOD



A close distance view east towards the site from Footpath CLAN40 on the edge of Calne. The site is obscured by an intervening hedgerow, even during the winter months. There may be a heavily filtered winter views of potential ridgelines of dwellings on the elevated southern boundary of the site. It should be noted that the location of this viewpoint is on the site of the proposed eastern expansion for Calne, which reduces the significance of this view.

VIEWPOINT 6

Approximate distance from site: 1.52km

OS map elevation: Between 90-95m AOD

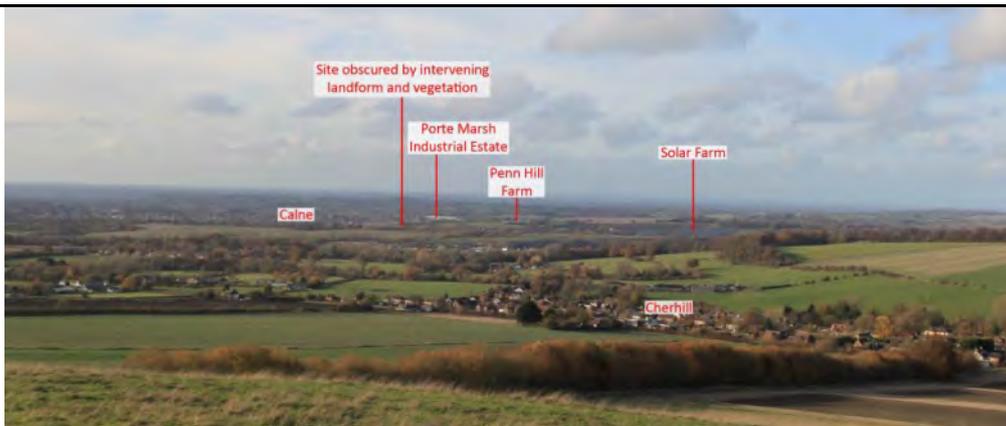


A medium distance view south-west towards the site from the minor road close to Freeth Farm. The site is obscured from view by intervening vegetation.

VIEWPOINT 7

Approximate distance from site: 3.9km

OS map elevation: Between 200-205m AOD



A long distance view north-west towards the site from Cherhill Hill close to Footpath CALW72. Although this is an elevated view towards the site, it is obscured from view by intervening tree belts, and the sloping land on the site.

VIEWPOINT 8

Approximate distance from site: 4.08km

OS map elevation: Between 195-200m AOD



A long distance view north towards the site from Morgan's Hill, the White Horse Trail Recreation Route/Byway BCAN32. Although this is an elevated view towards the site, it is obscured from view by intervening tree belts, and the sloping land on the site.

3.3 APPRAISAL OF ESTABLISHED TREES AND HEDGEROWS

3.3.1 The majority of trees and hedgerows identified on the site are associated with its boundaries and comprise mixed native hedgerows of varying quality and maintained by mechanical flail. The hedgerow runs are broken by occasional standard trees. Some boundary areas consist of continuous rows of mature native broadleaf trees. There is also a small copse of trees on the eastern boundary (W1). Three continuous lines of hedge, with some standard trees, located within the site split it into four individual fields of varying size. The boundary and central hedgerows principally comprise mixed native hedge species. The maintained height, as well as density of these hedges, varies along with their quality, with sections of some hedges over-grown with brambles which are starting to crowd-out other species. Photographs have been provided in Appendix 3 showing specific tree or hedgerow features.

3.3.2 NOTABLE ON-SITE TREES AND TREE GROUPS

3.3.2.1 The noteworthy individual or grouped trees within the site are shown below. See Figure 7. for the *Tree and Hedge Appraisal* plan.

Tree Schedule Table

No.	Species	Comments
T1	Oak <i>Quercus robur</i>	Mature tree, approximately 12m high with a stem diameter of approximately 1m, in good physiological and structural condition. Contained within the west central hedgerow with a high amenity and conservation value. Recommended for retention as a high-quality tree. Stands on a relatively sparsely treed area of the site.
T2	Ash <i>Fraxinus excelsior</i>	Early mature multi-stemmed (6 stems each approximately 20-30cm diameter), 10m> high, in good physiological condition and fair structural condition as a multi-stemmed tree. Small tree contained within the west central hedgerow and of moderate visual amenity and conservation value which will increase as the tree matures. Stands on a relatively sparsely treed area of the site.
T3	Oak <i>Quercus robur</i>	Mature tree, approximately 12m high with a stem diameter of approximately 80cm, in good physiological and structural condition. Stands within the west central hedgerow and is very similar to T1 with a high visual and conservation value within the site. Recommended for retention.
T4	Sycamore <i>Acer psuedoplatanus</i>	SUBJECT OF TPO: Ref 2017/00004/MIXED Early mature tree 10m> high with an approximate 30cm stem diameter, in good physiological and fair structural condition. Tree has a congested structure and ivy clad stem, and stands within dense hawthorn scrub and other hedgerow species in the southern corner of the site. This tree is of moderate visual amenity and conservation value but will likely need to be retained due to its TPO status.
T5	Ash <i>Fraxinus excelsior</i>	A Veteran tree at 10m> in height with an approximate 80cm stem diameter. This is a veteranised tree with a significant portion of dead and declining limbs in the upper crown, as well as live growth, multiple branch tears and open cavities, showing dead and decaying wood throughout the main stem and primary branching structure. Multiple conservation features

		(deadwood/live wood and cavities with decaying wood) gives the tree a high conservation value providing a wildlife habitat for birds, small mammal and invertebrates. The tree is located at the western end of the central hedgerow within a relatively sparsely treed area of the site. This tree should be retained as a conservation feature.
T6	Oak <i>Quercus robur</i>	Mature tree, 12m> in height, with a stem diameter of approximately 1m. In good physiological and good structural condition. Stands on the opposite side of brook, on adjacent land. Has a high visual amenity and conservation value. The tree is recommended for retention.
G1	Row of multi-stemmed White willows <i>Salix alba</i>	Row of 15m> in height, multi-stemmed ivy clad willow trees, with approximate stem diameter of 30cm, running from the northern corner of the site for approximately 200m along the north-western boundary and associated with Abberds Brook and the associated wetland area of the site. Comprises 30+ ivy clad stems, many of which are dead, collapsed and partially collapsed. Trees are of mixed physiological condition. Structural condition is overall poor. High conservation value providing wildlife habitat opportunities. High amenity value and important part of the visual structure of the site. Recommended for retention as part of the wetland feature of the site.
G2	Group of white willows <i>Salix alba</i>	Row of 15+ willow trees of 18m> in height, with approximate stem diameter of 40cm, standing adjacent to the pond in the fenced off area to the north of the site. Trees are in a good physiological and structural condition. They are of high conservation value, providing wildlife habitat opportunities. They form an important part of the visual structure of the site and should be retained.
W1	Woodland copse of mixed native broadleaf species	A copse of woodland comprising principally oak, ash, hazel and willow. Stretches for approximately 200m from the north-east corner southwards along the higher parts of the site and is approximately 30m deep in places. The standard trees and understory provide a dense and continuous cover along the

		boundary. The copse is of high conservation value and has a high landscape and visual amenity on the site. Retention is recommended.
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3.3.2.2 All trees appear to be self-set native species, with the exception of the row of willows G2, which have been planted within the fenced off area including the pond, which also appears to be a man-made feature. All the trees included within the above schedule are worthy of retention, although concerns regarding the long-term structural integrity of ash (T5), and the groups of willows (G1 and G2), are a potential constraint. Residential development may not be suitable within close proximity to these trees where there are concerns regarding the potential impacts of limb or stem failure.

3.3.2.3 Smaller trees within the central and boundary hedgerows are not included in the above schedule, as they are considered a more intrinsic part of the hedgerow structure as opposed to being individual trees. They are assessed as part of the hedgerows within which they are found.

3.3.3 PRINCIPAL HEDGEROWS WITHIN AND BORDERING THE SITE

3.3.3.1 The principal hedgerows which form the boundaries of the site, and those within it, which divide it into four fields, have been grouped by their location and function. These hedgerows are traditional field boundaries in nature and are of varying height, species composition and quality. In some case the hedges have been maintained by mechanical flail, however, others have been left unmanaged for a number of years. In order to describe the various aspects and features of the hedgerows, they have been individually titled. See Figure 7. for the *Tree and Hedge Appraisal* plan.

HEDGEROW ALONG THE WESTERN BOUNDARY.

3.3.3.2 A dense and continuous hedgerow running for approximately 270m from the southern corner of the site and sloping down to the western corner of the site. This hedge is comprised principally of hawthorn and blackthorn, and maintained at approximately 2m in height by mechanical flail. Some sections of the hedgerow are beginning to become dominated by brambles. The southern section of the hedge contains the TPO sycamore T4 (the only tree on site under legal protection). This is located in an overgrown section of the hedgerow, where some hawthorns, elms (many now dying) and other hedgerow species have not been flailed and are growing to become standard trees, many of which are in a poor structural and physiological condition.

3.3.3.3 The denser and more regularly maintained section of the hedgerow, contains a rich mix of species and has a relatively high conservation value, specifically as wildlife habitat providing abundant nesting opportunities for birds.

HEDGEROW BORDERING ABBERD BROOK ON THE NORTHERN BOUNDARY

3.3.3.4 The northern boundary of the site is approximately 400m long and defined by the watercourse Abberd Brook, which is wet with many marshy areas. This is generally reflected by the tree species that thrive there, specifically willow species and alder. The composition of the northern boundary changes from broken and scrubby growth of willow sallow and hawthorn at the western end, which stands at an average height of approximately 5m, to meet with an informal clump of standard trees, including willow and alder, approximately half way along the boundary. The boundary tree cover then becomes the line of mature/semi-mature willow trees (G1). The continuity of the western end of the hedgerow is broken in places to reveal views to the adjacent fields. It does not appear to have been maintained by mechanical flail regularly. Notable standard trees within this hedgerow are a group of scarlet willows (*Salix alba* var. *vitellina* 'Britzensis') which are distinguished by their vivid orange upper stems prominent during the dormant season.

HEDGEROW ALONG THE EASTERN BOUNDARY

3.3.3.5 The eastern boundary hedge beyond copse W1, runs for approximately 100m from the copse south, to the south-east corner of the site, and is bordered by an access road to the industrial complex to the north. This boundary contains some significant gaps and sections of poorly maintained, scrubby, hedgerow comprised largely of bramble and cut by mechanical flail.

TREES AND HEDGEROW ALONG THE SOUTHERN BOUNDARY

3.3.3.6 The southern boundary runs for approximately 150m adjacent to the access track that serves the nearby farm and industrial complex. The track is also a public right of way. A low scrubby hedgerow of hawthorn and brambles runs along the length of this hedgerow to the south-west corner of the site and has been flailed at approximately 1m.

SMALL HEDGED PADDOCK ON THE SOUTHERN BOUNDARY

3.3.3.7 Approximately half way along the southern boundary a small paddock area of around 0.15 hectares is enclosed by a high lapsed hedge (5-6m in height), comprised principally of hawthorn and

some field maple. The northern end of this enclosure contains several standard ash trees in the early mature age class with ivy clad stems. The hedgerow does not appear maintained.

WEST CENTRAL HEDGEROW

3.3.3.8 The west central hedgerow starts near the southern boundary of the site and runs in a north-westerly direction for approximately 240m, where it joins up with the southern boundary and Abberd Brook. There is a small un-gated break in the hedgerow adjacent to the point where the hedgerow meets the northern hedge. The hedge is otherwise continuous and maintained at 2-3m in height along much of its length. The hedge contains two standard oaks (T1 and T3), which are the two highest quality mature trees within the site from a conservation and visual amenity aspect. The standard ash (T2) also stands in the central section of the hedgerow. It is an early mature specimen that does not currently contribute significantly to the site, but its amenity and conservation value will increase as it matures.

3.3.3.9 The section of the hedgerow which contains the standard trees is of relatively low quality as, although many sections of it contain some hawthorn and blackthorn, much has been colonised by bramble. The northern end of the hedgerow, as it slopes down to meet the brook is more continuous and does not contain any standard trees. It is maintained at approximately 3m in height and is composed predominantly of hawthorn and with less bramble colonisation.

CENTRAL HEDGEROW

3.3.3.10 The central hedgerow is connected to the west central hedgerow at its western end and runs for approximately 180m from west to east to connect with the eastern central hedgerow. The hedge is scrubby and of low quality, comprising a lapsed collection of willow, blackthorn, hawthorn and young ash, with the occasional dead or moribund elm trees. These all stand at approximately 4-5m in height. Much of the hedgerow is becoming colonised and overrun with brambles. The hedge is sparse at its western end and livestock have sheltered within and grazed some sections here, with the effect of punching holes between the adjacent fields which subsequently have been used as access points. The hedgerow becomes denser towards its eastern end where connects with the east central hedgerow. At the western end of the hedge is the standard ash tree (T5), a veteran specimen with several key conservation features such as open cavities and a combination of live growth and deadwood in its crown.

EAST CENTRAL HEDGEROW

3.3.3.11 This section of hedgerow forms part of the scrubby patch of vegetation principally consisting of willow and brambles formed at its junction within the central hedgerow. From this point it runs for approximately 160m due north, down the slope of the site, where it connects to a patch of marshy ground consisting of reeds, willow and alder trees. The hedgerow is continuous in nature but unmaintained. It principally consists of an understory of blackthorn below a relatively dense line of standard trees, comprised largely of elms (some alive, some dead or moribund), with the occasional young ivy clad ash of generally low quality. A young oak and some field maple have established at the northern end of the hedgerow and form the better part of the hedgerow from a conservation point of view. Much of the hedgerow has become colonised by brambles, which have contributed to the density and continuity of the hedge. The brambles have also encroached into the field and are beginning to succeed the grass to the north-east in places extending up to 10m from the hedge.

3.4 APPRAISAL OF THE SITE'S STRENGTHS, WEAKNESSES, OPPORTUNITIES AND CONSTRAINTS

3.4.1 SITE STRENGTHS

LOCATION

3.4.1.1 The site is located on the north-eastern edge of Calne, within an area of land between quarrying works and the existing residential edge of the town. Furthermore, the site area has been identified in the Wiltshire Sites Housing Allocation Plan, as a Proposed Contingency Allocation site. This is located adjacent to the Eastern Expansion Area of Calne, with either completed or committed sites. Therefore, residential development will not be out of character for this local area, as there has been character changes already with the on-going development.

VEGETATION

3.4.1.2 The site is relatively well contained by existing dense boundary vegetation. The vegetation in the surrounding area, particularly to the south and south-east provides an additional visual barrier, even from longer distance elevated locations at Morgan's Hill and Cherhill Hill. Intervening vegetation cover also provides a visual barrier from views adjacent to the Solar Farm, and Freeth Farm to the north-east.

LANDFORM

3.4.1.3 Working in conjunction with the local and boundary vegetation is the prevailing landform. Although the site is on a northern facing slope, which does mean that there are views from the existing edge of Calne, and a potential longer distance view from Bremhill to the north-west, it is typically well contained within the local landscape. The sloping nature of the site means that the majority of the site will be below the ridgeline adjacent to the southern boundary, which alongside the intervening vegetation means that it will not be visible from beyond the adjacent track and Sands Farm. To the north of the site the ridgeline at Penn Hill, which follows from Penn Hill Farm in a north and north-easterly direction precludes views from further north.

VIEWS

3.4.1.4 Any views towards the site from the existing residential edge of Calne will see it in the context of the on-going buildings works already taking place in this area. Any views from the wider area will show the site in the context of the existing town, and new development either taking place or committed to being undertaken.

OTHER

3.4.1.5 There are no designations covering or adjacent to the site, nor is the site located within a nationally designated landscape.

3.4.1.6 No PRoWs will be affected by the proposed development, as there are none that currently cross the site.

3.4.2 SITE WEAKNESSES

LANDFORM

3.4.2.1 The sloping nature of the site means that proposed development on the site will be visible in the local area, with any development on the more elevated southern section of the site being the most prominent. However, the development will be seen in the context of the proposed dwellings on the neighbouring site, which are also located on the ridge alongside Low Lane.

ACCESS

3.4.2.2 Although Low Lane provides access to the site, it is a single carriageway road that serves the row of dwellings on the south-eastern edge of Calne. Beyond this point Low Lane becomes an unmade track providing access to Lower Sands Farm, and Sands Farm. This means that access from

Low Lane would entail a large amount of infrastructure work, which would likely entail the removal of well-established hedgerows and mature trees on the edge of the approved and proposed developments. Furthermore, there is no direct access to the site from Abberd Lane or Spitfire Road to the north.

VEGETATION

3.4.2.3 To reasonably accommodate development on this site some hedgerow and tree removal will need to take place. Furthermore, the fields on which the site is located will be taken out of their existing grazing use.

3.4.3 SITE OPPORTUNITIES

ACCESS

3.4.3.1 Although the site does not have its own direct access, the approved development to the west of the site has a proposed main route between the junction of Spitfire Road, Abberd Lane and Sand Pit Road to the north of the site, and Prince Charles Drive to the south-west of the site. A spur off this main road provides access to dwellings close to the site's western boundary. Therefore, there is the opportunity to make a break in the western boundary hedge to connect the two development areas and create an access into the site.

3.4.3.2 If it is determined that there will be development on the land to the north of the site, there is the opportunity to create potential road linkages close to the site's northern boundary to ensure there will be connectivity between both the site and the land to the north. Ultimately this creates the potential for another link to Spitfire Road to the north.

3.4.3.3 Although there are no PRoWs crossing the site, a footpath (CALW16) runs adjacent to the site's southern boundary. There is the opportunity to provide pedestrian/recreational links to the wider landscape by connecting the site to the PRoW network.

VEGETATION

3.4.3.4 The boundary vegetation on the site is strong, in the sense that it provides a defined boundary which contains the site in the local landscape. To ensure that this remains the case, there is the opportunity to enhance the boundary vegetation in places. An example of this would be to connect the woodland on the eastern boundary with that on the north-eastern boundary, where

currently an access to a storage area for the quarry divides it. Enhancing the boundary vegetation where necessary ensures that there is a strong landscape setting for the site.

3.4.3.5 To accommodate the development, a significant amount of low quality internal vegetation will be removed. However, there is the opportunity to off-set this removal by providing space within the design layout for the provision of structural tree planting for streetscapes to soften the development in its semi-rural setting. Space should also be provided in the layout to allow for domestic planting to enhance the street scene on property frontages, thereby enhancing the internal setting of the development.

DESIGN LAYOUT

3.4.3.6 The size of the site, allows for a layout that can be carefully designed to ensure that it is sympathetic to on-site constraints and retained boundary vegetation to integrate it into the wider landscape. Furthermore, there is the opportunity to provide a layout that is cohesive with the approved neighbouring development to the west. Links can also be provided where necessary between the neighbouring approved site to the west, as well as the other land identified as Proposed Contingency Allocated land to the north.

3.4.4 SITE CONSTRAINTS

LANDFORM

3.4.4.1 The slope of the land means that there will be the need for hard engineering such as retaining walls etc. The design of the landscape needs to ensure that this constraint is limited in terms of its visibility and that there is an allowance for space for landscaping where needed. The more elevated southern section of the site, close to the ridgeline will be prominent, therefore it is recommended that any development here is relatively low in ridge height.

ACCESS

3.4.4.2 As there is no direct access into the site from the surrounding road network, access into the site will be determined by a spur road from the neighbouring site. This connection will be made through the western boundary.

VEGETATION

3.4.4.3 There is a large amount of on-site and boundary vegetation some of which are of a good quality and will need to be retained as far as possible. The mature trees on and bordering the site

will be retained as far as possible to ensure a continued mature tree structure. This is also the case for the hedgerow structure, some of which is of a good quality. A visual inspection of the trees and hedges has been completed for the purpose of this report, however, a full survey should be undertaken to detail their quality.

FLOOD PLAIN

3.4.4.4 The lower northern section of the site along the length of the boundary and adjacent Abberd Brook is located within a flood zone. This is particularly noticeable on the site's north-eastern fields where a portion of the ground is marshy, as shown by the areas of wetland planting. This section of floodplain will limit the amount of development in and close to these areas on the site. It should be noted that the floodplain information has been taken from the documents forming part of the planning application for the development to the west.

OTHER

3.4.4.5 A pond with a low bunded edge is located in the site's northern most corner, within an area that seems to have been fenced off for potential biodiversity or ecological reasons, therefore it is recommended that no development is undertaken within this area. Although a constraint which limits development, it does allow for a substantial landscape buffer between any potential development and the neighbouring quarry works.

4. DISCUSSION AND RECOMMENDATIONS

4.1 The capacity for residential development on this site is determined by its suitability in terms of the potential landscape and visual effects on the local and wider area, as well as appraising the site itself in regard to its strengths, weakness, opportunities and constraints. Of particular importance to the consideration of the developments overall effect is whether the construction of a new residential development on-site will adversely affect the character of the study area, in particular the urban/rural edge character. Key mitigating factors to be considered are the contained nature of the site provided by well-defined boundaries; and the established built-form context of the site, which includes the on-going development as part of the eastern expansion of Calne, as well as approved development still to take place.

4.2 SUMMARY OF LANDSCAPE AND VISUAL APPRAISAL

4.2.1 In terms of the landscape effect resulting from the proposal for a residential development on this site, any change has to be considered in terms of the key elements and features that will be affected. The importance of these elements and features as part of the wider landscape is also a consideration. The proposals will see the construction of a form of development that pre-exists within the study area, including a site with planning approval for residential development on adjacent land to the west of the site. As there will be additional built form on the eastern edge of Calne, this will result in the loss or alteration of key elements, features or characteristics of the baseline condition. The proposals will see the loss of an area of rough pasture, as well as a large amount of low-quality internal vegetation, however there is the opportunity to offset this loss with landscape and ecological enhancements across the site. Furthermore, aside from a break in the western boundary hedge to allow for access from a neighbouring development site, the boundary planting will largely be retained, with the opportunity for enhancements to be made, thereby ensuring that a strong boundary structure will continue to contain the site.

4.2.2 The site is not located within a designated landscape, nor are there any natural environment or heritage designations covering or lying adjacent to the site. The development of this land will not provide detrimental impacts to the setting of any designated areas. Additionally, there will be no disruption to the PRoW network as none cross the site. Moreover, through careful development, there is the opportunity to create links from the site onto the PRoW network through a connection with Footpath CALW16, which is located on the site's southern boundary, therefore providing pedestrian links into the wider countryside.

4.2.3 In terms of the potential effect on the urban/rural edge landscape on the eastern edge of Calne, the development is likely to have an adverse effect due to introduction of more built form in this area. However, this will be in the context of adjacent site to the west which already has planning approval for residential development (Planning ref. 17/00679/OUT), and alongside other new development in the local area provides precedent for development on this low lying valley landscape. In the context of the wider landscape the proposed development will be contained on the developing eastern edge of Calne and is unlikely to be unduly prominent beyond the local area and valley landscape within the study area.

4.2.4 The visual character of the local area on the urban/rural interface of Calne, will change from its current condition, as there will be additional built form which is prominent in the local landscape. However, due to the on-going development on the eastern edge of Calne which includes development both in the process of being built, and which has planning approval to be built, the visual character had already changed significantly through recent years. Despite being located on sloping land, the visual envelope is comparatively limited, with viewpoints being relatively localised. This is due to intervening vegetation breaking up/obscuring a high percentage of the potential views towards the site, as well as the topography of the local area containing the site within a low valley landform.

4.2.5 The most notable and open view of the proposed development site is from the Footpath CALW61 on elevated land to the north of the site. which provides a partial view of the site's sloping nature. Other notable views of the development are close views from alongside the southern boundary from Footpath CALW16, and from close views from CALW63 open and partial views into the elevated southern section of the site. In terms of longer distance views, there is a view towards the elevated southern boundary from adjacent to the solar farm to the north-east from bridleway CALW56. There may also be a very long distance view from Bremhill beyond Calne to the north-west. Although there are elevated locations to the east and south, aside from distance being a mitigating factor, intervening landform and vegetation obscure views of the site, including the elevated southern edge.

4.2.6 Although there are some views of the proposed development site, including from residential viewpoints, these views will be seen in the context of the expanding edge of Calne. Therefore, although there will be some change to the visual character of the local area, any detrimental effects are unlikely to be significant.

4.3 RECOMMENDATIONS

TREES AND HEDGES

4.3.1 After a visual inspection of the trees and hedgerows both on and bounding the site, a summary of those that should be retained, and those that are suitable for removal has been provided below. It should be noted that this is a preliminary review of the site's trees and hedges and does not constitute a full tree survey. Therefore, a full tree survey will be required to confirm these preliminary observations.

4.3.2 Trees and hedgerows advised to be retained:

- The boundary hedgerows and treelines surrounding the site should be maintained in their entirety subject to access. They provide important landscape and conservation benefits and maintain the connectivity and continuity with adjacent farmland hedgerows. This includes the line of willows (G1) adjacent to Abberd Brook, which alongside the marshy area of ground comprising of reeds and sallow at the southern end of the row of trees, is a key amenity and conservation feature.
- The fenced off area to the north of the site containing the pond, must be retained and kept outside the scope of any development. Overall this section of the site has the highest conservation value due to its diverse range of habitat, and tree and shrubs species, as well as the benefits provided by the pond and aquatic species of flora and fauna. The row of trees to the rear of this area also provides an important screen from the industrial site to the north-east.
- The copse of woodland (W1) on the eastern boundary must be retained in its entirety as a key visual amenity and conservation feature. It contains a number of mature broadleaf species including several oaks as well as a well-established understorey.
- The individual trees recommended for retention include the oaks (T1 and T3) within the west central hedgerow. These are high-quality mature specimens that are key focal points within the site. The smaller ash (T2) adjacent to the larger oak (T3) is also a suitable candidate for retention as this will soon grow to become a prominent feature of the site.
- The majority of the western central hedgerow should be retained, especially the section running from the oak (T3) north-west towards the northern boundary with Abberd Brook. This section of hedgerow is better maintained and denser in structure than other sections, making it good habitat for nesting birds. A gateway exists within this section of hedge and it is accepted that this may need to be widened to provide a vehicle access point within the site.

- The sycamore (T4) situated in the south-west corner of the site, and within the western boundary hedgerow is to be retained being subject to a TPO.
- The veteran ash (T5) should be retained along with the section of hedgerow which connects it to the adjacent west central hedgerow. This tree has a high level of conservation value within the context of the site, and due to features, such as open cavities with dead and rotting wood, provides habitat for a range of insect species as well as birds and mammals.

4.3.3 Trees and hedgerows suitable for removal:

- The scrubby hedgerow and standard ash trees enclosing a small paddock area on the southern boundary, is of relatively low quality and could be removed.
- The section of the central hedgerow from the ash (T5) running eastwards is scrubby, broken in places, and of relatively low quality overall. The removal of the eastern section of hedge would be acceptable and improve the permeability of the site.
- The removal of the eastern central hedgerow could be justified to facilitate the development of the site. The removal of this hedge must provide for the retention of the marshy area of reeds and trees at its northern end as a wildlife/conservation feature.
- The section of the west central hedgerow running from the oak (T3) towards the southern corner of the site is of low quality in comparison to other sections of adjacent hedgerow and could be breached for access providing that the oak (T1) and its rooting zone remains intact.

DEVELOPABLE AREA

4.3.4 There are constraints on the site which may limit the developable area, however, this is largely on the lower land to the northernmost section of the site, and consists of areas of conservation value, largely within an area likely to flood at times. Across the rest of the site good quality vegetation that is recommended for retention will also limit the developable space, however, tree and hedge recommendations above, allow for the removal of substantial amounts of low-quality vegetation to accommodate the development.

4.3.5 A further constraint is that due to the site's sloping nature and strong ridgeline on the southern boundary, there will be views from elevated locations to the north, and from the residential edge of Calne to the west. Therefore, it is recommended that any development on the southern boundary should be kept as low as possible without compromising its intended use, or for the ridge height to be no higher than those dwellings on the elevated land to the north-west of the new dwellings west of Sand Pit Road. It is also suggested that due to the elevated nature of the site that external lighting

is restricted to prevent light-spill into the wider countryside. A suitable materials palette should be used for any proposed development on this site, and should be consistent with neighbouring new development to the west.

4.3.6 In terms of access this is dictated by the adjoining approved development site to the west, which allows for an access from Prince Charles Road to the west, or from the junction of Sand Pit Road and Spitfire Road to the north. This access will break through the western boundary, just south of centre, thereby allowing a main route into the site.

MITIGATION

4.3.7 Mitigation measures will need to focus largely on the enhancement and management of the existing vegetation to be retained both on the site's boundaries, and within the site itself. Proposals for additional landscaping will be informed by the guidance provided in the relevant character assessments and associated documents, with the aim being to integrate the proposed development into the landscape and provide enhancements to the green infrastructure network around the site.

4.3.8 Enhancing the boundary vegetation where necessary will ensure that there is a strong landscape setting for the site. Furthermore, it is recommended that space is provided within the layout of the development to allow for the provision of structural tree planting to soften and break up the development in views towards the site. Space within the domestic areas of the site will also allow for the chance to provide domestic planting to ultimately enhance the street scene within the development.

4.3.9 It should be noted that due to the sloping nature of the site, mitigation planting cannot be used for obscuring the site, as elevated views from the north and east, will see above and through any proposed internal structural planting. Ultimately, the aim of any landscape scheme on this site will be to further integrate the development into the landscape while providing enhancements to the area's landscape structure through a comprehensive scheme of planting and management.

4.4 CONCLUSIONS

4.4.1 As a result of the appraisal of landscape and visual effects, it has been determined that, due to the site's level of containment, coupled with its local landscape context on the expanding eastern edge of Calne, the proposal for residential development on the site could be undertaken without 'Significant detrimental impacts' on the landscape and visual resources of the site and surrounding area. A full LVIA will be required to confirm these preliminary observations.

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Planning Application Number: 17/00679/OUT

ILLUSTRATIVE MATERIAL



Key:

- Site boundary
- Off-set from site boundary

Public rights of way

- Footpath
- Bridleway

Other public access

- Recreational route

Roads

- Main road
- Road generally more than 4m wide
- Road generally less than 4m wide
- Other road, drive or track

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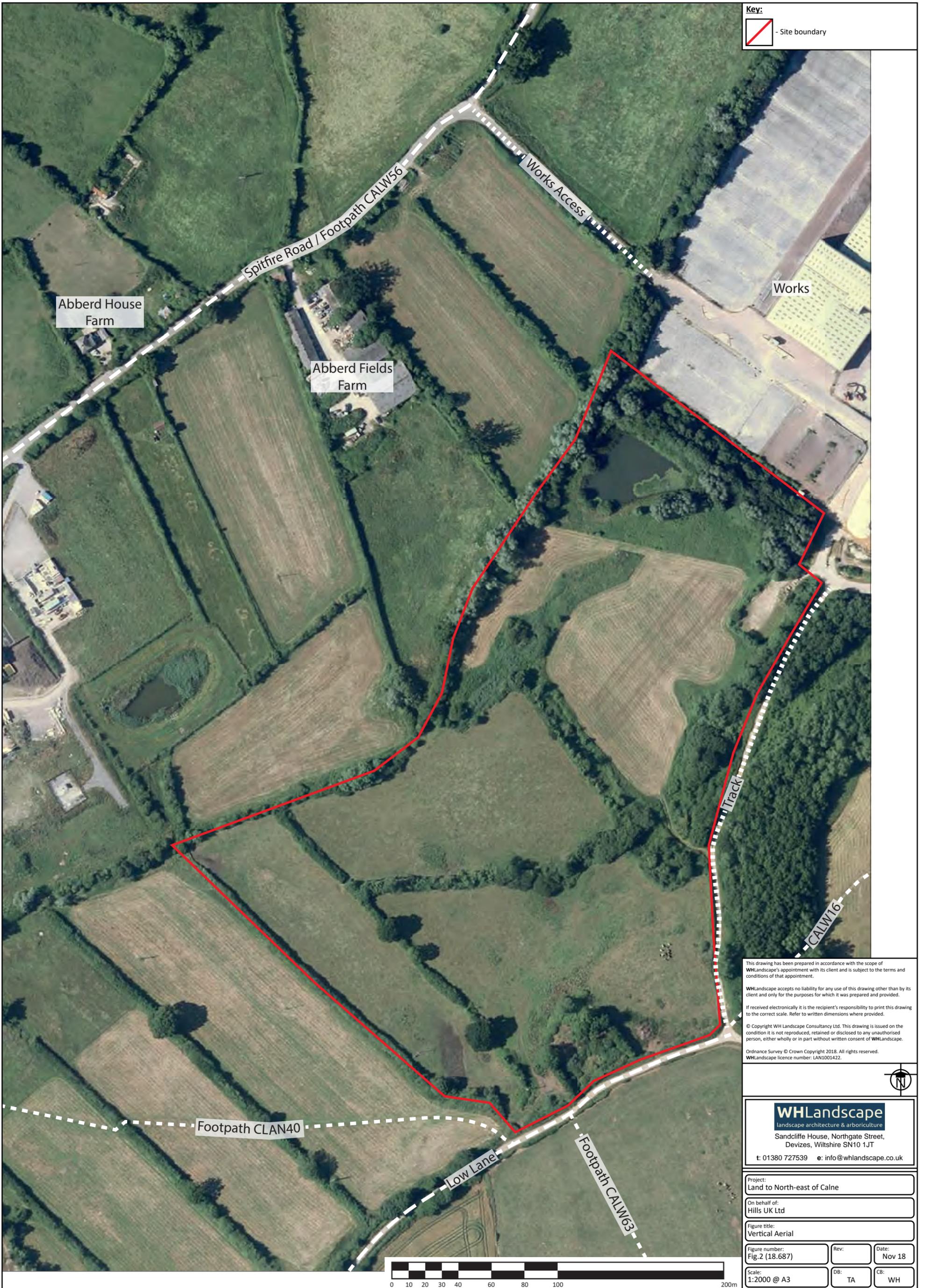
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Project: Land to North-east of Calne		
On behalf of: Hills UK Ltd		
Figure title: Location Plan		
Figure number: Fig.1 (18.687)	Rev: 	Date: Nov 18
Scale: 1:10000 @ A3	DB: TA	CB: WH





Key:
 - Site boundary

Abberd House Farm

Abberd Fields Farm

Works

Spitfire Road / Footpath CALW56

Works Access

Track

CALW16

Footpath CLAN40

Low Lane

Footpath CALM63

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On behalf of:
 Hills UK Ltd

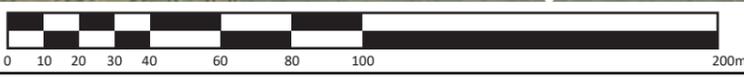
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 Vertical Aerial

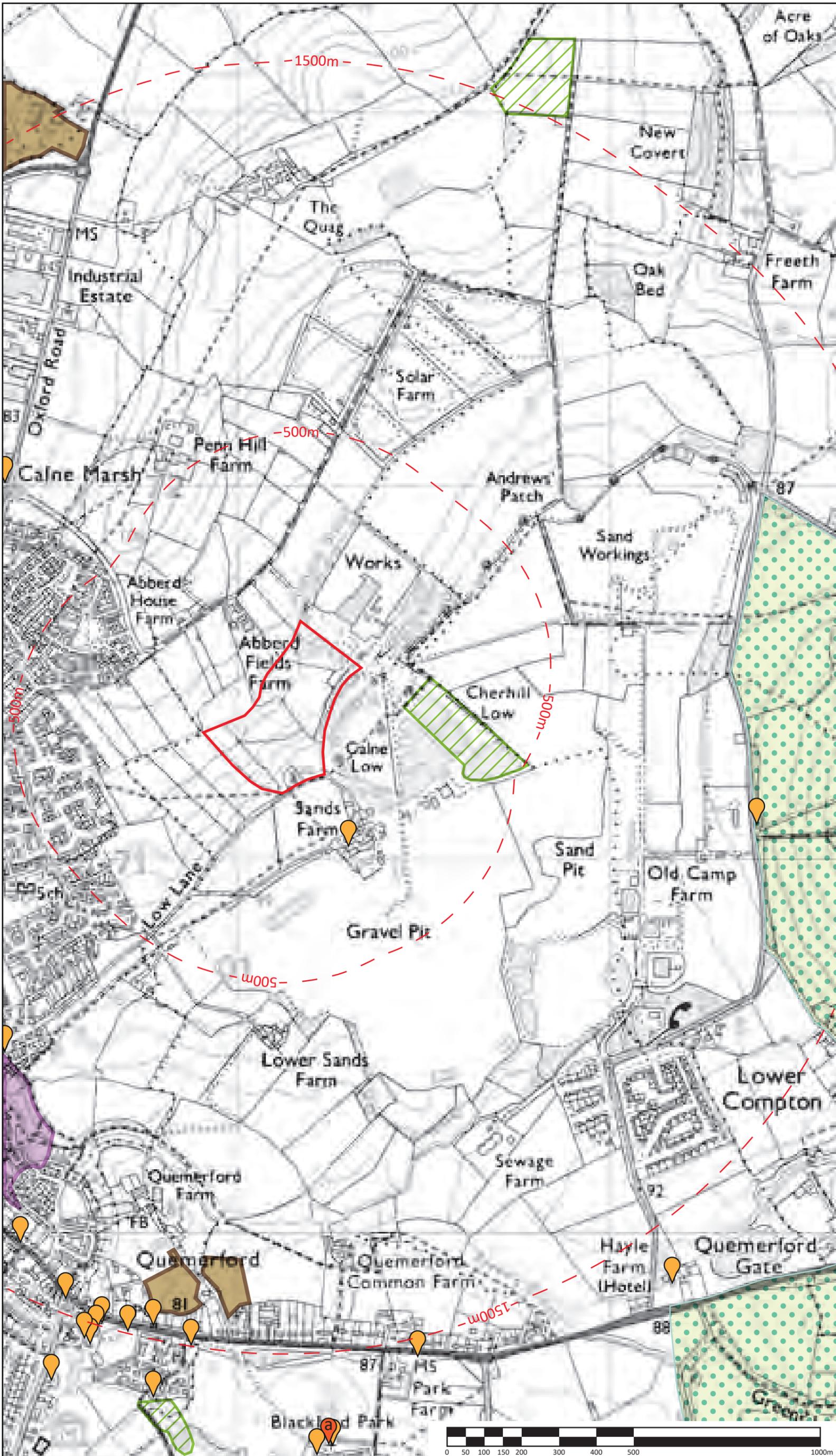
Figure number:
 Fig.2 (18.687)

Rev: Date:
 Nov 18

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DB: TA CB: WH





Key:

- Site
- Off-set from site boundary
- North Wessex Downs Area of Outstanding Natural Beauty (AONB)

Natural Heritage Designations

- County Wildlife Site (CWS)

Historic Heritage Designations

- Conservation Area
- Scheduled Ancient Monument (SAM)
- Grade II* listed a. Church of St Peter
- Grade II listed

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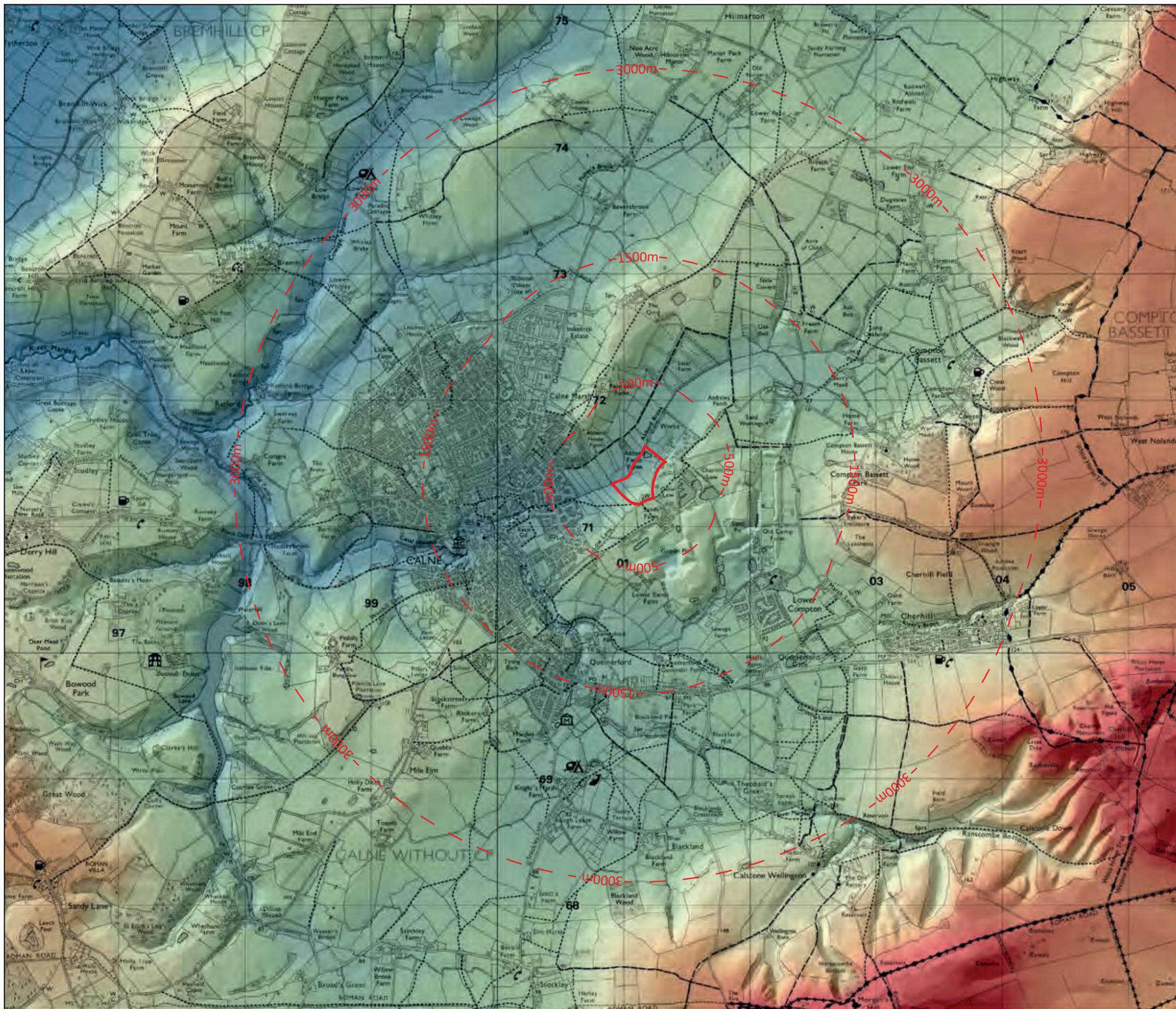
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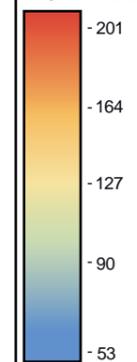
t: 01380 727539 e: info@whlandscape.co.uk

Project: Land to North-east of Calne		
On behalf of: Hills UK Ltd		
Figure title: Designations		
Figure number: Fig.3 (18.687)	Rev:	Date: Nov 18
Scale: 1:10000 @ A3	DB: TA	CB: WH



- Key:**
-  - Site boundary
 -  - Off-set from site boundary

Height AOD (m)



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Project:
Land to North-east of Calne

On behalf of:
Hills UK Ltd

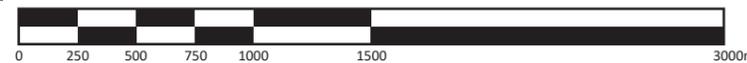
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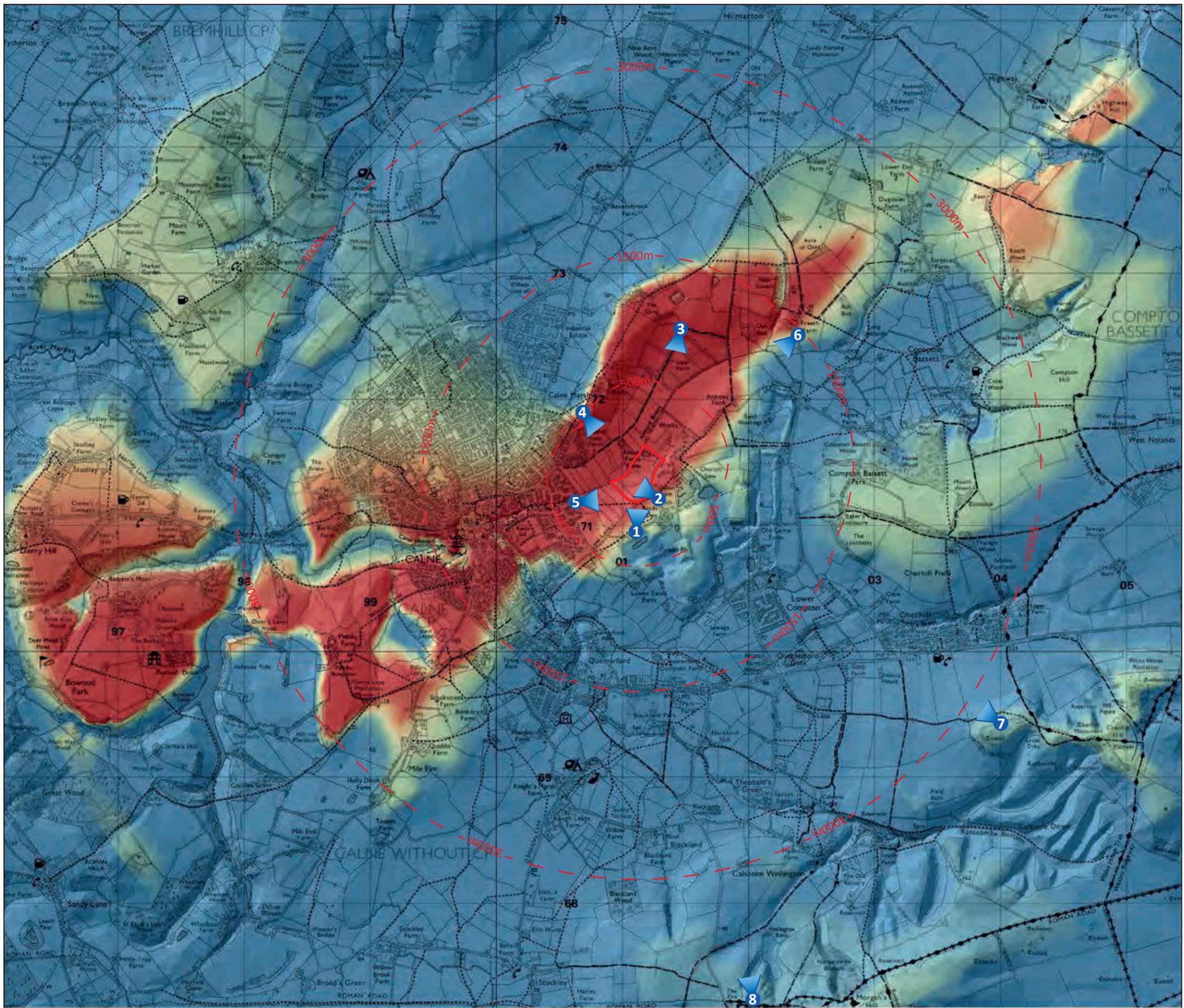
Figure number:
Fig.4 (18.687)

Rev:
Date:
Nov 18

Scale:
1:30000 @ A3

DB:
CB:
NM WH





Key:

-  - Site boundary
-  - Off-set from site boundary
-  - Viewpoint

Zone of Theoretical Visibility (ZTV)

-  - High Potential Visibility
-  - Low Potential Visibility
-  - No Visibility

The Zone of Theoretical Visibility (ZTV) illustrates the extent to which the site as a whole is potentially visible from the surrounding area (1.6m high receptor). The plan has been prepared using GIS computer software (MapInfo) and Ordnance Survey landform data, and as such does not take into account built form or vegetation present within the landscape. Field verification is required to refine the accuracy of the ZTV.

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Project:
Land to North-east of Calne

On behalf of:
Hills UK Ltd

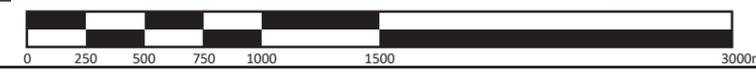
Figure title:
Zone of Theoretical Visibility & Viewpoint Plan

Figure number:
Fig.5 (18.687)

Rev:
Date:
Nov 18

Scale:
1:30000 @ A3

DB:
CB:
NM
WH





Key:

- Site
- Off-set from site boundary

Landscape Appraisal

- Ridge
- Downslope
- Woodland block
- Significant tree/hedged boundary
- Watercourse
- Significant developed boundary

Visual Appraisal

- Open views
- Filtered Views
- Views obscured by landform

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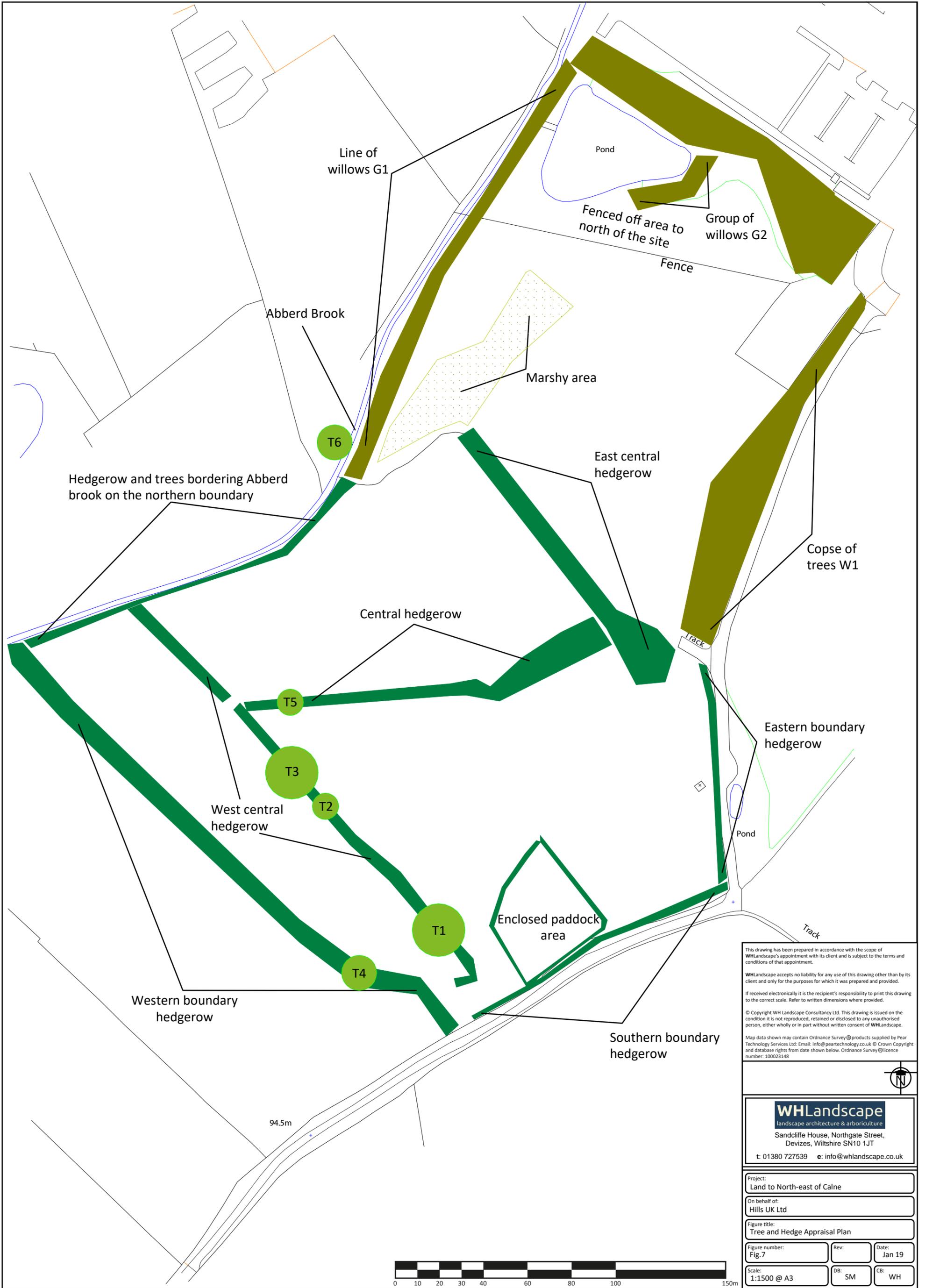
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Project:
Land to North-east of Calne

On behalf of:
Hills UK Ltd

Figure title:
Landscape and Visual Appraisal

Figure number: Fig.6 (18.687)	Rev:	Date: Nov 18
Scale: 1:10000 @ A3	DB: TA	CB: WH



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Project:
 Land to North-east of Calne

On behalf of:
 Hills UK Ltd

Figure title:
 Tree and Hedge Appraisal Plan

Figure number:
 Fig.7

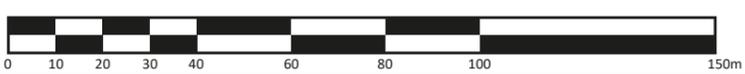
Rev:
 SM

Date:
 Jan 19

Scale:
 1:1500 @ A3

DB:
 SM

CB:
 WH





Residential site with planning approval
(Planning Application Ref. 17/00679/OUT)

- Key:**
-  - Site boundary
 -  - Significant wooded boundary
 -  - Significant hedged boundary
 -  - Riparian boundary vegetation
 -  - Significant internal hedges
 -  - Significant off-site hedges
 -  - Tree Preservation Orders
 -  - Watercourse/pond
 -  - Sloping land
 -  - Residential views
 -  - Elevated views
 -  - Views obscured by intervening landform and vegetation
 -  - Connectivity opportunity between developments
 -  - Main routes into site
 -  - Approximate extent of flood risk

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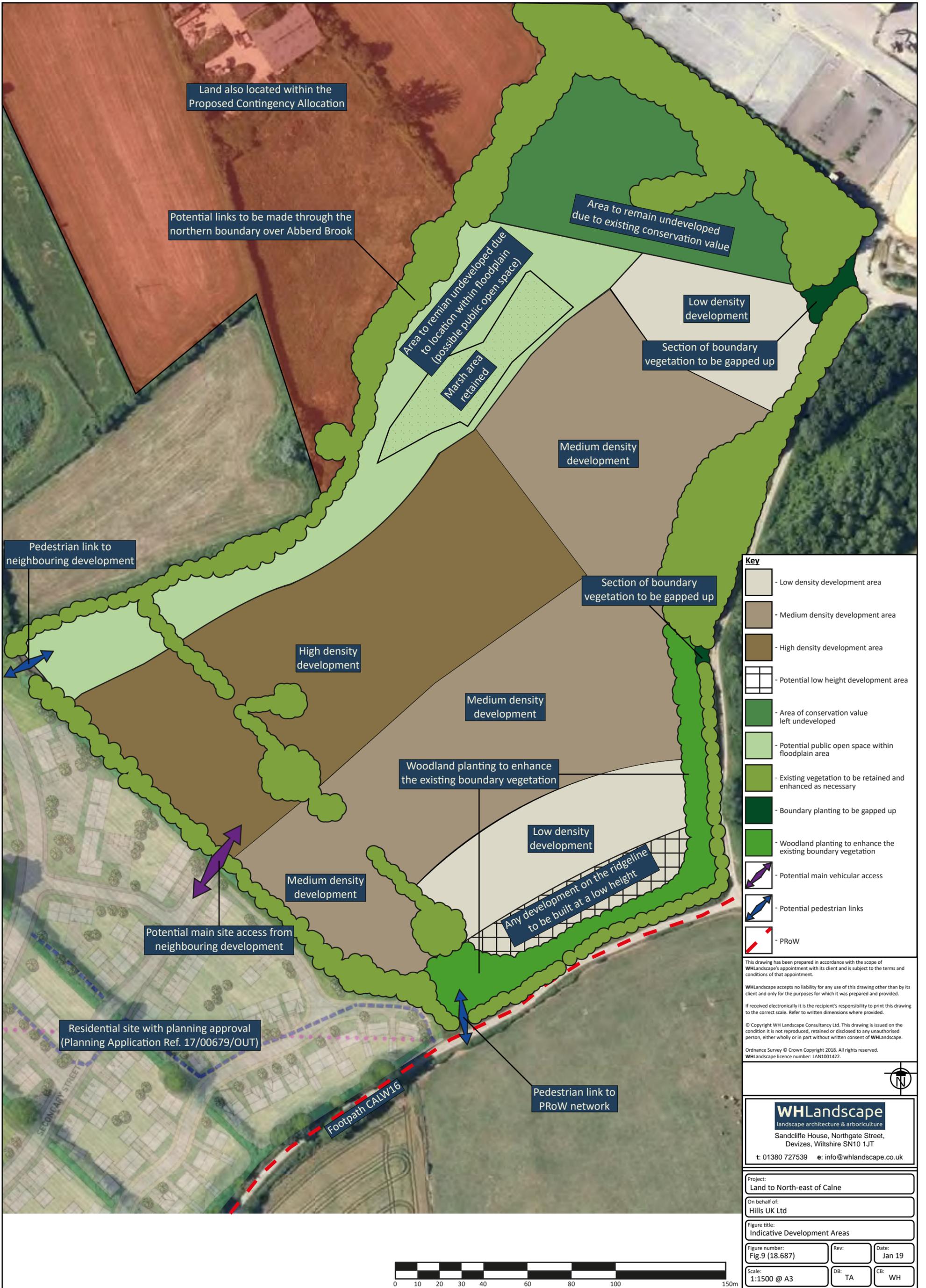
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Project: Land to North-east of Calne		
On behalf of: Hills UK Ltd		
Figure title: Constraints Plan		
Figure number: Fig.7 (18.687)	Rev:	Date: Jan 19
Scale: 1:2500 @ A3	DB: TA	CB: WH





APPENDICES

APPENDIX 1: WILTSHIRE HOUSING SITES ALLOCATION PLAN

APPENDIX 2: VIEWPOINT PHOTOGRAPHS



VP: 1

Viewpoint direction: North

Approximate distance from site: 195m

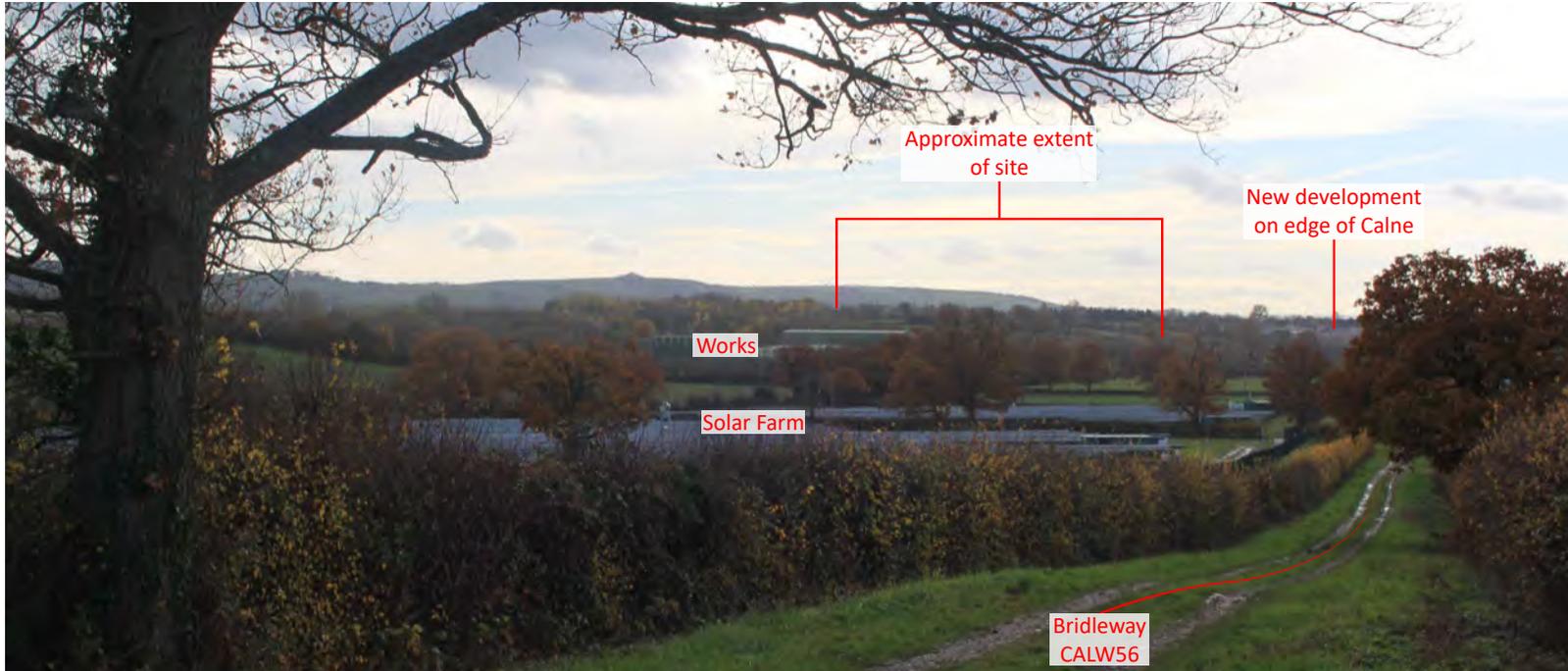
Taken by: TA

Photograph date: November 2018

OS map elevation: >95m AOD



VP: 2	Viewpoint direction: North-west	Approximate distance from site: Adjacent
Taken by: TA	Photograph date: November 2018	OS map elevation: >95m AOD



VP: 3

Viewpoint direction: South-west

Approximate distance from site: 1.02km

Taken by: TA

Photograph date: November 2018

OS map elevation: Between 100-105m AOD



VP: 4

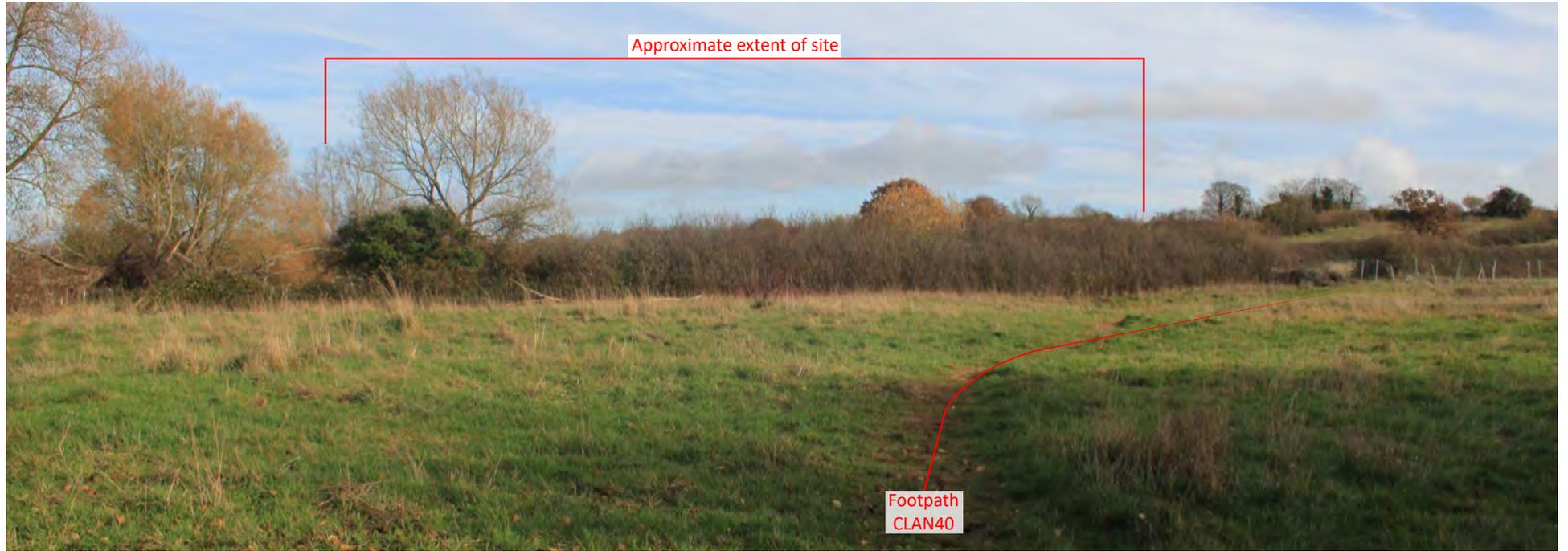
Viewpoint direction: South

Approximate distance from site: 355m

Taken by: TA

Photograph date: November 2018

OS map elevation: Between 100-105m AOD



VP: 5

Viewpoint direction: East

Approximate distance from site: 295m

Taken by: TA

Photograph date: November 2018

OS map elevation: <75m AOD



VP: 6

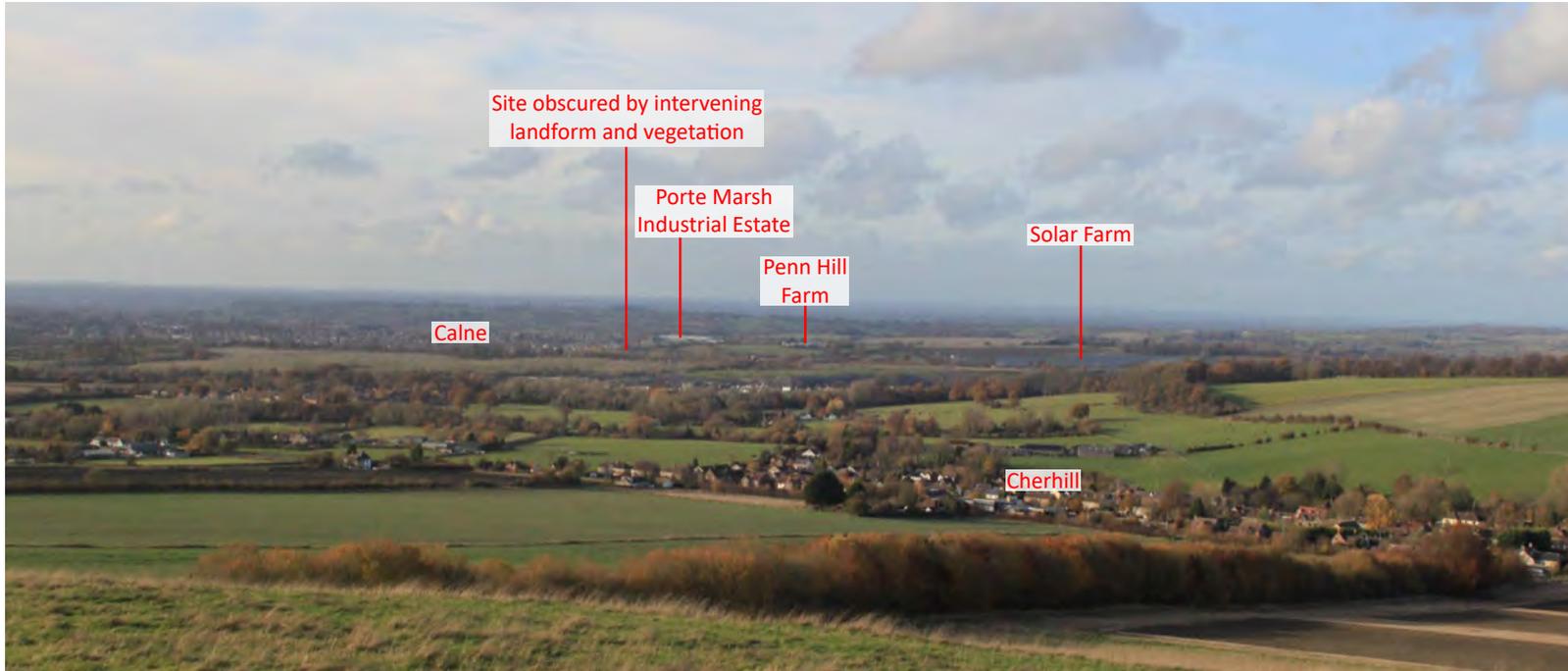
Viewpoint direction: South-west

Approximate distance from site: 1.52km

Taken by: TA

Photograph date: November 2018

OS map elevation: Between 90-95m AOD



VP: 7

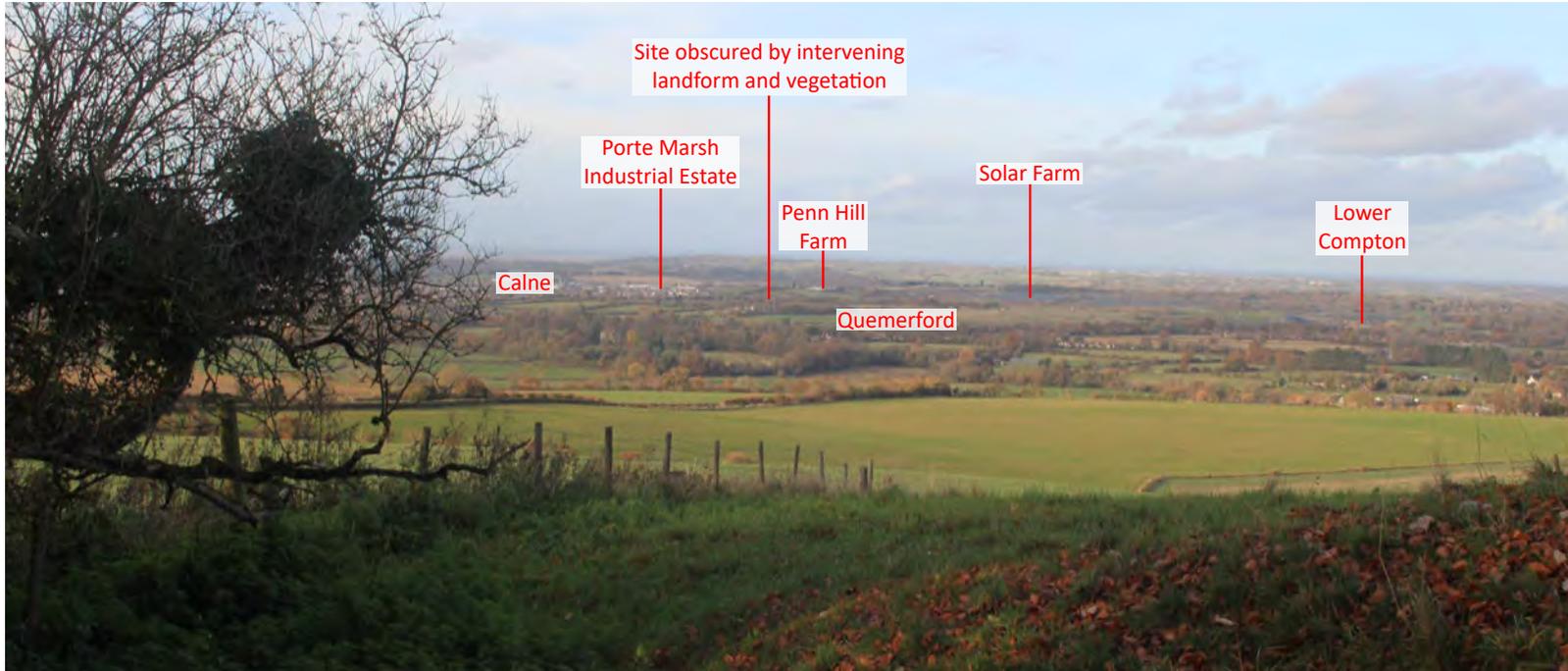
Viewpoint direction: North-west

Approximate distance from site: 3.9km

Taken by: TA

Photograph date: November 2018

OS map elevation: Between 200-205m AOD



VP: 8

Viewpoint direction: North

Approximate distance from site: 4.08km

Taken by: TA

Photograph date: November 2018

OS map elevation: Between 195-200m AOD

APPENDIX 3: TREE AND HEDGE PHOTOGRAPHS

T1 Oak within west central hedgerow



T2 Ash within west central hedgerow



T3 Oak within eastern hedgerow



T4 TPO sycamore in southern corner hedgerow



T5 Veteran ash within central hedgerow



T6 Oak on opposite side of brook



G1 Line of willows on along Abberds Brook



G2 Group of willows in northern fenced off area



W1 Copse of trees on eastern boundary



Western boundary hedgerow (from south looking north-west)



Northern boundary hedgerow (from south looking north)



Northern boundary hedgerow (central section of northern boundary)



Central section of the northern boundary hedgerow containing alder



Showing general condition of line of willows G1



Northern fenced off area including pond and surrounding planting



Copse of trees on the eastern boundary



Hedgerow along the eastern boundary



Small hedged paddock on the southern boundary





Central hedgerow western end (including ash T5)



Central hedgerow eastern end



Denser scrub at eastern end of central hedgerow



East central hedgerow (northern end)



East central hedgerow (southern end)



APPENDIX 4: TREE PRESERVATION ORDER SCHEDULE

TOWN AND COUNTRY PLANNING ACT 1990
Wiltshire Council – Area North – Land North of Low Lane, Calne, Wiltshire
Tree Preservation Order 2017

The **Wiltshire Council**, in exercise of the powers conferred on them by section 198 of the Town and Country Planning Act 1990, as amended in the Town and Country Planning (Tree Preservation)(England) Regulations 2012, make the following Order:

Citation

1. This Order may be cited as **Land North of Low Lane, Calne, Wiltshire.**
Tree Preservation Order 2016, **2017/00004/MIXED**

Interpretation

2. (1) In this Order “the authority” means the Wiltshire Council.
(2) In this Order any reference to a numbered section is a reference to the section so numbered in the Town and County Planning Act 1990 and any reference to a numbered regulation is a reference to the regulation so numbered in the Town and Country Planning (Tree Preservation)(England) Regulations 2012.

Effect

3. (1) Subject to article 4, this Order takes effect provision on the date on which it is made
(2) Without prejudice to subsection (7) of section 198 (power to make tree preservation orders) or subsection (1) of section 200 (tree preservation orders: Forestry Commissioners) and, subject to the exceptions in regulation 14, no person shall:-
 - (a) cut down, top, lop, uproot, wilfully damage, or wilfully destroy; or
 - (b) cause or permit the cutting down, topping, lopping, uprooting, wilful damage or wilful destruction of,

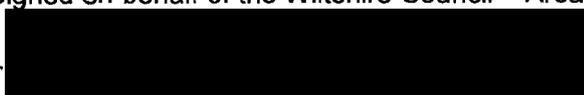
any tree specified in the Schedule of this Order except with the written consent of the authority in accordance with regulations 16 and 17, or of the Secretary of State in accordance with regulation 23, and, where such consent is given subject to conditions, in accordance with those conditions.

Application to trees to be planted pursuant to a condition

4. In relation to any tree identified in the first column of the Schedule by the letter ‘C’ being a tree to be planted pursuant to a condition imposed under paragraph (a) of section 197 (planning permission to include appropriate provision for preservation and planting of trees), this Order takes effect as from the time when the tree is planted.

Dated this 08 day of MARCH 2017

Signed on behalf of the Wiltshire Council – Area North



Authorised by the Council to sign in that behalf

CONFIRMATION OF ORDER (without modifications)

This Order was confirmed by the Wiltshire Council – Area North without modifications on the
..... day of

.....
Authorised by the Council to sign in that behalf

CONFIRMATION OF ORDER (with modifications)

This Order was confirmed by the Wiltshire Council – Area North, subject to the modifications indicated below:

T6 is within the site of the drainage attenuation pond, which has been engineered to deal with flooding on the site, and therefore has been removed from the Order.

on the 16th day of May 2017



Authorised by the Council to sign in that behalf

DECISION NOT TO CONFIRM ORDER

A decision not to confirm this Order was taken by the Wiltshire Council – Area North on the
..... day of

.....
Authorised by the Council to sign in that behalf

VARIATION OF ORDER

This Order was varied by the Wiltshire Council – Area North on the
..... day of

by a variation order under reference number (*insert reference number to the variation order*) a copy of which is attached

.....
Authorised by the Council to sign in that behalf

REVOCATION OF ORDER

This Order was revoked by the Wiltshire Council – Area North on the

..... day of

.....
Authorised by the Council to sign in that behalf

SCHEDULE

SPECIFICATION OF TREES

Wiltshire Council – Area North - Land North of Low Lane, Calne

Tree Preservation Order 2016

TREES SPECIFIED INDIVIDUALLY

(encircled in black on the map)

<i>Reference on map</i>	<i>Description</i>	<i>Situation*</i>
T1	Ash	West of Sands Farm
T2	Oak	West of Sands Farm
T3	Oak	West of Sands Farm
T4	Oak	West of Sands Farm
T5	Ash	West of Sands Farm
T6	Oak	North West of Sands Farm
T7	Oak	North West of Sands Farm
T8	Sycamore	North West of Sands Farm

TREES SPECIFIED BY REFERENCE TO AN AREA

(within a dotted black line on the map)

<i>Reference on map</i>	<i>Description</i>	<i>Situation*</i>
-------------------------	--------------------	-------------------

GROUP OF TREES

(within a broken black line on the map)

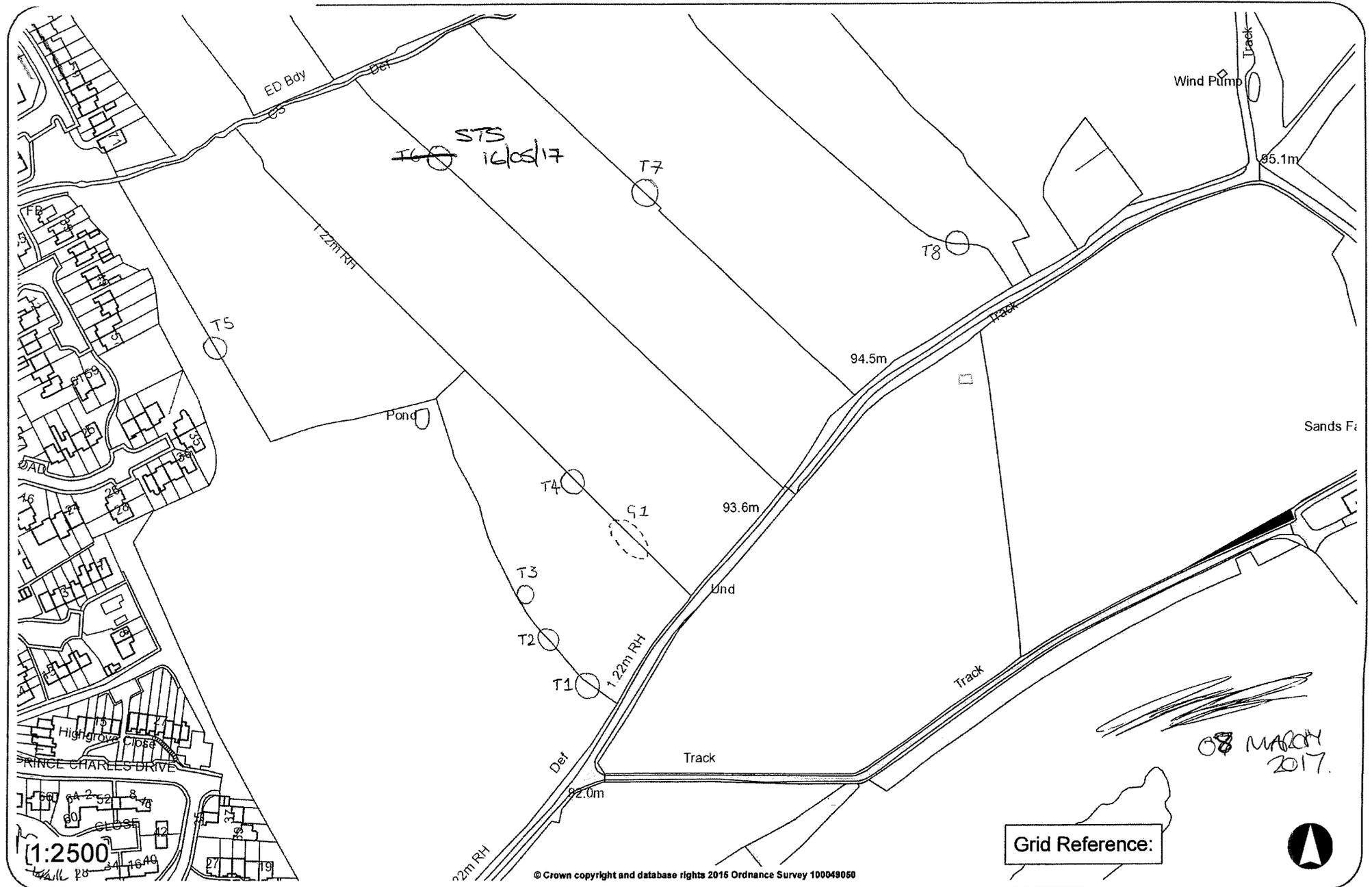
<i>Reference on map</i>	<i>Description</i>	<i>Situation*</i>
G1	1 Oak and 1 Ash	West of Sands Farm

WOODLANDS

(within a continuous black line on the map)

<i>Reference on map</i>	<i>Description</i>	<i>Situation*</i>
-------------------------	--------------------	-------------------

*complete if necessary to specify more precisely the position of the trees.



CALNE126

CPRE WILTSHIRE'S RESPONSE TO THE CALNE LOCAL PLAN QUESTIONNAIRE.

1. What do you think to the scale of growth? Should there be a brownfield target? Should it be higher or lower?

The scale of growth overall in the county is questioned.

The scale of growth at Calne should be constrained completely until the Neighbourhood Plan has completed an assessment of the town centre brownfield sites in the light of the new economic conditions as a result of Covid. Until the potential is understood, and the options with estimate levels made public, a target is unrealistic.

Residential permissions on allocated employment have been very damaging. The imbalance of jobs to houses is now acute.

No new employment allocations should be made, certainly not as much as 4ha, until the issue of the town centre potential is understood. At present there are 56,000 sq ft of employment space advertised in the town, and a further 1.67 ha of employment land advertised at the High Penn site.

In addition the application for units at the Lidl site total 52,000 sq ft.

2. Are these the right priorities? What priorities may be missing? How might these place shaping priorities be achieved?

The priorities are in the wrong order. Should start as below. Many of the other points are meaningless

Develop a plan for the town centre and a proper vision for its role in the future.

Deliver infrastructure suited to the Climate Change Emergency. Wider spread, better quality cycle and pedestrian paths and routes, more and more regular local bus services, improved central market to sell local goods, create a forward looking environmentally conscious town which creates liveability and character.

3. Is this the right pool of potential development sites? Are there any other sites we should be considering?

These sites should not be considered until after the Neighbourhood Plan has carried out a comprehensive appraisal of brownfield land in the urban area. No more greenfield land should be allocated until a 5-year review. This constraint is essential to achieve some kind of balance between employment and housing, sustainability and commuting.

Brownfield sites, large and small, must be considered. Redevelopment and density will be key.

Car parking areas should be considered and evaluated.

The type and form should be 1, 2 or 3 bedroom units which are for discounted market sales with some social housing.

The future economic conditions are wholly unpredictable, but the demographic need will be for those retiring from work and those looking for first time occupancy. Small town centre units close to services.



4. What land do you think is the most appropriate upon which to build? What type and form of development should be bought forward at the town?

No greenfield land should be developed, and no development considered until an up-to-date review of the economic and employment case is delivered which can give categorical evidence that new housing in Calne is required.

5. Are there important social, economic or environmental factors you think we've missed that need to be considered generally or in respect of individual sites?

That Calne has become a commuter town and with this comes a lack of social cohesion and integration. Developing and encouraging small business, start-ups and the town centre will contribute positively towards social, environmental and economic factors in the long term. Proposed sites do none of these.

6. Are there any issues or infrastructure requirements that should be identified? Other than that already identified within the 'Planning for' document?

Improved town connectivity for cyclists and pedestrians. Major roads A4, A3102 (N&S), and Bypass to carry safe cycling, built or marked on road. Urban routes to be hugely improved so schools, surgery, town centre and housing are inter accessible and attractive to use.

Re-skilling, and skilling, of local workforce to trades with local jobs (light industry, communications technology, environmental /green technology) in order to avoid distance commuting. Facilitate start-up businesses in affordable units and use town centre space as public face.

Employment and economic growth

We believe it is impossible to say what shape work will take in the future, but other surveys suggest that with regard to offices flexible working is here to stay with employees spending part of the week in the office, part at home.

The Employment Land Review by Hardisty Jones 2018 which accompanies the current review makes the following points:

- a. Employment in Calne has stagnated since 2009
- b. Mixed use developments have not been a success (Landowners and developers being unwilling to promote land for employment use due to expectation of higher land value returns with housing permissions)
- c. Calne. In the present plan 6 ha of employment space were offered, 3.2ha from 2011 brought forward, 3ha added. Other than development of Tesco and its related car park, and the possibility of a further supermarket on Oxford Road, the employment allocation has gone to housing.
- d. Over past years there has been an established excess of supply over demand of employment land up until 2021
- e. The new demand, 2021 forwards, is for logistics and warehousing. These are land hungry but with low employment levels. Suitable for sites such as Jt17 M4 or on the A350 corridor.
- f. There is an anticipated skills shortage in not only technical fields but qualified trades (plumbers, electricians, glaziers, bricklayers) this must be addressed.

The Swindon and Wiltshire Local Housing Needs Assessment report 2019, shows high out commuting levels all over Wiltshire with Calne being the highest level of all.



Nearly 5,000 out commuting from a population of just under 9,000. This imbalance of local jobs to housing growth is stark and undeniable. The reliance on car use is shocking and in the light of climate change issues, growth of retail shopping and home working, it is an unsustainable growth pattern.

Calne housing growth has to be adjusted down until realistic predictions on employment growth and type are presented with up-to-date evidence. Employment growth allocations and predictions should be subject to an up-to-date assessment by the Neighbourhood Plan for the area, most importantly a realistic analysis of the central urban area for multiple use work units and residential. It will take into account potential conversions under PDRs within the town centre.

This will be crucial to a re-evaluation of the central space when considering a multiple use approach to new models such as e offices, residential accommodation through PDR, a greater use of markets and stalls days and events, with a pop-ups approach to retail in order to promote growth of small businesses. A thorough analysis of Porte Marsh Industrial Estate is needed to establish any wasted space in order to encourage densification.

What has to be considered is the forthcoming rise in unemployment, re-skilling of workers, housing affordability in a new economic climate, housing type appropriateness in that new economic climate and the positioning of what is still a small town in a high value environment.

Present average wage is £25K and average house price £280.00, will this be the same by 2022.

We believe there should be a moratorium/constraint on any housing allocations beyond identified brownfield, windfall and conversions for 5 years, then a review.

In 5 years, the longer effects of Covid and Brexit will be clear and a revised strategy for the town for the period 2026-2036 can be formulated.

If you have any further comments you wish to make, please detail them below.

CALNE132

Calne Market Town Consultation Response Form

Ref:

(For official use only)

A series of 'Planning for' documents break down the work undertaken so far for each Principal Settlement and Market Town. Within these documents, information is presented, and questions asked to help shape proposals for each place.

To view these documents please visit the Council's Local Plan Review Consultation page on its website at: <https://www.wiltshire.gov.uk/planning-policy-local-plan-review-consultation>

Please return to Wiltshire Council, by 5pm on Tuesday 9th March 2021.

By post to: Spatial Planning, Economic Development and Planning, Wiltshire Council, County Hall, Bythesea Road, Trowbridge, Wiltshire, BA14 8JN.

By e-mail to: spatialplanningpolicy@wiltshire.gov.uk

This form has two sections:

Section One – Personal details

Section Two – Your response to the questions. Please use a separate sheet for each representation.

Section One – Personal details

*if an agent is appointed, please fill in your Title, Name and Organisation but the full contact details of the agent must be completed.

	1. Personal details	2. Agent's details (if applicable)*
Title		
First name		
Last name		
Job title (where relevant)		
Organisation (where relevant)	Robert Hitchins Ltd	
Address Line 1		
Address Line 2		
Address Line 3		
Address Line 4		

Postcode		
Telephone Number		
Email Address		

Section Two – Questions

Which Market Town does your response relate to?

Answer:

Calne

1. What do you think to the scale of growth? Should there be a brownfield target? Should it be higher or lower?

Answer:

The level of growth identified in paragraph 9 is based on the local housing needs assessment of Wiltshire for the period 2016-2036 and indicates a higher level of growth than the standard method for the Chippenham HMA and the figure for the Chippenham HMA is higher than for the other HMAs.

The adopted Wiltshire Core Strategy 2006-2026, identifies a requirement for 1,440 homes. The Emerging Strategy for Calne only proposes a requirement of 1,610 homes for the plan period 2016-2036, some 170 more dwellings than in the adopted Core Strategy. This figure is only marginally higher than the Core Strategy and does not reflect the need to significantly boost housing supply and or reflect the role of Calne as a market town and its potential for growth. The high level assessment in the Alternative Development Strategies indicates that after Chippenham and Melksham, Calne is least constrained. Development at Calne can support the place shaping priorities, being well connected to the town centre, promoting sustainable travel. Options for higher growth should be considered to support the delivery of infrastructure to relieve congestion in the town centre and Air Quality Management Area (AQMA) within the town which would support the place shaping priorities. Furthermore, given the difficulties experienced in terms of housing delivery at Chippenham, Calne could continue to play a complementary role to Chippenham as a focus where development is being delivered.

According to the Council’s figures once completions and commitments have been taken into account footnote 1 on page 3, 627 dwellings have been built between 2016-2019 and, at 1 April 2019, 625 homes are already in the pipeline i.e. they have planning permission, resolution to grant planning permission or are allocated for development in the Calne Community Neighbourhood Plan (2018). Consequently the residual figure for the remaining plan period to 2036 of only 360 dwellings.

It is noted that a brownfield target is proposed for the period 2021-2031 of 60 dwellings which has the intention of reducing the requirements for greenfield land to be identified in the local plan (paragraph 11 of the Emerging Strategy document). Paragraph 13 of Planning for Calne states that:

“Needs for development land should be met as far as possible on brownfield sites in order to help minimise the loss of greenfield land. The Council suggests that a target of 60 homes should be built on brownfield sites over the next 10 years.”

Two key issues arise, firstly the plan period and secondly the reliance on brownfield sites.

As referred to in our response to the Emerging Strategy it is considered that the plan period should be 2020 – 2040. Therefore allowing the plan to be positively prepared and sufficiently flexible to respond to rapid change (para 11 of the NPPF). Succinct and up to date plans should provide a positive vision for the future for each area, a framework for addressing housing needs and other social, economic and environmental priorities. The plan needs to be aspirational, but also deliverable and strategic policies for Calne should provide a clear strategy for bringing sufficient land forward and at a sufficient rate to address objectively assessed needs over the plan period.

As proposed the plan is only being rolled forward 10 years from the end date of the adopted Core Strategy i.e. 2026 to 2036, it is considered that the ability to provide a long term strategy for the town is being compromised as the strategic policies in the plan should look ahead at least 15 years from adoption to respond to long-term requirements and opportunities (paragraph 22 of the NPPF).

Whilst the principle of brownfield development is encouraged these sites are often fraught with difficulties in terms of delivery timescales. The promotion of an effective use of land set out in the 2019 NPPF is not a return to a brownfield first policy approach of the past. The Council's growth strategy should be a balanced rather than sequential approach. Housing delivery is optimised by the widest possible range of housing site sizes and market locations, which provides suitable land buying opportunities for small, medium and large housebuilding companies.

There needs to be a range and choice of sites in order to meet housing needs. The Council should avoid "town cramming", which would provide insufficient variety in house typologies to create balanced communities with the right types of new homes to meet the housing needs of different groups. There will be a limited capacity for higher densities and more taller buildings, which will only be appropriate in certain locations. A blanket approach to the intensification of housing densities everywhere would be inappropriate as a range of differing densities will be needed to ensure development is in keeping with the character of the surrounding area. The future deliverability of intensely developed residential schemes will also be dependent on the viability of PDL and market demand for high density urban living post Covid-19. The promotion of an effective use of land set out in the 2019 NPPF is not a return to a brownfield first policy approach of the past.

The widest mix of sites provides choice for consumers, allows places to grow in sustainable ways, creates opportunities to diversify the construction sector, responds to changing circumstances, treats the housing requirement as a minimum rather than a maximum and provides competition in the land market. A diversified portfolio of housing sites also offers the widest possible range of products to households to access different types of dwellings to meet their housing needs.

2. Are these the right priorities? What priorities may be missing? How might these place shaping priorities be achieved?

Answer:

As referred to in the preceding paragraphs place shaping priorities need to be bespoke to the settlement and relate to the development and use of land.

It is considered that whilst some of the place shaping priorities for Calne are supported, consideration should be given to the longer term and reflect the strategic opportunities at Calne.

3. Is this the right pool of potential development sites?

Are there any other sites we should be considering?

Answer:

It is noted that the Council is focussing its assessment on a smaller pool of potential sites. In order to satisfy the tests of soundness, the Council need to demonstrate that they have considered all reasonable alternatives. It is noted that at this stage there is no SA of the sites and the intention appears to reduce the number of sites to be considered before they are subjected to a sustainability appraisal.

The sustainability appraisal needs to consider and compare all reasonable alternatives as the plan evolves, including the preferred approach, and assess these against the baseline environmental, economic and social characteristics of the area and the likely situation if the plan were not to be adopted. Reasonable alternatives are the different realistic options considered by the plan-maker in developing the policies in the plan. They need to be sufficiently distinct to highlight the different sustainability implications of each so that meaningful comparisons can be made.

As a consequence of the plan period to 2036 (paragraph 28) there is on a relatively small amount of land required to meet the strategic housing requirements. Paragraph 28 then states that:

“this will be identified by the neighbourhood plan. The review of the neighbourhood plan can also consider whether further land is needed for development to meet the community’s need.”

Subsequently paragraph 28 states that:

“ One or more sites will be selected for housing in the Local Plan and the rest of the pool of potential development sites will remain as they are.”

An objection is made to this approach, it is not clear whether it is the intention to include sites in the Local Plan and or whether this is to be left entirely to the Neighbourhood Plan. The Local Plan should include strategic policies for Calne. As referred to above, strategic policies should look ahead over a minimum 15 year period from adoption, strategic policies should address the strategic priorities for the area and provide a clear starting point for any non-strategic policies. Paragraph 23 states:

“...Strategic policies should provide a clear strategy for bringing sufficient land forward, and at a sufficient rate, to address objectively assessed needs over the plan period, in line with the presumption in favour of sustainable development. This should include planning for and allocating sufficient sites to deliver the strategic priorities of the area...”

Neighbourhood plans must be in general conformity with the strategic policies contained in any development plan that covers their area and should support the delivery of strategic policies set out in the local plan or spatial development strategy and should shape and direct development that is outside of those strategic policies.

Eight potential sites have been identified at Calne for further assessment of their development potential. Planning for Calne states at paragraph 30 that *“given the relatively small amount of land that needs to be planned for Calne, not all of any particular site may be required at this time,”* but then the paragraph continues *“that it would be sensible to consider the area as a whole when decision making.”*

A short-term piecemeal strategy will not assist in meeting longer term objectives. Consideration should be given to a strategy which would assist in meeting the strategic priorities over a plan period at least to 2038.

4. What land do you think is the most appropriate upon which to build?

What type and form of development should be brought forward at the town?

Answer:

Land to the north-east of Calne (north and south of Spitfire Road) is considered to represent an unconstrained and sustainable direction for future growth. It is well related and connected to the town centre, employment areas to the north and to the A3120 corridor and is well placed to benefit from improvements to public transport.

Robert Hitchins Limited, an experienced developer/land promoter who over the last few years has brought forward numerous housing and employment sites across Wiltshire, Gloucestershire and Worcestershire, controls SHELAA referenced sites 488, 489, 3168 & 3610, all found suitable available, achievable, deliverable and developable.

Land to the north of Spitfire Road (SHELAA ref 3610) is within Site 2 (southern section) which the Planning for Calne report refers to as : "Site 2: Land to the west of Spitfire Rd (SHELAA sites 495, 3610)". Land to the south of Spitfire Road (SHELAA ref 488,489 and 3168) is the majority of Site 3 which the report refers to as: "Site 3: Land to the east of Spitfire Rd (SHELAA sites 488, 489, 451, 3168)". Together these sites can provide for residential development and the provision of a new local centre (on the corner of Spitfire Way and Spitfire Road) to serve the immediate needs of existing and new residents on this side of the town as well as providing employment generating opportunities.

Land to the south of Spitfire Road can provide for around 150 new dwellings and local centre, the land to the north around 450 dwellings.

Pegasus on behalf of RHL has previously made representations regarding land to the south of Spitfire Road, putting the land forward for consideration though the SHELAA and in submissions made (August 2019) in response to the conclusion on the August 2019 Alternative Strategies. These included concept plans and delivery trajectories.

The Site Selection report reviews the sites in the SHELAA and identifies sites for further assessment. Stage 2 of the assessment refers to a RAG assessment of the sites in terms of accessibility and wider impacts and sets out a judgment against each of the SHELAA sites, taking into account both the accessibility and wider impact considerations and strategic context. Sites are categorised overall as low accessibility (red), medium accessibility (amber) or high accessibility (green). It is not necessarily clear how some of these assessments have been made, they appear to have been made without any justification and reference to any evidence base.

Site SHELAA ref 451 (part of Potential site 3) is assessed and is considered suitable for further assessment as there are no overriding significant impacts that justify rejecting the site at this stage. The assessment considers that the site could be combined with adjacent sites 488, 489 and 3168 to consider one logical extension to the town. This is supported. It is not clear why the site has been rated "amber" in terms of accessibility and traffic a whilst it may appear detached from the urban edge it has the potential as the assessment acknowledges to form part a logical extension to Calne.

Site SHELAA ref 488 (part of Potential site 3) is assessed as above (is the same RAG assessment) for site 451 and considered suitable for further assessment as there are no overriding significant impacts that justify rejecting the site at this stage. The assessment considers that the site could be combined with adjacent sites It would be appropriate to combine this site with adjacent sites 451, 489 and 3168 to consider one

logical extension to the town. The analysis concludes that there is no justification for rejecting the site at this stage.

Site SHELAA ref 489 (part of Potential site 3) which is adjacent to site 451 is assessed but is rated amber in the assessment for all categories except landscape. This site is not adjacent to the revised settlement boundary but is adjacent to SHELAA sites 451 and 495. The assessment concludes that the site:

“On its own the site is remote from urban edge but could be developed with other adjacent sites. Part of the site is Flood Zone 3 associated with Abberd Brook. Heritage impacts likely to be minimal. The site is closer to the Area of Outstanding Natural Beauty than some other sites therefore may be more sensitive to development. There may be potential for using some of this site for mitigating the rural / urban edge in combination with other surrounding sites here. The site is in close proximity to Hills Quarry Products, therefore potential noise and dust issues which will require further assessment. No justification for rejecting site at this stage. Take forward for further assessment. It would be appropriate to combine this site with adjacent sites 451, 488 and 3168 to consider one logical extension to the town.”

The fact that the site is to be taken forward into the next assessment is supported.

Site SHELAA ref 3610 Land off Spitfire Road, Calne (N) (which is part of Potential site 2) is assessed, the site adjoins recent new development to the west and is also adjacent to site 495 which is adjacent to the settlement boundary. The site is low flood risk - entire site is Flood Zone 1. In heritage terms, no likely impacts are noted. In landscape terms, the site is rated amber, whilst site 495 is rated green. The justification appears to be that the site will need further assessment of impacts on Area of Outstanding Natural Beauty. The assessment state that there is *“Potential for using some of this site to the north and east for mitigating the rural / urban edge in combination with other adjacent sites.”* The assessment concludes that – as there are no likely significant impacts the site could come forward with other adjacent sites, site to be taken forward for further assessment. Whilst this is supported it is considered that the site should come forward with land to the south of Spitfire Road as referred to above.

There are some inconsistencies in the assessment, as there is no justification for the RAG rating, there is no cross reference to any evidence base for the assessments made, for example SHELAA sites 1104a, b and c are all rated green in respect of flooding, yet the Map showing the sites, clearly subject to flood risk. It is not clear why these sites have been rated green and site 489 rated amber.

In summary Site 2: Land to the west of Spitfire Rd (SHELAA site, 3610) and Site 3: Land to the east of Spitfire Rd (SHELAA sites 488, 489, 451, 3168) are considered to offer the most sustainable opportunities to accommodate the future needs of Calne.

5. Are there important social, economic or environmental factors you think we've missed that need to be considered generally or in respect of individual sites?

Answer:

6. Are there any issues or infrastructure requirements that should be identified?
Other than that already identified within the 'Planning for' document?

Answer:

Our major concern is that as the plan period commences at 2016, is limited to 2036 consequently it fails to look to the longer term and provide a strategic approach for the future of the market town which could if considered provide more scope and opportunities to address the strategic priorities of Calne.

If you have any further comments you wish to make, please detail them below.

I wish to be notified of any future updates relating to the Local Plan Review:

YES:

NO:

Clicking yes will add you to the planning policy contact database. This will mean you are kept informed of any future planning policy updates and consultations.

Further information on how the Spatial Planning Department treats your personally identifiable information can be found by reading the privacy notice available via the link below:

<https://www.wiltshire.gov.uk/planning-privacy-notice>

Here you will also find information about how and why your data may be processed and your rights under the Data Subject Information Notice section further down the page.

Signature:

Date:

4.03.2021

Thank you for completing this form.

Data Protection

Wiltshire Council has a duty to protect personal information and will process personal data in accordance with Data Protection legislation. The personal data you provide on this form will only be used for the purpose of the Wiltshire Development Framework. It may also be used for the prevention or detection of fraud or crime and in an anonymised form for statistical purposes. The data will be stored on computer and/or manual files. You have a right to a copy of your information held by any organisation, with some exemptions. To gain access to your personal data held by Wiltshire Council or if you have any Data Protection concerns please contact Wiltshire Council's Data Protection Officer on 01225 713000 (switchboard) or e-mail to dataprotection@wiltshire.gov.uk ."

CALNE133

Representation Statement

Wiltshire Local Plan Review (Regulation 18) Consultation Response: March 2021

Landowners: [REDACTED]

Developer: CG Fry and Son Ltd

Date: March 2021

Site: Land at Wenhill Calne

Wiltshire SHELAA Refs: 709, 3251,
3311 & 3312



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- C Landscape Executive Summary: McGregor-Smith
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- F Heritage Statement: Landgage
- G Infrastructure Statement: Tumu Consulting
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1.0 Introduction

- 1.1 PlanningSphere have been instructed to make representations to the Wiltshire Local Plan Review (Regulation 18) on behalf of CG Fry and Son Ltd who are the prospective option holders of land at Wenhill, Calne. The subject site is outlined on the Site Location Plan shown at Appendix A.
- 1.2 This representation follows previous submissions of development plan representations promoting this site through both the Wiltshire Housing Site Allocation Plan and the Calne Neighbourhood Plan plan-making processes.
- 1.3 The representation contends that in order to meet the required plan-making test of 'soundness' and maintain mixed-tenure housing delivery in the Chippenham Housing Market Area over the plan period to 2036, it will be necessary for the Council to allocate of the subject site in the Local Plan Review. This is on the basis that the subject site is the most sustainable prospective development site in Calne, and is available, technically deliverable and viable.
- 1.4 The representation is supported by technical and delivery evidence set out in the Appendices. We would welcome an opportunity to discuss the promotion of this site through subsequent stages of the Local Plan Review with the Council's Spatial Planning Team in due course.

2.0 Relevant Background Information

(i) Site Description and Context

- 2.1 The subject site, known as Land at Wenhill, extends to 16.07ha, as outlined in red in the Site Location Plan at Appendix A.

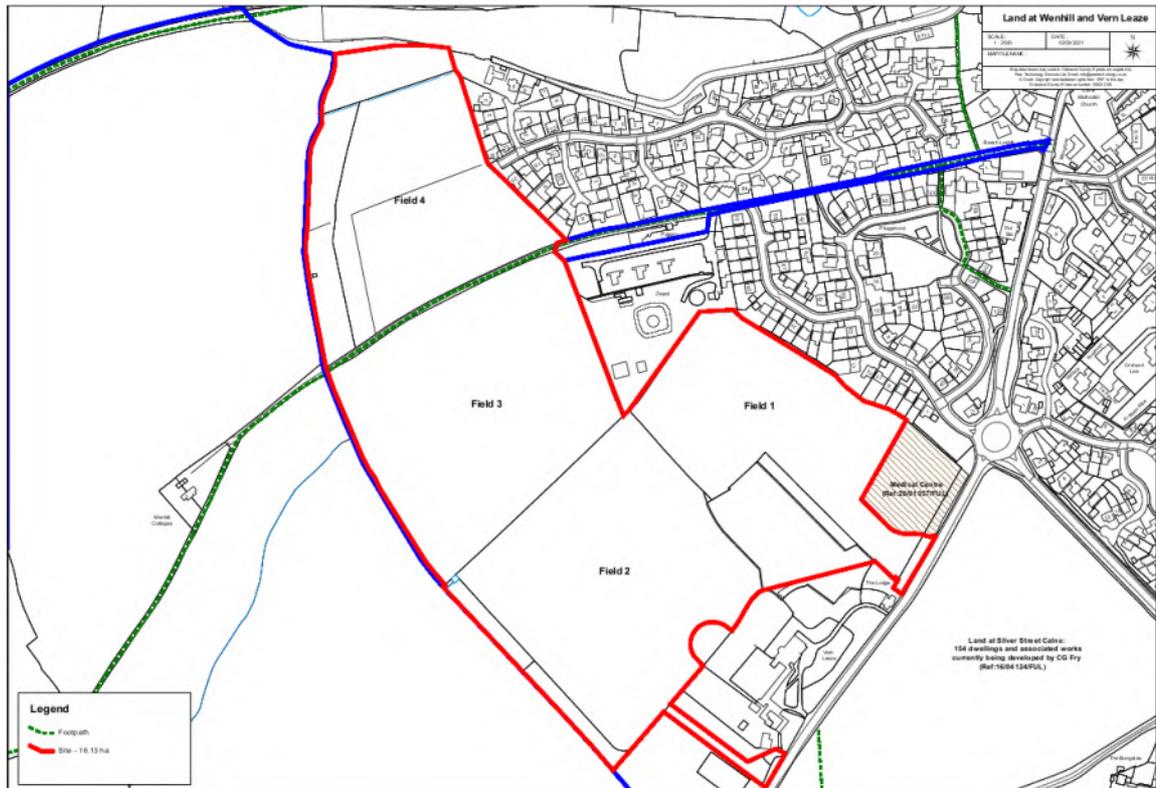


Fig 1. extract from Site Location Plan

- 2.2 The site comprises agricultural land over four fields: 1-4 as annotated in Figure 1 above. The part of Field 1 excluded from the proposed allocation site will be developed for a new medical centre under planning permission (20/01057/FUL) – see planning history summary below. It is proposed that the vehicular access permitted under Medical Centre application will be adapted to serve the proposed housing allocation.
- 2.3 The Transport Technical Note at Appendix E describes the subject site's location, and accessibility in respect of existing facilities, services and public transport, and a proposed access strategy in respect of existing and proposed points of vehicular and pedestrian/cycle access, as annotated on the Parameter Plan at Appendix B. An existing public right of way (PROW), Wenhill Lane, bisects Fields 3 and 4 and provides vehicular access to two farm dwellings owned by the Bowood Estate. A further public right of way, which is used as a Sustrans cycle route (No.403), lies further to the north beyond Field 4. This route connects back into the Town Centre.
- 2.4 Fields 1 and 2 include a block of unmanaged woodland and can be described as pastureland. Field 3 and 4 are in arable use. A full description of the site topography and landscape setting is set out in the accompanying Landscape Visual Appraisal (NB. an

executive summary is shown at Appendix C and the full document is separately submitted as Appendix H). The report also sets out a proposed landscape strategy to inform the future evolution of masterplan based upon the Parameter Plan at Appendix B.

- 2.5 The heritage context includes: archaeological potential; the grade II* listed Vern Leaze (NB. now known as ‘Highlands’) on the eastern side of the site; and the grade I listed park and garden at Bowood to the west. The relationship of the subject site with these heritage assets is considered in the Heritage Statement at Appendix F.
- 2.6 An Ecological Appraisal, which has been partly informed by in-season ecological surveys that were conducted to support the Medical Centre application, has highlighted bat activity along vegetated boundaries of the site (refer to Appendix D). This information along with advice in respect of achieving biodiversity net gain has informed the landscape and wildlife buffers as shown on the Parameter Plan at Appendix B. Further surveys are planned for the 2021 ecology surveying season.
- 2.7 An Infrastructure Statement has been prepared which covers utilities and sets out a drainage strategy (refer to Appendix G) This has identified the presence of live and de-commissioned oil pipelines which cross part of the site, and their associated easements. An outline surface water and foul drainage strategy has also been formulated, and has fed into the ‘green and blue’ infrastructure strategy, which has also informed the Parameter Plan at Appendix B.

(ii) Existing Lawful Use and Planning history

- 2.8 The subject site is agricultural land. Planning history recorded on the Council’s public access system includes the following decision relating to the Medical Centre on the frontage part of Field 1. Site preparatory works are due to commence in Q2: 2021.

Reference	Description	Decision
20/01057/FUL	Proposed medical centre with integral pharmacy, with associated development including means of access, access road, diagnostics/ambulance bay, car and cycle parking, bin storage area, and hard and soft landscaping.	Permitted 15.12.2020

- 2.9 Other relevant planning history is referred to below:

Reference	Description	Decision
16/04124/FUL Land at Silver Street	Residential Development of 154 dwellings with public open space, landscaping, engineering works, associated infrastructure and vehicular access from Silver Street	Permitted 27.02.2018
15/12063/LBC Vern Leaze	Sub-Division and Conversion of Service Wing, Coach House/Stables and the Erection of a New Dwelling to create 3 New Residential Dwellings and New Garage. (Associated Works Including Improvements to Existing Southern Access.)	Withdrawn 31.05.2016

(iii) Existing planning policy context and constraints

- 2.10 The Development Plan for the site comprises:

- Wiltshire Core Strategy (adopted January 2015);

- Calne Community Neighbourhood Plan (made January 2018); and
- Wiltshire Housing Site Allocation Plan (adopted February 2020)

2.11 Applicable designations from the WCS are shown in Figure 2 below:

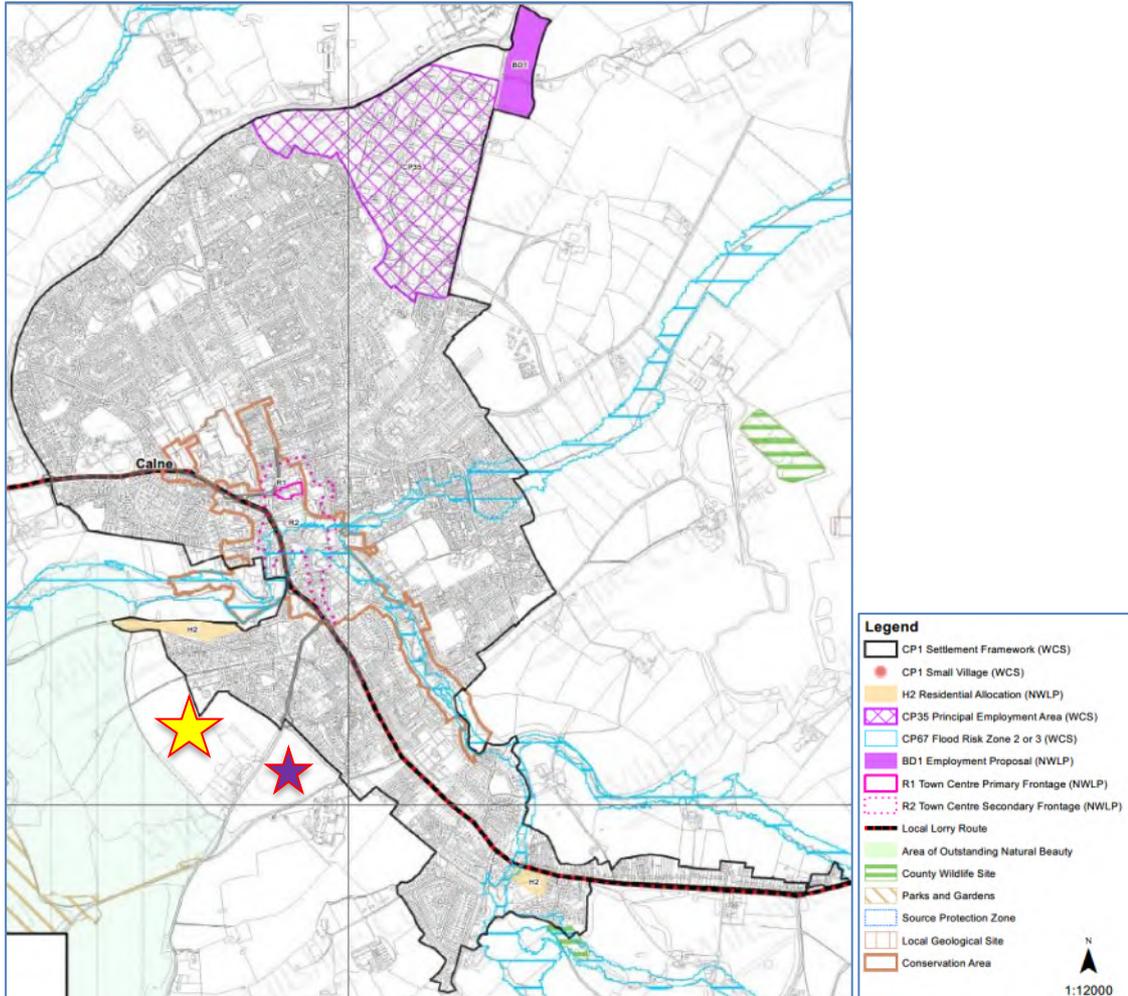


Fig 2. Extract from Inset Map 6 of the Core Strategy Policy Map. The subject site is annotated with a yellow star and the CG Fry site at Silver Street Lane is annotated with purple star. The plan shows that the subject site is not subject to any landscape or ecological designations. The site lies adjacent to the existing Calne Settlement boundary.

2.12 The Calne Community Neighbourhood Plan (CCNP) has not added any additional designations that apply to the subject site. Therefore, the WCS Core Strategy proposals map shows the current planning policy context.

(iv) Summary of previous site promotion

2.13 The site was previously promoted in the CCNP. Representations were as also submitted to the Wiltshire Housing Site Allocation Plan process.

2.14 The subject site was assessed in 2015/16 in the Site Appraisal for the Calne Community Neighbourhood Plan, which was undertaken by external consultants, AECOM who were acting for the CCNP Steering Group. The assessment was undertaken against all four

SHELAA land parcels that make up the subject site and formed part of the CCNP examination evidence base.

- 2.15 Following the AECOM appraisal, the Lemon Gazelle Community Interest Company undertook a further assessment that homed in on two focused choices, which were subject to community consultation: (i) Land North of Low Lane (SHELAA 486); and (ii) the subject site at Wenhill. A balanced decision was made to include the Land North of Low Lane as a development plan allocation under Policy H1 of the CCNP. The site has subsequently been permitted (LPA Ref: 14/11179/OUT, 16/12380/REM; and 17/00679/OUT), and is in the process of being implemented. This has now completed the expansion of the town on its north west perimeter.

3.0 Suitability of the Site for a Mixed Tenure Housing Allocation

(i) Legal ownership and delivery mechanism

- 3.1 The landowners are formally collaborating. Heads of Terms for an Option Agreement with CG Fry and Son Ltd have been agreed. At the time of writing the Option Agreement is in the process of being drafted and is expected to be finalised by Q2:2021. On this basis, the subject site is available for development by an SME developer, CG Fry and Son Ltd.
- 3.2 CG Fry and Son Ltd is a family-owned regional house builder and has track record in delivering high quality residential schemes throughout the South West. Recent track record in Wiltshire includes: Silver Street, Calne adjacent to the subject site (due for completion by Q4: 2021); and the Core Strategy strategic site at Kingston Farm, Bradford on Avon (due for completed by Q2: 2021). Other completed CGF developments in Wiltshire include: Derry Hill; Tisbury (Hindon Lane); and Mere (Woodlands Road – the old Hill Brush Factory site).

(ii) Development Parameters

- 3.3 Further to the technical surveys and initial multidisciplinary assessments that have been completed, a Parameter Plan has been formulated to indicate the potential developable area extent. This in turn has led to initial capacity assessment, which suggests that approximately 200 homes can be accommodated on the subject site.

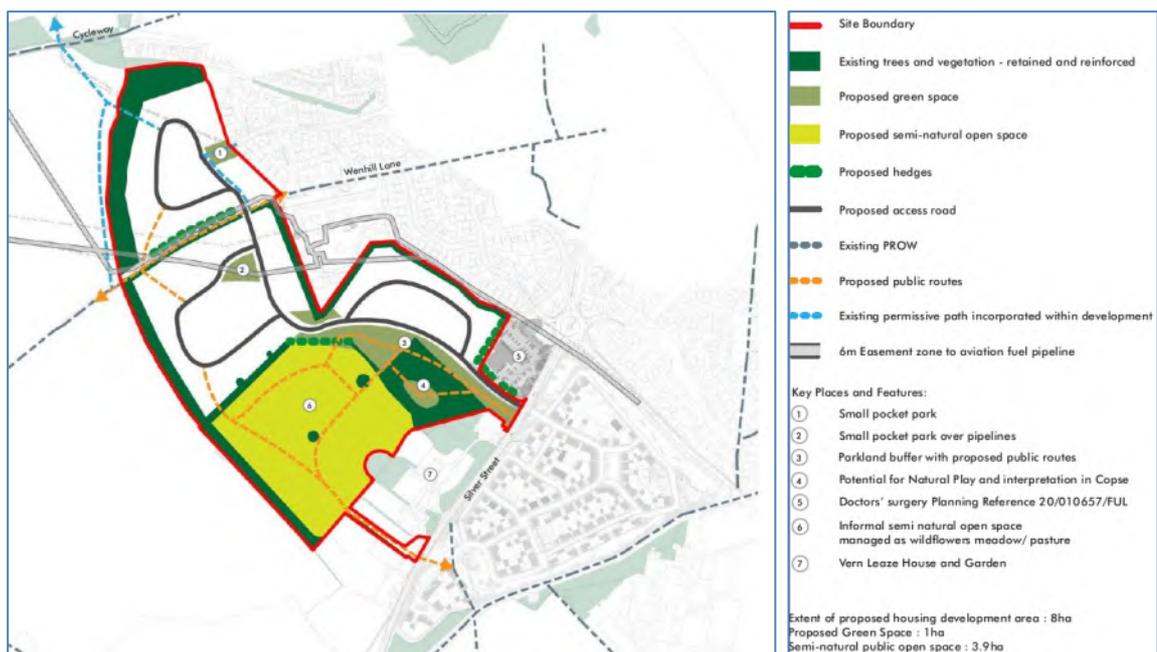


Fig 3. Extract from the Proposed Parameter Plan at Appendix B. The potential residential area extends to circa 8ha

- 3.4 The elements of the indicative Parameter Plan include the following:

- **Principal vehicular access:** is proposed from the A3102 Silver Street utilising the permitted Medical Centre access, which forms a staggered cross roads junction

arrangement by adding a new side arm to the existing ghost island right turn lane priority junction that serves the CG Fry site on the opposite side of the road. An alternative 'compact roundabout' is also feasible, as described in the Transport Technical Note at Appendix E.

- **Secondary (emergency access):** the main internal spine road crosses over Wenhill Lane (a private road and PROW) that bisects Fields 3 and 4. Access to Wenhill Lane from the north would be restricted by demountable bollards. The two farm cottages that served from Wenhill Lane would then take access via the new Spine Road through the site and beyond to the A3102 Silver Street.
- **Heritage mitigation:** housing is proposed on Fields 1, 3 and 4. Field 2 will remain largely undeveloped so as to preserve the setting of the grade II* listed Vern Leaze. A link for the internal spine road in its north west corner will be discretely designed and mitigated.
- **Landscape mitigation:** the most sensitive views of the site from public vantage points are the south. Analysis of site topography and levels and key publicly accessible viewpoints has informed the location of proposed built development on the Parameter Plan at Appendix B. A substantial structural planted shelter belt of native tree species is proposed on the western boundary. This will re-enforce and create new wildlife corridors whilst also providing screening. It is also envisaged that new wildlife corridors and avenues of street trees will be provided within the proposed residential areas.
- **Ecological mitigation:** the site is not located in a bat consultation zone. However, surveys have established the location of a Lesser Horseshoe roost near to Vern Leaze, and bat commuting activity along the south and western boundaries of the site. This is not unusual nor especially difficult to mitigate and thus the Parameter Plan makes provision of dark vegetated corridors along the site perimeter. There is sufficient land available to deliver the required minimum 10% biodiversity net gain on site – on the assumption that this will be a mandatory requirement following the enactment of the Environment Bill. The finalised masterplan will be subject to an agreed Landscape and Environmental Management Plan (LEMP), which will be implemented by the future private management company that will be set up to maintain the areas of common ownership.
- **Drainage and easements:** the Parameter Plan acknowledges the easements associated with the live and de-commissioned oil pipelines that cross the site. NB. the same pipeline crosses CGF's Silver Street site and this has not proven to be a major constraint on development following early engagement with CLH's surveyors. Surface water drainage will be conveyed in a system of swales and attenuation basins and then discharged at less than the existing greenfield rate to the existing water system of ditches and watercourse to the south. Foul drainage will connect to existing mains systems.

(viii) Proposed further work in progress to develop the evidence base

- 3.5 Following the submission of the Regulation 18 representations, the project team will commission the following further work:

- A full topographical survey
 - Liaison with oil pipeline engineers to establish the precise location and depth of both the live and de-commissioned oil pipelines that cross the site.
 - Arboricultural survey
 - Geophysical survey
 - Infiltration testing
 - Liaison with Wessex Water in respect of foul drainage connections
 - Feasibility study to investigate the proposed pedestrian/cycle link from Field 4 to the Sustrans cycleway (403) to the north
- 3.6 The project team will be willing to share this information as part of an evolving technical evidence base with the Council's Spatial Planning Team.
- 3.7 At the appropriate time, CGF, will appoint a masterplan architect / urban designer to formulate an illustrative masterplan, which will be landscape/heritage-led. This will then be tested internally before being progressed as a pre-application enquiry. Feedback from the pre-application enquiry can then be added to the technical evidence base in advance of the Local Plan Review examination in due course. CGF will commit to undertaking public consultation in advance of submitting any formal planning application.

4.0 Response to the Consultation

(i) National Policy Context

- 4.1 Paragraph 16 of the NPPF requires that plans should be ‘...*(a) prepared with the objective of **contributing towards sustainable development***’; and ‘...*(b) be prepared positively, in a way that is **aspirational but deliverable***’.
- 4.2 In respect of non-strategic policies, Paragraph 28 of the NPPF states that LPAs should allocations to promote sustainable development, and Paragraph 29 states that ‘...policies should be underpinned by relevant and up to date evidence’ and ‘...*take into account relevant market signals*’.
- 4.3 Paragraph 59 requires that as part of the Government’s objective of significantly boosting the supply of new homes, ‘...*it is important at sufficient amount and **variety of land can come forward where it is needed, that the needs of groups with specific housing requirements are addressed***...’
- 4.4 Paragraph 61 states that the ‘...*size, type and tenure of housing needed for different groups in the community should be assessed and reflected in planning policies... ..*’
- 4.5 Paragraph 68 states that ‘...***small and medium sized sites can make an important contribution** to meeting the housing requirement of an area and are often **built out relatively quickly***’.
- 4.6 Paragraph 72 states that ‘...*The supply of large numbers of new homes can often be best achieved through planning for larger scale development, such as new settlements or significant extensions to existing villages **and towns, provided they are well located and designed, and supported by the necessary infrastructure and facilities***....
- b) ensure that their size and location will support a sustainable community, with **sufficient access to services and employment opportunities** within the development itself (**without expecting an unrealistic level of self-containment**), or in larger towns to which there is good access;...*

(Our emphasis in **bold**)

(ii) Spatial Strategy and distribution of growth in the Chippenham HMA

- 4.7 Calne falls within the proposed Chippenham Housing Market Area, which replaces the former North and West Housing Market Area. The change from three to four HMAs is broadly supported. However, for the reasons explained below, we do not consider that the spatial strategy for delivering the growth is sound on the basis of deliverability, or through acknowledgement of societal change that has been accelerated by the covid pandemic.
- 4.8 The Regulation 18 spatial strategy for the HMA is reliant to high degree on the delivery of the strategic growth options at Chippenham. At the other end of the settlement hierarchy, it is noted that the Regulation 18 Spatial Strategy is relying upon

Neighbourhood Plans to deliver housing growth at Large Villages and other rural settlements in the rural hinterland outside principal settlements and market towns across the whole county.

- 4.9 Wiltshire Council has a poor track record in timely delivery of large urban extension strategic sites, such as Ashton Park in Trowbridge and the West Warminster Urban Extension, both of which were allocated in the adopted Core Strategy and have not yet commenced. At the other end of the scale, Neighbourhood Plans have failed to make any real meaningful contribution to housing delivery in Wiltshire, although it is acknowledged that CCNP is an exception through the inclusion of a residential allocation.
- 4.10 Given that the covid-pandemic has accelerated the trend towards flexible home-working and internet shopping, and that there is now a clear road map to the decarbonisation of private transport (electric vehicles), with transformation expected to take place over the plan period to 2036, we submit that the proposed Regulation 18 spatial growth strategy is too weighted to towards the principal settlements. We consider that more growth should be directed towards market towns and rural areas. This approach would place less reliance upon volume home builders to deliver of a small number of complicated strategic sites (for which there is poor delivery track record in Wiltshire) and would enable a greater role for SME regional housebuilders to deliver the housing requirement through a larger number of smaller scale housing developments in market towns and rural areas.
- 4.11 In the context of Wiltshire Council not currently being able to demonstrate a 5-year housing land supply across its whole administrative area (NB. 4.56 years in the last published Annual Monitoring Report with a base date of April 2019), combined with the NPPF requirements, as summarised above, and the importance of the SME sector in delivering smaller and medium sized sites to diversify choice of new housing provision, it is in our view imperative that the Council allocates sufficient smaller/medium sized sites at the Market Town level of the identified settlement strategy. This is particularly important in the Chippenham HMA where the deliverability of large-scale strategic sites is both technically and politically challenging.
- 4.12 Under the proposed growth strategy for Calne, the Local Plan Review identified need for Calne is 1,610 homes over the plan period 2036. Having regard to existing commitments the residual need is 360 homes of which circa 60 are expected to come forward through windfall/brownfield opportunities – NB. we have not seen the detailed evidence to substantiate this figure. This leaves a residual requirement of c.300 homes over the plan period to 2036. While the subject site could assist meeting two thirds of this requirement, we consider that Calne, in comparison to some other market towns, is relatively unconstrained and has capacity to receive a greater number of homes.
- 4.13 Therefore, for the reasons outlined above, and to ensure the delivery of new open market and affordable homes in Calne, it will be imperative that additional housing allocations are made in the Local Plan Review, over and above the proposed 300 number, to ensure continuity of supply in the Chippenham Housing Market Area over the plan period to 2036.

(iii) Comment on the subject site (Site 2 in the Site Selection Report)

- 4.14 It is understood that the external consultants acting for the Council have assisted in assessing prospective development sites. Wiltshire Council’s high-level summary assessment relates to Site 7, as shown in Figure 4 of the Site Selection Report for Calne as one of the *‘final pool of potential sites for further detailed assessment’*.
- 4.15 The assessment of Site 7 has been summarised in the report under the four SHELAA individual reference numbers, but it is acknowledged that the four sites should be assessed a single site. The high-level ‘traffic light’ assessment of the constituent elements of the subject site is set out below in Figure 4:

SHELAA Reference	Site Address	Accessibility	Flood Risk	Heritage	Landscape	Traffic	Stage 2A and Stage 2B - Overall judgement	Taken Forward
709	Land at Wenhill Heights, Wenhill Lane	Green	Green	Yellow	Yellow	Red	Site is adjacent to the revised settlement boundary and to existing residential development. Low flood risk - entire site is Flood Zone 1. In heritage terms, some potential impacts on setting of Bowood Grade I Registered Park and Garden RPG which will require further assessment. Mitigation may be a constraint. The site has broken views across the valley and whilst there is a tree belt planted along the western boundary this is currently immature and needs protection and enhancement to provide suitable screening on this urban / rural edge. No justification for rejecting site at this stage. Take forward for further assessment. It would be appropriate to combine this site with 3251, 3312 and 3211 to consider one logical extension to the town.	Green
3311	Land adjacent Fynamore Gardens – Vern Leaze A	Green	Green	Yellow	Yellow	Red	Site is adjacent to the revised settlement boundary and to existing residential development. Low flood risk - entire site is Flood Zone 1. Potential for heritage impacts on the setting of Grade II* listed Vernleaze and the setting of Bowood Grade I Registered Park and Garden; mitigation may be a constraint. Few landscape impacts considered likely. In combination with other west of Calne sites, could potentially provide a link road that would reduce traffic impacts in centre. No justification for rejecting site at this stage. Take forward for further assessment. It would be appropriate to combine this site with adjacent sites 3312, 3251 and 709 to consider one logical extension to the town.	Green
3251	Land at Wenhill South	Green	Green	Yellow	Yellow	Red	Site is adjacent to the revised settlement boundary. Low flood risk - entire site is Flood Zone 1. Potential heritage impacts on the setting of Bowood GI RPG - mitigation may be a constraint. The site has broken views across the valley towards Pinhills Farm and a strong planted woodland screen would need to be provided on the western boundary to link into that currently planted on site 709. In combination with other west of Calne sites, could potentially provide a link road	Green
3312	Land west of Vern Leaze – Vern Leaze B	Green	Green	Yellow	Yellow	Red	Site is adjacent to the revised settlement boundary and also to SHELAA sites 3251, 3211 and 858318. Low flood risk - entire site is Flood Zone 1. In heritage terms, potential impacts on setting of Grade II* listed Vernleaze and setting of Bowood Grade I Registered Park and Garden - mitigation may be a constraint. Existing landscaping would need protection and enhancement to provide suitable screening on this urban / rural edge. In combination with other west of Calne sites, could potentially provide a link road that would reduce traffic impacts in centre. No justification for rejecting site at this stage. Take forward for further assessment. It would be appropriate to combine this site with adjacent sites 3251, 3211 and 709 to consider one logical extension to the town.	Green

Fig. 4 the Council’s traffic light summary assessment of the 4 constituent SHELAA entries that comprise Site 7.

4.16 Using the Council’s Traffic Light Assessment, we have undertaken a similar appraisal utilising the site-specific evidence base. This is set out in the table below:

WC Traffic Light Assessment	PlanningSphere Response
Accessibility	<p>The evidence prepared by Miles White Transport at Appendix E includes an accessibility appraisal of the subject site (No.7). The same methodology has also been applied to the ‘competing’ sites: 1-6; and 8.</p> <p>The MWT assessment confirms that the subject site (7) is highly accessible and outscores all the competing sites in Calne. On this basis, we agree with the ‘green’ categorisation.</p>
Flood Risk	<p>The site lies in Flood Zone 1 on the Environment Agency’s Flood Map for Planning. A technical solution is available for surface water attenuation and disposal at less than the existing greenfield run off rate to existing watercourses. For more information refer to the Infrastructure Report at Appendix G. On this basis, we agree with the ‘green’ categorisation.</p>
Heritage	<p>The Heritage Assessment at Appendix F assesses the relationship of the site with the identified heritage assets. The Parameter Plan has considered these constraints carefully to enable the setting of Vern Leaze to be protected, and to ensure that with screen planting mitigation, there will be no intervisibility of the site with the grade I listed registered Bowood parkland. On this basis, we agree with the ‘orange’ categorisation.</p>
Landscape	<p>The subject site is not located within a designated AONB and is not subject to local level landscape designations. The landscape strategy that has informed the Parameter Plan, which includes a substantial proposed new shelter belt on the sensitive western boundary, will provide adequate landscape mitigation as explained in the Landscape and Visual Appraisal at Appendix H. On this basis, we agree with the ‘orange’ categorisation.</p>
Traffic	<p>The Transport Technical Note explains that the vehicular access that has been approved pursuant to the permitted medical centre (LPA Ref: 20/01057/FUL) is sufficient to service the proposed development. If required following further technical evaluation, there is sufficient land available to remodel the proposed access as a compact roundabout. Further information is set out in the Transport Technical Note at Appendix E.</p> <p>The non-car accessibility of the site is greater than any of the other potential development sites in Calne, and the site will benefit from a direct link to the town centre via Wenhill Lane. Furthermore, there may also be an opportunity to create a northern link to the existing Sustrans Route (403).</p> <p>On the basis that it has been demonstrated that an access solution is available, and noting the accessible location of the site, we disagree with the ‘red’ categorisation and have re-assigned a ‘green’ categorisation.</p>

5.0 Conclusions

- 5.1 In strategic planning terms, the growth distribution strategy set out in the Regulation 18 consultation draft is too weighted towards large scale complex sites adjacent to principal settlements. Having regard to societal and technological changes that have been accelerated by the covid-pandemic, we advocate a more decentralised strategy to meet the growth requirement with more development distributed to market towns and rural areas. Such an approach would enable the SME housing building sector to play a greater roll in the delivery of the housing requirement, which would ensure a more diverse and even supply of new housing over plan period. SME developers also tend to deliver housing at a higher build and design quality than volume home builders, as has been shown in consumer satisfaction surveys. Market towns and larger settlements in rural areas remain sustainable places in which to develop and should not be allowed to decline at the expense of hard to deliver strategic site allocations.
- 5.2 In order to meet the test of soundness, the Council should allocate the subject site on the basis that it is: (i) available, (ii) technically deliverable, and (iii) is viable for delivery early in the plan period.
- 5.3 In summary, the allocation of the subject site would deliver the following benefits:
- A sustainable location relatively close to and well connected to the town centre in comparison to other potential available sites in Calne.
 - A site suitable for delivery of circa 200 homes by an SME home builder and viable to deliver a 30% element of affordable housing provision.
 - A safe and suitable vehicular access solution from Silver Street.
 - The ability to mitigate the impact of development on the wider landscape and preserve the setting of the grade II listed Vern Leaze.
 - The ability to address ecological constraints (bats and badgers) and deliver a biodiversity net gain on site.
 - The site is situated within Flood Zone 1 and surface water attenuation can be managed as part of an integrated green and blue infrastructure strategy.
 - Provision of a substantial areas of onsite publicly accessible open space and allotments.
 - Provision of public access through the site connecting into the wider footpath and cycleway network maximizing the opportunities for non-car access.
- 5.4 Given we have demonstrated that the subject site is suitable and technically deliverable, we request the Council acts proactively to plan for housing need in Calne and **allocates sites 709, 3251, 3311, 3312 for approximately 200 No. dwellings and associated public open space.**

CALNE134

Representation Statement

Wiltshire Local Plan Review (Regulation 18) Consultation Response: March 2021

Landowner: The Reversioners Trust

Date: March 2021

Site: Land north of Old Road, Derry Hill

Wiltshire SHELAA Ref: 3302



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- A Site Location Extract from the SHELAA Records
- B Site Appraisal for the Calne Community NP: January 2016
- C Parameter Plan for Land at Old Road

1.0 Introduction

- 1.1 PlanningSphere have been instructed to make representations to the Wiltshire Local Plan Review (Regulation 18) on behalf of the owners of the subject site, The Reversioners Trust. The subject site lies to the north of Old Road, Derry Hill, and is on the Site Location Plan shown at Appendix A.
- 1.2 This representation follows previous development plan representations that have been submitted in respect of the subject site's promotion through the Calne Community Neighbourhood Plan and the Wiltshire Housing Site Allocation Plan.
- 1.3 The technical delivery of the site has been established through preliminary technical assessments in respect of access, and other high-level assessments following the identification of the site constraints.
- 1.4 The enclosed representation contends that the subject site should be allocated in order to meet the required plan making test of 'soundness' and maintain mixed-tenure housing delivery in Chippenham Housing Market Area.
- 1.5 We would welcome an opportunity to discuss the evolution of a more detailed technical evidence and the promotion of the site through success stages of the Local Plan Review plan making process with representatives of the Council's Spatial Planning Team in due course.

2.0 Relevant Background Information

(i) Site Description and Context

- 2.1 The subject site extends to 4.33ha and is located within the existing built extent of Derry Hill. The site has defensible boundaries on all sides and is bounded by: the A4 to the north; and Old Road to the south and east. The site is bounded by existing residential development to the east, south and west. The outline of the site is shown in the extract from the Council's SHELAA plan in Appendix A.
- 2.2 The site lies approximately equidistant from Calne and Chippenham. There is an existing regular bus services in both directions along the A4. There are a range of existing services and community facilities in Derry Hill that include: a primary school; public house; village shop; two churches; and a village hall.
- 2.3 There are also various permanent and seasonal employment opportunities in the wider Derry Hill / Studley area. The subject site therefore benefits from good levels of non-car accessibility and connectivity and is one of the most sustainable Large Villages in the Chippenham Housing Market Area.
- 2.4 The subject site is relatively flat and is well contained from longer range views by a tree belt on its northern boundary, and woodland associated with the Bowood Estate to the south.
- 2.5 The site is proximate to but lies outside designated Grade 1 listed park and garden at Bowood. The nearest listed buildings lie to the west of the site and include:
- Grade II listed Studley Lodge
 - Grade II listed Village Hall
 - Grade II listed Christchurch
- 2.6 None of the dwellings along the site perimeter on Old Road are listed.
- 2.7 The site lies within Flood Risk Zone on the EA's Flood Map for Planning.

(ii) Existing Lawful Use and Planning history

- 2.8 The site is used as arable agricultural land. There is no relevant planning history.

(iii) Existing planning policy context

- 2.9 For the purposes of this application the Development Plan for the site comprises:
- Wiltshire Core Strategy (adopted January 2015);
 - Calne Community Neighbourhood Plan (Made 2018); and
 - Wiltshire Housing Site Allocation Plan (adopted February 2020).

2.10 The subject site lies within the 'Large Village' of Studley / Derry Hill. The site is effectively an enclave between the two polygons that comprise Derry Hill's defined settlement limits. It is notable that following the implementation of 'Bowood Gate' by Crest Nicholson, immediately to the north of the A4, the settlements of Studley and Derry Hill are now effectively contiguous and function as a single settlement, albeit bisected by the A4.

2.11 An extract from the Wiltshire Core Strategy proposals map is shown in Figure 1 below:

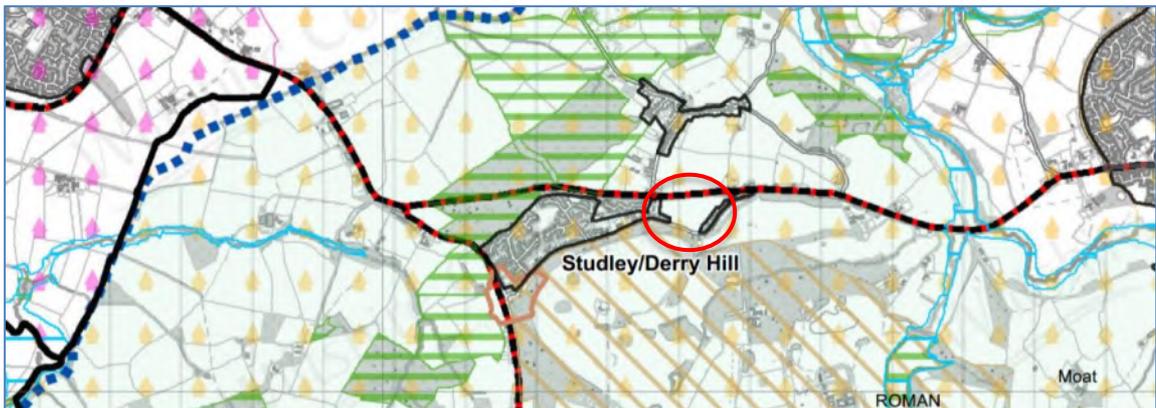


Fig 1. Extract from the Calne, Chippenham and Corsham Wiltshire Core Strategy proposals map. The subject site lies within the red circle between the two elements of the Derry Hill settlement boundary.

(iv) Promotion history

2.12 The site was initially promoted as part of the Calne Community Neighbourhood Plan process. The initial assessment undertaken by AECOM on behalf of the CCNP Steering Group is shown at Appendix B. We disagree with the comments on access as a subsequent initial feasibility assessment has confirmed that the site can be accessed from Old Road.

2.13 Representations were subsequently submitted as part of the Wiltshire Housing Site Allocation Plan process in September 2017. The Council decided not to include any allocations in Derry Hill/Studley at that time as a speculative application made by Crest Nicholson at Studley had been approved. That scheme has now been implemented and there are no other committed development sites in Derry Hill / Studley in the pipeline.



Fig 2. An aerial plan showing the subject site. The yellow star denotes the recently completed Crest Nicholson scheme at Studley north of the A4.

3.0 Suitability of the Site for Mixed-Use Tenure Housing Allocation

(i) Legal ownership and delivery.

3.1 The freehold interest of the subject site is owned by The Reversioners Trust. In the event that an allocation is secured, the landowner will seek to partner with a local SME developer to deliver the site. It is anticipated that the site could be delivered early in the plan period.

(ii) Development Parameters

3.2 The Parameter Plan at Appendix C and extracted in Figure 3 below identifies the potential developable area of the subject site. On this basis we consider that the site has potential to accommodate up to c.70 dwellings and public open space.



Fig 3. Extract from the Proposed Parameter Plan

3.3 Key points to note in respect of the proposed allocation are summarised below:

- **Access:** there are two potential points of vehicular access from Old Road both – both simple priority junctions with adequate visibility splays. A direct pedestrian / cycle link is available to the A4 to the north through the existing woodland buffer.
- **Landscape / Ecology:** a precautionary 15m buffer for green and blue infrastructure, and a dark wildlife corridor is shown around the perimeter. The north east corner could be used for allotments or additional woodland planting. It is also envisaged that the internal access road would be tree-lined and that there would be a central focal area of open space. Given the existing use of the site for arable farming we consider that it will be possible to deliver the 10% biodiversity net gain requirement that will be a mandatory requirement following the enactment of the Environment Bill later this

year. The finalised masterplan will be subject to an agreed Landscape and Environmental Management Plan (LEMP), which will be implemented by the future private management company that will be set up to maintain the areas of common ownership.

- **Drainage Strategy:** mains foul drainage is available from the A4. Surface water will be attenuated on site and released at less than the existing greenfield runoff rate, with the appropriate climate change factor applied.

3.4 Noting that the subject site has not been assessed as part of the Site Selection Report, as this was only undertaken in Principal Settlements and Market Towns, we have undertaken our own assessment, as summarised in the table below:

WC Traffic Light Assessment	PlanningSphere Assessment
Accessibility	The site is situated in a highly accessible location with good non-car access to village services and amenities, and public transport accessibility to both Calne and Chippenham.
Flood Risk	The site is located in Flood Zone 1 on the Environment Agency's Flood Map for Planning. The site is proposed for low density development with sufficient space for onsite surface water attenuation.
Heritage	The site does have a sensitive historic context given its proximity to the Grade I listed park and garden but there is very limited inter-visibility due to the dense screening at the northern side of the Bowood Estate. The setting of the nearest listed buildings will also need to be respected. The proposed landscape buffer will provide screening.
Landscape	The site is not subject to any AONB or local landscape designations. The site is bounded by built development and has defensible boundaries on all sides, with a strong woodland belt to the north adjacent to the A4. There is scope for significant new screening on the southern edge to mitigate the impact of new built development.
Traffic	Advice from transport consultants has confirmed that it will be possible to form points of vehicular access from Old Road, which could function as simple priority junctions with the required standard of visibility splays. Direct cycle and pedestrian access is available to the A4.

(iii) Further work

3.5 In the event the site is reconsidered by Wiltshire Council for allocation, the landowner would undertake the following work to evolve a technical evidence base:

- Measured survey
- Infiltration testing and drainage design
- Detailed access design and traffic surveys
- In-season ecology surveys
- Heritage assessment and geophysical survey
- Landscape appraisal

4.0 Response to the Consultation

(i) National Policy Context

- 4.1 Paragraph 16 of the NPPF requires that plans should be ‘...*(a) prepared with the objective of **contributing towards sustainable development***’; and ‘...*(b) be prepared positively, in a way that is **aspirational but deliverable***’.
- 4.2 In respect of non-strategic policies, Paragraph 28 of the NPPF states that LPAs should allocations to promote sustainable development, and Paragraph 29 states that ‘...policies should be underpinned by relevant and up to date evidence’ and ‘...*take into account relevant market signals*’.
- 4.3 Paragraph 59 requires that as part of the Government’s objective of significantly boosting the supply of new homes, ‘...*it is important at sufficient amount and **variety of land can come forward where it is needed, that the needs of groups with specific housing requirements are addressed***...’
- 4.4 Paragraph 61 states that the ‘...*size, type and tenure of housing needed for different groups in the community should be assessed and reflected in planning policies... ..*’
- 4.5 Paragraph 68 states that ‘...***small and medium sized sites can make an important contribution** to meeting the housing requirement of an area and are often **built out relatively quickly***’.
- 4.6 Paragraph 72 states that ‘...*The supply of large numbers of new homes can often be best achieved through planning for larger scale development, such as new settlements or significant extensions to existing villages **and towns, provided they are well located and designed, and supported by the necessary infrastructure and facilities***....’
- b) ensure that their size and location will support a sustainable community, with **sufficient access to services and employment opportunities** within the development itself (**without expecting an unrealistic level of self-containment**), or in larger towns to which there is good access;...*

(Our emphasis in **bold**)

(ii) Spatial Strategy and distribution of growth in the Chippenham HMA

- 4.7 Derry Hill is a Large Village that falls within the proposed Chippenham Housing Market Area, which replaces the former North and West Housing Market Area. The change from three to four HMAs is broadly supported. However, for the reasons explained below we do not consider that the spatial strategy for delivering the growth is sound on the basis of deliverability or through acknowledgement of societal change that has been accelerated by the covid pandemic.
- 4.8 The Regulation18 spatial strategy for the HMA is reliant to high degree on the delivery of the strategic growth options at Chippenham as part of the growth strategy for the principal settlement of Chippenham. At the other end of the settlement hierarchy, it is

noted that the Regulation 18 Spatial Strategy is relying upon Neighbourhood Plans to deliver housing growth at Large Villages and other rural settlements in the rural hinterland outside principal settlements and market towns across the whole county.

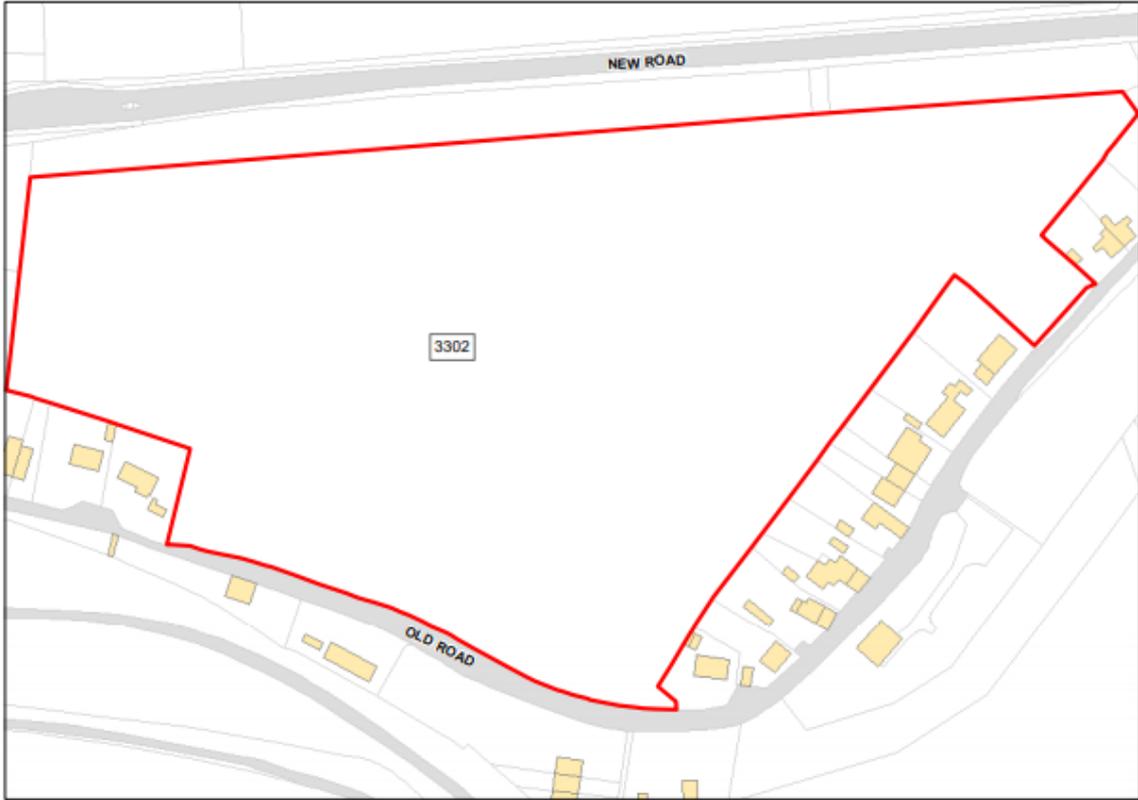
- 4.9 Wiltshire Council has a poor track record in timely delivery of large urban extension strategic sites, such as Ashton Park in Trowbridge and the West Warminster Urban Extension. At the other end of the scale, Neighbourhood Plans have failed to make any real meaningful contribution to housing delivery in Wiltshire with many of the made Neighbourhood Plans not proposing any housing growth and acting a further constraint on development. It is however acknowledged the CCNP did allocate a housing site in Calne but failed to allocate any sites in the rural Calne Without.
- 4.10 Given that the covid pandemic has accelerated the trend towards flexible home-working and internet shopping, and that there is now a clear road map to the decarbonisation of private transport (electric vehicles), with transformation expected to take place over the plan period to 2036, we submit that the proposed Regulation 18 spatial growth strategy is too weighted to towards the principal settlements. We consider that more growth should be directed towards market towns and sustainable large villages, such as Derry Hill/Studley. This approach would place less reliance upon volume home builders to deliver a small number of complicated strategic sites (for which there is poor delivery track record in Wiltshire) and would enable a greater role for SME regional housebuilders to deliver the housing requirement through a larger number of smaller scale housing developments in market towns and rural areas.
- 4.11 In the context of Wiltshire Council not currently being able to demonstrate a 5-year housing land supply across its whole administrative area (4.56 years in the last published Annual Monitoring Report with a base date of April 2019), combined with the NPPF requirements, as summarised above, and the importance of the SME sector in delivering smaller and medium sized sites to diversify choice of new housing provision, it is in our view imperative that the Council allocates sufficient smaller/medium sized sites at the Market Town and Large Village level in the identified settlement strategy. This is particularly important in the Chippenham HMA where the deliverability of large-scale strategic sites is both technically and politically challenging.
- 4.12 It is also the case that large villages, such as Derry Hill/Studley act for as a service hub for a much wider area of rural settlements with limited or no facilities. The NPPF acknowledges the need to for allocations to support existing rural facilities. Reliance on neighbourhood plan making process to meet important rural needs is not sensible and could result in rural decline without proactive intervention at the County level.
- 4.13 Therefore, for the reasons outlined above, and to ensure the delivery of new open market and affordable homes in Chippenham HMA, it will be imperative that additional housing allocations are made in the Local Plan Review at Market Towns and Large Villages to ensure continuity of supply over the plan period to 2036. Failure to include any new housing allocations at Derry Hill / Studley would render the plan unsound and would be in conflict with the NPPF.

5.0 Conclusions

- 5.1 In strategic planning terms, we are concerned that the growth distribution strategy set out in the Regulation 18 consultation draft is too weighted towards large scale complex sites adjacent to principal settlements. Having regard to societal and technological changes that have been accelerated by the covid-pandemic, we advocate a more decentralised strategy to meet the growth requirement with more development distributed to market towns and rural areas. Such an approach would enable the SME housing building sector to play a greater role in the delivery of the housing requirement, which would ensure a more diverse and even supply of new housing over plan period. SME developers also tend to deliver housing at a higher build and design quality than volume home builders, as has been shown in consumer satisfaction surveys.
- 5.2 In summary, the allocation of the subject site would deliver the following benefits:
- A site suitable for delivery of circa 70 homes by an SME home builder and viable to deliver a 30% element of affordable housing provision.
 - A safe and suitable vehicular access solution from Old Road.
 - Good levels of non-car accessibility for a Large Village
 - Potential to assist in sustaining an existing wide range of local services and community facilities.
 - The ability to mitigate the impact of development on the wider landscape through new planting on a site that is contained by defensible boundaries.
 - The ability to address ecological constraints and deliver a biodiversity net gain on site.
 - Development on land located in Flood Zone 1 and the ability to attenuate surface water on site.
 - Provision of publicly accessible open space and the potential for allotments.
 - Provision of public access through the site connecting into the wider footpath and footway network.
- 5.3 Given we have demonstrated that the subject site is suitable and technically deliverable, we request the Council revises its spatial strategy, and acts proactively to plan for housing need at Large Villages and **allocates site 3302 for approximately 70 No. dwellings and associated public open space.**

Appendix A: Extract from SHEELA

Calne: Studley / Derry Hill
3302



Site Address: Land North of Old Road

Total Area:	4.3359ha	HMA:	North & West Wiltshire
Suitable Area:	4.3359ha (100.0%)	Previous Use:	Greenfield
Suitability Constraints*:	N/A		
All Constraints*:	PP, SSSI_2km, MRZ, MSA, ALCG1, OP		

Suitable:	Yes. No suitability constraints.	Available:	Yes
Achievable:	Yes (Residential)	Deliverable:	Yes
Capacity:	132	Developable:	In short-term

*Note: Constraint abbreviations can be found in the SHELA Methodology Report in Appendices 1 and 2 on pages 14 and 16.

Appendix B: Site Appraisal for the Calne Community NP: Jan 2016

4.22 3302: Land to the east of Derry Hill, bounded by the A4 and Old Road



Agricultural land to the east of Derry Hill, surrounded by trees and hedges on all boundaries, bounded by the A4 to the north and Old Road to the south

Site Development Potential

The site is 4.34 ha in size and is located on Grade 3 agricultural land; the site could accommodate up to 65 homes. It is located on the edge of Derry Hill, with residential land use adjacent to the site. It is also close to a primary school and shop, as well as Bowood Registered Park and Garden and recreational field.

The site is within a Flood Zone 1, which denotes a low probability (i.e. less than 1 in 1,000 annual probability) of river flooding. The site is mostly at a very low risk of surface water flooding, which denotes the area has a chance of flooding of less than 1 in 1000 (0.1%); however a very small part of the site to the east is at low risk, which denotes the area has a chance of flooding of between 1 in 1000 (0.1%) and 1 in 100 (1%).

The site is well screened from Bowood Registered Park and Garden, despite being adjacent to the boundary; its setting is therefore unlikely to be affected. Views from surrounding residential properties are also unlikely to be adversely affected as they only have short views.

Key Constraints

The site has significant access issues, which would potentially preclude development to its full capacity. In this context development of the site to its full capacity would require significant improvements to access through enhancements to Old Road, which is currently a narrow lane with no pedestrian footways.

The site is close to a number of listed buildings. It is however screened by adjacent residential properties. As such the setting of these is unlikely to be affected.

The site is adjacent to the A4, which is a considerable source of noise. Development may need to consider the orientation and design of housing in this regard. Access is likely to be from Old Road, which is a narrow lane.

Site Appraisal

January 2016

AECOM

Calne Community Neighbourhood Plan

30

Part of the site is situated within an SSSI Impact Risk Zone for Bencroft Hill Meadows SSSI, relating to residential development of 100 units or more.

Recommendations

The site is appropriate for allocating through the Neighbourhood Plan in principle, as it is of a large enough size to accommodate a significant number of new houses, whilst being compatible with surrounding uses.

However, the site has significant access issues, which would potentially preclude development to its full capacity. In this context development of the site to its full capacity would require significant improvements to access through enhancements to Old Road, which is currently a narrow lane with no pedestrian footways. This would likely include through the widening of the lane, which would require significant highways works, lead to the loss of hedgerows (a key biodiversity habitat) and have adverse effects on the character of Derry Hill.

Development at this location may also need to consider the design and orientation of housing to ensure noise from the A4 does not adversely affect residents, and trees which screen the site should be retained. Development should also seek to ensure that potential effects on the Bencroft Hill Meadows SSSI are avoided.

Appendix C

