

STRAT281

WILTSHIRE LOCAL PLAN REVIEW

CONSULTATION

REPRESENTATIONS

ON BEHALF OF

HALLAM LAND MANAGEMENT LTD



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SECTION 1

REPRESENTATION FORMS





SECTION 2

REPRESENTATIONS





Wiltshire Local Plan Review

Consultation

Representations by Hallam Land Management Ltd

March 2021

**ROCKE
ASSOCIATES**

The representations below set out the response of Hallam Land Management Ltd (HLM) to the matters identified in the title banners.

Housing Market Areas

The HMAs identified in the emerging strategy broadly reflect and continue those that were previously identified in the Wiltshire Core Strategy (WCS). However, the evidence base does not suggest that there has been fundamental change in the functional relationships between where people live and work.

Wiltshire County covers a very large geographical area which was formerly administered by four separate district level authorities. As is correctly acknowledged in the consultation document, needs vary around the County, and it would not result in a sustainable pattern of development if there was a mismatch between the focus of development and the locus of need. Given the divergent housing and economic needs and potential across the County, its continued disaggregation into separate HMAs and the apportionment of growth accordingly, is considered to be a sound and sustainable strategy approach.

The economic evidence base confirms that the Chippenham HMA (formerly part of the North and West HMA) continues to be the 'engine room' of the Wiltshire economy given its relationship with the strategic road network (M4 / A350) and position in relation to major urban centres in the M4 corridor (Bristol / Swindon / Reading), together with its rail connectivity provided by the Great Western main line. A distribution of circa 45% of the County's overall housing growth to the Chippenham HMA is therefore not disproportionate as part of a strategy to deliver a step change in economic growth and increase self-containment.

With regard to the overall housing need to be apportioned to the HMAs, the Council's approach to plan to exceed the minimum figure that arises from the Government's Standard Method, by 11.7% (4,795 dwellings), is considered to an appropriate approach in order to provide flexibility should a number of sites be delayed in coming forward. However, it is noted that the Swindon Borough Council and Wiltshire Local Housing Needs Assessment 2019 identifies a higher requirement of 2,285 dwellings per annum based upon meeting the aspirations of the Economic and Development Needs Assessment. HLM believe that this would be a more appropriate figure to adopt.

As the Council correctly acknowledges, their proposal to exceed the Standard Method figure incorporates a contingency that will provide a buffer against delivery shortfalls which could result in sanctions arising from the annual Housing Delivery Tests, and increases the prospects of the minimum need being 'met' within the plan period. The evidence base confirms past shortfalls in housing delivery in relation to identified needs, not least at Chippenham¹ where considerable reliance has been placed on large strategic sites which have failed to come forward in accordance with the anticipated trajectory. The incorporation of a contingency that plans to exceed the minimum figure arising from the Standard Method will assist with ensuring that the minimum need is met. However, in order to deliver the step change in housing delivery that is required, the higher figure of 2,285 dwellings should be adopted. This would be consistent with the Government's objective of 'significantly boosting' the supply of housing.

The incorporation of a contingency allowance of 10-20% as a non-implementation allowance is common and good practice in allocating land for development. It is unlikely to result in the minimum housing need identified by the Standard Method being exceeded, but is more likely to ensure that it is met.

It is also germane that, in order to comply with the NPPF requirement for strategic policies to look ahead over a 'minimum' 15 year period from adoption², the plan period will need to be extended beyond 2036. This, in turn, will increase the minimum housing requirement for which it must provide, and in consequence the overall quantum of homes for which provision must be made in accordance with the Council's approach to plan to exceed the minimum figure.

Chippenham Housing Market Area

The emerging strategy for the Chippenham HMA is broadly supported, which indicates a step change in growth at Chippenham compared with the Core Strategy, and to a lesser extent at Melksham, with the other main settlements maintaining equivalent or slightly reduced levels of growth. The emerging strategy is supported by both the Sustainability Appraisal and the economic assessments contained in the evidence base.

The evidence base indicates that Chippenham has underperformed in terms of employment development, but that Melksham has experienced higher rates of employment development than envisaged³. However, it is also acknowledged that "... *there have been very low rates of house building in Chippenham in recent*

¹ Formulating Alternative Development Strategies (ADSs) Wiltshire Council Chippenham Housing Market Area, p.27, Figure 3

² NPPF, para. 22

³ Formulating Alternative Development Strategies (ADSs) Wiltshire Council Chippenham Housing Market Area, paras. 82-83

*years because (until recently) there has been little land available for development*⁴. This has accounted for past under-delivery of housing at Chippenham, and consequential shortfall (-189%) in relation to what would be needed to roll the current strategy forward, compared with Melksham where the shortfall is much lower (-27%)⁵. The evidence therefore confirms the economic potential of the A350 corridor given the higher rates of employment growth than anticipated, but also indicates the critical relationship between housing and economic growth, and that shortfalls in housing delivery can act as a brake on economic development. The same constraints have been witnessed in neighbouring Swindon at times when housing growth has fallen substantially behind delivery trajectories and has acted as a brake on economic development.

Whilst acknowledging that the forecast housing need for the Chippenham HMA is by far the largest over the plan period and poses significant challenges, there is no evidence to suggest that the step change required cannot be achieved to support the Council's ambitions for economic growth. However, it will only be achieved if suitable and deliverable housing land is genuinely available. If the focus is on meeting the requirement through a limited number of large strategic sites, which derives support from the NPPF where the delivery of large numbers of new homes is necessary⁶, then the recent experience at Chippenham confirms the imperative to plan for the release of early, discrete phases which can be served from existing infrastructure to ensure that homes are provided when required. Moreover, to stand any prospect of the plan period requirement being met, early, continuous and consistent delivery throughout the plan period is essential.

Given that there are ceilings to the level at which both the development industry and the market can sustain annual housing growth, delivery must start, and reach its optimum level, as early as possible during the plan period. Given that nearly five years of the period have already elapsed, and having regard to the lead times for procuring medium to large sites which are confirmed through research studies⁷, it is imperative that the procurement of early phases is commenced without delay.

HLM therefore supports a strategy for the Chippenham HMA based on Chippenham B (CH-B), which the evidence confirms is the most sustainable and most likely to deliver the balanced growth required. No other strategy is consistent with achieving the Council's objectives for sustainable (economic and population) growth, or has the potential to deliver the plan period requirements. However, this is providing suitable land

⁴ Ibid, para. 71

⁵ Ibid, p.27, Figure 3

⁶ NPPF, para. 72

⁷ Start to Finish (Second Edition), Lichfields



is available immediately, necessitating early release of discrete sites associated with the two principal urban extensions that are canvassed in the options for the HMA.

WILTSHIRE LOCAL PLAN REVIEW CONSULTATION

2 Planning for Chippenham

For reasons set out in response to the 'Emerging Spatial Strategy', HLM supports the broad spatial strategy for the Chippenham HMA, which is considered to provide the potential for sustainable growth subject to attention to the necessary pre-conditions for delivery. The focus of HLM's response to the Planning for Chippenham consultation document is on the potential development sites that are canvassed for consideration.

HLM supports the inclusion of Site 3 (east of the B4578). This is a highly flexible option that can be developed either on a solus basis as a logical conclusion to the existing South West Chippenham urban extension, or as part of a wider South Chippenham allocation offering potential for an early phase of development.

Land east of Showell Farm was promoted through the Chippenham Site Allocations Plan, but was assessed in conjunction with rising land to the south, and rejected at that stage largely on the basis of the impact of development on that more elevated land. It is a natural extension of the existing South West Chippenham allocation to the roundabout at the junction of the A350 with the B4578, and will provide a logical and defensible south western limit to the urban area.

As is evident from the Site Selection Report, in Stage 4 of the Site Selection Process, Site 3 is one of the strongest performing of all of the site options that are considered. It is the only site that is assessed to have strengths in relation to PSP3-6 inclusively, and is neutral on the other two. Whilst it is assessed as 'neutral' in relation to PSP1 since the amount of employment land that it could contribute is limited, given the proximity of existing employment land in the immediate vicinity to the west of the B4578, which remains available for development, there is no requirement for additional employment land in this location, and its relationship with existing such land should be construed as a strength. Whilst it emerges from Stage 4 in joint first place, it should properly hold first place on its own.



It is therefore clear from the evidence base, and the Site Selection Report in particular, that Site 3 should be included on its own merits, and irrespective of any wider and/or alternative allocations at South or East Chippenham, or anywhere else. It is a clear and logical completion of the existing South West Chippenham allocation, and will provide an appropriate new south-western gateway to the town from the A350. The site can be accessed directly from the B4578, and can therefore be developed independently without any wider development or as an early phase of a wider South Chippenham allocation. It could also be served from the proposed Southern Link Road if this goes ahead. For reasons set out in earlier representations relating to the 'Emerging Spatial Strategy', early phases of development are critical to achieving the step-change in housing delivery that is required.

Site 3: Concept Plan

Whilst HLM support the allocation of Site 3, they comment specifically on the preliminary concept plan in relation to the following matters:

- Heritage *cordon sanitaire*
- Possible Renewable Energy Site
- Flood Risks

Heritage

The evidence base does not include a detailed heritage assessment, and the *cordon sanitaire* indicated on the Concept Map for Site 3 is therefore not informed by any detailed assessment.

HLM have commissioned their own assessment of the significance of the heritage assets, and the contribution of Site 3 to that significance, which is included at Annex 1 to these representations. The findings of the assessment of significance are that there is no historic association between the subject land to the east of the B4578 and the heritage assets to the west. The evidence indicates an historical association between the Showell Farm buildings with land to the north and west, and that it comprised part of the Talbot estate of Lacock. Based on the 1764 Parish Map, all of the land forming part of Showell Farm was located to the west of (what is now) the B4578, whereas the subject land to the east was in separate

ownership. Therefore the associative historic link is between Showell Farm and the settlement of Lacock, and not the subject land.

The finding of the assessment is therefore that a buffer zone of circa 340 metres is excessive, includes land beyond the farm's ownership at the Tithe Survey, and the eastern limit of which appears to coincide with the footpath from Lacock to Chippenham shown on the 1764 Parish Map, rather than being defined with reference to the agricultural holdings of the farm. Whilst the footpath may be an historic feature, its relationship to the heritage assets and their significance is tenuous. There is little justification in terms of the historical understanding of the buildings and their function for it to define the eastern extent of the buffer zone. Given the evidence of the two historic hedgerows between the footpath and the farm buildings to the west, any putative historic views would have been extremely limited.

It is germane that the field parcels to the north and west of the heritage assets are allocated for employment development, with a buffer zone of 130 metres⁸. If a *cordon sanitaire* of that magnitude is sufficient on land which has a much closer and greater historical association with the heritage assets, then to require a zone of 340 metres on land with much weaker historical association, is disproportionate and unnecessary. It is therefore inconsistent with the Government's objective to promote an effective use of land in meeting the need for homes and other uses⁹.

Informed by the Statement of Significance, HLM have therefore proposed a revised *cordon sanitaire*, which is shown on the concept plan at Annex 2.

Furthermore, in order to demonstrate HLM's commitment to providing an appropriate setting and mitigation to ensure there is no adverse impact on the setting of the listed building, a programme of advanced planting is being undertaken to ensure that the mitigation is provided ahead of any development taking place. This will provide sufficient time for the planting to grow and mature well in advance of any development.

Renewable Energy

HLM objects to the inclusion of a renewable site within Site 3.

⁸ Planning for Chippenham Document, Figure 6 Concept Map for Sites 2 and 3 ... (Planning Permission ref: 20/002511/REM)

⁹ NPPF, para 117

The Government's future strategy to reduce carbon emissions from residential development is focused on 'on plot' measures to increase the energy efficiency requirements of new homes, use of heat pumps for domestic heating as an alternative to gas heating, combined with a de-carbonisation of the grid electricity through the delivery of wind farms. These will be implemented through changes to Part L of the Building Regulations and the Future Homes Standard.

Whilst heat networks can be considered where there is a waste heat source to utilise, or low grade heating such as community ground source heat pumps, these are not suitable for all circumstances, and require to be located centrally within a development. Site 3 does not meet the essential preconditions for the location of a centralised energy strategy given its peripheral location to the overall development.

Site 3 is not a suitable location for a renewable energy site. It would sterilise land for a purpose that is unlikely to be implemented, and in consequence would be an inefficient use of land contrary to the requirements of the NPPF.

Given the Government's future strategy for de-carbonisation, together with the inappropriateness of the location, land should not be safeguarded within Site 3 for a renewable energy facility.

Flood Risks

In the Stage 2 assessment of Site 3¹⁰ reference is made to the site having a medium flood risk due to the proximity of the River Avon and the historical flooding that has taken place on the eastern side of the site, and also that there is a risk of surface water flooding and groundwater flooding.

HLM have commissioned a preliminary assessment of the flood risks, which is included at Annex 3 to these representations. The assessment confirms:

- The majority of the site lies within Flood Zone 1 in terms of fluvial flooding.
- The risk of surface water flooding across the majority of the site is low to medium, and will be low following the implementation of further mitigation measures.
- The North Wiltshire Strategic Flood Risk Assessment does not identify any risk of groundwater flooding.

¹⁰ Wiltshire Council Local Plan, Site Selection Report for Chippenham, p.18

- The proposed drainage strategy incorporating SuDS, with associated on-site attenuation, will ensure no increase in surface water discharge rates from the site and result in betterment in terms of water quality.

The overall findings of the flood appraisal are therefore that, other than on that part of Site 3 that is affected by fluvial flooding and identified as an extension of the Riverside Country Park, there are no constraints on grounds of flood risk on developing the remainder, and majority, of the site.

Conclusions

HLM therefore broadly supports the inclusion of Site 3 as a preferred option for allocation, but objects to the conceptual proposals as currently shown on Figure 6 (Concept Map for Site 2 and 3 ...). The *cordon sanitaire* currently shown to the east of the Showell Farm buildings is excessive and disproportionate, and not justified by any evidence. The Statement of Significance included at Annex 1 to these representations confirms that the extent of the buffer is not justified in heritage terms, and that the alternative proposals shown on the Concept Plan at Annex 2 to these representations will provide a proportionate and effective balance between the objectives to protect heritage assets and make effective use of land in meeting the need for homes and other uses. There are no contributory reasons on grounds of flood risks for *the cordon sanitaire* that is identified.

HLM also objects to the potential renewable energy site shown on the Figure 6 which is neither consistent with the Government's current strategy for reducing carbon emissions which focus on 'on-plot' measures combined with de-carbonising the grid, nor would it be appropriately located within the overall development for delivering a district heating network.

HLM's revised concept plan at Annex 2 has been prepared taking into account all known constraints, including those foreshadowed in the consultation documents and considered in the foregoing representations. It demonstrates how Site 3 can accommodate approximately 450 dwellings at a similar density to the South West Chippenham urban extension to the north, whilst protecting the setting of the heritage assets and incorporating existing watercourses into the green infrastructure provisions.

The revised concept plan demonstrates how the site can be accessed from the existing highway network (B4578), and can therefore be delivered at an early stage during the plan period, thus making a significant and essential contribution to housing land supply. It also demonstrates that the proposed development



could accommodate the Southern link road on an appropriate alignment to connect with the existing roundabout on the A350, contain the southern limit of development, and maintain land use efficiencies.

HLM therefore commends the conceptual proposals set out on the plan at Annex 2 to these representations as a more appropriate and efficient basis for the development of Site 3.





List of Annexes

- 1 **Statement of Significance**
- 2 **Concept Plan**
- 3 **Flood Risk and Drainage Appraisal**





Annex 1

Statement of Significance



Land East of Showell Farm, Chippenham, Wiltshire
Statement of Significance
March 2021

Land East of Showell Farm, Chippenham, Wiltshire
Statement of Significance
March 2021

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Report
Statement of Significance

Site
Land east of Showell Farm, Chippenham, Wiltshire

Client
Hallam Land Management

Planning Authority
Wiltshire County

Grid Reference
ST 91233 70862

Prepared By
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- Figure 3 1840 Lacock Tithe Map (NA)
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Executive Summary

This Statement of Significance considers Showell Farm, Chippenham, Wiltshire (hereinafter referred to as the “Subject Buildings”). In accordance with government policy (*National Planning Policy Framework 2019*) and guidance (Historic England’s *Conservation Principles, Policies and Guidance 2008*), this assessment outlines the historical development of the Subject Buildings, analyses their physical attributes and assesses the heritage significance of them in accordance with the listing criteria set out in *Principles of Selection for Listed Buildings* (DCMS, 2018). The latter document sets out the general principles that the Secretary of State applies when deciding whether a building is of special architectural or historic interest and should be added to the list of buildings compiled under the *Planning (Listed Buildings and Conservation Areas) Act 1990*.

The document also considers the contribution made by the asset’s setting to its significance in accordance with Historic England’s GPA3: Setting of Historic Assets, in order to understand the historic land ownership in greater detail and its importance to the Subject Building in terms of its significance.

The overall conclusion of this assessment is that the land to the east of the Chippenham/Lacock Road is documented as only having formed part of the Showell Farm holdings from the nineteenth century onward and consequently has less functional association with the farmstead than the lands to the west of the farmhouse. Whilst the Chippenham/Lacock footpath is a historical feature within the landscape, its function in relation to the setting and significance of the assets is of a considerably lesser order than the historically associated farmland, and its employment as the setting boundary for the asset is considered to be arbitrary, rather than as a true reflection of the asset’s historical significance.

1.0 Introduction

- 1.1 This Statement of Significance considers Showell Farm, Chippenham (hereinafter referred to as the “Subject Buildings” or “Buildings Group”) which is located at grid reference ST 91233 70862.
- 1.2 In accordance with relevant Historic England guidance and advice notes, including *Conservation Principles, Policies and Guidance for the Sustainable Management of the Historic Environment* document (2008) and *Statements of Heritage Significance: Analysing Significance in Heritage Assets* (Advice Note 12, 2019), this assessment:
- outlines the historic development of the Subject Buildings and provides an assessment of the heritage values that contribute to their significance;
 - includes the results of a site survey undertaken on 24th February 2021, including external inspection of the buildings;
 - includes an examination of published and unpublished records, charts historic land-use through a map regression exercise and identifies key changes, including additions to the subject buildings, that have occurred over time. As part of the latter, historic planning records have been reviewed to determine more recent changes in particular.
- 1.3 The key objectives of this analysis are to:
- identify heritage values associated with the Subject Buildings and/or parts of them;
 - assess significance to establish the level of significance associated with the Subject Buildings; and
 - determine the contribution made to the significance of the building by the land parcels contained within the land to the east in the client’s ownership.
 - Investigate the validity of the buffer area in the Council’s proposed allocation.
- 1.4 The assessment enables relevant parties to assess the level of significance of the Subject Buildings and to determine which parts are of no heritage value.

Location and description

- 1.5 The Subject Buildings are located to the west of the B4528, c. 4.5km south of Chippenham (Figure 1). A summary of the key elements is provided below with a more detailed physical description and fabric analysis in section 4.
- 1.6 The building group comprises three Grade II listed buildings: Showell Farmhouse (NHL 1022145, Barn to the south east of Showell Farmhouse (NHL 1198151) and Granary to the south of Showell Farmhouse (NHL 1363926). The main body of the Farmhouse dates from c. 1820, with a late seventeenth century wing, and the barn and granary date from the eighteenth century.

2.0 Planning background including policy and guidance

Planning (Listed Building and Conservation Areas) Act 1990

2.1 The *Planning (Listed Buildings and Conservation Areas) Act 1990* sets out broad policies and obligations relevant to the listing of special buildings.

2.2 Section 1(1) of the Act states:

For the purposes of this Act and with a view to the guidance of local planning authorities in the performance of their functions under this Act and the principal Act in relation to buildings of special architectural or historic interest, the Secretary of State shall compile lists of such buildings, or approve, with or without modifications, such lists compiled by the Historic Buildings and Monuments Commission for England (in this Act referred to as ‘the Commission’) or by other persons or bodies of persons, and may amend any list so compiled or approved.

2.3 Section 1(3) of the Act states:

In considering whether to include a building in a list compiled or approved under this section, the Secretary of State may take into account not only the building itself but also

- a) *any respect in which its exterior contributes to the architectural or historic interest of any group of buildings of which it forms part; and*
- b) *the desirability of preserving, on the ground of its architectural or historic interest, any feature of the building consisting of a man-made object or structure fixed to the building or forming part of the land and comprised within the curtilage of the building.*

2.4 The *Planning (Listed Building and Conservation Areas) Act 1990* also sets out broad policies and obligations relevant to the protection of Listed Buildings and their settings.

2.5 Section 66(1) states:

In considering whether to grant planning permission for development which affects a listed building or its setting, the local planning authority or, as the case may be, the Secretary of State shall have special regard to the desirability of preserving the building or its setting or any features of special architectural or historic interest which it possesses.

National Planning Policy Framework (NPPF) and National Planning Practice Guidance (NPPG)

2.6 Government policy in relation to the historic environment is outlined in Section 16 of the *National Planning Policy Framework* (NPPF), entitled *Conserving and Enhancing the Historic Environment*. This provides guidance for planning authorities, property owners, developers and others on the conservation and investigation of heritage assets. Overall, the objectives of Section 16 of the NPPF can be summarised as seeking the:

- Delivery of sustainable development;

- understanding the wider social, cultural, economic and environmental benefits brought by the conservation of the historic environment;
 - conservation of England's heritage assets in a manner appropriate to their significance; and
 - recognition of the contribution that heritage assets make to our knowledge and understanding of the past.
- 2.7 Section 16 of the NPPF recognises that intelligently managed change may sometimes be necessary if heritage assets are to be maintained for the long term.
- 2.8 Paragraph 187 requires local planning authorities to maintain or have access to a historic environment record, which can be used to assess significance of heritage assets and the contribution they make to their environment. Paragraph 188 also requires that authorities make information about the historic environment gathered as part of plan-making or development management publicly accessible.
- 2.9 *Heritage Assets* are defined in Annex 2 as: a building, monument, site, place, area or landscape identified as having a degree of significance meriting consideration in planning decisions, because of its heritage interest. Heritage assets include designated heritage assets and assets identified by the local planning authority (including local listing).
- 2.10 *Designated Heritage Assets* comprise: World Heritage Sites, Scheduled Monuments, Listed Buildings, Protected Wreck Sites, Registered Parks and Gardens, Registered Battlefields and Conservation Areas.
- 2.11 *Significance* is defined as: the value of a heritage asset to this and future generations because of its heritage interest. This interest may be archaeological, architectural, artistic or historic. Significance derives not only from a heritage asset's physical presence, but also from its setting.
- 2.12 *Setting* is defined as: the surroundings in which a heritage asset is experienced. Its extent is not fixed and may change as the asset and its surroundings evolve. Elements of a setting may make a positive or negative contribution to the significance of an asset, may affect the ability to appreciate that significance or may be neutral.
- 2.13 The NPPF is supported by the *National Planning Policy Guidance* (NPPG). In relation to the historic environment, paragraph 18a-001 states that:
- Protecting and enhancing the historic environment is an important component of the National Planning Policy Framework's drive to achieve sustainable development (as defined in Paragraphs 6-10). The appropriate conservation of heritage assets forms one of the 'Core Planning Principles'.*
- 2.14 Paragraph 18a-002 makes a clear statement that any decisions relating to Listed Buildings and their settings and Conservation Areas must address the statutory considerations of the *Planning (Listed Buildings and Conservation Areas) Act 1990*, as well as satisfying the relevant policies within the National Planning Policy Framework and the Local Plan.
- 2.15 Paragraph 18a-013 outlines that the assessment of the impact of a proposed development on the setting of a heritage asset needs to take into account and be proportionate to the significance of the asset being considered, and the degree to

which the proposed development enhances or detracts from the significance of the asset and the ability to appreciate the significance.

2.16 The NPPG outlines that although the extent and importance of setting is often expressed in visual terms, it can also be influenced by other factors such as noise, dust and vibration. Historic relationships between places can also be an important factor stressing ties between places that may have limited or no intervisibility with each other. This may be historic as well as aesthetic connections that contribute or enhance the significance of one or more of the heritage assets.

2.17 Paragraph 18a-013 concludes:

The contribution that setting makes to the significance of the heritage asset does not depend on there being public rights or an ability to access or experience that setting. This will vary over time and according to circumstance. When assessing any application for development which may affect the setting of a heritage asset, local planning authorities may need to consider the implications of cumulative change. They may also need to consider the fact that developments which materially detract from the asset's significance may also damage its economic viability now, or in the future, thereby threatening its on-going conservation.

Principles of Selection for Listed Buildings (DCMS 2018)

- 2.18 The *Principles of Selection for Listed Buildings* (DCMS, 2018) sets out the general principles that the Secretary of State applies when deciding whether a building is of special architectural or historic interest and should be added to the list of buildings compiled under the *Planning (Listed Buildings and Conservation Areas) Act 1990*.
- 2.19 The statutory criteria for listing are the special architectural or historic interest of a building. Many buildings are interesting architecturally or historically but, in order to be listed, a building must have 'special' interest.
- 2.20 Buildings on the list are graded to reflect their relative architectural and historic interest. Buildings of historic interest may justify a higher grading than would otherwise be appropriate.
- Grade I buildings are of exceptional interest;
 - Grade II* buildings are particularly important buildings of more than special interest;
 - Grade II buildings are of special interest, warranting every effort to preserve them.

Conservation Principles, Policies and Guidance for the Sustainable Management of the Historic Environment (Historic England 2008)

- 2.21 The *Conservation Principles Policies and Guidance* (English Heritage, 2008) defines the significance of a place as:

'The sum of the cultural and natural heritage values of a place, often set out in a statement of significance'.

It goes on to state that:

A 'statement of significance' of a place should be a summary of the cultural and natural heritage values currently attached to it and how they inter-relate, which distils the particular character of the place. It should explain the relative importance of the heritage values of the place (where appropriate, by reference to criteria for statutory designation), how they relate to its physical fabric, the extent of any uncertainty about its values (particularly in relation to potential for hidden or buried elements) and identify any tensions between potentially conflicting values.

and that:

To identify the cultural and natural heritage values of a place, its history, fabric and character must first be understood. This should include its origins, how and why it has changed over time (and will continue to change if undisturbed), the form and condition of its constituent elements and materials, the technology of its construction, any habitats it provides, and comparison with similar places. Its history of ownership may be relevant, not only to its heritage values, but also to its current state.

2.22 The guidance states that to identify the significance of a place, it is necessary first to understand its fabric, and how and why it has changed over time; and then to consider:

- who values the place, and why they do so;
- how those values relate to its fabric;
- their relative importance;
- whether associated objects contribute to them;
- the contribution made by the setting and context of the place; and
- how the place compares with others sharing similar values.

Understanding and articulating the values and significance of a place is necessary to inform decisions about its future. The degree of significance determines what, if any, protection, including statutory designation, is appropriate under law and policy.

2.23 Paragraphs 35-60 within the 'Understanding the Values' section describes a range of heritage values, arranged in four groups, which may be attached to places. These are:

- Evidential value: the potential of a place to yield evidence about past human activity.
- Historical value: the ways in which past people, events and aspects of life can be connected through a place to the present – it tends to be illustrative or associative.
- Aesthetic value: the ways in which people draw sensory and intellectual stimulation from a place.
- Communal value: the meanings of a place for the people who relate to it, or for whom it figures in their collective experience or memory.

Historic Environment Good Practice Advice In Planning Notes

Historic Environment Good Practice Advice In Planning Note 2: Managing Significance in Decision-Taking in the Historic Environment (Historic England 2015)

2.24 The purpose of this document is to provide information to assist local authorities, planning and other consultants, owners, applicants and other interested parties in implementing historic environment policy in the NPPF and NPPG. It outlines a six-stage process to the assembly and analysis of relevant information relating to heritage assets potentially affected by a proposed development:

- Understand the significance of the affected assets;
- Understand the impact of the proposal on that significance;
- Avoid, minimise and mitigate impact in a way that meets the objectives of the NPPF;
- Look for opportunities to better reveal or enhance significance;
- Justify any harmful impacts in terms of the sustainable development objective of conserving significance and the need for change; and
- Offset negative impacts on aspects of significance by enhancing others through recording, disseminating and archiving archaeological and historical interest of the important elements of the heritage assets affected.

- 2.25 Historic England's Historic Environment Good Practice Advice in Planning Note 3 provides guidance on the management of change within the setting of heritage assets.
- 2.26 The document restates the definition of setting as outlined in Annex 2 of the NPPF. Setting is also described as being a separate term to curtilage, character and context; while it is largely a visual term, setting, and thus the way in which an asset is experienced, can also be affected by noise, vibration, odour and other factors. The document makes it clear that setting is not a heritage asset, nor is it a heritage designation, though land within a setting may itself be designated. Its importance lies in what the setting contributes to the significance of a heritage asset.
- 2.27 The Good Practice Advice Note sets out a five-stage process for assessing the implications of proposed developments on setting:
1. Identification of heritage assets which are likely to be affected by proposals;
 2. Assessment of whether and what contribution the setting makes to the significance of a heritage asset;
 3. Assessing the effects of proposed development on the significance of a heritage asset;
 4. Maximising enhancement and reduction of harm on the setting of heritage assets; and
 5. Making and documenting the decision and monitoring outcomes

3.0 Historical development

Introduction

- 3.1 The following section presents a historical development of the Subject Buildings through the results of a map regression exercise and review of relevant background documentation, including historic plans and relevant planning decisions.

Historical Background

Lacock and Lackham : summary

- 3.2 At the time of the Domesday Book, 1086, the settlements at Lacock and Lackham were roughly similar in size although Lacock possibly had a small church. Estimating population from the Domesday returns is difficult but modern interpretation of the record would suggest a population for Lacock of between 160 and 190 and for Lackham between 170 and 200. Lacock had 2 mills and 1/2 an acre of vineyard while Lackham also had 2 mills.
- 3.3 The manor of Lacock came into the possession of the Norman, Edward of Salisbury, and by the early 13th century it had descended to Ela, Countess of Salisbury. She began legal measures to set up an abbey here in 1229 but the accepted date of the foundation is 1232.
- 3.4 Outside the abbey was the medieval village and manor. The village had developed to the west of the late 11th century church of St. Cyriac with the market-place lying

immediately west of the churchyard. A grid pattern of streets was created with Church Street and High Street running parallel to one another, east to west, joined by East Street and West Street parallel to one another north to south. This grid pattern gives Lacock the appearance of a small medieval town and it was often referred to as the town of Lacock.

- 3.5 After the dissolution, the abbey buildings were stripped of most of their lead (it was sold for £193 and 12 shillings) and handed over to William Sharrington, who completed the purchase of the abbey lands on 26th July 1540. He demolished the abbey chapel but retained most of the other buildings of the nunnery and made some good additions which showed both Italian and French influence.
- 3.6 The abbey passed to the Talbot family by marriage but the most substantial change came in 1618 when the royal forest was sold, allowing private development to the east of the river. There had been limited development on the lower slopes - Bewley Court was a 15th century hall house - but now trees could be felled for timber and more dwellings built. By now there were tanning pits near the packhorse bridge and in the 17th century the bridge near the abbey was built bringing the London to Bath road off Bowden Hill and into the High Street, instead of off Naish Hill and over Reybridge. During the Civil War Lacock was occupied by both Royalists and Parliamentarians and although the Royalist Talbots were fined, they managed to keep their land. After the restoration Charles II visited the Abbey as, at a later date, did Queen Anne.
- 3.7 By the mid-18th century the nun's tithe barn was being used as a market hall for perishable goods alongside the outdoor market in the High Street. A pest house for victims of infectious diseases, such as smallpox, on Bowden Hill continued to be used through the 18th century. At this time Lacock was a thriving small town with industries of spinning, weaving, chair-making, tanning and hurdle-making, set in a prosperous farming community. This situation was to change from 1783 when a new road to Bath (the present A4) was created and the old route that passed through Lacock fell into disrepair.
- 3.8 The 19th century saw the extinction of the cloth industry as factories were built in the nearby towns and Lacock became fossilised architecturally with virtually no new buildings after the 18th century.
- 3.9 The markets did survive well into the 19th century. In 1833 a larger workhouse was built, near the tan yard, a gaunt factory-like building that still survives. This accommodated an increasing number of local people as work declined and in 1841 the large total of 136 Lacock men from the workhouse were working in railway gangs on the G.W.R. line being built in the west of the parish.
- 3.10 Under the aegis of William Henry Fox Talbot, the later nineteenth century saw much improvement of the estate, both in the village and the surrounding farms.

Showell Farm : summary

- 3.11 Reference to Showell Farm with Milbourne is given in the 1755 Book of maps of farms and lands in Lacock (Ref: 2664/1/2D/21) as being within the estate of the Talbot Family of Lacock. The Talbot family had ownership of Lacock Abbey and the village of Lacock from the early seventeenth century onwards.

- 3.12 A map of the estates of Thomas Kington called Showells and Notton, Lacock also dates from 1775 and is referenced in the NHLE listing for the Barn at Showells Farm. This would seem to indicate that the farmstead passed out of Talbot ownership during this year.
- 3.13 In the 1764 Parish Map (Figure 1), Showell Farm is labelled as Shouhill Farm, and is surrounded by field parcels bearing the same name, all located to the west of the Lacock to Chippenham Road, no ownership name is given for the Shouhill land parcels.
- 3.14 To the east of the Lacock/Chippenham Road, the field parcels in the 1764 map are recorded as being in the ownership of Mr Anthony Kingston, and a footway is recorded running north/south through the field parcels, parallel with the road, noted as the footway from Lacock to Chippenham.
- 3.15 By the 1840 Lacock Tithe map (Figure 3), Showell Farm is recorded in the ownership of Thomas Rumming, who also now owns a number of the field parcels to the east of the Lacock/Chippenham Road. The apportionment records the following ownership and field names:
- 633 Great Marsh owned by Henry Burrard occ John and Joseph Freeth (sic)
 - 634 Withy Bed owned and occupied by Thomas Rumming
 - 636 Little Marsh owned by Henry Burrard occ John and Joseph Freeth (sic)
 - 637 Lowe Paddock and Shilling owned and occupied by Thomas Rumming
 - 638 Lower Five Acres owned and occupied by Thomas Rumming
 - 639 Upper Five Acres owned and occupied by Thomas Rumming
 - 641 Popes Hill owned and occupied by Thomas Rumming
 - 642 The Ten Acres owned and occupied by Thomas Rumming
 - 643 Great Marsh owned and occupied by Thomas Rumming
 - 644 Pick and Cat Hide owned by Frederick William Rooke and occupied by Richard Sergeant
 - 645 Lots in Normead three owned by Frederick William Rooke and occupied by Richard Sergeant
 - 646 Six lots in Normead, owned by William Henry Talbot and occupied by David Clark
 - 647 Lots in Normead owned by Sophia Rumming and occupied by Thomas Rumming
 - 648 Four lots in Normead, owned by John Neale and occupied by Edward Ponting
 - 650 Seven lots in Normead owned by Henry Burrard occ John and Joseph Freeth (sic)
- 3.16 The Tithe map shows the presence of Showell Cottages to the north of the farmstead, although these are not labelled as such until the first edition Ordnance Survey mapping of 1885 (Figure 4). The first edition survey shows roughly the same configuration of buildings to the farmstead as the Tithe map, but the extension of the range to the south-west is noted as well as a reduction in footprint of the building to the south east of the farmhouse.
- 3.17 The 1899 edition of the Ordnance Survey mapping (Figure 5) shows further expansion of the farmstead with a new barn range located to the south-east, oriented north-south, and a further ancillary building located to the north-east of the farmhouse adjacent to the Lacock/Chippenham Road.

- 3.18 The 1922-25 edition of the Ordnance Survey mapping (Figure 6) shows the construction of a further cottage to the north of the farmstead as well as an increase in footprint of the two ancillary buildings furthest north of the farmhouse.
- 3.19 The mapping from 1956-60 (Figure 7) shows the beginnings of the Showell Nursery buildings to the north-east of the farm, as well as the loss of one of the northern barn ranges.
- 3.20 The position remains the same until the mapping of 1982 (Figure 8) which shows the expansion of the Showell Nurseries, and the redevelopment of the northern most barn footprint into an inverted u shape, together with the loss of the L-shape building immediately to the north of the farmhouse.
- 3.21 Mapping from 1990 (Figure 9) shows the loss of the south-eastern most barn, first depicted in the 1899 mapping.
- 3.22 The building of two further ancillary buildings on the footprint of the L-shape building is evident from the mapping of 2001 (Figure 10), whilst the 2020 edition of the mapping (Figure 11) shows the removal of the building immediately to the north-east of the farmhouse, the footprint of which is recorded since the Tithe mapping, although there is a change to its extent in the 1982 edition of the Ordnance Survey, which may indicate its alteration/replacement at this time.

Showell Farm: Planning History

- 3.23 Below is a selection of the permissions relating to the listed buildings within the Subject Group (omitting those which were withdrawn).
- 3.24 Approval for conversion of the listed Barn at Showells Farm to residential accommodation in 1988 (N/88/00202/FUL and N/88/00201/LBC) and conversion of garage into ancillary residential accommodation (N/91/00792/LBC). No documentary information held by LPA online regarding the details of conversion.
- 3.25 Approval for conversion of barn to business use internal and external alterations in 2005 (N/05/00067/LBC and N/05/00067/FUL)
- 3.26 Approval for external and internal alterations to the House and Workshop/Hayloft at The Dove House, Showell Farm and construction of Glazed Garden Room in 2006 (N/06/01422/LBC and N/06/04121/FUL)
- 3.27 Approval for conversion of barn into two residential units in 2015 (15/08340/LBC and 15/08293/FUL following approved applications for the same in 2011 and 2008.

4.0 Assessment of significance

Description

- 4.1 The significance assessment draws on the historical development included above (section 3), the review of information held on the NHLE for the designated buildings and has been informed by a physical survey covering the exterior of the Subject Buildings (section 4).
- 4.2 The listing descriptions for the three buildings are given as follows:

Showell Farmhouse

Farmhouse, c1820 with late C17 attached wing. Main range is red brick with ashlar dressings, slate low-pitched roof, coped gables and end stacks. Formal 2-storey, 3-window front with ashlar plinth, flush quoins, moulded cornice, parapet and flush window surrounds. Twenty-pane outer windows, 12-pane to first floor centre over ashlar doorcase, broad elliptical-arched surround with keystone framing full-width fanlight over 6-panel door and sidelights. Attached wing is 2-storey, rubble stone with slate roof. To left, cyma-moulded 2-light recessed mullion-and-transom window with hoodmould and 2-light window above, centre door in chamfered surround with rounded shoulders. To right is double-fronted stable section with two 2-light beaded mullion windows of C18 type and centre door to each floor. Dove openings to upper floor. Across forecourt is early C18 screen wall, originally with iron railings, now with ashlar block walls between piers to 2 gateways. Rusticated piers with gate stops, cornices and urn finials. Early C19 iron gates. Wing rear wall has chimney gable and 4-light mullion-and-transom window to right.

Barn to Southeast of Showell Farmhouse

Barn, C18, rubble stone with timber-framed side walls clad in corrugated iron. Bridgwater tile roof with coped gables. Projecting gabled east cart-entry with lean-to additions each side. Side walls on rubble stone plinth. South end blocked Tudor-arched opening. Three-bay, 2-purlin roof with tie-beam-and-collar trusses. A 1775 map of Showell and Notton lands of T. Kington in W.R.O. shows barn.

Granary to south of Showell Farm House

Granary, late C18, weatherboarded timber frame with Bridgwater tile half-hipped roof, raised on 3 x 3 staddle stones.

Historical Value

- 4.3 The Subject Buildings' historical value derives from the age of the built fabric, its consequent relative scarcity of survival, the agricultural typologies of the buildings and their historic function, and the level of intactness of the built fabric. Historic associative value is also derived from the assets' ownership by the Talbots.
- 4.4 The buildings form a coherent group with their former historic purpose continuing to be legible through their configuration and typology, although change of ownership and use generates a degree of dilution of this aspect of the buildings' value.

Architectural Value

- 4.5 The architectural value of the buildings principally resides in their typologies and the vernacular forms of construction of the 17th and 18th century buildings. The 18th century screen wall evidences the gentrification of the farmstead through its architectural ornamentation, and this is reinforced by the classical character of the detailing to the early nineteenth-century element of the main farmhouse. The conversion of the ancillary buildings to residential function serves to erode the original hierarchy of the group through the domestication and change in character of the subservient structures. Conversion has also occasioned alteration to the historic floor plans of these buildings with consequent loss of a degree of historic and architectural value.

Contribution of Setting

- 4.6 The building group occupies a relatively isolated position within a rural and agricultural landscape which reinforces its historic function as a farmstead. The allocation of the land in its environs by the Local Planning Authority for the southward expansion of Chippenham has resulted in a large degree of change within the asset's setting generally. The Council have identified a green space buffer zone to the assets which, to the west, follows the historic plot boundary of the field parcel in which the buildings are located. This land, as evidenced in section 3 above (Figure 12) is identified with the farm group in the historic ownership of the Talbots, and thereby has an associative historic link to the settlement of Lacock, albeit that it lies to some degree distant. Field parcels to the north and west of the parcel to which the assets are located, which also formed part of the historic holding have been allocated as employment development, and this will generate a degree of erosion to the historic setting of the asset. The buffer to this aspect of encroachment on the setting is located c.130m from the building group.
- 4.7 To the east of the building group is a field parcel which incorporates six historic land parcels within its area, although the loss of any associated hedgerow boundaries mean that its historic configuration is no longer legible save by the combined outline hedgerow boundary. None of these field parcels were associated by ownership to Showell Farm until the nineteenth century, and whilst they therefore have a degree of association with the c. 1820 element of the farmhouse building, their relationship with the 17th and 18th century farmstead elements is much weaker.
- 4.8 The buffer drawn by the LPA to the assets in their allocation document is set at c. 340m to the east of the Showell Farm building group and incorporates a parcel of land outside of the farm's ownership at the Tithe survey, although the remainder of the parcels were in the ownership of Thomas Rumming at this time (Figure 13).

The boundary line for the buffer extent appears to be given as the line of the footway from Lacock to Chippenham, shown on the 1764 Parish Map, rather than as any reference to the agricultural holdings of the farm.

- 4.9 Whilst the footpath is a historic feature, its relationship to the assets and their significance is much more tenuous than the documented historic ownership ties, and there is therefore little justification to be had in adopting it in terms of historical understanding of the buildings and their function. The sole argument in relation to this buffer would be the putative historic view of the farmstead from the footpath, and given that there would likely have been two historic hedgerow boundaries intervening, such a view would have been severely limited.
- 4.10 If erosion of the assets' setting to the west is permissible to within a field parcels' width (given the mitigation of associated tree-screening) on land with a much longer historical association to the assets, it is considered that it is not unreasonable to employ a similar buffer level to the east of the building group, given the weaker historic association with the assets at Showell Farm.
- 4.11 The Concept Masterplan proposed by the Hallam Land Management show a buffer to the east of the assets that lies on the approximate eastern boundary line of the historic field parcels nearest to the asset to the east. Beyond the boundary planting is open green space, orchard planting and proposed allotment planting, all of which would assist in the retention of a verdant character to the east of the Showell Farm assets, although departing from the open field character at present. It is considered that the proposed new use is not unsympathetic to this historic context, given that the single open expanse of the present field parcel was not historic experience of the land in the vicinity of the Farmhouse and its buildings.

6.0 Summary and Conclusions

- 6.1 In accordance with government policy (*National Planning Policy Framework 2019*) and guidance (*Historic England's Conservation Principles, Policies and Guidance 2008*), this assessment outlines the historical development of the subject buildings, analyses their physical attributes and assesses the heritage significance of these together with an analysis of the setting of the asset and what it contributes by way of significance.
- 6.2 The overall conclusion of this assessment is that the land to the east of the Chippenham/Lacock Road is documented as only having formed part of the Showell Farm holdings from the nineteenth century onward and consequently has less functional association with the farmstead than the lands to the west of the farmhouse. Whilst the Chippenham/Lacock footpath is a historical feature within the landscape, its function in relation to the setting and significance of the assets is of a considerably lesser order than the historically associated farmland, and its employment as the setting boundary for the asset is considered to be arbitrary, rather than as a true reflection of the asset's historical significance.
- 6.3 The proposed layout and planting details indicate a mixture of boundary planting treatment, orchard planting, open green space and allotment allocation which all contribute to a rural landscape character, albeit arranged differently to the present appearance of the field parcels. It is, however to be borne in mind that the parcel as it is currently experienced has departed significantly from its historic appearance from the loss of plot boundaries and associated hedgerow and planting.

Sources

General

Wiltshire Historic Environment Record (WHER)
 Wiltshire & Swindon History Centre (WSHC)
 British Library (BL)
 National Archives (NA)

Cartographic

1764 Plan of Lacock Parish (WSHC 2664/1/2E/19L)
 1801 Ordnance Survey Drawing 61 Bradford Leigh (BL)
 1840 Lacock Tithe Map (NA)
 1885 OS 1:10,560 Scale Map
 1922-25 OS 1:10,560 Scale Map
 1956-60 OS 1:10,560 Scale Map
 1982 OS 1:10,000 Scale Map
 1990 OS 1:10,000 Scale Map
 2001 OS 1:10,000 Scale Map
 2020 OS 1:10,000 Scale Map

Websites

Heritage Gateway - www.heritagegateway.org.uk
 Historic England - The National Heritage List for England - [historicengland.org.uk/listing/the list](http://historicengland.org.uk/listing/the-list)
 MAGIC - www.magic.gov.uk
 Pastscape - www.pastscape.org.uk
 British History Online – www.british-history.ac.uk
 Victoria County History online – www.history.ac.uk
 Wiltshire College and University Centre – www.wiltshire.ac.uk

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 English Heritage 2012 Comparison of PPS5 Policies with Historic Environment-Related Policies in the NPPF – Parts 1 & 2.
 Historic England 2015 Historic Environment Good Practice Advice in Planning: 2 – Managing Significance in Decision-Taking in the Historic Environment
 Historic England 2017 Historic Environment Good Practice Advice in Planning Note 3 – The Setting of Heritage Assets
 Ministry of Housing, Communities & Local Government 2019 *National Planning Policy Framework*
 Ministry of Housing, Communities & Local Government 2019 *Planning Practice Guidance*



Figure 3 1840 Lacock Tithe Map (NA)



Figure 4 1885 OS 1:10,560 Scale Map (Extract)



Figure 5 1899 OS 1:10,560 Scale Map (Extract)



Figure 6 1922-25 OS 1:10,560 Scale Map (Extract)

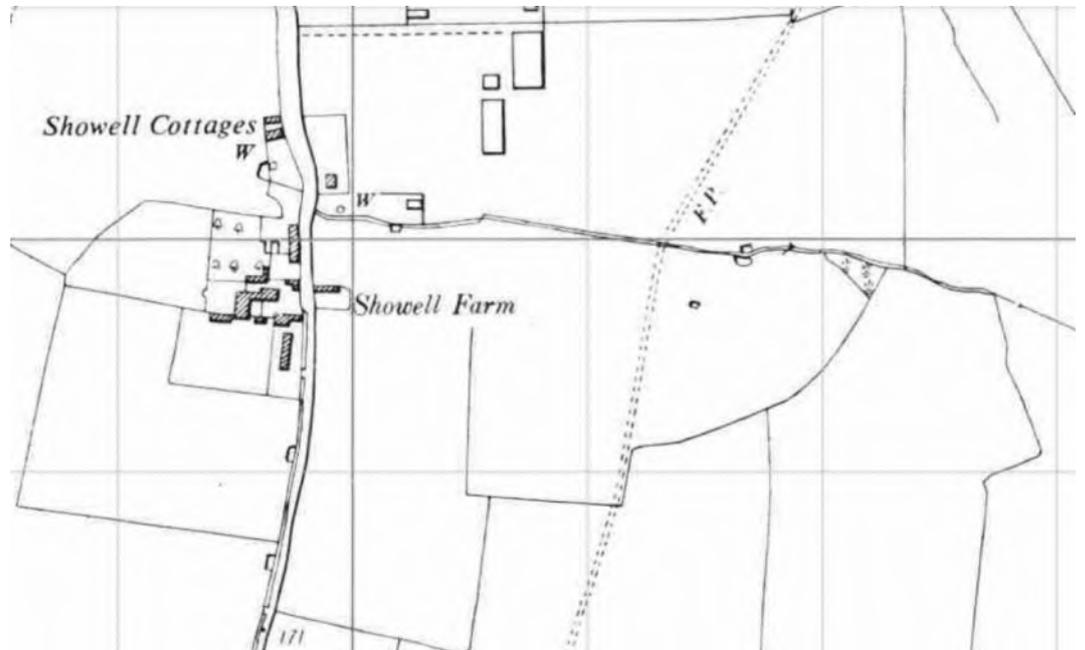


Figure 7 1956-60 OS 1:10,560 Scale Map (Extract)



Figure 8 1982 OS 1:10,000 Scale Map (Extract)

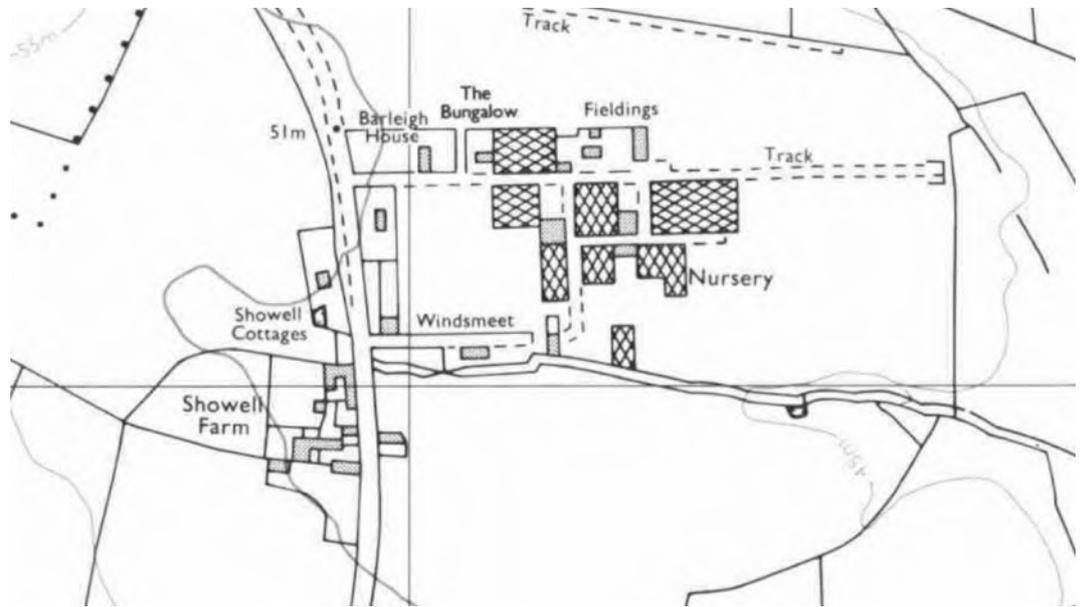


Figure 9 1990 OS 1:10,000 Scale Map (Extract)



Figure 10 2001 OS 1:10,000 Scale Map (Extract)

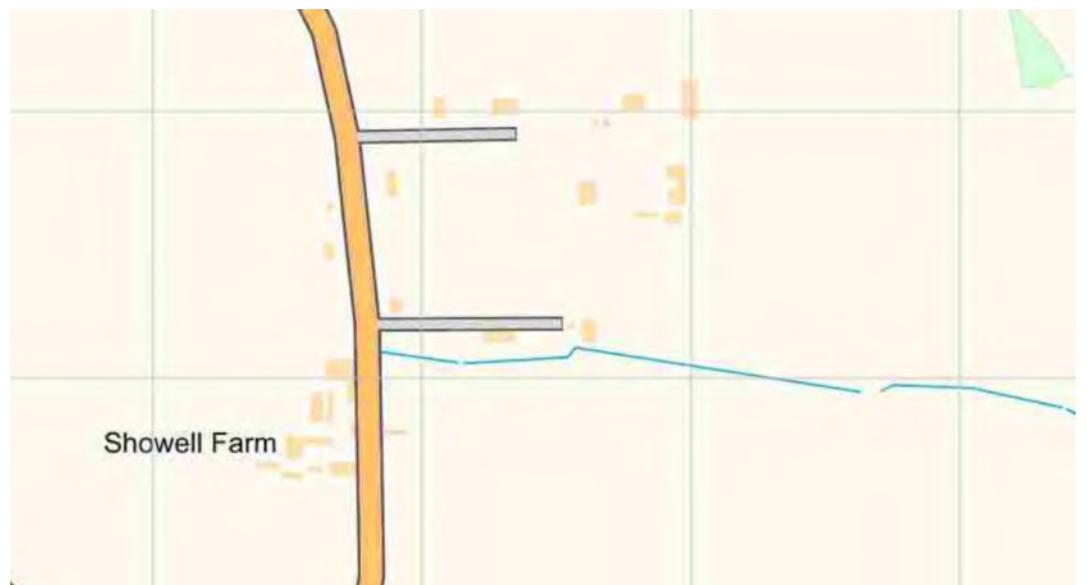




Figure 12 Shouhill Holdings shown on 1764 Parish Map

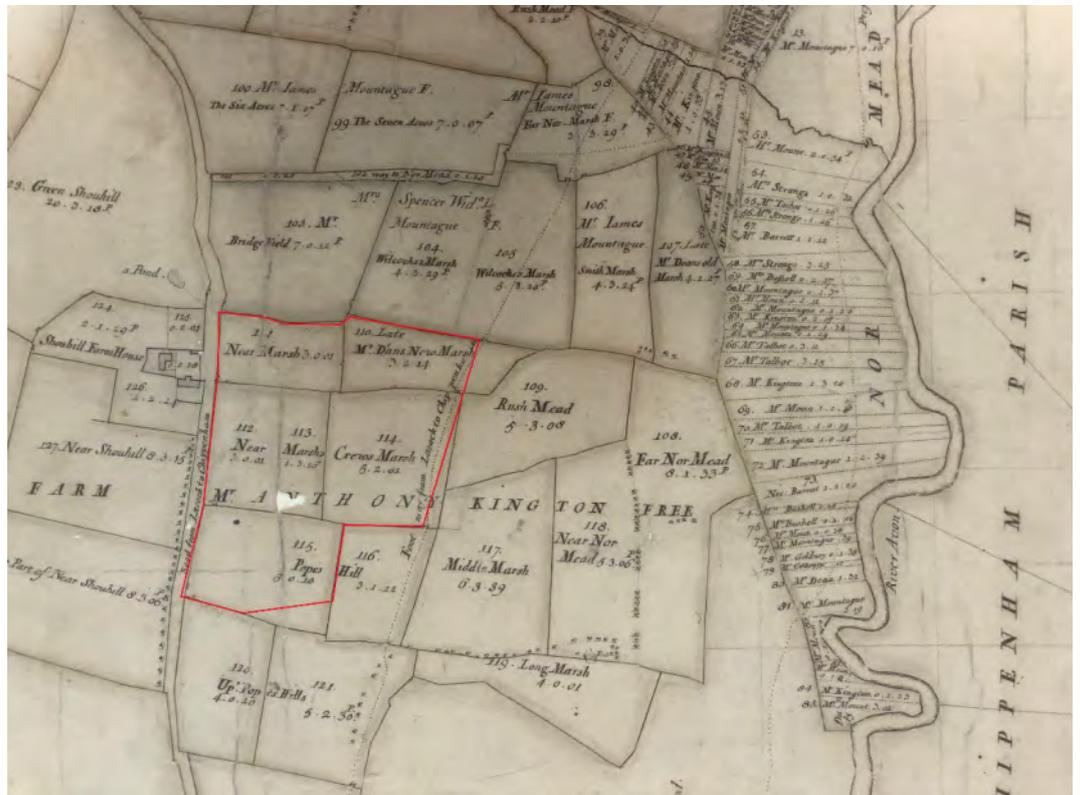


Figure 13 LPA Buffer shown on 1764 Parish Map



Annex 2

Concept Plan





-  Site Boundary (34.07ha)
-  Proposed Development Blocks (12.34ha, 432 dwellings @ 35dph)
-  Indicative Primary Internal Street Circulation
-  Potential Points of Access
-  Indicative Alignment of Proposed Link Road Option B within 30m Wide Corridor Based Upon Wiltshire Council's Proposed Route Options Map
-  Existing Public Rights of Way
-  Proposed Public Open Space
-  Informal Open Space Area
-  Proposed Equipped Play Area
-  Existing Vegetation
-  Proposed Vegetation
-  Proposed Trees
-  Proposed Drainage Basins
-  Proposed Swale
-  Proposed Allotments
-  Proposed Orchard
-  5m Contours
-  Flood Zone 2
-  Listed Buildings
-  Proposed Advance Planting to Protect Setting of Listed Building

client
Hallam Land Management

project title
Land East of Showell Farm, Chippenham

drawing title
Concept Masterplan

| | | | |
|----------------|----------------------|----------|------------|
| date | 08 MARCH 2021 | drawn by | JGo |
| drawing number | edp2272_d014b | checked | PW |
| scale | 1:2,500 @ A2 | QA | XXX |



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Annex 3

Flood Risk and Drainage Appraisal



10741 Land at Showell Farm, Chippenham

Technical Note 1: Preliminary Flood Risk and Drainage Review

9th March 2021

1 Introduction

- 1.1 Brookbanks is appointed by Hallam Land Management Ltd to undertake an initial review of a potential site in Chippenham, Wiltshire.
- 1.2 This note, in brief, includes findings of the study and specifically addresses the following issues in the context of the current legislative regime:
 - Flooding risk
 - Surface water drainage

Site Location

- 1.3 The site is located approximately 2.5km south of Chippenham. The Site is currently undeveloped agricultural land and is not thought to have been historically subject to any significant built development. The site location and boundary is shown indicatively on **Figure 1-1** below.

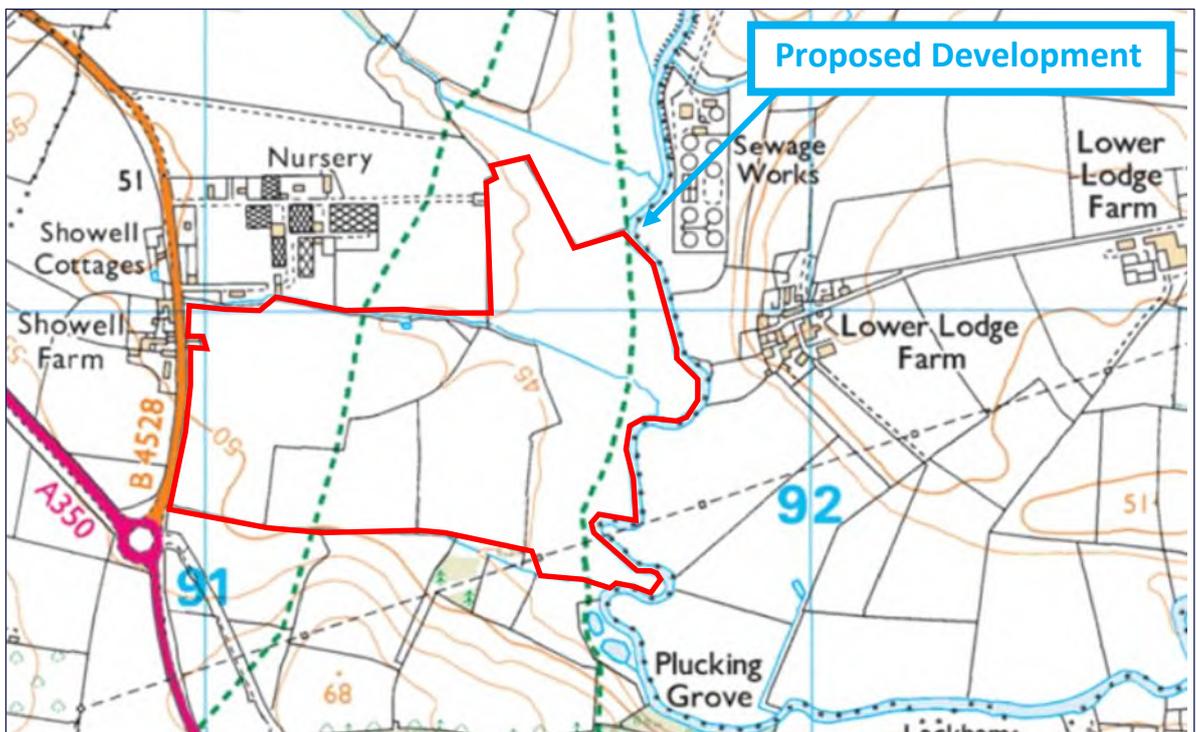


Figure 1-1: Site Location

2 Watercourse Systems & Drainage

- 2.1 With reference to the Flood Estimation Handbook (FEH) online, the site is shown to be a part of the drainage network belonging to the River Avon, which forms the eastern boundary of the site.
- 2.2 The majority of the site is shown to have a Low Productivity aquifer with only the south western corner lying within an area of a highly productive aquifer.
- 2.3 The FEH catchment is illustrated in **Figure 2-1** below:



Figure 2-1: FEH (online) Reported Catchment

3 National Planning Context

- 3.1 In line with current planning procedures, the existing flood mechanisms on site will need to be understood. The National Planning Policy Framework (NPPF) 2019 sets out government policies on a range of matters, including development and flood risk.
- 3.2 Allocating and planning of development must be considered against a risk-based search sequence, as provided by the NPPF. In terms of fluvial flooding, the guidance categorises flood zones into three principal levels of risk, as shown in **Table 3-1** below.

| Flood Zone | Annual Probability of Flooding |
|--------------------------------|--------------------------------|
| Zone 1: Low probability | < 0.1 % |
| Zone 2: Medium probability | 0.1 – 1.0 % |
| Zone 3a / 3b: High probability | > 1.0 % |

Table 3-1: NPPF Flood Risk Parameters

4 Flood Mechanisms

4.1 Having completed a site hydrological desk study, the possible flooding mechanisms at the site are identified and presented in the table below and explained further within the following paragraphs.

| Mechanisms | Potential | Comment |
|--------------------------|-----------|---|
| Fluvial | Y | The eastern third of the site lies within flood zone 3. |
| Coastal & tidal | N | No tidal watercourses lie within an influencing distance of the proposed development. |
| Overland flow (pluvial) | Y | There is a high risk of surface water in the east of development site, with a medium risk along the existing ditches. |
| Groundwater | N | No groundwater flooding was identified within the SFRA. |
| Sewers | N | No sewer flooding was identified near the site within the SFRA. |
| Reservoirs, Canals, etc. | Y | A small area of Flood Zone 3 also lies within an area of Reservoir Flooding. |

Table 4-1: Potential Flood Mechanisms

Fluvial Flooding

4.2 The mapping shows that the western two thirds of the development site lies within Flood Zone 1; being an area of Low Probability of flooding, outside both the 1 in 100 (1% AEP) and 1 in 1,000 (0.1% AEP) year flood events. However, the eastern third of the site lies within Flood Zone 3; being an area having a 1% or greater probability of flooding from rivers.

4.3 Fluvial flood risk on site is illustrated below in **Figure 4-1**.

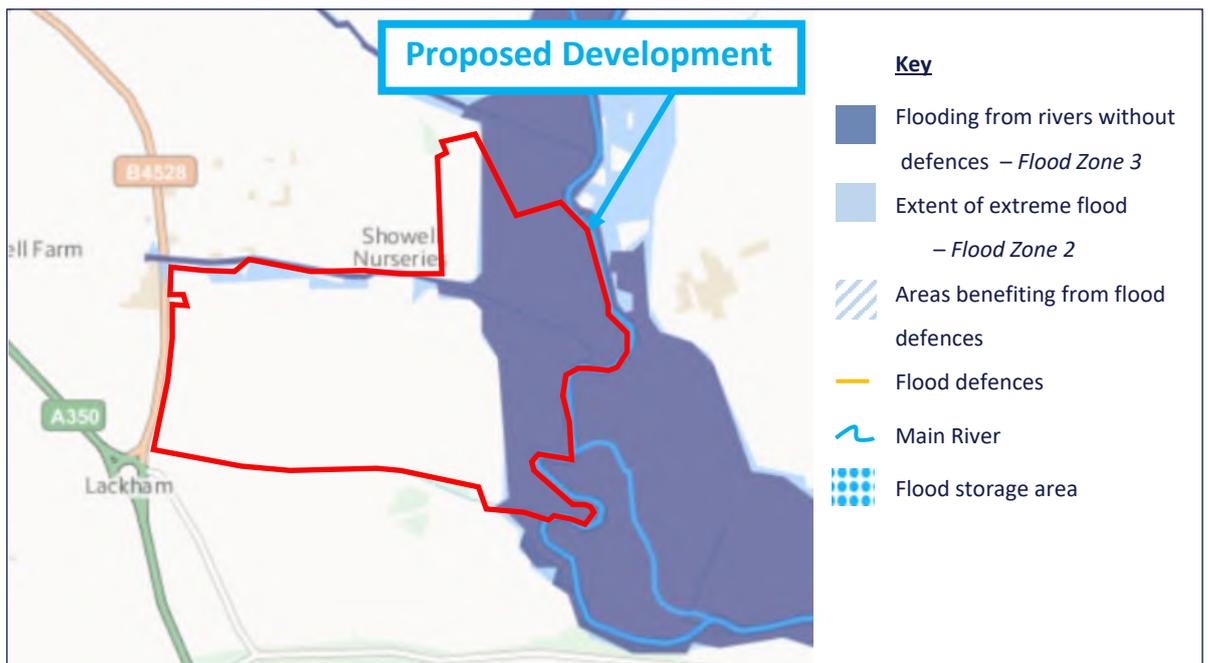


Figure 4-1: Environment Agency / Gov.UK – Flood Probability Map

Coastal Flooding

- 4.4 The site lies a significant distance from the nearest tidal watercourse and the coast. As such there is no risk of tidal or coastal flooding at this location.

Overland Flow (pluvial)

- 4.5 Overland flow mechanisms result from the inability of unpaved ground to infiltrate rainfall or due to inadequacies of drainage systems in paved areas to accommodate flow directed to gullies, drainage downpipes or similar. In minor cases, local ponding may occur. In more extreme events, flows accumulate and may be conveyed across land.
- 4.6 **Figure 4-2** below illustrates the flood risk on site.

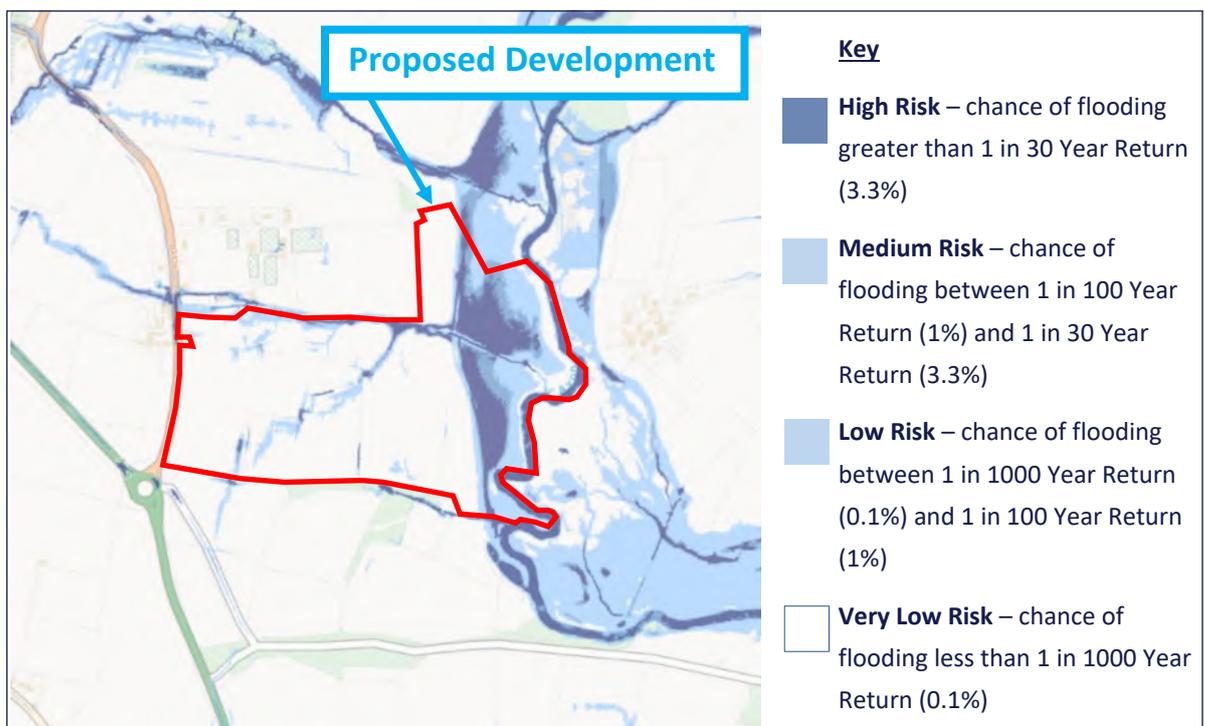


Figure 4-2: Environment Agency / Gov.UK – Flood Risk from Surface Water Map

- 4.7 The mapping provided by the EA identifies the site has a high risk of surface water flooding within the eastern third of the site. There is a low to medium risk of surface water flooding along the exiting drainage networks along the northern and southern boundaries, as well as, within the low lying areas of the site.
- 4.8 Given the baseline site characteristics and further mitigating measures to be implemented, residual flood risk from an overland flow mechanism is considered to be a low probability.
- 4.9 Before the site is developed, the land will be levelled out. This will remove the risk of surface water ponding within the low lying areas. The addition the proposed SuDS will remove the risk of the surface water flooding across as the site as they have been designed to convey and store surface water from the development.

Groundwater

- 4.10 Groundwater related flooding is fortunately quite rare, although where flooding is present, persistent issues can arise that are problematic to resolve. Such mechanisms often develop due to construction activities that may have an unforeseen effect on the local geology or hydrogeology.
- 4.11 North Wiltshire Strategic Flood risk Assessment (SFRA) does not identify any risk of groundwater flooding.
- 4.12 Positive drainage systems incorporated into the Proposed Development will further reduce the risk of flooding within the built development. Given the baseline site characteristics and further mitigating measures to be implemented, residual flood risk from a ground water mechanism is considered to be of a low probability.

Sewerage Systems

- 4.13 No reports of sewer flooding were identified within the site boundary within the SFRA.
- 4.14 Positive drainage measures incorporated on site, coupled with sustainable drainage systems (SuDS) will ensure that no increase in surface water will result from the site. Flood risk associated with sewer flooding is therefore considered to be a low probability.

Artificial Water Bodies - Reservoirs & Canals

- 4.15 Non-natural or artificial sources of flooding comprises of reservoirs, canals and lakes where water is retained above the natural ground level. However unlikely, reservoirs, canals and other artificial sources have a potential to cause flooding due to the release of large volumes of water, resulting from a dam or bank failure.
- 4.16 The area of flood risk, lies within Flood Zone, therefore, any development will be located away from the risk of this type of flooding.

5 Surface Water Drainage Options

- 5.1 As the site is currently Greenfield, initial investigations assume that surface water currently drains into the River Avon and existing ditch that lies along the boundaries of the proposed development.
- 5.2 The following paragraphs in this section outline the proposed drainage strategy to meet national and local design requirements and guidance.
- 5.3 It will be necessary to implement a SuDS scheme consistent with local and national policy at the Proposed Development.
- 5.4 When appraising suitable storm water discharge options for a development site, the following search sequence identifies the most appropriate drainage methodology.

“Rainwater from a system provided pursuant to sub-paragraphs (1) or (2) shall discharge to one of the following, listed in order of priority -

- a) an adequate soakaway or some other adequate infiltration system; or where that is not reasonably practicable,***
- b) a watercourse; or where that is not reasonably practicable,***
- c) a sewer. ”***

- a) **Into the ground via Infiltration** – The north of the Site is shown to be underlain by sandstone, siltstone and mudstone in the eastern two thirds of the sites with the western third comprising of Limestone. The site contains superficial deposits of Alluvium and River Terrace Deposits. As such; infiltration might be a viable option for discharge. However, infiltration testing should be undertaken to confirm this.
- b) **To a surface water body** – The attenuation basins will be positioned in the lowest points of the site, there is an existing drainage network across the site and along the site boundaries that drain into the River Avon that lies along the eastern boundary. However, a site investigation will need to be undertaken in order to determine the existence and location of a drainage network that operates on site.
- c) **To a surface water sewer** – Should the above prove to not be possible surface water discharge directly into sewers would require a pre-development enquiry to determine Wessex Water’s preferred discharge connection point and a capacity assessment of their network.

- 5.5 The search sequence outlined above indicates that the existing watercourse and drainage network across the development site is the most likely receptor for storm water. SuDS will have the potential to employ source control measures to control peak discharges to no greater than the baseline conditions.
- 5.6 Coupled with the storm water control benefits, the use of SuDS can also provide betterment on water quality. National guidance in the form of CIRIA 609 outlines that by implementing SuDS, storm water from the site can be polished to an improved standard thus ensuring the development proposals have no adverse effects on the wider hydrology.

Preliminary Drainage Proposals

- 5.7 Surface water from the site will be conveyed and stored on site before discharging into the existing drainage network.
- 5.8 Discharge from the development will be no greater than the existing greenfield run off rates, which will ensure that no increase in surface water will result from the site. The use of SuDS can also provide betterment on water quality.
- 5.9 The image below indicates the potential SuDS location for the proposed site, which will be designed to accommodate surface water for the 1 in 100 year + 40% climate change storm event.

Drainage Strategy

- 5.10 The developable area comprises of 11.18ha.

| Catchment | Developable Area (ha) | Impermeable Area (ha) | Existing 100 Year Run-off | Design Discharge Rate (l/s) | Volume Required (m3) | Area Required (m2) |
|-----------|-----------------------|-----------------------|---------------------------|-----------------------------|----------------------|--------------------|
| A | 4.71 | 22.85 | 1.20 | 5.00 | 2,648 | 2,642 |
| B | 2.80 | 1.69 | 0.72 | 3.00 | 1,563 | 1,630 |
| C | 4.97 | 3.01 | 1.27 | 6.00 | 2,720 | 2,704 |

Table 5-1: Run Off Calculations

- 5.11 An indicative surface water drainage strategy for the site can be seen in **Figure 5-1**.



Figure 5-1: Surface Water Drainage Strategy

6 Limitations

- 6.1 The conclusions and recommendations contained herein are limited to those given the general availability of background information and the planned usage of the Site.
- 6.2 Third party information has been used in the preparation of this report, which Brookbanks by necessity assumes is correct at the time of writing. While all reasonable checks have been made on data sources and the accuracy of data, Brookbanks accepts no liability for same.
- 6.3 The benefits of this report are provided solely to Hallam Land Management Ltd for the proposed development at Land East of Showell Farm only.
- 6.4 Brookbanks excludes third party rights for the information contained in the report.



STRAT282

Vision Framework

March 2021



Land to the South of Snarlton Farm

Melksham, Wiltshire

Catesby Estates plc

part of Urban&Civic

Catesby Estates is a specialist strategic land promotion business. Our projects are located throughout the country ranging from large urban extensions to sensitively designed residential schemes on smaller edge of settlement sites.

Recognising the individuality of every site, Catesby Estates seek to work very closely with local communities, key stakeholders and the Local Planning Authority throughout the life of a development project to create the most mutually beneficial and sustainable schemes.

Introduction

This Vision Framework has been prepared to accompany representations to Wiltshire County Council's Local Plan Review Consultation and presents Catesby Estates vision for a new residential allocation on land at Snarlton Farm, Melksham.

This document seeks to bring together the outcome of the studies undertaken to date and explain how the constraints and opportunities of the site can inform a positive vision for the delivery of a high quality sustainable housing led scheme.

In addition, the document responds to the Council's development options for Melksham and the proposal to combine land to the north and south of Snarlton Farm to deliver a logical and sustainable new strategic extension to the east of Melksham (Site 1), with the opportunity to provide supporting infrastructure and a new community centre.

Discussions have taken place with the other landowners and promoters of the adjoining land and all parties have confirmed their support for a strategic extension to the east of Melksham. Catesby Estates is committed to working with landowners, Wiltshire Council, local community and key stakeholders to deliver a well planned and high quality housing led scheme which meets the needs and aspirations of both Melksham and the Council.



The Site and its Sustainable Context

The Planning Context

Wiltshire will need between 40,840 and 45,630 new homes over the next plan period. The Chippenham Housing Market Area is forecast to have the largest housing need over the next plan period and Melksham has been identified as having potential for significant growth due to its relatively limited constraints and good availability of local services and facilities.

The Emerging Spatial Strategy proposes a requirement for 3,950 homes to be delivered in Melksham of which 2,545 homes remain to be allocated.

The current Local Plan Review Consultation has included land at Snarlton Farm as part of a potential development site to provide a strategic extension to the east of Melksham (Site 1)

Land at Snarlton Farm has been positively assessed in the Council's SHLAA, achieving green ratings for landscape, heritage and flood risk impact.

This document demonstrates the development opportunities of land at Snarlton Farm which can deliver a total of 600-700 homes. This includes a first phase for circa 300 homes with supporting infrastructure, which can be delivered within the first 5 years of the Plan period.

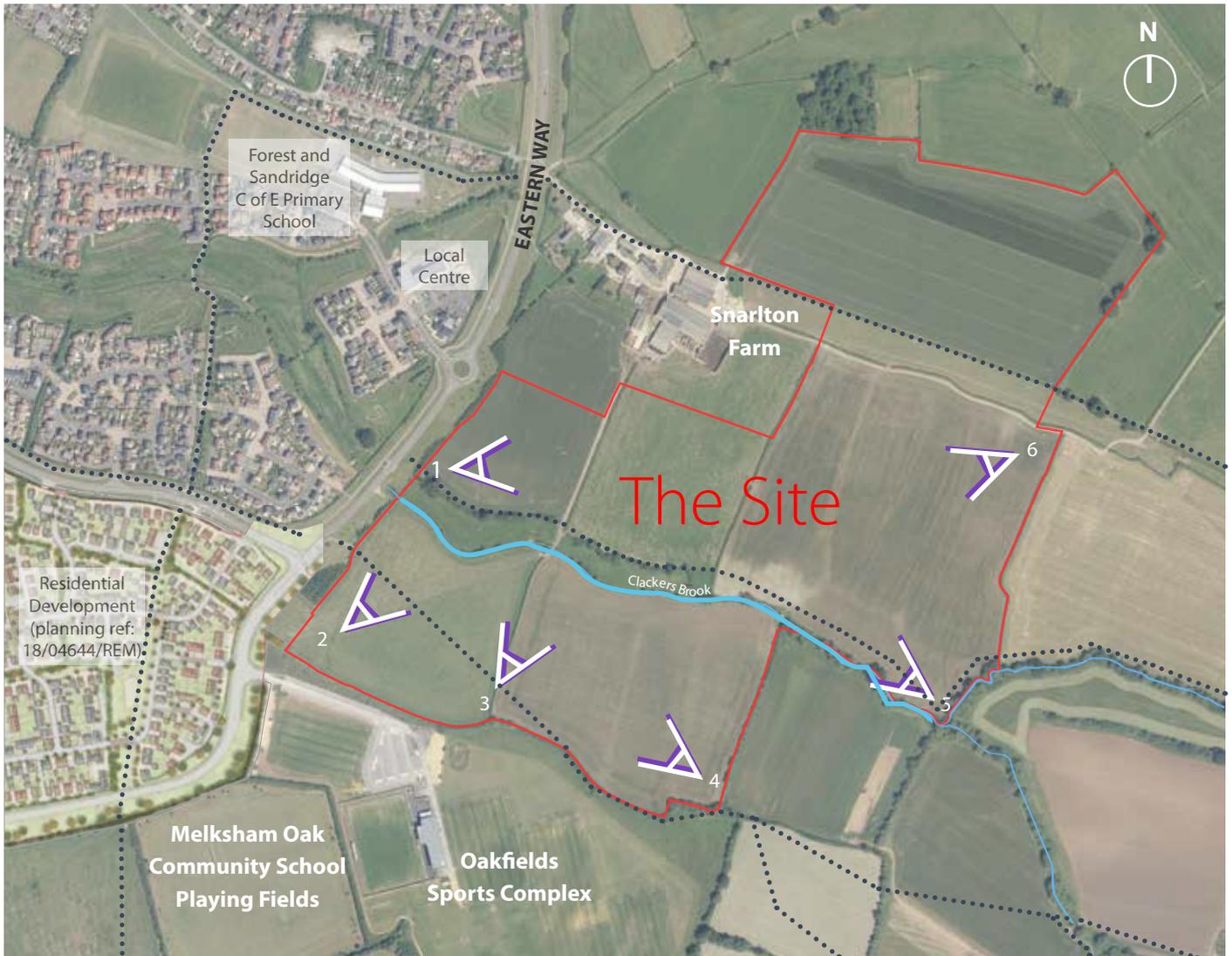
This first phase can be seamlessly connected to adjoining land to provide a high quality and sustainable strategic extension to the east of Melksham.

Land at Snarlton Farm

The land area under control of Catesby Estates for promotion (hereafter called the Site) adjoins the eastern edge of Melksham. The Site is situated south and east of Snarlton Farm; east of Eastern Way (the perimeter road network connecting the A3102, the A365 and the A350); and north of the Oakfields Sports Complex.

The Site comprises six agricultural fields which are currently accessed via two tracks from Snarlton Farm. All boundaries are defined by hedgerows and occasional trees.

The Clackers Brook crosses through the centre of the Site, flowing west towards the River Avon. Two public rights of way also pass through the site east to west.



Aerial view of the site



1

View to the north east from the western boundary



2

View north from the southern boundary



3

View north towards the internal hedgerow on the southern boundary



4

View across the west from the southern corner of the site



5

View across the west, adjacent to Clackers Brook



6

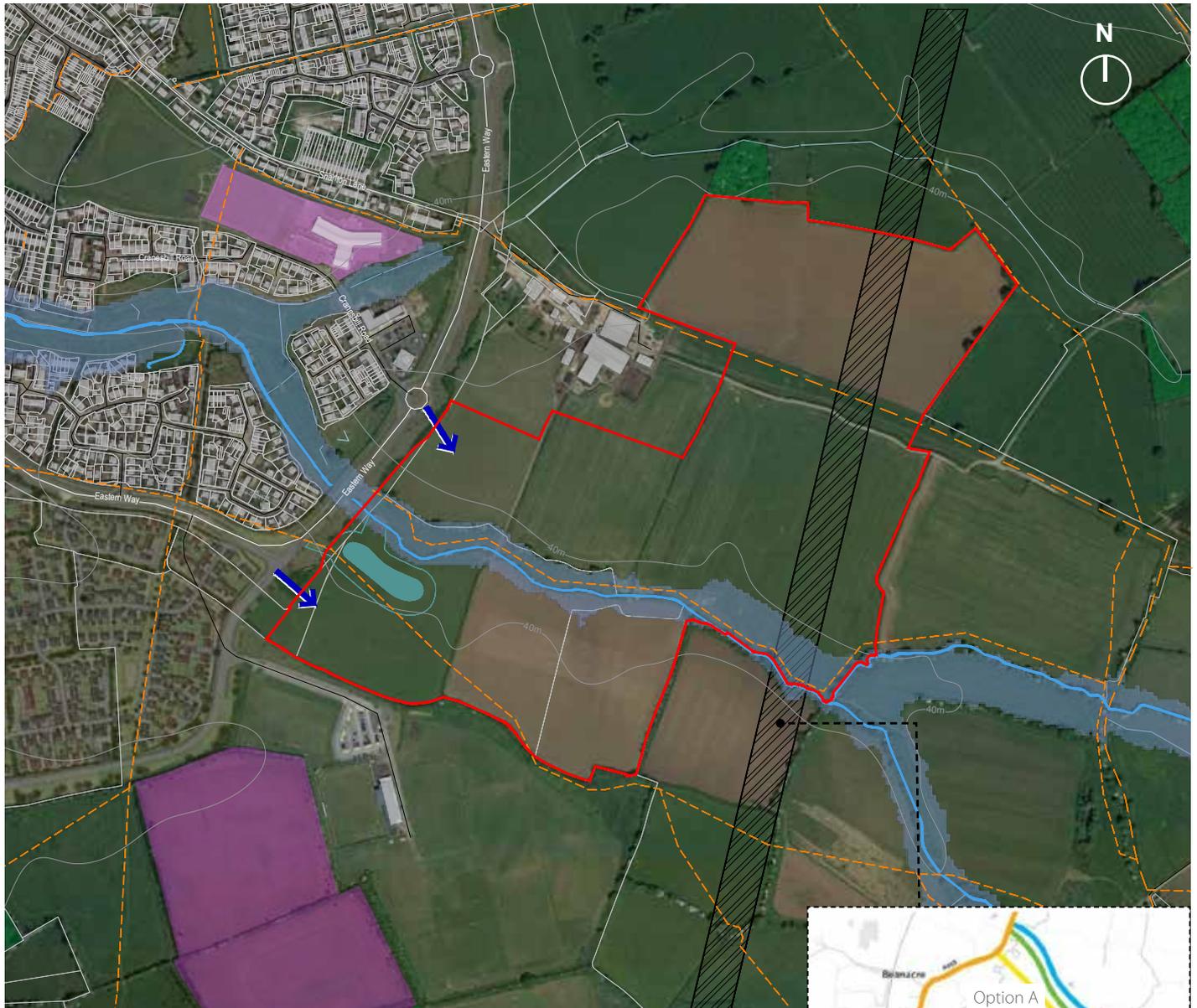
View towards the south west from the north east corner

Site Features

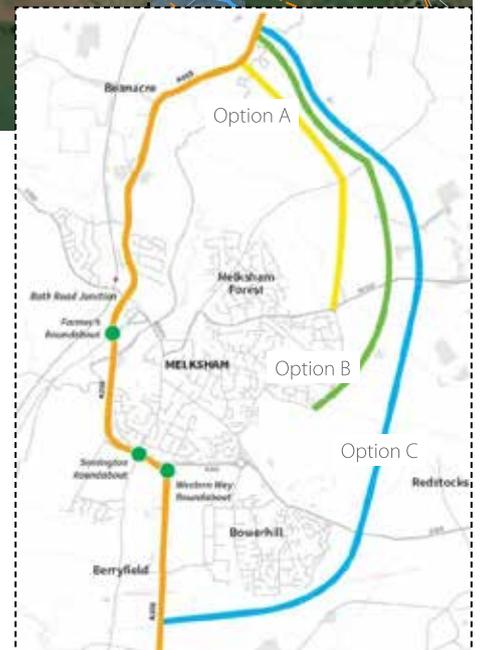
Following analysis of environmental and technical features of the Site the following table and plan confirm that there are no significant physical, environmental or technical constraints to developing the site for residential use. This plan underpins the development rationale and concept masterplan section of this document.

| Feature | Summary |
|---|--|
| Landscape | <ul style="list-style-type: none"> The Site and immediate surroundings feature no formal landscape designations. While the character / views of the site will change as a result of the proposed development, it is considered that any effects would generally be limited to the local area and the Site would relate well to the existing settlement pattern. Opportunities exist to retain and enhance current landscape features across the Site and create new green infrastructure and areas of publicly accessible open space. Clackers Brook will be retained and enhanced as a significant landscape, open space and ecology corridor. A Landscape Analysis report by David Jarvis Associates is submitted with the representations. |
| Heritage | <ul style="list-style-type: none"> There are no heritage designations or listed buildings within the Site. Grade II Listed Bowerhill Lodge Farmhouse (470m west), Tanhouse Farmhouse (730m east) and Blackmore House (850m north) are the closest to the Site. The majority of listed buildings are set within the historic core of the town which is designated as a Conservation Area, approximately 1.29km from the Site. It is considered that harm to heritage assets will be avoided. |
| Arboriculture | <ul style="list-style-type: none"> Hedgerows, tress and scrub defined the Site and internal field boundaries. Clackers Brook is also characterised by trees and scrub along its banks. To facilitate development some tree and hedgerow clearance will be required. However, every effort will be made to preserve the majority of trees and hedgerows on Site and to supplement these with new planting in appropriate locations. |
| Ecology | <ul style="list-style-type: none"> Habitats of elevated value include Clackers Brook, the hedgerows and mature trees. Overall the Site has opportunities for protected species, but if found these will be safeguarded and appropriate habitats created within the masterplan. Surveys for bats, reptiles and breeding birds, as well as water vole, otter and great crested newts are being completed. Significant opportunities exist for biodiversity enhancement through blue and green infrastructure provision on Site as part of the masterplan. |
| Ground Conditions | <ul style="list-style-type: none"> The Site does not have any significant geo-technical constraints in relation to strata or contamination that would impact on the residential development of the Site. |
| Flood Risk and Drainage | <ul style="list-style-type: none"> The majority of the Site is located in Flood Zone 1 (EA mapping), and is therefore not at risk of flooding from rivers, sea or reservoirs. The central swathes of land surrounding Clackers Brook are within Flood Zone 2 and 3. Proposed development would be located outside these areas. Where the Site currently outfalls via gravity into Clackers Brook there is some low risk surface water flooding. This will be alleviated through design work. 1.10 Ha / 2.71 acres of the Site accommodates a surface water attenuation basin serving the adjacent consented residential development (planning ref: 18/04644/REM). Sustainable drainage features will be accommodated to deal with surface water run off generated by the proposed development. Foul drainage will outfall to Wessex Water sewer to the west. Pumping of foul water flows from the Site will be required. |
| Highways, Access and Public Rights of Way | <ul style="list-style-type: none"> The Site is currently accessed from a track to the north through Snarlton Farm. Two public footpaths cross the Site on an east / south east alignment. These will be retained / diverted to facilitate appropriate development layouts, alongside provision of new informal footpath routes. Opportunities to provide access into the Site can be achieved from a new arm off the existing Eastern Way / Cranesbill Road roundabout; and a second access from a signalised crossroads which will be constructed as part of the consented Land to the East of Spa Road residential scheme (planning ref: 18/04644/REM). |
| Indicative A350 Melksham Bypass Route | <p>In February 2020 the Government announced its support of a bypass around Melksham and have approved funding to enable the Council to proceed to the next step.</p> <p>We understand that this project is at very early option stages (See Inset page 9) and is subject to detailed design. The indicative route of option C would pass through the eastern boundary of land under our control. The proposals for an early phase would not fetter the delivery of the bypass which can be accommodated into the wider masterplan once the final route has been chosen.</p> |

Site Features Plan



- Site Boundary
- 40m Existing Contours
- - - Public Footpaths
- - - Public Bridleways
- █ Existing Ponds and Watercourses
- █ Extent of Flood Zone 2 and 3
- █ Woodland
- Grade II Listed Buildings
- Consented Bloor Homes & Hallam Land Management Scheme (ref: 18/04644/REM)
- Forest & Sandridge C of E Primary School
- Melksham Oak Community School
- ➔ Proposed Primary Accesses (All modes)
- Indicative A350 Melksham Bypass Route (Option C)
- Attenuation basin to serve the Consented Bloor Homes & Hallam Land Management Scheme



A350 Melksham Bypass Strategic Options

Potential Development Site 1

The Local Plan Review Consultation has combined 4 land parcels, identified as Site 1 in the Planning for Melksham document. This site is capable of delivering a significant proportion if not all of the housing requirement for Melksham in the emerging Local Plan.

The land is held in 3 ownerships. SHLAA sites 3686 and 3525 form land at Snarlton Farm and are under the control of Catesby Estates. The land to the north (SHLAA site 3552) is being promoted by Gleason Strategic Land and the land to the south (SHLAA 3123) is owned by Mr Simon Cottle. Discussions have taken place between the parties and there is support to work together to bring this site forward and deliver a comprehensive and well planned housing scheme which meets the aspirations of both existing residents and Council.

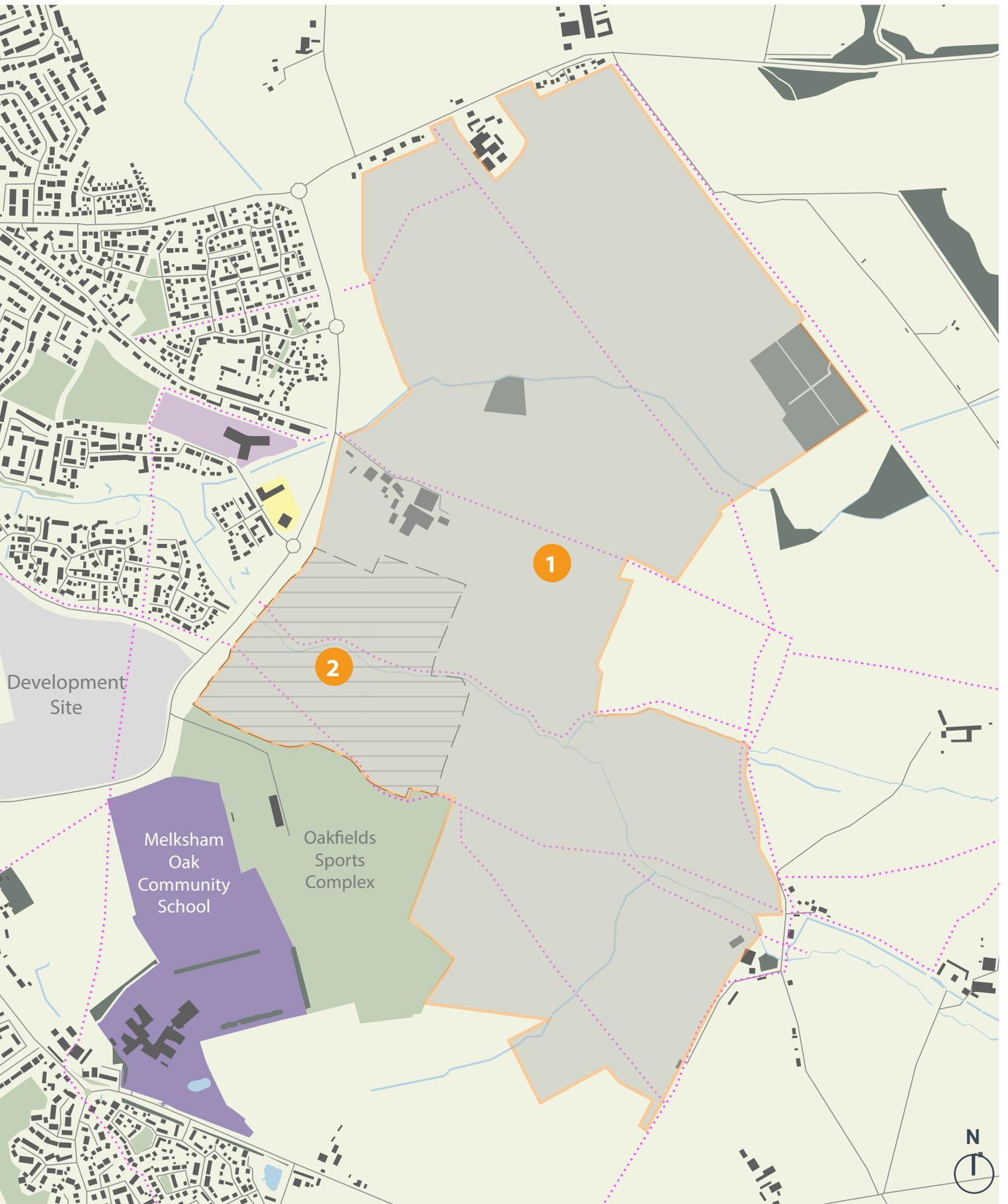
The following plan illustrates the high level opportunities that a strategic extension to the east of Melksham could deliver. In particular, it demonstrates an opportunity to provide a new neighbourhood with supporting infrastructure, community facilities and high quality open space. The proposals will be designed to deliver on the Council's placemaking, sustainability and environmental objectives.

The plan also illustrates how a phase 1 (detailed further in the following pages) can bring an early delivery of new dwellings to provide security of supply during the early years of the Plan.



- 1** Wiltshire District Council Site 1 - Land to be considered as part of a wider strategic urban extension solution.
- 2** Phase 1 Site Area (Land in Catesby Estates Control)

- East of Melksham Extension



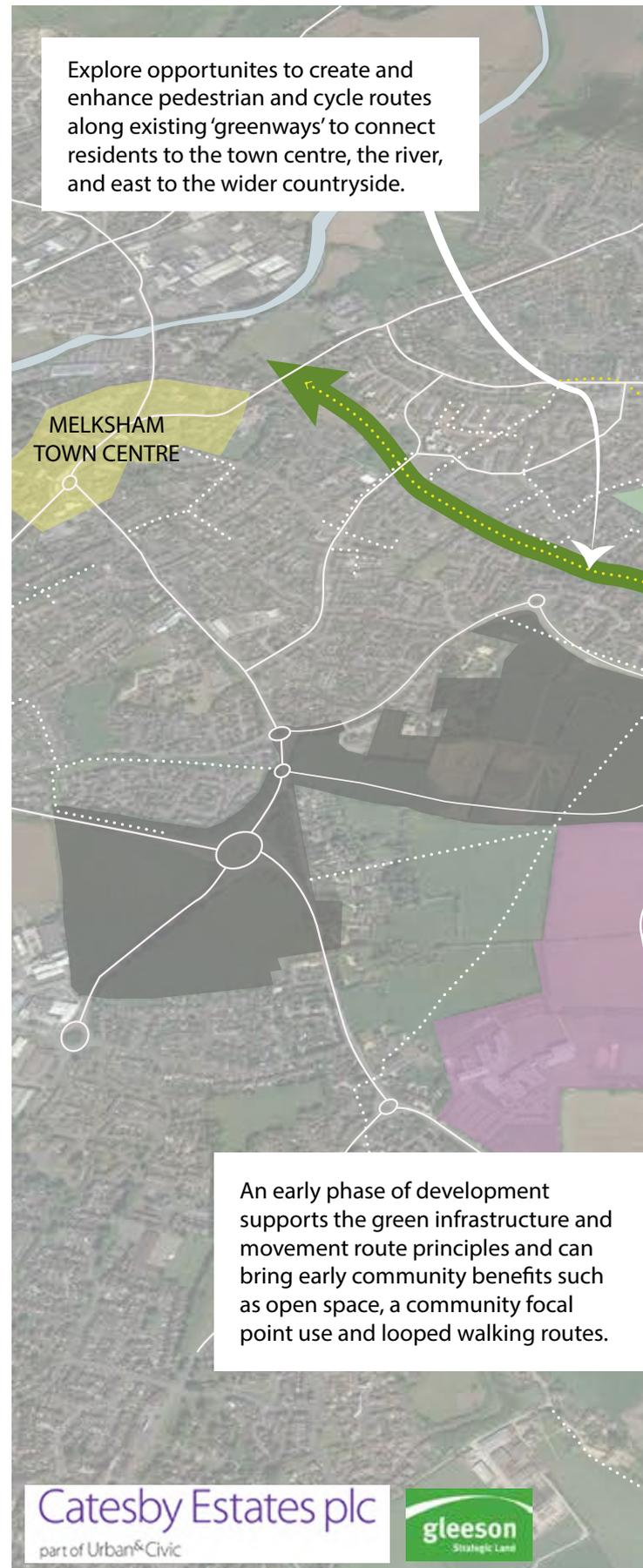
Potential Development Site 1

The following plan illustrates the high level opportunities that a new neighbourhood could bring to Melksham. In particular, it demonstrates some key community benefits that can be delivered satisfying the Council's quality placemaking, sustainability and environmental objectives.

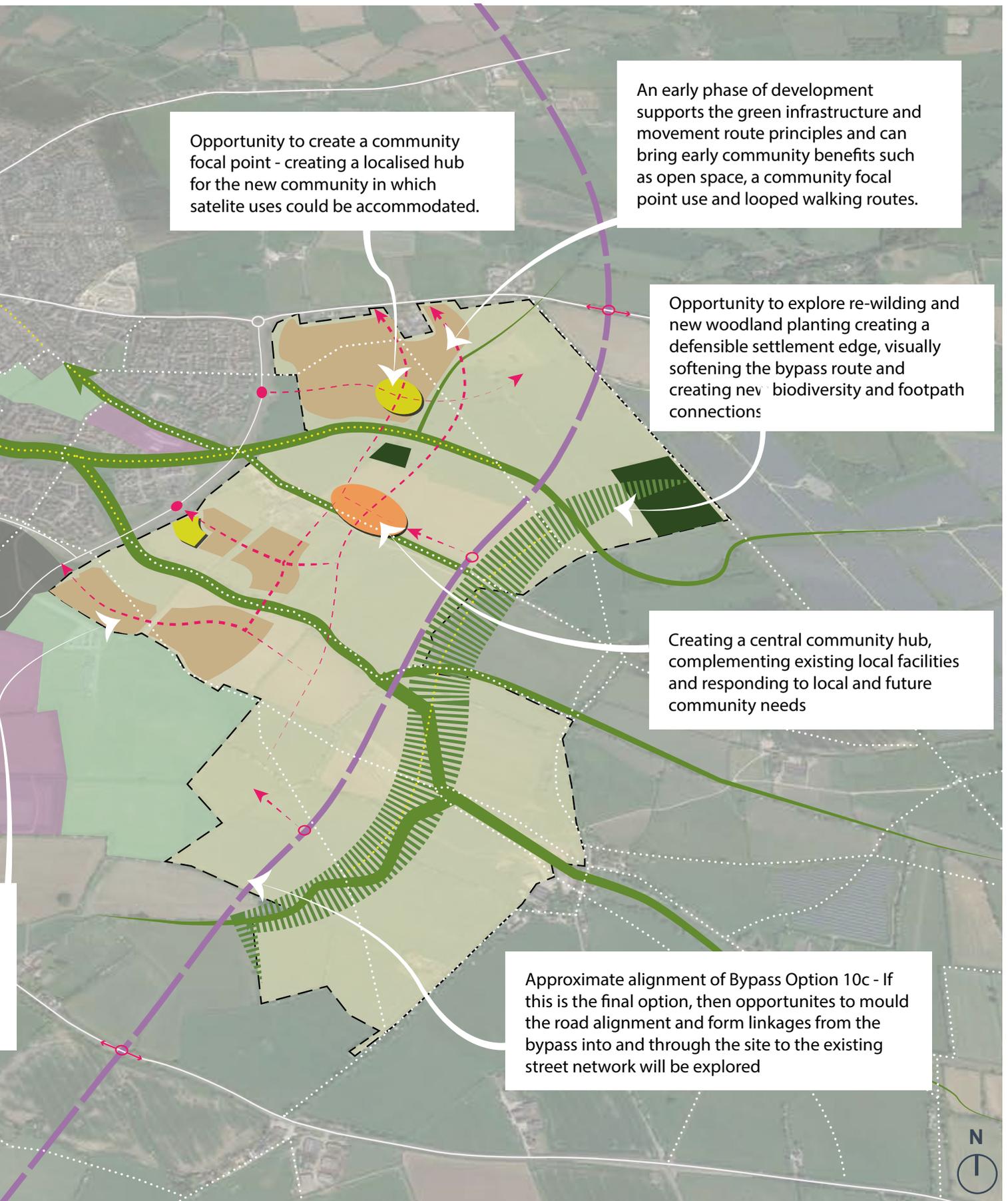
The proposals facilitate the delivery of an early phase to assist with housing supply in the early years of the Plan. The remaining land can deliver an exciting comprehensive development which will incorporate key new infrastructure including schools, community buildings, sports facilities and local amenities to create a sense of place and community. The development will have sustainability at its heart providing high quality open space and will prioritise the pedestrian and cyclist, linking the new community to Melksham and visa versa.

This plan has been prepared in collaboration with the relevant landowners and promoters of land within Site 1.

-  Wiltshire Council Site Allocation Options - Site 1
-  Existing Education Establishments
-  Site with Planning Permission for Residential Development
-  Existing Recreation Spaces
-  Existing Woodland Cluster
-  Watercourse / Green Corridor
-  Existing Highways
-  Existing Public Right of Way/ Bridleway
-  Pedestrian/ Cycle Links Enhanced or Created
-  Approximate Location for a Central Community Hub
-  Community Focus
-  Potential Early Phases of Residential Development
-  Approximate Alignment of Melksham Bypass (Option 10c)
-  Potential Junctions onto Bypass
-  Potential Movement Routes
-  Links to Existing Roundabouts



- Land East of Melksham



Opportunities and Aspirations

Accessibility to Melksham

A strategic allocation on land to the east of Melksham provides a logical extension to Melksham. The land already lies close to existing facilities, including schools, health and extensive sporting amenities. Proposals will seek to prioritise the pedestrian and cyclist, providing safe and attractive links through the site into existing nearby communities, Melksham town centre and out to the wider countryside to the east.

The proposals will also create a new neighbourhood which can provide local day to day facilities for existing and future residents, further reducing the reliance on the private car. We will also work with the Highways team and the local bus companies to provide improved services to encourage a greater use of more sustainable transport options.

The development will also enable the appropriate integration of the A350 bypass should this route be the preferred option.

A Range of New Community Facilities

The scale of the new neighbourhood offers the potential to deliver a wide range of facilities to meet the needs of both existing and future residents. New facilities could include schools, community buildings, sporting facilities, small scale employment hubs responding to changing working practices, as well as retail shops to provide for day to day essentials.

We will work with the local community and key stakeholders to determine what is needed to ensure that this new community provides tangible benefits to both existing and new residents.



Biodiversity and Environmental Enhancements

The new neighbourhood will support the delivery of significant open space and landscape areas. These spaces can accommodate a range of biodiversity and habitat networks benefiting wider nature connectivity. These spaces also accommodate sustainable drainage features designed to take into account climate change to deal with surface water flows and treatment before leaving the site.

The open space networks can also offer a range of recreation and play opportunities including walking, cycling and trim trails through out supporting healthy active lifestyles.

A Wide Mix of House Types and Styles

A new neighbourhood in Melksham will be able to deliver a wide mix of high quality homes to meet local market and affordable housing needs. The quantum of dwellings can enable new energy saving and carbon cutting technologies to be integrated on a scale that is not so easy on smaller development sites.

The proposals will provide on-site affordable housing in line with Council policy. These homes will be a mix of tenure and size to cater for identified need in the area.

Responding to the Climate Emergency

Recognising the Council's status and policies in relation to the Climate Emergency and sustainability, development proposals can take significant strides in moving towards carbon neutrality by 2030.

A wide range of strategies impacting on all design decisions will be explored such that Carbon Emissions reductions will comply with the government standards at the time of construction and during the life time of the development.

Funding Local Enhancements

Community Infrastructure Levy (CIL) and Section 106 (S106) payments generated by developments of scale can make a real difference to the enhancement of existing local infrastructure, facilities and services benefiting the quality of life in Melksham.



Phase 1 Design Principles

We recognise the importance of the need to maintain a supply of deliverable land for new homes. We have therefore identified an early phase which can be delivered within the first 5 years of the Plan. The following diagram illustrates design principles which build on the wider aspirations for the illustrated Wiltshire Site 1 neighbourhood creation.

Community Use

Should a community use building be desirable, a position close to the main access and Eastern Way will give good visibility and accessibility for existing and future communities.

Clackers Brook Corridor

Reflecting and linking to the existing landscape and watercourse corridor to the west, a significant landscape, open space and ecology corridor along the Clackers Brook will be integrated into the proposals. Early conversations with the Wiltshire Wildlife Trust confirmed that some naturalisation of the brook would be advantageous and this will be explored alongside other recommendations. Existing Public Rights of Way and new footpaths will also be accommodated within this corridor.

-  Total Site Area
-  Approx Development Area
-  Potential Mixed/ Community Use
-  Potential Site Access
-  Public Right of Way - Footpath Access
-  Consented Attenuation Basin for Adjacent Development
-  Watercourse Link Corridor with Open Space and Landscape
-  Existing Landscape Features Retained & Enhanced
-  Phase 1 Build Line and Open Space Buffer Provision
-  Future Potential Development Area as Part of Comprehensive Urban Extension
-  Indicative Route of Proposed A350 Bypass - Option C



Development Line

Reflecting the extents of the Snarlton Farm buildings to the north, and the Oakfields Sports Complex building to the south, a new rounded settlement line and landscape/ open space buffer is proposed.

Melksham A350 Bypass Route Option C

Acknowledging the current uncertainty around the exact nature, extents and position of the Melksham A350 Bypass route, the approximate alignment of Route Option C has been plotted. This demonstrates that our proposed phase 1 can be delivered without prejudicing the final alignment of the A350 bypass.



Phase 1 Concept Masterplan

The Illustrative Concept Masterplan shows one way that the design principles can be interpreted on the Site to create a new logical residential extension to Melksham. The illustration demonstrates that an early phase of development will not prejudice the Council's wider consideration and delivery of the A350 Melksham Bypass, or the wider neighbourhood delivery.

Phase 1 can deliver the following benefits:

- Around **300 new homes** comprising a mix of sizes and types.
- **30% affordable homes** (up to 90 dwellings) in a mix of sizes and tenure responding to identified local need.
- Potential to accommodate a **community use** (subject to identified local need).
- Delivery of a range of new **children's play areas** within a linked open space network.
- An **extensive multi-functional open space, landscape and ecology network** accommodating existing ecology and landscape features, particularly around Clackers Brook, as well as new structural landscape planting.
- Integration of existing **public rights of way** within the open space network and creation of **new linked and circular footpath routes** through the development and exploring connections to surrounding community and leisure uses.
- Utilising existing highway junctions on Eastern Way, access into the Site will be direct and integrated.
- Should **Melksham Bypass Route Option C** be the selected option, the proposed development does not prejudice its future delivery.



-  Phase 1 Site Boundary
-  Potential Future Phase Development Area
-  Site Access
-  Primary Street



- | | | | |
|---|--|---|--|
|  | Future Potential Connection |  | Formal and Informal Open Spaces |
|  | Existing and Diverted Public Rights of Way and Proposed Footpath Links |  | Potential Locations for Children's Play |
|  | Residential Development Parcels |  | SuDs Feature |
|  | Potential Community Use |  | Approximate Alignment of the Potential A350 Melksham Bypass Option C Route |

Conclusion

The NPPF and the Government's growth agenda seek to ensure that sufficient land is available in the most appropriate locations to increase housing supply, support growth and boost home ownership.

Importantly this land should be deliverable, to ensure that the Wiltshire Council can meet their increasingly unmet housing need. Catesby Estates fully supports the Council's proposal for a strategic extension to the east of Melksham. We have identified no impediment to delivery of Site 1 for housing and the landowners/promoters of the different land parcels are in support of working together to deliver a comprehensive scheme.

DELIVERABILITY

To be considered deliverable, sites should meet the following tests:

- Be Available
- Be Suitable
- Be Achievable

The Site to the south of Snarlton Farm satisfies each of the NPPF criteria as follows:

Available

Catesby Estates Plc has agreed legal agreements with the landowners of Snarlton Farm to promote their land for residential development. The remaining parcels of Site 1 are either under option or in active discussions with a promoter. We therefore determine that this land is available and the landowners and promoters are in agreement to work collaboratively to deliver this land for development.

Suitable

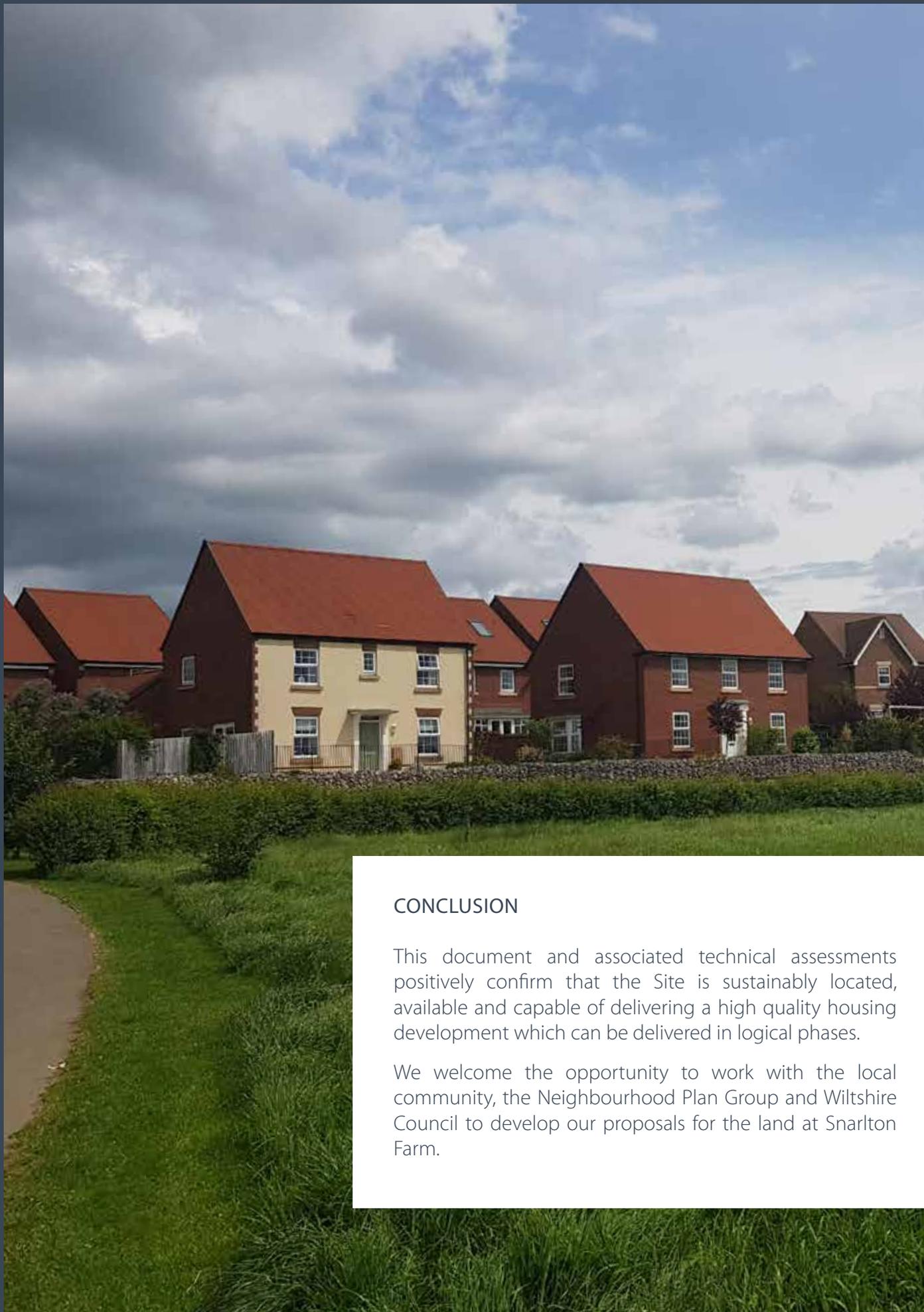
The Site is suitable for housing development because it:

- Offers a suitable location in relation to existing services and facilities in the immediate surroundings;
- Can be developed immediately;
- Has no identified environmental constraints that would prevent it from coming forward for residential development;
- Will deliver significant public benefit in addition to new housing including much needed affordable housing, highway improvements, and enhanced biodiversity habitats.

Achievable

The phase 1 concept masterplan illustrates that the Catesby site could deliver around 300 new dwellings. On average from the date of an outline consent to start on site is around 20 months for our schemes. This will support the view that a substantial part of the 300 unit scheme will be delivered in the first 5 years which would make a significant contribution towards meeting the housing needs of Wiltshire Council.

This document and technical assessment identifies that Site 1 has no restrictions for development and the landowners/promoters are committed to delivering a comprehensive development to the east of Melksham.



CONCLUSION

This document and associated technical assessments positively confirm that the Site is sustainably located, available and capable of delivering a high quality housing development which can be delivered in logical phases.

We welcome the opportunity to work with the local community, the Neighbourhood Plan Group and Wiltshire Council to develop our proposals for the land at Snarlton Farm.

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CATESBY ESTATES PLC.

LAND AT SNARLTON FARM, MELKSHAM

LANDSCAPE STRATEGY

MARCH 2021



Tel: 01793



RTPI

Chartered Town Planners

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CLIENT Catesby Estates PLC

PROJECT Land at Snarlton Farm, Melksham

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Figures

1. Viewpoint Location Plan

Appendices:

2. Field Survey Record Sheets (February 2021)

1. INTRODUCTION

- 1.1 This report has been prepared by David Jarvis Associates Limited (DJA). DJA is instructed by Catesby Estates plc. to provide landscape and visual analysis and advice relating to potential residential development at Snarlton Farm, Melksham, Wiltshire.
- 1.2 DJA is a firm of chartered landscape architects and town planning consultants established in 1982 and has extensive experience in the planning, assessment, design, and implementation of residential development. The firm is a Registered Practice of the Landscape Institute.
- 1.3 This report provides a strategic landscape review of land under the control of Catesby Estates plc, which is located to the east of Eastern Way, Melksham. The land is identified as Phase 1 in the Vision Framework produced by Catesby Estates plc, and also includes the remaining land to the northeast under their control. Both Phase 1 and the remaining land comprise undeveloped farmland.
- 1.4 Catesby Estates plc. acknowledges that there have been local concerns raised relating to the development of land to the east of Melksham, as identified in a Site Assessment Report prepared by AECOM (published in September 2018) in support of the emerging Melksham Neighbourhood Plan. The objective of this landscape strategy report is to provide further analysis and commentary with regards to the suitability for development of the Phase 1 Site and the remaining land under the control of Catesby Estates plc.
- 1.5 The Phase 1 Site and the remaining area of land under the control of Catesby Estates plc. are identified within parcels 3525 and 3686 in Wiltshire Council's Site Selection Report for Melksham document, published in January 2021. This area forms part of a broader parcel of land collectively identified as Site 1 in this document.
- 1.6 This report provides further landscape assessment of the Phase 1 site, the broader parcels of land 3525 and 3686 and the wider Site 1 area as recommended in Wiltshire Council's Site Selection Report. This report constitutes a high-level assessment of the site and its context relevant to landscape.
- 1.7 The report has been produced in support of representations to the Wiltshire Local Plan Review and is based on the Vision Framework provided by Catesby Estates plc.

Limitations

- 1.8 The preliminary visual analysis which accompanies this note provides a broad overview of the visibility of the site and does not constitute a full visual assessment. This would form part of a full Landscape and Visual Impact Assessment (LVIA) to be prepared in support of a future outline planning application(s).
- 1.9 A representative selection of viewpoints has been provided, however not all locations from where the site is likely to be visible have been assessed and no private land (other than the site) has been accessed during fieldwork. A viewpoint location plan is provided at Figure 1 and the photoview record sheets are provided in Appendix 1.

2. SITE DESCRIPTION

- 2.1 The Phase 1 Site totals approximately 20 hectares of low-lying agricultural land on the eastern edge of Melksham and to the south and southwest of Snarlton Farm. The site comprises seven fields defined by good quality hedgerows which frequently contain hedgerow trees. The site is bounded by Eastern Way to the west, which defines the eastern extremities of existing residential development of Melksham. A sports facility is located beyond the south western boundary, with Melksham Oak Community School beyond. Junction improvements are currently taking place to the southwest of the site to facilitate access to approved residential development to the south of Eastern Way.
- 2.2 The Phase 1 site is bisected on a northwest-southeast alignment by a narrow watercourse known as Clackers Brook. Two public footpaths, MELW22 and MELW23 extend to the southeast from Eastern Way and connect with the wider network of public rights of way (PRoW) to the east of the site.
- 2.3 The remaining land is generally low-lying and comprises agricultural land interspersed by small pockets of woodland cover.
- 2.4 With regard to the adjoining wider Local Plan Review Assessment Site 1, land to the north ascends towards Sandridge Hill, whilst land to the south exhibits' similar topography to the Phase 1 Site. Sandridge Solar Farm occupies a large and fairly prominent site immediately to the northeast of Site 1. Land to the south beyond Melksham Oak Community School is increasingly urbanised beyond the A365 towards the edge of Bowerhill.

3. DESIGNATIONS AND CONSIDERATIONS

- 3.1 Site 1 is not subject to any statutory or non-statutory landscape designations.
- 3.2 The Joint Melksham Neighbourhood Plan identifies the extent of residential planning approval to the west and to the south of Eastern Way during the current Wiltshire Core Strategy period (adopted in 2015).
- 3.3 The closest heritage assets to the site are identified as:
- Bowerhill Lodge Farmhouse (Grade II Listed), approximately 0.5km west;
 - A number of private residences on the north western edge of the A365 (Bath Road), (Grade II Listed) approximately 0.7km southwest;
 - Woolmere Farmhouse, (Grade II* Listed), approximately 0.8km southwest; and
 - Tanhouse Farmhouse, (Grade II Listed), approximately 1km east.
- 3.4 An assessment of the intervisibility between the heritage assets listed above and the Phase 1 site would form part of a full LVIA. However initial visual analysis has established likely limited visibility between the heritage assets listed above and the site under the control of Catesby Estates plc. due to intervening field boundary hedgerows and trees.
- 3.5 Wiltshire Council's Site Selection Report for Melksham did not identify effects on heritage assets as a constraint to development of the wider Site 1 area.
- 3.6 Land at Snarlton Farm and the wider land within Site 1 are located within the *Avon Open Clay Vale* Landscape Character Area. This character area covers the majority of Melksham and extends to the north, south and east and includes the Phase 1 Site and the wider Site 1 assessment area.

4. LANDSCAPE ANALYSIS

4.1 A full LVIA would be carried out as part of outline planning application(s). The section below summarises key views of the site from the preliminary site visit only.

Phase 1 (refer to accompanying photoview record sheets in Appendix 1)

4.2 The Phase 1 site has good connectivity to local residential distributor roads and the wider major road network. The site is bounded to the west by Eastern Way which provides a direct link to the A350, via the A365 to the south, whilst to the north Eastern Way links with the A3102. Vehicular access to the Phase 1 site could be easily facilitated from the existing roundabout to the west of the site at Eastern Way.

4.3 The Phase 1 site and its immediate contextual landscape are low lying. As represented in viewpoints 7 and 8 of the fields survey, fields are defined by good quality hedgerows containing hedgerow trees. Principal views of the site are from the two public footpaths within the boundary (MELW22 and MELW23); however views of the entire site are prevented by internal field boundary hedgerows. Principal external views are oblique and filtered through the fragmented hedgerow on the southern edge of public bridleway MELW41 to the east of Snarlton Farm. This is represented in viewpoint 4.

4.4 Views of the Phase 1 site from the north, south and east diminish with increasing distance due to the sequential screening effect of good quality field boundary hedgerows and hedgerow trees. The channel of Clackers Brook is frequently flanked with established native trees which additionally filters and fragments views of the site from the south. Views towards the site from Eastern Way beyond the western boundary and the existing residential development on the eastern edge of Melksham are generally prevented by roadside bunds and established hedgerows as represented in viewpoints 5 and 6.

4.5 The Phase 1 site is distantly and obliquely visible from the public rights of way on the ascending and higher ground towards Sandridge Hill including the A3102 and public bridleway MELW40 (viewpoints 1 and 2 respectively). However, the site appears within a panoramic view containing existing notable urbanising detracting elements including Sandridge Solar Farm to the south and Melksham to the southwest. Overhead powerlines and pylons are also considered detractors in the view.

4.6 Wiltshire Council's Site Selection Report for Melksham does not consider landscape a constraint to development within the Phase 1 Site and provides the site with a "green" landscape rating.

4.7 Part of the Phase 1 site is identified as Site 30 in the Melksham Neighbourhood Plan Site Assessment Report (September 2018). Site 30 is omitted for further consideration for development in this report due to a number of concerns including the impact upon landscape and townscape character.

4.8 However, it is considered that with appropriate embedded landscape mitigation measures in place, (refer to the landscape strategy section below), development of the Phase 1 site and the remaining land under the control of Catesby Estates plc. could be successfully assimilated into the wider landscape.

4.9 Development of the Phase 1 site individually could be justified in landscape terms should the wider site not be allocated.

Melksham Assessment Site 1

- 4.10 The wider Site 1, which includes the remaining land within Catesby's control, comprises numerous low-lying agricultural fields bounded by hedgerows. The site fits entirely within the existing field pattern and consequently, principal visibility of the Site 1 area is generally limited to oblique views from the higher land in the vicinity of Sandridge Hill. From the PRoW and the A3102 the site is viewed in the context of existing residential development on the eastern edge of Melksham and notable detractors including Sandridge Solar Farm, pylons and overhead powerlines.
- 4.11 Whilst a number of PRoW traverse the internal areas of Site 1, many of these respect field boundaries, limiting visibility to oblique view of parts of the site. Features including trees associated with Clackers Brook and good quality, dense hedgerows containing hedgerow trees prevent views of Site 1 from the south and the southeast.
- 4.12 It is assumed that full Landscape and Visual Impact Assessments would be carried out as part of application(s) for development of the wider Site 1 area and that these assessments would be used to inform a landscape strategy. Landscape enhancements including the provision of areas of native woodland, public open spaces and appropriate treatment of the eastern boundaries would contribute to assimilating development into its context with limited residual landscape and visual effects.

5. LANDSCAPE STRATEGY

Wider Landscape Strategy Principles

- 5.1 As shown in the Vision Framework prepared by Catesby Estates plc, development of the area identified as Site 1 in the Melksham Site Assessment Report would provide the opportunity for embedded landscape enhancement. This would include the extension of existing green linkages from the east of Melksham and the creation of native woodland and areas of public open space. The integration of green linkages into development would provide ecological and visual coherence, enhance biodiversity and nature conservation and would assist in fragmenting any perceived massing of built form from elevated views from the north and west from the landscape in the vicinity of Sandridge Hill. This strategy would be consistent with local landscape character objectives.
- 5.2 The Phase 1 Site concept masterplan contained within the Vision Framework shows development retained towards the northern and southern boundaries of the site, with extensive areas reserved as public open space, biodiversity enhancement and for formal/informal recreation. These areas would also provide the opportunity for landscape enhancement including native tree planting. An offset between the development area and the eastern boundary of the site is retained, which could be used for landscape enhancement and to screen views towards the site from the landscape to the east.

Recommended Phase 1 Site Landscape Strategy Principles

- 5.3 A summary of the landscape strategy principles for Phase 1 are provided below:
- Retain and enhance peripheral and internal hedgerows (where possible) to maintain ecological corridors and to screen and fragment views of the development from external areas;
 - Utilise the undevelopable flood zone associated with Clackers Brook for ecological and visual enhancement and to cohere with the wider implemented green infrastructure strategy within the existing residential development to the west of Eastern Way;
 - Integrate any diverted routes of public rights of way through green infrastructure to reduce an “urbanising” experience for recreational users;
 - Maintain an offset between the development area and the northern/north eastern site boundary to reduce views of development from the ascending land to the north and northwest and to contribute its assimilation into the wider landscape. This would also serve the purpose of screening the development from the undeveloped land to the east should the preferred route 10c or 10d of the Melksham bypass not come to fruition;
 - Introduce areas of native woodland and scrub on the southern boundary to provide a screening effect and to enhance biodiversity; and
 - Consider the orientation and density of residential units towards the northern and eastern boundaries of the site to reduce the perception of a “hard edge” of development adjacent to open, agricultural land.

Recommended Landscape Strategy Principles for the remaining Catesby Estates land

- 5.4 The remaining land under the control of Catesby Estates plc. extends to approximately 22 hectares and forms a contiguous area to the northeast of the Phase 1 Site. The remaining land comprises two complete fields and is bisected by bridleway MELW41. Recommendations are summarised below:

- Complement aural and visual containment of the proposed development with a native woodland corridor to the eastern edge. This would further enhance ecological connectivity and provide on-site green infrastructure;
- Provide a continuation of the green corridor associated with Clackers Brook from the Phase 1 Site;
- Retain and enhance internal hedgerows where possible and consider introducing an area of public open space to the east of Snarlton Farm, integrating public bridleway MELW41;
- Reinforce the existing hedge rows on the northern boundary of the site to assist in the assimilation of development into the wider landscape in distant, elevated views in the vicinity of Sandridge Hill.

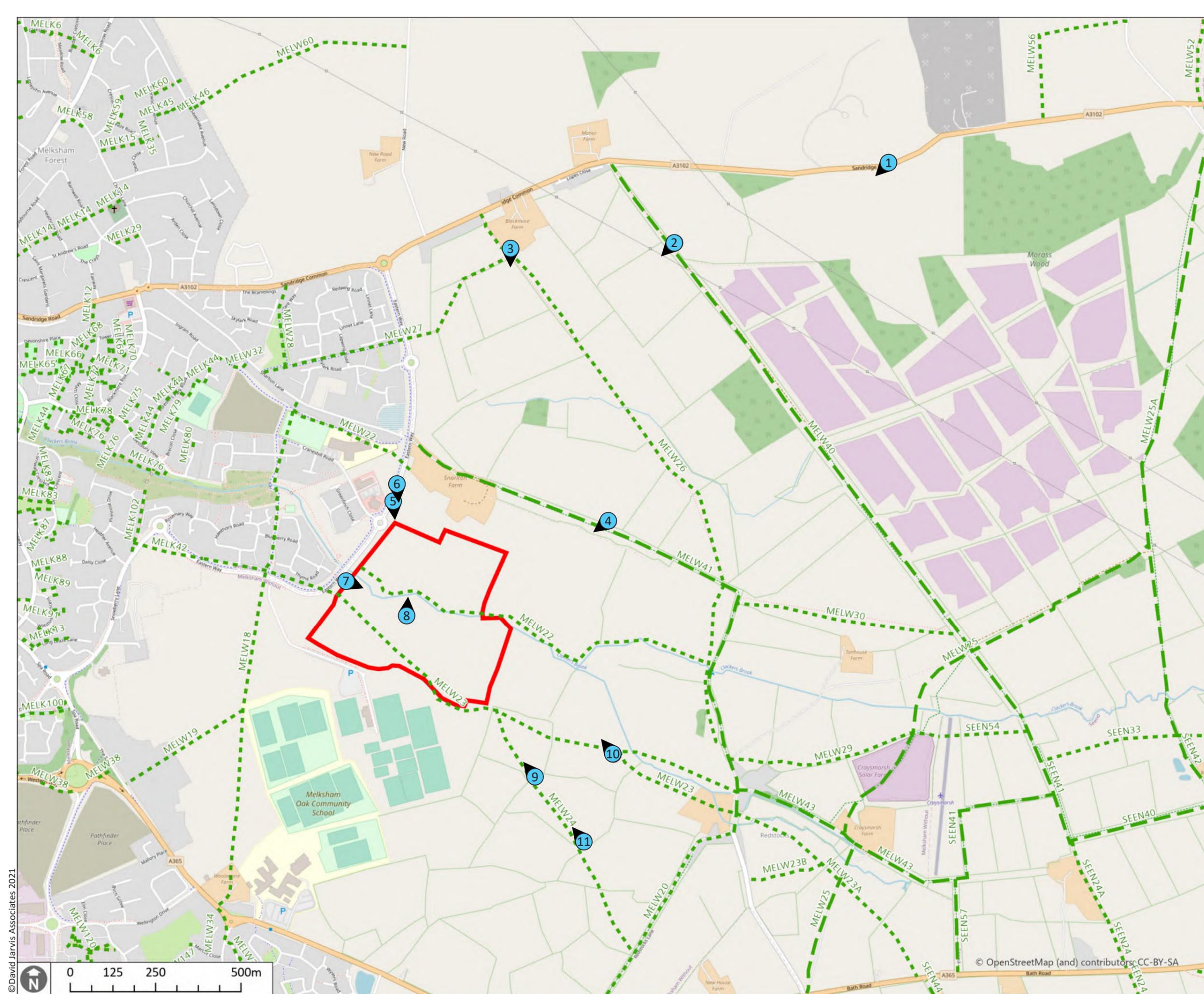
5.5 Wiltshire Council are in the early stages of consultation to establish a preferred route for the A350 Melksham bypass. Options 10c and 10d, shown in the Melksham Bypass Public Consultation document, would provide a “full bypass” for the town and would route the bypass through the land controlled by Catesby Estates plc. Potential connectivity to the development could be achieved from the east should the bypass be constructed on either of these routes.

Further recommendations

5.6 A full Landscape and Visual Impact Assessment should be produced to establish further views from a wider range of key receptors, including but not limited to, the south eastern edge of Melksham and listed buildings located to the northeast of the A365 (Bath Road). A LVIA would further provide detail on landscape policy and landscape character which would be used to inform detailed design principles for both the Phase 1 Site and the remaining land under the control of Catesby Estates plc.

6. CONCLUSION

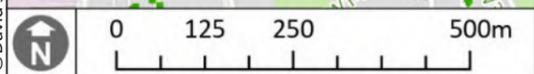
- 6.1 This report, prepared by DJA on behalf of Catesby Estates plc., provides a strategic landscape review of land under the control of Catesby Estates plc. located to the east of Eastern Way, Melksham.
- 6.2 The Phase 1 Site and the remaining land under the control of Catesby Estates plc, forms part of a wider parcel of land (Site 1) to the east of Melksham which has been identified as land suitable for further assessment for development in Wiltshire Council's Site Selection Report for Melksham document. The earlier Melksham Neighbourhood Plan omits the Phase 1 Site, in part, to landscape related concerns.
- 6.3 The Phase 1 Site, the remaining land under the control of Catesby Estates plc. and the wider Site 1 comprise low-lying agricultural farmland separated by hedgerows. Sandridge Solar Farm occupies a notable site on the north eastern edge of Site 1.
- 6.4 Options 10c and 10d of the Melksham bypass bisects both the wider land under the control of Catesby Estates plc. and the wider Site 1 area. This would provide potential connectivity to the development.
- 6.5 This report concludes that with the recommended embedded landscape mitigation measures in place, development of the Phase 1 Site, the adjacent remaining land under the control of Catesby Estates plc. and wider Site 1 area could be successfully assimilated into the wider landscape. Development to the east of Melksham also provides the opportunity for landscape, ecological and recreational enhancement including green corridors, native woodland planting and public open spaces.



KEY

- Boundary: Application Site
- Public Rights of Way
- Public Footpath
- Public Bridleway

| | | | |
|--|--------------|-------------|---------|
| Status | | | |
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| Client | | | |
| Catesby Estates PLC | | | |
| Project | | | |
| Land at Snarilton Farm, Melksham | | | |
| Drawing Title | | | |
| Viewpoint Location Plan and Public Rights of Way (PRoW) | | | |
| Scale | Sheet Size | Date | |
| 1:10,000 | A3 | Mar 2021 | |
| Client Ref. | Drawing Ref. | Drawing No. | Version |
| - | 2734-5-1 | DR-0001 | S0-P1 |



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Viewpoint 1 - View south/southwest from Sandridge Hill (A3102)



Viewpoint 2 - View south from public bridleway MELW40 to the southeast of Blackmore Farm



Viewpoint 1

Grid Reference: E: 393610, N: 164576
 Altitude AOD: 85.22m
 Distance to Site: 1585m

Date: 23/02/2021
 Time: 12:40

Viewpoint 2

Grid Reference: E: 392984, N: 164341
 Altitude AOD: 51.31m
 Distance to Site: 1018m

Date: 24/02/2021
 Time: 12:17

Project

SNARLTON FARM, MELKSHAM

Client

CATESBY ESTATES

Drawing Ref & Title

2734-5-1 APPENDIX 1

PHOTOGRAPHIC FIELD SURVEY RECORD

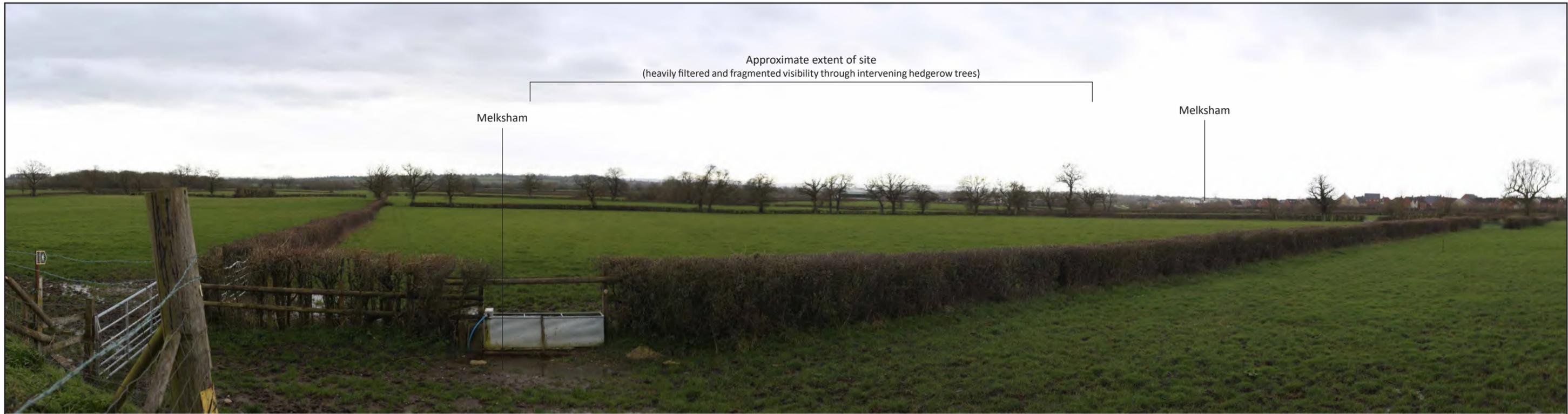
SHEET 1 OF 6

Date

FEB 2021

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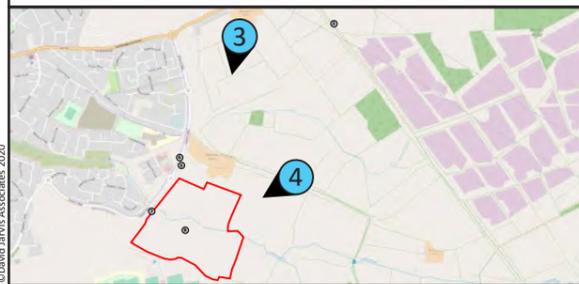
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Viewpoint 3 - View south from public footpath MELW26 to the south of Blackmore Farm



Viewpoint 4 - View south from public MELW41 to the east of Snarlton Farm



Viewpoint 3
 Grid Reference: E: 392504, N: 164322
 Altitude AOD: 40.96m
 Distance to Site: 831m
 Date: 25/02/2021
 Time: 12:29

Viewpoint 4
 Grid Reference: E: 392789, N: 163526
 Altitude AOD: 39.69m
 Distance to Site: 301m
 Date: 26/02/2021
 Time: 12:00

Project: **SNARLTON FARM, MELKSHAM**
 Client: **CATESBY ESTATES**
 Drawing Ref & Title: **2734-5-1 APPENDIX 1**
PHOTOGRAPHIC FIELD SURVEY RECORD
SHEET 2 OF 6
 Date: **FEB 2021**

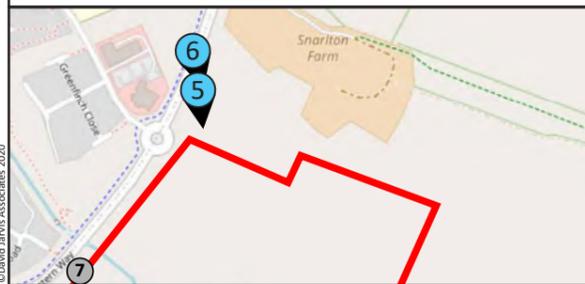
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Viewpoint 5 - View southeast from Thyme Road on the eastern extremities of Melksham



Viewpoint 6 - View from Thyme Road on the eastern extremities of Melksham



Viewpoint 5

Grid Reference: E: 392178, N: 163615
 Altitude AOD: 40.00m
 Distance to Site: 81m

Date: 27/02/2021
 Time: 12:20

Viewpoint 6

Grid Reference: E: 392168, N: 163634
 Altitude AOD: 40.00m
 Distance to Site: 100m

Date: 28/02/2021
 Time: 12:27

Project: **SNARLTON FARM, MELKSHAM**
 Client: **CATESBY ESTATES**
 Drawing Ref & Title: **2734-5-1 APPENDIX 1**
PHOTOGRAPHIC FIELD SURVEY RECORD
SHEET 3 OF 6
 Date: **FEB 2021**

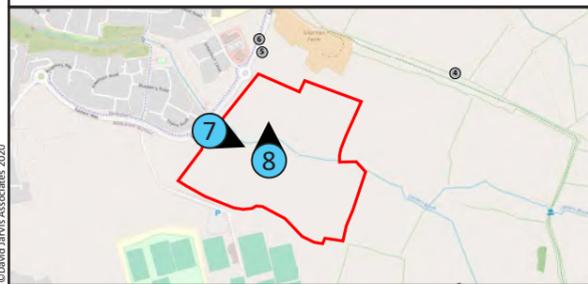
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Viewpoint 7 - View east from public footpath MELW23 on the south eastern edge of Thyme Road



Viewpoint 8 - View north from public footpath MELW23 to the east of Melksham



Viewpoint 7
 Grid Reference: E: 392021, N: 163350
 Altitude AOD: 40.00m
 Distance to Site: 4m
 Date: 01/03/2021
 Time: 12:45

Viewpoint 8
 Grid Reference: E: 392198, N: 163250
 Altitude AOD: 40.00m
 Distance to Site: 0m
 Date: 02/03/2021
 Time: 12:57

Project: **SNARLTON FARM, MELKSHAM**
 Client: **CATESBY ESTATES**
 Drawing Ref & Title: **2734-5-1 APPENDIX 1**
PHOTOGRAPHIC FIELD SURVEY RECORD
SHEET 4 OF 6
 Date: **FEB 2021**

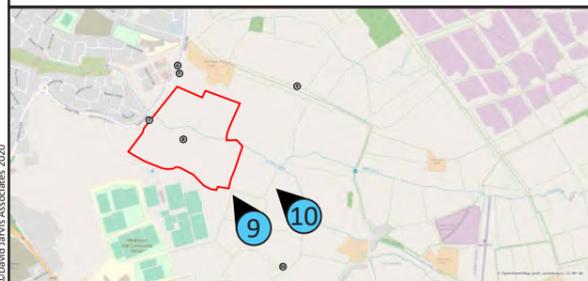
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Viewpoint 9 - View west from public footpaths MELW262 and MELW26 to the west of Tanhouse Farm



Viewpoint 10 - View north from public footpath MELW23 to the northwest of Redstocks



Viewpoint 9

Grid Reference: E: 392574, N: 162778
 Altitude AOD: 31.43m
 Distance to Site: 264m

Date: 03/03/2021
 Time: 10:57

Viewpoint 10

Grid Reference: E: 392796, N: 162843
 Altitude AOD: 13.12m
 Distance to Site: 391m

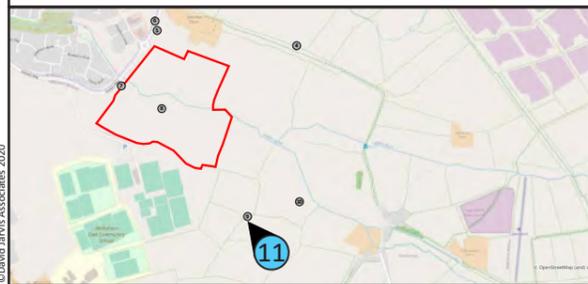
Date: 04/03/2021
 Time: 10:50

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PHOTOGRAPHIC FIELD SURVEY RECORD
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 Date: **FEB 2021**

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Viewpoint 11 - View northwest from public footpath MELW24 to the northwest of New House Farm



Viewpoint 11
 Grid Reference: E: 392710, N: 162589
 Altitude AOD: 41.00m
 Distance to Site: 496m
 Date: 05/03/2021
 Time: 11:05

Project: **SNARLTON FARM, MELKSHAM**
 Client: **CATESBY ESTATES**
 Drawing Ref & Title: **2734-5-1 APPENDIX 1**
PHOTOGRAPHIC FIELD SURVEY RECORD
 SHEET 6 OF 6
 Date: **FEB 2021**

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Our ref: C0012795

9 March 2021

Dear Sir / Madam

LOCAL PLAN REVIEW (REGULATION 18) CONSULTATION (JANUARY – MARCH 2021 – REPRESENTATIONS ON BEHALF OF ATWELL WILSON MOTOR MUSEUM, CALNE

We write on behalf of our client, the Trustees of the Atwell Wilson Museum, Calne, in response to the Wiltshire Local Plan Review (LPR) 'Issues and Options' (Regulation 18) consultation.

The Atwell Wilson Motor Museum was founded in Calne in 1981 by Richard and Hasell Atwell and is home to a permanent collection of vehicles from the 1920's onwards. The Museum also hosts a collection of vehicles on special loan which enables a variety of exhibitions to be held periodically to encourage regular visitors. The site has not previously been promoted through the adopted Development Plan.

As illustrated on the attached **red line plan**, the Trustees own approximately 45.2 acres / 18.3 hectares of land to the south of Calne which provides the opportunity for residential development and a relocation and / or modernisation of the museum to create a sustainable mixed use development outside the flood plain to help Calne address the housing shortfall, in addition to creating employment opportunities, a tourist attraction and community benefits. Active travel routes will be created throughout the site linking to the facilities in the town and the surrounding green and blue infrastructure will be enhanced and augmented providing biodiversity net gain.

This representation comments on the Local Plan Review Consultation Documents, namely:-

- Emerging Spatial Strategy
- Planning for Calne

Additionally, we provide comment on the following supporting documents:-

- Local Housing Needs Assessment - Swindon Borough Council and Wiltshire Council (Opinion Research Services April 2019)
- Local Plan Review Interim Sustainability Appraisal – January 2021
- Chippenham HMA: Formulating Alternative Development Strategies
- Employment Land Review – Hardisty Jones April 2018
- Level 1 Strategic Flood Risk Assessment – JBA Consulting May 2019

The representation is structured in the following sections:

1. Wiltshire LPR Consultation Documents
2. Supporting Evidence Documents
3. Land at The Atwell Wilson Motor Museum, Calne

1. The Emerging Spatial Strategy:

We are supportive of Wiltshire's preparation of a Local Plan Review and alongside it, the identification of key issues and aspirations for the County. However, we are concerned that the review is being undertaken in a piecemeal way which is not embracing the opportunity to review the adopted Development Plan as a whole, including the Chippenham Site Allocations Plan (CSAP) and the Site Allocations Development Plan Document (SADPD). We consider that, due to the proposed extent of the Local Plan Review, the other adopted documents in the Development Plan will be considerably changed and that by the time the plan is adopted, the CSAP will be at least six years old and that the SADPD will be nearing the end of its life. For efficiency (in both resources and cost) and simplicity's sake, we suggest that it would be more prudent to assess the functionality of the Development Plan as a whole and review it in its entirety now.

Whilst we generally concur with the Council's initial considerations in relation to the Spatial Strategy (paragraphs 2.4 – 2.13) we consider that sites, especially large scale sites, can be developed to be sustainable by including mixed use development, employment, community benefits and improved public transport along with green and blue infrastructure to encourage active travel. The development of sites in smaller scale settlements can actually improve their sustainability through the introduction of small scale employment, retail and enhanced community benefits whilst increasing footfall to the existing centre. We therefore respectfully suggest that paragraph 2.7 should refer to the opportunity to improve sustainability through development.

The impact of Covid-19 has certainly changed the way we live and work and this does provide the opportunity for the reconsideration of spatial planning. Settlements, and particularly smaller scale settlements, should be encouraged to embrace this change to limit out commuting further by making provision for community work hubs and meeting facilities with fast broadband in smaller settlements.

Whilst brownfield sites play an important role in contributing to overall housing need, their contribution should be to compliment the strategic housing sites allocated in the Local Plan, rather than to be relied upon to meet the housing targets. It is unclear how the LPR's Brownfield Targets will limit the pressure of development on greenfield sites as it does not provide an incentive for these sites to come forward. Indeed, brownfield sites generally take longer to be redeveloped due to the time required for remediation and decontamination.

The Council's 2019 Brownfield Land Register demonstrates that only 3,613 dwellings are potentially available to come forward on previously developed sites with only 45% of the sites having achieved planning permission since the Government requirement to produce a Register. A target for brownfield sites in the LPR is unlikely to change the speed of these sites coming forward and we suggest that Neighbourhood Development Plans could be an appropriate platform to positively plan for bringing forward smaller scale brownfield sites to complement the Local Plan allocations.

Delivery Principles – Neighbourhood Planning

Whilst the Wiltshire community has to a large extent embraced Neighbourhood Planning, there are still parishes that have not sought to produce a Neighbourhood Plan. Consequently, there is concern that the LPR's reliance on sites being identified and coming forward through this mechanism to address the recognised need is aspirational. Therefore, it is considered that it is the responsibility of Wiltshire Council through the LPR to allocate sites outside of the principal Settlements and Market Towns where Neighbourhood Plans are not being produced, or where Neighbourhood Plans do not allocate sites for residential development to meet their recognised local housing need.

Additionally, we do not consider the need to phase the construction of Greenfield sites as, logistically, large sites do not come forward in one lump due to the nature of construction. Indeed, due to Covid restrictions on construction sites, the building out of sites has decelerated due to socially distanced working requirements. By putting the brakes on large consented schemes, that have undoubtedly had many years of promotion and planning, only seeks to delay deliverability and constrain the market resulting in increased property prices. Such interference is unhelpful.

Delivery Principles – Brownfield Target

Whilst it is laudable for the Council to place emphasis on the development of previously developed land these should be complimentary to the strategic sites allocated in the Development Plan which provide more certainty in addressing the housing need. It is unclear as to why the proposed Brownfield Target only covers the ten year period 2021-2031 and not the plan period as it is possible that it may take a longer period for these sites to come forward. A situation that is unlikely to arise with greenfield sites. As is acknowledged at Para 3.9, large windfall sites are more infrequent and much harder to predict therefore, to ensure the certainty of housing delivery, caution should be given to a brownfield target and an over reliance on previously developed sites coming forward.

Paragraph 11 of Appendix One: The Role and Function of Brownfield Targets states that *'a large pool of brownfield sites will reduce requirements for new greenfield land to be identified'* however, as evidenced by the Brownfield Register, just because a brownfield site has been identified, it does not necessarily correlate that the site is deliverable and will be developed. For brownfield sites to be added to the supply of deliverable land for housing, *"the site should be available now, offer a suitable location for development now and be achievable with a realistic prospect that housing will be delivered on the site within five years"* NPPF definition of deliverable.

Additionally, there is concern in relation to the Brownfield Target calculation limiting permissions to sites within a certain range of units depending on the settlement's status in the Settlement Hierarchy (Para 15 Appendix One) as this is contrary to positive, aspirational planning and the presumption in favour of sustainable development as contained in the NPPF. Also, as the calculation is based upon previous permissions, there is an assumption that similar previously developed sites are available within the settlement which is a flawed assumption to make, especially when considered against the number of sites currently on the brownfield register and the expectations contained in the table at Para 17 Appendix One.

Housing Numbers

The NPPF (2019) sets out that the Standard Method for calculating Local Housing Need (LHN) should be used to identify a *minimum* annual housing need figure (paragraph 60), and PPG guidance reiterates that the Standard Method does not provide a housing requirement figure in itself (paragraph: 002 Reference ID: 2a-002-20190220). It is therefore clear that the calculation of LHN is a starting point in identifying the number of homes that must be planned for through the Wiltshire LPR. In this instance, the Standard Method generates a minimum housing need of 40,840 dwellings over the 20 year Local Plan period (2016-2036).

Whilst the Standard Method takes into account projected household growth, the LHN Assessment (April 2019) undertaken for Swindon Borough Council and Wiltshire Council takes into account longer term migration trends and employment growth amongst other factors. The Assessment concludes that to ensure that there will be sufficient resident workers to align with the job growth identified by the 2017 EDNA forecast, it would be necessary consider increasing the minimum LHN by up to 5,700 dwellings with most of this increase (at least 85%) being in Wiltshire. This takes the housing calculation to 45,630 dwellings in Wiltshire over the Plan period.

The PPG makes clear that the Standard Method calculation does not predict the impact that future government policies, changing economic circumstances or other factors might have on demographic

behaviour and that therefore, there will be circumstances where it is appropriate to consider whether actual housing need is higher than the standard method indicates (paragraph: 010 Reference ID: 2a-010-20201216). The Emerging Spatial Strategy is therefore supported insofar as it recognises the need to plan for a higher figure than the LHN and moreover, that the alternative development strategies for each of the Housing Market Areas (HMAs) should be based on the higher end of the range (45,630 homes).

Chippenham Housing Market Area (HMA)

We support the findings of the interim sustainability appraisal that the Chippenham Expanded Community option performs the best in sustainability terms however, we are concerned that due to the funding of the Future Chippenham road scheme and Melksham bypass (which will encourage additional vehicle trips) the Melksham focus is the preferred option. Paragraph 3.34 acknowledges that the increased level of housing need is translated directly into an increase in housing requirements at rural settlements however, there is concern that the result is a scale of growth equivalent to past rates of housing development which is not reflective of the ever growing housing need and affordability gap.

Whilst it is acknowledged that Calne has seen a recent increase in new homes in the town, redevelopment of the Atwell Wilson Motor Museum provides an opportunity for employment, community, residential and tourism development to redress the balance and create greater settlement self-containment.

We consider that there is a policy disconnect in relation to the Future Chippenham road consultation and the LPR consultation. Whilst the Future Chippenham consultation closes on the 12th March, it is somewhat surprising that the LPR makes limited, if any, mention of this proposal. It is considered that, due to the Government grant of £75million to deliver the road scheme, the future direction of growth for Chippenham has already been decided.

Planning for Calne

In answer to “*What do you think to this scale of growth?*”, it is acknowledged and welcomed that the dwelling requirement for Calne is proposed to increase however, we consider that this level of growth still does not go far enough to meet the identified local need for the area and enable employment growth.

Whilst we have doubts in relation to what the brownfield target is likely to achieve, we note in “The Planning for Calne” consultation document that the Council is suggesting that a target of 60 dwellings should be built on brownfield sites in Calne over the next 10 years. The redevelopment of the Atwell Wilson Motor Museum site, which lies within the settlement boundary, could go some way to meeting this target and delivering some of the 360 dwellings identified to meet the assessed need for the town. However, to facilitate the relocation and expansion of the museum into a state of the art community facility, we consider that additional residential development will be required to enable the relocation and assist in employment opportunities to be delivered.

In answer to the question CA2 in relation to the priorities for Calne, we agree with the consolidated approach to housing growth and the provision of new employment land, in addition to the promotion of sustainable transport and active travel. Indeed, the redevelopment of the existing Atwell Wilson Museum site, that is within the settlement boundary, accords with the priorities for the town. However, we note the absence of reference to the importance of visitor attractions to the footfall of the town and the revenue that arises from tourism. We therefore suggest that Calne’s priorities be extended to include reference to retaining and enhancing visitor attractions, such as the Atwell Wilson Motor Museum, to help increase the town centre’s footfall.

In response to question CA3 in relation to the right pool of potential development sites, we consider that the opportunity afforded by the relocation of the Atwell Wilson Motor Museum and development of the land within and south of the settlement boundary out with the flood plain should also be explored. The museum site itself could go some way to meeting Calne’s brownfield target in addition to enabling the expansion and creation of a state-of-the art visitor attraction and community hub.

In answer to question CA4, we consider that there needs to be a mix of sites, on both brown and green fields, that can provide a range of dwelling types and tenures of both market and affordable dwellings to meet the identified local need.

As per our response to question CA2, we consider that the LPR should recognise the importance of visitor attractions to the local economy and the social benefits of community facilities to the residents. A new facility for the Atwell Wilson Motor Museum will create the opportunity for a modern educational and community environment that can be used by schools and community groups alike, creating a sense of place and pride for Calne. Sustainable and active travel routes can be created through the site, which currently does not benefit from the public right of way network, connecting the new museum and proposed residential development to the town centre. New publicly accessible green and blue infrastructure will be provided on the site linking into the existing networks and providing wider biodiversity enhancements.

2. Supporting Evidence Documents

Local Housing Needs Assessment (LHNA) - Swindon Borough Council and Wiltshire Council (Opinion Research Services April 2019)

It is considered that the LHNA is out of date as it is calculated on the basis that the strategic policies of the Core Strategy are not out of date. It is acknowledged that the minimum Local Housing Needs figure for Wiltshire in 2019/2020 is 2,042 dwellings per year which yields an overall minimum housing need for Wiltshire of 40,840 dwellings over the Local Plan period 2016 – 2036. The report concludes however that the evidence suggests that an additional 6,300 dwellings would have to be provided to enable sufficient workers to live in the combined area going forward (Para 4.26).

Local Plan Review Interim Sustainability Appraisal - January 2021

It is noted that the Interim Sustainability Appraisal (ISA) tests a range of local housing needs from 40,840 to 45,600 dwellings for the period 2016 to 2036. The Sustainability Appraisal assessment of the alternative development strategies for the HMAs concludes that there would be no adverse effects of such significance that would prevent the higher figures (of each alternative strategy) from being progressed. Moreover, it concludes that a higher figure level would be more robust when planning for the longer term and has a greater level of contribution to meeting national and local needs for more homes. We are therefore supportive of the LPR's approach in taking the higher level as a basis for developing the spatial strategy.

We support the view that Calne is considered less environmentally constrained than other market towns within the HMA (Page 26) albeit this is contrary to the assessment on page 7 under the Chippenham Strategy B (CH-B). Whilst there are concerns in relation to peak time congestion and air quality management in the town centre, we consider that development of the land at the Atwell Wilson Motor Museum will not exacerbate the existing situation through the inclusion of robust sustainable transport measures as part of the development proposals providing good access and reasonable walking and cycling opportunities to the town. The development of the site could provide in the region of 150 to 200 dwellings which will go some way to address the identified need of 360 additional dwellings to 2036.

Additionally, we support the key recommendation that an amended or additional strategy be explored for the Chippenham HMA which redistributes growth to the less environmentally constrained settlement of Calne. Increasing the level of housing development at Calne will not only meet identified needs but will provide infrastructure solutions to resolve traffic congestion and subsequent air quality issues.

We consequently support the recommendation in paragraph 4.6.3 (1) that an additional / amended development strategy that reduces proposed development levels around the more environmentally constrained settlements and that growth should be increased in the less environmentally constrained settlements of Calne and the rest of the HMA.

Chippenham HMA: Formulating Alternative Development Strategies

The challenges associated with increasing the housing delivery within the Chippenham HMA are noted (Para 78) as a substantial proportion of the land necessary to achieve higher rates of development has yet to be identified. Land at the Atwell Wilson Motor Museum could help meet that identified need for both residential and employment development as there is very little (2.7% Figure 6) additional employment land in the pipeline at Calne (Para 86). Indeed, owing to the development potential and availability of this site for a mix of uses, we disagree that the current strategy at Calne shouldn't be rolled forward and, as acknowledged at paragraph 100, that some additional employment land up to 2036 may still be required.

Employment Land Review – Hardisty Jones April 2018

Whilst the Employment Land Review (ELR) is a little dated and consequently doesn't consider the impact of the pandemic, the report confirms concerns in relation to employment within Calne having stagnated since 2009. The relocation and redevelopment of the Atwell Wilson Motor Museum will help contribute to employment generation.

Level 1 Strategic Flood Risk Assessment – JBA Consulting May 2019

Whilst it is acknowledged that Calne is subject to high groundwater flood risk, the development proposals for the Atwell Wilson Motor Museum are focussed on the areas not susceptible to flooding and could potentially provide the opportunity for drainage betterment to the surrounding area. Further technical studies will be undertaken in this regard as promotion of the site progresses.

3. The Atwell Wilson Motor Museum, Calne

Our client's land at the Atwell Wilson Motor Museum extends to circa 18.3 hectares / 45.2 acres on the southern side of Calne. As acknowledged in the adopted Core Strategy and the vision for Calne, Market Towns have the potential for significant development that will increase jobs and homes in order to help sustain and enhance their services and facilities and promote better levels of self containment and viable sustainable communities.

The Atwell Wilson Museum itself is situated within the settlement boundary, south of Stockley Lane, with the remainder of the land (as identified on the attached red line plan) extending south to Knights Marsh Farm and east to Upper Quemerford Mill and Lake View road, with Stockley Lane also forming the western boundary.

The site is bisected in a north south direction by an unnamed watercourse and the land, whilst generally flat, falls gently in the direction of the watercourse. The Grade II Listed Upper Provender Mill lies out with the eastern boundary of the site and the Grade II Listed building The Croft is situated to the north at Stockley Lane outside of the site. There are no public rights of way within the site neither are there any trees that are subject to a Preservation Order. The site is not designated greenbelt and is not within the North Wessex Downs AONB.

Whilst the museum has extended several times over the past decade, to enable it to continue to offer the facilities of a modern visitor attraction, and viably function as a museum facility, it wishes to relocate and expand to new facilities to the southern portion of the Trustees ownership in the vicinity of Knights Marsh Farm. The new facilities will be better able to host an expanded offering of specialist exhibitions in addition to providing an education facility equipped with community café, work hub and meeting rooms. A children's play park with picnic facilities could also be incorporated into the plans providing a new community benefit and wider visitor attraction for the town.

It is proposed that the land within the settlement boundary and that to the south, out with the flood plain, could be developed for circa 150 – 200 dwellings. Land to the east of the watercourse, out with the floodplain, could also be available for residential, employment or biodiversity net gain purposes subject to further technical investigation. It is considered that development in this vicinity, west of Lake View road, could provide betterment for the community in relation to the existing drainage issues in the area.

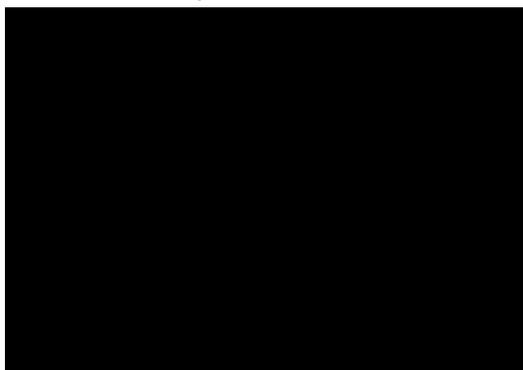
Indeed, development proposals will be informed by the Council's themes contained within the "Addressing Climate Change and Biodiversity Net Gain" paper by limiting development to Flood Zone 1; incorporating SUDs drainage solutions and natural flood management measures; enhancing and creating new green and blue infrastructure; providing a minimum of 10% biodiversity net gain to be managed in perpetuity; development will be designed to achieve a net zero carbon standard and will seek to minimise embodied carbon and environmental impacts; electric vehicle charge points will be provided both at the new museum facilities and in the residential development; and will be designed to encourage sustainable and active travel modes.

Summary

These representations demonstrate the opportunity for a relocation and modernisation of the Atwell Wilson Motor Museum which will create a sustainable mixed use development outside the flood plain to help Calne address the housing shortfall, in addition to creating employment opportunities, a tourist attraction and community benefits in a parkland setting. The site has the potential to become a natural extension to Calne which will increase the footfall in the town through the anticipated visitors.

We are pleased to have had the opportunity to comment on this stage of the Wiltshire Local Plan Review. We trust that the information provided assists the Council with its ongoing work as part of the LPR process. We look forward to further and continued dialogue with the Council regarding development options at the Atwell Wilson Motor Museum, Calne and would welcome the opportunity to meet with the Council to discuss our proposals in more detail. We look forward to arranging this meeting in due course.

Yours faithfully



PROJECT TITLE

**ATWELL-WILSON MUSEUM
CALNE, WILTSHIRE**

DRAWING TITLE

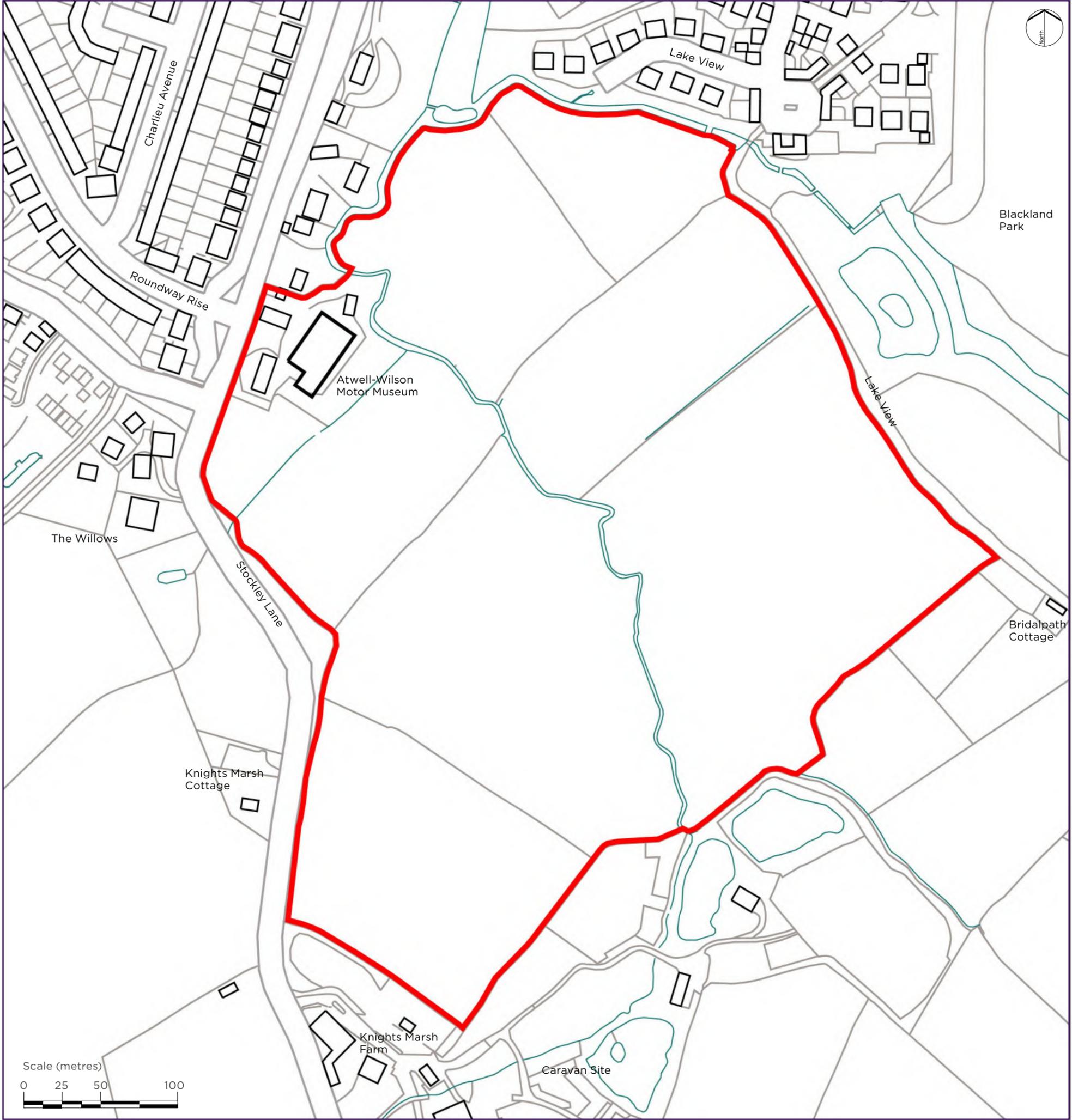
LOCATION PLAN

DWG. NO. P20_151_002

| REV. | DESCRIPTION | APP. DATE |
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LEGEND

 Site boundary

STRAT287

Our ref: SC/CP

9th March 2021

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Dear Sir or Madam,

Consultation on the Wiltshire Local Plan review

1. We are instructed by Charlton Park Estates to prepare and submit representations to the current consultation on the Wiltshire Local Plan review.

2. On Tuesday 1 December Wiltshire Council's Cabinet agreed the next steps for the Local Plan review, including undertaking a round of consultation to enable people to comment and help shape the content of the draft Wiltshire Local Plan Review, with the draft plan due to be completed towards the end of 2021. This round of consultation is built on earlier engagement with councillors, council partners and the public undertaken since 2017.

3. To inform the preparation of the Wiltshire Local Plan Review the Council has prepared documents that cover the following topics:

- How growth (additional new homes and employment land) is distributed around the county ('Emerging Spatial Strategy' paper)
- Levels of growth, potential locations for development and place shaping priorities for each of the county's main settlements (documented in a series of 'Planning for' papers for each Market Town and Principal Settlement)
- Improving the framework for rural communities to meet housing needs ('Empowering Rural Communities' paper)
- The opportunity to inform proposals about how the council's planning policies can be shaped to address climate change and biodiversity net gain ('Addressing Climate Change and Biodiversity Net Gain through the Local Plan - raising the ambition' paper)
- The consultation is supported by a set of supporting documents that have been prepared to inform the development of policy. These can be viewed via the 'Supporting documents' link.

4. These representations focus on the 'Emerging Spatial Strategy' paper and the 'Planning for Malmesbury' paper, with specific reference to the Malmesbury Site Selection Report.

Emerging Spatial Strategy

5. Malmesbury is identified as a market town and has the potential for significant development that will increase the number of jobs and homes to help sustain/enhance services and facilities and promote self-containment and

Contd.../

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sustainable communities. We support this statement and consider that Malmesbury will be key in helping to deliver new homes and employment land.

6. In the delivery principles it sets out that Each main settlement will have a set of 'place shaping priorities' to guide how and where development will take place and what distinct priorities there may be to manage change in the local environment. Furthermore, it sets out that The Council will allocate land for development through the Local Plan where it is necessary to do so. It will be necessary to do so to ensure the scale of the County's housing and employment needs are met and to ensure a supply of deliverable land.

7. As part of the process, it is noted that County has been divided up into four different Housing Market Areas (HMAs). Malmesbury is located within the Chippenham HMA, where the plan seeks to allocate between 17,000 and 21,000 houses over the plan period of 2016 – 2036, along with 9 hectares of employment land. This is the highest number of additional dwellings across all 4 HMAs (approximately 44% of the total housing requirement) and the second highest in terms of employment development).

8. The development strategy for Chippenham sets out that the level of environmental constraints at other main settlements within the HMA (Corsham, Devizes and Malmesbury) should lead to a smaller proportion of growth if possible in these areas with the central focus on Chippenham and Melksham. The most appropriate locations for growth in employment is focussed similarly on the less constrained settlements (Calne, Chippenham and Melksham) identified by sustainability appraisal. It is considered that Malmesbury also offers an opportunity for employment development in addition to the settlements identified.

9. Malmesbury's main employer is Dyson, which has a site on the edge of the town where it employs around 1,600 people. In addition, there are office for Persimmons Homes (Wessex). The strategy has identified that additional housing is to be proposed in Malmesbury and accordingly an appropriate increase in employment land in the Market Town should be considered to help support this growth. It is understood that with companies such as Dyson operating in Malmesbury there is a lot of in-commuting, with the work force travelling from neighbouring towns and villages. The provision of additional dwelling would help to balance this, encouraging more people to live and work in Malmesbury.

10. It is noted that in total the strategy proposes an additional 95 dwellings in Malmesbury over the plan period. This number seems minimal given that settlements considered to be similarly constrained, i.e. Corsham and Devizes, have been allocated more dwellings despite having already delivered a greater number of houses in the current plan period.

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11. Chippenham has been allocated the greatest number of additional houses over the plan period (45% of the total requirement). Melksham has been allocated a significant number of the requirement (19%) despite the fact that over the past 13 years it has delivered 1,365 dwellings. In order to meet the new requirement, 152 new dwellings would need to be provided in Melksham each year, having only previously achieved 105 dwellings per year between 2006 and 2019. It is therefore questioned whether these settlements can realistically deliver the required housing numbers over the plan period.

12. Furthermore, a large number of additional dwelling are proposed in the 'Rest of HMA' despite the strategy seeking to focus development within what it identifies as the Main Settlements. Accordingly, the plan will seek to deliver an additional 1,270 dwellings across the HMA in Local Service Centres, Large and Small Villages, whilst only having earmarked an additional 95 units in Malmesbury. It is noted that in the other HMAs a much more even split is proposed across the Main Settlements and a limited number of additional dwellings are proposed in the 'Rest of the HMA'.

13. It is questioned whether the level of development proposed in Chippenham and Melksham are achievable over the plan period and why so many dwellings are proposed in the 'Rest of HMA'. It is considered to Malmesbury provides an opportunity to provide an increase level of housing to help meet the requirement which would help to reduce the amount of in-commuting to town for employment.

Planning for Malmesbury

14. The 'Planning of Malmesbury' document sets out that given the modest scale of growth remaining to be planned for and the possibility to identify sites through a review of the neighbourhood plan, there may be no need to allocate further greenfield land. Furthermore, it sets out 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. However, it goes on to state that the Council cannot rely on the brownfield target being met by as yet unidentified windfall redevelopment, the scale or timing of which is uncertain.

15. Question MM1 in this document poses, "*What do you think to this scale of growth? Should there be a brownfield target? Should it be higher or lower?*". For the reasons set out above it is not considered that the scale of growth is appropriate and that additional housing and employment could be accommodated within the Malmesbury, reducing the reliance on Chippenham and Melksham, and less sustainable settlement in the HMA.

16. With respect to potential development site, the document sets out that land around much of Malmesbury is being promoted for development by landowners or prospective developers. From this larger amount of land, the Council is focussing its own assessment on a smaller pool of potential

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development sites. How these sites have been chosen is explained in a separate 'Site Selection Report', published alongside this document.

17. The document identifies that if Malmesbury is to expand, the next difficult question focuses on where and how the built-up area may need to extend to accommodate change. The pool of sites identified in the plan could be used to allocate sites in the Local Plan and that one or more sites in whole or part will be selected and the rest of the pool of the potential development sites will remain as they are – i.e. potentially available for consideration in any subsequent plan review.

18. The document identifies that the results of the current consultation might remove some sites, might restore others that were rejected or might even throw up new ones that have not so far been considered.

19. Accordingly, the document poses the following questions:

- MM3. Is this the right pool of potential development sites? Are there any other sites we should be considering?
- MM4. 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?
- MM5. Are there important social, economic or environmental factors you think we've missed that need to be considered, generally or in respect of individual site?

20. It is considered that as part of the site selection process, certain site were removed and that important social, economic or environmental factors were missed by the council in their consideration. This is considered below in more detail below when considering the Site Selection Report below.

21. Currently, the document identifies the following sites as potential options:

- **Site 1:** Whychurch Farm and Inglenook, Crudwell Road (SHELAA sites 649, 866217, 3432)
- **Site 2:** Land east of the A429/Crudwell Rd, Malmesbury (SHELAA site 3630)
- **Site 3:** Malmesbury Static Caravan and Camp Site (SHELAA site 1108)
- **Site 4:** Land adjacent Park Lane (SHELAA site 691)
- **Site 5:** Land West of Malmesbury and Land at Park Road (SHELAA sites 502 and 452)

Site Selection Report for Malmesbury

22. This document sets out the stages reached in the site selection process for the settlement and concludes by showing the reasonable alternative sites that could be appropriate for development around the built-up area of Malmesbury.

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The document explains how this set of potential development sites has been arrived at based on a range of evidence and objectives of the plan.

23. Figure 1 in the document shows the entire site selection process and it is understood that this document covers stages 1 and 2.

24. Stage 1 seeks to identify sites for assessment, excluding SHELAA sites from further consideration that constitute unsuitable land for development. The second stage assesses further those sites that have passed through Stage 1 and results in a set of reasonable alternatives for further assessment through sustainability appraisal.

25. The document includes a table that sets out that the judgements against each of the SHELAA sites, taking into account both the accessibility and wide impact considerations and strategic context described above.

26. Charlton Park Estates put forward two sites as part of this process, which were considered as part of the site selection (3630 and 3631) which were ultimately removed. The assessment of these sites as part of this process are considered in greater detail below.

3630 Land east of the A429/Crudwell Rd, Malmesbury

27. This site scored well in terms of Flood Risk, Heritage and Landscape, but was excluded on the basis of accessibility and landscape. The overall judgement concluded that:

"Its accessibility to important destinations in the town is below the average of available sites as a result. Existing character is dispersed homes and isolated non-residential uses. A significant scale of development would be a significant change. Most importantly development would represent a coalescence with the hamlet of Milbourne that so far retains its own separate identity. Largely, for this last reason the site is rejected."

28. In terms of accessibility, site 3630 is located approximately 1.4 kilometres northeast of Malmesbury Town Centre and approximately 500m north of the village of Milbourne. The site is bounded to the north by Malmesbury Garden Centre, to the east by agricultural land, to the south by the B4040 Charlton Road and to the west by an agricultural field and the A429 Crudwell Road beyond that. Notably a planning application (Ref: 18/06980/FUL) for the redevelopment of Malmesbury Garden Centre to provide a 1,782sqm A1 Foodstore (Aldi) together with a replacement garden centre and B1/B2/B8 employment uses. It is considered that the residential led redevelopment of the site would help enhance pedestrian and cycle connections between Milbourne village and the proposed garden centre redevelopment which would help to enhance the sustainable credentials of the village.

29. The nearest bus stops to the site are located on the B4040 to the south of the site within 50m. The stops are currently served by the 31/93 bus services

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which provide connections between Malmesbury and Swindon via Wootton Bassett as well as services to Cirencester. A number of public rights of way (PRoW) provide connections to Gloucester Road, Lovers Lane, Old Station Mews and Reeds Farm Road. In addition to this an intermittent footway is provided on the B4040 in to Malmesbury and on the A429 and B4014 providing connections to northern Malmesbury.

30. Other sites are similarly well removed from the town centre with lower levels of accessibility and with no alternative facilities in close proximity, which have still been taken forward, namely sites 691 and 502.

31. A key part of any local plan allocation will be outlining how the site could be made into a sustainable location and improve the sustainability of the town/village overall. Notably, one of the key ways of retaining existing local amenities and ensuring their longevity and viability is through additional population as a result of additional housing. Furthermore, additional housing will help support local services, schools and will result in increased public transport patronage which will help to maintain the viability and sustainability of the town (Malmesbury)/village (Milbourne).

32. With respect to the potential landscape impact, the development to the north and existing garage to the west provided the context for the site. It is noted that the Council consider that the development of this site would represent a coalescence with the hamlet of Milbourn; however, the site is on the other side of Charlton Road to Milbourne, the heart of which is located over 500m to the south. Therefore, it is considered that the site would do little to change the relationship between Milbourne and Malmesbury. It should also be noted that immediately to the west of Malmesbury is the Cotswold AONB which is considered to be of much higher landscape value than the land to the west of Malmesbury. It is noted that a number sites have been assessed as having less landscape harm than this site, despite being immediately adjacent to the AONB, again site 691 and 502.

33. In order to properly assess these impacts, which are the only reasons that this site was excluded, detailed highways and landscape assessments of this site have been commissioned and will be provided to the Council as part of the Local Plan Review.

3631 Land north of the B4014/Tetbury Road

34. This site scored well in terms of Flood Risk, Heritage and Landscape, but was excluded on the basis of accessibility and landscape. The overall judgement concluded that:

"Its accessibility to important destinations in the town is below the average of available sites as a result. Existing development in the area takes the form of sporadic development along the B4014 without development rising up the slope. Significant development of the site would represent a marked change. This site is very exposed to views from the countryside to the north and east and an urban

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encroachment into the open countryside and significant harmful landscape impacts. Given its location the site has limited scope for development; a low density or frontage development at best. On this basis the site is rejected.”

35. Site 3631 is located approximately 1.8km north of Malmesbury Town Centre and in close proximity to Dyson. It is bordered to the north and east by agricultural land, to the south and west by the B4014. The nearest bus stops to the site are located on Tetbury Hill within 240m of the site. These are served by the 30, 31 41 and 93 bus services which provide connections to Malmesbury, Swindon and Cirencester.

36. The site is located on the opposite side of the road to the Dyson site and in close proximity to Malmesbury’s principle employment area. As part of the development of this site it is anticipated that a pedestrian crossing and footpath connection could be provided along the B4014 to enhance the connectivity to the town, not only for this site but for surrounding development as well.

37. In terms of the landscape impact, again this site is located away from the west of Malmesbury and the Cotswold AONB, and therefore other site which have been taken forward in the site selection process are considered to result in a greater level of landscape harm.

38. In order to properly assess these impacts, which are the only reasons that this site was excluded, detailed highways and landscape assessments of this site have been commissioned and will be provided to the Council as part of the Local Plan Review.

39. On the basis of what is set out above, and returning to the questions posed in the Planning for Malmesbury document, it is considered that this is not the right pool of potential development sites and that site 3630 and 3631 should be included in the assessment going forward, either in addition to other identified site or in the place of site 691 and 502.

40. It is considered that site 3630 would lend itself to residential led development, which would help enhance pedestrian and cycle connections between Milbourne village and the proposed garden centre redevelopment which would help to enhance the sustainable credentials of the village. Additional housing will help support local services, schools and will result in increased public transport patronage which will help to maintain the viability and sustainability of the town (Malmesbury)/village (Milbourne).

41. Site 3631 would lend itself to employment led development, which would help support the established principle employment area and the nearby Dyson site. The development of the would help to improve the sustainability and accessibility of this part of the town.

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42. Overall it is considered that important social, economic or environmental factors have been missed by the Council that need to be considered in respect of these individual sites.

Summary of Representations

43. We are instructed by Charlton Park Estates to prepare and submit representations to the current consultation on the Wiltshire Local Plan review.

44. Malmesbury is identified as a market town, and has the potential for significant development that will increase the number of jobs and homes to help sustain/enhance services and facilities and promote self-containment and sustainable communities.

45. The strategy proposes only 95 additional dwellings in Malmesbury over the plan period. It is questioned whether the level of development proposed in Chippenham and Melksham are achievable over the plan period and why so many dwellings are proposed in the 'Rest of HMA'. It is considered to Malmesbury provides an opportunity to provide an increase level of housing to help meet the requirement.

46. For the reasons set out in these representations it is not considered that the scale of growth is appropriate and that additional housing and employment could be accommodated within the Malmesbury, reducing the reliance on Chippenham and Melksham, and less sustainable settlement in the HMA.

47. Turning to the specific proposal for Malmesbury, it is considered that site 3630 should not have been excluded in the site selection process as its development for residential use would help enhance pedestrian and cycle connections between Milbourne village and the proposed garden centre redevelopment which would help to enhance the sustainable credentials of the village. Furthermore, site 3631 should similarly have not been excluded as its employment led development would help support the established principle employment area and the nearby Dyson site, improving the sustainability and accessibility of this part of the town.

48. Overall it is considered that important social, economic or environmental factors have been missed by the Council that need to be considered in respect of these individual sites and should be included in the assessment going forward, either in addition to other identified site or in the place of site 691 and 502 which are considered to be less accessible and would likely have a greater impact upon the landscape character of the western edge of Malmesbury, which adjoins the AONB.

49. We intend to provide further detailed highways and landscape assessments of these sites and will be provided to the Council as part of the Local Plan Review in support of these arguments.

Wiltshire Council

9th March 2021

Consultation on the Wiltshire Local Plan Review Consultation Paper

50. We hope that these comments will be given due consideration as part of this consultation exercise.

Yours faithfully,

A solid black rectangular box used to redact the signature of the sender.

STRAT288

Representations to the Wiltshire Local Plan Review

Informal Regulation 18 Consultation

Made on behalf of L&Q Estates

1 March 2021

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Appendices

- Appendix 1 Assessing the Alternatives
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1.0 **Emerging Spatial Strategy**

Plan Date

The proposed plan period extends from 2016 to 2036 which is an approach inconsistent with the requirements of the National Planning Policy Framework [NPPF].

- 1.1 NPPF (paragraph 22), states that strategic policies should look ahead over a minimum 15-year period from adoption. According to the Council's Local Development Scheme (published July 2020), the target adoption date for the Local Plan is 2023. This would therefore only provide 13 years between adoption and the expiration of the plan. As such, the end of the plan period must be extended to at least 2038 as a minimum to meet the requirements of NPPF. However, to mitigate against any slippage in the timetable, it is suggested that the plan period be extended to 2040. Indeed, the current consultation on draft revisions to the NPPF (closes 27 March 2021), suggests at paragraph 22 that where larger-scale developments form part of the strategy for the area, policies should be set within a vision that looks further ahead (at least 30 years), to take into account the likely timescale for delivery.
- 1.2 It is also not considered that there is a specific justification for why 2016 has been used as a base date and concern is raised that to do so is unnecessarily suppressing the housing requirement, with the Council apparently justifying no / lesser allocations in certain settlements due to development delivered since 2016 and other committed development. It is therefore requested that the plan period be amended to 2020 – 2040.
- 1.3 As drafted, it is considered that the current plan period is unsound as a result of it being unjustified, not positively prepared and inconsistent with national planning policy.

Housing Requirement

- 1.4 Council forecasts predict Wiltshire will need between 40,840 and 45,630 new homes over the plan period of 2016 to 2036. The standard method has been used to calculate the minimum figure of 40,840 homes, while a Local Housing Needs Assessment has been used to calculate the higher figure (as a result of considering longer term migration and economic forecasts).
- 1.5 Wiltshire Council is correct to factor economic and demographic trends into the housing requirement and a figure of at least 45,630 units is required which must be expressed as a minimum figure.
- 1.6 However, as set out in representations by the HBF, the proposed housing requirement of 2,282 dwellings per annum is only 182 dwellings per annum above the adopted housing requirement of 2,100 dwellings per annum. Whilst the proposed housing requirement is greater than the minimum Local Housing Need (LHN) figure of 2,042 dwellings per annum, it is below previous completion figures identified in the 2020 Housing Delivery Test (completions of 2,406 dwellings in 2017/18, 2,766 dwellings in 2018/19 and 2,548 dwellings in 2019/20), which exceed the minimum LHN (2,042 dwellings per annum) as well as both adopted (2,100 dwellings per annum) and proposed (2,282 dwellings per annum) housing requirements. As such, the proposed housing requirement is nothing more than a "business as usual" scenario rather than a significant boost to the supply of homes.
- 1.7 The Government's objective of significantly boosting the supply of homes set out in the 2019 NPPF remains paramount (para 59) and the Government is committed to ensuring that more homes are built and supports ambitious Councils wanting to plan for growth (National Planning Policy Guidance [NPPG], ID 2a-010-20190220). As such, in line with comments made by the

HBF, L&Q Estates believe that the Council should be must more ambitious in terms of housing requirement.

1.8 As also stated above, it is considered that the Plan period should be amended to 2020 – 2040, with the housing requirement amended accordingly.

1.9 NPPG also sets out that the LHN is calculated at the start of the plan-making process but this number should be kept under review and when appropriate revised until the Local Plan is submitted for examination (NPPG, ID 2a-008-20190220). The minimum LHN for the Wiltshire may change as inputs are variable, which should be borne in mind by the Council.

Residual Requirement

1.10 Paragraphs 3.15-3.16 sets out that the Council has determined the housing requirement for each Housing Market Area [HMA] / settlement over the period 2016-2036 and then calculated the residual requirement by deducting completions since 2016, planning permissions and other commitments (including land already allocated in current local and neighbourhood plans).

1.11 Whilst the principle of this is accepted, as stated above, it is considered that the plan period should be amended to 2020 – 2040 and thus completions in the period 2016-2019 should not be deducted.

Swindon HMA

Alternative Development Strategies

1.12 L&Q Estates is supportive of the spatial strategy for the Swindon HMA in terms of the pursuit of growth strategy Swindon B (SW-B) which seeks to focus growth at Royal Wootton Bassett as the most appropriate and sustainable location to meet the needs of the HMA.

1.13 It is noted that the Council raise concern regarding education and health capacity as a potential barrier, but as explored in our representations to the Planning for Royal Wootton Bassett document and the Site Selection Report, these are matters which can be easily mitigated through strategic planned growth. In addition, allocating growth to the north of the town would greatly limit the impact of traffic generation and journeys through the town.

Housing Distribution

1.14 Under the proposed spatial strategy, Royal Wootton Bassett will take circa 36% of the growth within this HMA which is a welcomed increase from growth allocated through the Core Strategy. Royal Wootton Bassett has a proven track record of delivery, having delivered over the Core Strategy housing requirement to 2026 seven years ahead of schedule. As such, there is clearly potential to increase the housing requirement within the town further given it is clearly a desirable place to live with a buoyant market and with excellent sustainable transport links to Swindon and other main towns.

1.15 Indeed, it is noted that the Planning for Royal Wootton Bassett document states that Royal Wootton Bassett Town Council would also support higher level of growth than what is currently proposed under the Local Plan Review, provided this enables delivery of capacity improvements to transport, education and health infrastructure, ideally by way of strategic development.

1.16 The Emerging Strategy also sets out a housing requirement of 1,255 for Royal Wootton Bassett. However, the table on Page 19 of the document states that due to completions since 2016 and other commitments, the residual requirement is reduced to only 990 dwellings.

- 1.17 This is explained further in the Planning for Royal Wootton Bassett document which sets out that 183 dwellings have been built between 2016-2019 and, at 1 April 2019, 82 dwellings already either had planning permission / resolution to grant planning permission. As set out above, it is considered that the plan period should be amended to 2020 – 2040 and thus completions in the period 2016-2019 should not be deducted. As such, the residual requirement for Royal Wootton Bassett should be increased accordingly.
- 1.18 From reviewing the Council’s most recent Housing Land Supply Statement (published December 2020), it states that the North & West HMA (including the main towns of Chippenham, Trowbridge and areas west of Swindon such as Royal Wootton Bassett) have a housing land supply of 4.29 years with a deficit of 980 homes.
- 1.19 It is noted that from the Spatial Strategy, the Council envisage that a large proportion of homes are to be delivered within the Chippenham, Trowbridge and Salisbury HMA’s (93% of the overall housing requirement). Given the lack of 5-year housing land supply within the previously defined North & West HMA, this suggests that areas within the Swindon HMA should take more growth in the future. It is therefore considered that the Council should look at allocating sites within Royal Wootton Bassett capable of delivering over and above the 990 unit requirement as a method of securing this growth and ensuring a rolling 5 year housing land supply.

Brownfield Target

- 1.20 We note that the Council has provided brownfield housing targets over the period of 2021 and 2031 and for Royal Wootton Bassett this is 70 units (7/annum). This allowance does not appear to be unreasonable and it is welcomed that this figure has not been deducted from the residual requirement for the town. As such, this is approach supported.

2.0 **Planning for Royal Wootton Bassett**

WB1. What do you think to this scale of growth? Should there be a brownfield target?

- 2.1 As stated in our representations to the Emerging Strategy document, the scale of growth within Royal Wootton Bassett is broadly supported, as is the brownfield target.
- 2.1 However, it is noted that Royal Wootton Bassett is one of the few towns within Wiltshire to have already met its Core Strategy growth target and has thus proven that it is a buoyant housing market and a desirable place to live particularly given the excellent sustainable transport links to Swindon and other main towns. It is clearly a sustainable location for greater growth.
- 2.2 As such, it is considered that there is scope to boost the housing requirement within the town and importantly, this would also be supported by the Royal Wootton Bassett Town Council provided the development is strategic enough in nature to deliver the infrastructure improvements needed by the town.
- 2.3 These representations therefore demonstrate how land within L&Q Estates' control to the north of the town can be brought forward for residential-led mixed use development, aligning with the aspirations of both the Town Council and Wiltshire Council. Further, as clearly demonstrated in Table 3.2 below, when ranking L&Q's site against the alternatives, it is clearly the most sustainable and suitable option for development within the town.

WB2. Are these the right priorities? What priorities may be missing? How might these place shaping priorities be achieved?

- 2.4 L&Q Estates is broadly supportive of the stated priorities, with comments as follows:

Priority i - Protecting the distinct character and identity of the town, recognising its proximity to Swindon.

- 2.5 Royal Wootton Bassett is a distinct settlement with an identifiable and distinct character which should be respected as far as possible through additional development. As demonstrated in Appendix 1 of this report, few development sites are capable of truly respecting the hilltop nature of the town. However, at L&Q's site, as demonstrated in the promotional document at Appendix 2, the built form will be positioned on the higher area of the site, contiguous with the existing settlement, with new areas of woodland to be planted within green open space located on the gently sloping hillside to the north-east, and the original historic character of a *'hilltop settlement within the woods'* being reinstated.
- 2.6 It is further considered that coalescence with Swindon should be avoided and this is a key concern of the local community. L&Q's site would not contribute to coalescence with Swindon as development would not extend any further east than the existing settlement. It would also provide a large buffer of parkland to the north maintaining significant separation to the M4 and Hook.
- 2.7 Royal Wootton Bassett has an important functional relationship with Swindon given its proximity and this opportunity needs to be fully embraced through the spatial strategy. There is a real opportunity to provide excellent connectivity through cycling to the southern employment areas of Swindon (e.g. Windmill Business Park). In addition, the 55 bus service already provides half hourly services to Swindon and Chippenham, with potential to improve bus services further between the towns.

Priority ii - Maintaining capacity at M4 Junction 16 throughout the Plan period

- 2.8 It is understood that traffic modelling is being undertaken to understand the capacity of Junction 16 and the requirement for future mitigation. If mitigation is required which would be funded in part through developer contributions, it will be important that site allocations are of a scale and critical mass capable of making such a contribution.
- 2.9 It should be noted that any site in Royal Wootton Bassett will generate a degree of residual traffic impact at Junction 16 and none offer alternative road routes that avoid this. As such, no location for development within the town will be superior in terms of impact on Junction 16.

Priority iii - Maximising the use and availability of sustainable modes of transport along with managing levels of congestion on strategic routes and in the town centre

- 2.10 The consultation documents raise concern regarding congestion within the town and the potential for new development to worsen this situation. As set out in Appendices 1 and 3, in terms of the assignment of traffic from site locations, those sites located to the north of Royal Wootton Bassett would put the least proportion of traffic through the town centre and sites located to the south and west will put the most strain on the town centre.
- 2.11 Sites to the south of the town in particular have to contend with both the physical barrier of the railway where there are several 'pinch points' restricting flow as well as capacity of the High Street to accommodate a significant increase in flows. Accommodating additional growth in this location will have significant traffic implications for the whole town.
- 2.12 Conversely, sites located to the north of the town provide the greatest opportunity for sustainable travel. L&Q's site is within easy walking distance of a number of services and facilities including education, health, retail, employment, leisure, bus services, the town centre and the SUSTRANS strategic cycle route providing access to Windmill Hill Business Park and wider Swindon.

Priority iv - Safeguarding land for a Swindon parkway station

- 2.13 There is no current commitment or agreement that a new railway station can be opened in Royal Wootton Bassett and certainly, it is not something which will come forward within this plan period. As set out in Appendix 3, with regards to a future railway station serving Royal Wotton Bassett, whilst it may remain a long term ambition for inclusion in future Plans, in terms of the selection of sites within the current plan period to 2036, other than safeguarding land for rail use, the location of development should not be informed or influenced by this requirement. Indeed, the selection of sites should be informed on their ability to make best use of sustainable travel connections to Swindon station as per the suggested transport strategy.

Priority v - Provision of additional employment to improve self-containment

- 2.14 While the ambition for increased self-sufficiency is supported, it must be recognised that the pull of Swindon is significant and therefore the focus should be on improving sustainable and active travel routes between the two settlements, with development in the north of the town best placed to facilitate this. The strategy will therefore need to provide an appropriate balance of employment growth at RWB (informed by what the market can sustain and deliver) and how the strategic opportunities at Swindon can be accessed to best effect from sustainably located development.
- 2.15 In addition, the impact of Covid-19 requires further consideration in terms of its likely legacy regarding working patterns. A Study by the Chartered Institute of Personnel and Development

(CIPD) in September 2020 found that the relative success of homeworking overall points to more working from home in future, with 70% of employers saying they will expand or introduce working at home on a regular basis compared with 45% before the crisis. The survey found that, on average, employers estimated that before lockdown started, about 18% of their staff worked from home regularly (at least once a week) and 9% worked from home all the time. Looking ahead beyond the crisis they expect these numbers to double to 36% and 18%, respectively.

2.16 Increased numbers of people working from home may also change the nature of office requirements, with employers looking for smaller, more flexible workspaces closer to where people live.

2.17 In response to this, as demonstrated in the promotional document (Appendix 2), L&Q's site is capable of delivering employment uses as part of a residential led mixed use development, with potential for a local hub area to include a new community/co-working centre to provide more modern, responsive and flexible working options.

Priority vi - Infrastructure improvements to promote and encourage non-car travel

2.18 This priority is supported and, in this regard, it is noted that sites located to the north of the town are best placed to promote sustainable travel both within the town and to neighbouring Swindon. Specifically, L&Q's site can achieve a direct connection to the Sustrans strategic cycle route (delivering a missing link of the route to the north of the town), providing access to the Windmill Hill Business Park and Swindon.

Priority vii - Increased primary education, GP and cemetery capacity

2.19 L&Q's site proposes a mix of uses, including community uses which could include for a health centre if required. Contributions could also be provided to education and cemetery provision as part of a strategic development.

Priority viii - Safeguarding the historic alignment of the Wilts and Berks Canal and taking forward canal restoration

2.20 No comments on this priority. L&Q's site is located some distance from the canal and will not impact it.

Priority ix - Conserving and enhancing environmental assets around Royal Wootton Bassett

2.21 The submitted promotional document (Appendix 2) demonstrates the ability to provide an attractive landscape-led scheme at L&Q's site, including significant areas of green and blue infrastructure.

Priority x - Maintaining the town's elevated historical setting and central conservation area

2.22 As demonstrated in Appendix 1 of this report, few development sites are capable of truly respecting the hilltop nature of the location. However, at L&Q's site, the built form will be positioned on the higher area of the site, contiguous with the existing settlement, with new areas of woodland planted within green open space located on the gently sloping hillside to the north-east, and the original historic character of a *'hilltop settlement within the woods'* being reinstated. Further details are provided in the promotional document at Appendix 2.

2.23 Conversely, other potential strategic sites particularly to the east of the town, are located on the lower land, which if developed would reduce the perception of the town's elevated setting and

this 'priority' in the future planning of the town requires significant consideration into the next stage of the plan preparation. The Council has not completed a full assessment of how potential site options respond to this priority at the current time and this should be undertaken.

WB3. Do you agree these sites are the most appropriate upon which to build? If not, why not?

- 2.24 L&Q Estates broadly support the pool of potential development sites selected and welcome the inclusion of site 3366 / Site 2.
- 2.25 However, as considered further in representations to the Site Selection Report below, the boundary of Site 3366 / Site 2 is incorrect insofar as it relates to L&Q's land interest and requires amendment. Site 3366 'Land adjoining Midge Hall Farm', is included in the 2017 Strategic Housing and Employment Land Availability Assessment (SHELAA) and has thus been assessed within the Royal Wootton Bassett Site Selection Report (RWBSSR). However, it is not clear how the boundary of this site was identified given that it incorporates several different ownerships and appears arbitrary and illogical.
- 2.26 L&Q Estates control circa 24.3ha of this 51.2ha site, with a red line plan provided in the promotional document at Appendix 2. The remainder of the site falls within at least another two different ownerships, although the boundary of 3366 does not appear to logically follow these ownerships.
- 2.27 The main concern relating to the boundary is that it includes land which is more constrained and therefore due to the scoring system being applied by the Council, is artificially suppressing the suitability of L&Q's site for development. For example, L&Q's site does not abut the M4, does not wrap around a listed building, does not bring development closer to any other settlement and is wholly located within Flood Zone 1. As such, impacts relating to noise, landscape, coalescence, heritage and flood risk are all significantly overstated.
- 2.28 It is therefore imperative that the next stage of the plan review process distinguishes L&Q's site from this wider parcel. The point must be addressed in the next assessment undertaken and in the site scoring and comparative assessment.
- 2.29 We have undertaken the SA assessment for the land under the control of L&Q when considered in isolation and it performs well against all the criterion. Further detail is provided below and the promotional document (Appendix 2).

WB4. 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?

- 2.30 L&Q Estates considers that the site area provided at Appendix 2 is the most appropriate site in Royal Wootton Bassett on which to build. This site represents circa 50% of the site area of Site 2.
- 2.31 The merits of the site are discussed further below and in the accompanying promotional document (Appendix 2) which demonstrates the sustainability, suitability and deliverability of the site for a range of uses including housing, employment/community uses, open space (including allotments) and leisure.
- 2.32 The Promotional Document demonstrates that the site could sustainably deliver much needed market and affordable housing to support the economic growth of Royal Wootton Bassett (RWB) whilst responding to the local community's and Council's objectives. The site will also deliver land for potential employment/community use at Coped Hall, adjacent to Swindon Road and Hook Road roundabout, which would contribute towards improving the self-containment of

the town. Built form is focused on the higher areas to the south-west of the site, where development will maintain the town's elevated historical setting. The remainder of the site will deliver substantial areas of strategic parkland to the north-east, providing space for community and leisure activities and enhanced landscape planting. These open space areas will be connected through a series of green corridors that will extend through the site along existing Public Rights of Way (PRoW).

2.33 In summary, the proposals include:

- Circa 400 dwellings;
- Potential for commercial/employment uses;
- Potential for local hub area to include new community/co-working centre;
- Mix of housing types and tenure suitable for local needs;
- Opportunity for new skate park, play areas and allotments;
- New vehicular access junctions onto Hook Road and A3102;
- New bus route and traffic calming treatment along primary route to discourage 'rat running' between Hook Road and Swindon Road; and
- Extensive open space networks, including new woodland planting, green corridors, sustainable drainage features, ecological improvements and a network of new footpaths and cycleways.

2.34 The site has limited physical constraints and is able to accommodate development that reflects the existing settlement pattern and is in keeping with the town's elevated historical setting - protecting the distinct character and identity of the town. Substantial new areas of open space are created, reinstating historic local woodland characteristics and establishing a defensible green wedge between Royal Wootton Bassett and Swindon.

2.35 Development of the site would have a strong focus on promoting active and sustainable modes of transport, with opportunities to connect into the existing bus provision and cycle infrastructure. This includes a potential extension to the Sustrans strategic cycle route between Royal Wootton Bassett and the south of Swindon, providing a direct cycle link between L&Q's site and Windmill Business Park.

2.36 The site offers a unique opportunity to provide a high-quality mixed-use development to create a new northern gateway to Royal Wootton Bassett and improve the town's self-containment. New businesses could be accommodated and new community infrastructure provided to both support the prosperity of the town and provide additional community uses for all residents to benefit from.

2.37 It is requested that the promotional document is read in conjunction with these representations and L&Q's site (as per the site boundary provided) be fully considered by the Council in the next stage of the site sifting process.

WB5. Are there important social, economic or environmental factors you think we've missed that need to be considered, generally or in respect of individual site?

2.38 As stated above, concern is raised that the site area for Site 2 is illogical and has no reference to our client's land ownership. The parts of Site 2 which sit outside of L&Q Estates' control are subject to constraints and thereby their inclusion within the Site 2 area is suppressing the site's scoring and thus its perceived suitability. It is therefore imperative that the Council consider L&Q's site as a standalone promotion site in the next stage of the site sifting process.

- 2.39 Concern is also raised over the high level nature of the site sifting process, with limited account taken of the technical evidence available. L&Q's site has been subject to pre-application feedback previously and the Council has access to significant amounts of technical information relating to the site but does not appear to have utilised this information to better inform the assessment process.
- 2.40 To assist the Council, a more thorough assessment of the site has been undertaken as part of our comments to the Site Selection Report below which demonstrates that of all the sites in Royal Wootton Bassett, L&Q's site scores the highest. In addition, further information is provided within the submitted promotional document (Appendix 2), which summarises all the technical assessment work undertaken to date demonstrating that the site is technically unconstrained.
- 2.41 It is requested that the promotional document is read in conjunction with these representations and L&Q's site (as per the site boundary provided) be fully considered by the Council in the next stage of the site sifting process utilising the detailed evidence and information which has been provided in the representations. We would also be happy to elaborate on any aspect of the site's deliverability if required.

3.0 **Royal Wootton Bassett Site Selection Report**

3.1 The Royal Wootton Bassett Site Selection Report (RWBSSR) details how 14 Strategic Housing and Employment Land Availability Assessment (SHELAA) sites have been assessed for their relative development potential, which following an initial sifting process has been sifted down to eight potential sites which will be subject to further assessment of their development potential.

3.2 L&Q Estates has control of part of site 3366 which is identified as Site 2.

Site 3366 / Site 2 – Site Assessment Boundary

3.3 The most recent published SHELAA on the Council's website is dated 2017. However, it is understood that it is a living process, with all residential submissions assessed on receipt.

3.4 Site 3366 'Land adjoining Midge Hall Farm', is included in the 2017 SHELAA and has thus been assessed within the RWBSSR. However, it is not clear how the boundary of this site was identified given that it incorporates several different ownerships and appears arbitrary and illogical.

3.5 L&Q Estates control circa 24.3ha of this 51.2ha site, with a red line plan provided in the promotional document at Appendix 2. The remainder of the site falls within at least another two different ownerships, although the boundary of 3366 does not appear to logically follow these ownerships.

3.6 The main concern relating to the boundary is that it includes land which is subject to constraints and therefore due to the scoring system being applied by the Council, is artificially suppressing the suitability of L&Q's site for development.

3.7 It is therefore imperative that the next stage of the plan review process distinguishes L&Q's site from this wider parcel. The point must be addressed in the next assessment undertaken and in the site scoring and comparative assessment.

3.8 In terms of the merits of L&Q's site when considered in isolation, this is discussed further below.

Stage 2 – Reassessing Site 3366 (L&Q land ownership only)

3.9 Stage 2 of the site sifting process has assessed each SHELAA site against five criteria. Whilst L&Q welcome the inclusion of site 3366 within the final eight sites for further consideration, concern is raised regarding some of the scoring attributed to the site.

3.10 As discussed above, due to the arbitrary nature of the site boundary, it is considered that the assessment for site 3366 is not reflective of the opportunity for land within this area to come forward for development, mainly as it includes parcels which are more constrained and therefore more challenging to develop.

3.11 Conversely, the western half of site 3366 which is noted in the assessment to be less sensitive, scores significantly better when assessed in isolation using the same criteria.

3.12 To assist the Council, a revised assessment for L&Q's site only is provided below.

Table 3.1 L&Q Site Assessment

| | Accessibility | Flood Risk | Heritage | Landscape | Traffic | Overall Assessment |
|--|---------------|------------|----------|-----------|---------|--|
| L&Q's Site – the western half of site 3366 | | | | | | <p>The site has a hilltop position, sits on elevated ground and development would be in keeping with character of the hilltop settlement. The land falls to the north-east towards the M4 from which transient views of the site are possible. Longer range views are possible from south of Lydiard Park and Hook Road. However, the M4, existing built form of Royal Wootton Bassett and infrastructure such as overhead utility cables, are all visual detractors in the landscape setting.</p> <p>Development would not extend any further north than existing thereby limiting the risk of coalescence with Hook and Coped Hall. Development would not contribute to coalescence with Swindon as development would not extend any further east than the existing settlement.</p> <p>The site is located circa 250m to the south of a Grade II listed farmhouse, with agricultural land and farm buildings between the listed building and the site. A scheduled ancient monument is also located beyond the site boundary to the east.</p> <p>The site is within flood zone 1 and is at a low risk of flooding.</p> <p>The site is adjacent to the strategic road network and is accessible by modes other than the private car. It is therefore suitable for a mixed use development including employment.</p> |

3.13

Pre-application advice was sought on the site in June 2020. The advice received is provided at Appendix 4, with the key comments relating to technical matters summarised below:

- 1 **Landscape:** considered impact on the AONB to be unlikely. Considered development to the north and east of the site should be limited and opportunities for woodland planting, recreation and mitigated light spill should be embraced if the site is pursued in order to mitigate visual impact. Perceived coalescence of RWB, Hook and Swindon would require thorough exploration in any planning submission.
- 2 **Highways:** Neutral response. Stated that the TA will require strategic transport modelling and this should incorporate Wiltshire's West Wilts Strategic Transport Model. Council advised that due to the impact at J16, that a microsimulation model will be required by Highways England. Noted that Royal Wootton Bassett is subject to congestion, particularly along the A3102 towards J16 and through the town and requires assessment, a matter of relevance for any development site in the town.
- 3 **Accessibility:** Site located close to S5 bus service route, is close to existing shared paths for active travel, would need to connect into proposed RWB/Swindon cycle route, 3no. existing PROW across site should be retained/enhanced.
- 4 **Ecology:** Local species records include badger, bird and bat species, reptile and great crested newt. The Council highlighted the potential need for an Appropriate Assessment

due to likely recreational impact on the North Meadows SAC which requires further investigation.

- 5 **Heritage:** notes that the proposed development would potentially have an impact on the setting of Midge Hall (Grade II) to the north and The Marsh (Grade II), Purton Road to the west which would need consideration through design. Archaeological potential noted. Principle issue considered to be loss of green open landscape and the manner in which this provides a buffer from the existing settlement and the M4 Corridor. Recommends application will need to consider significant landscape mitigation measures to preserve the existing sense of openness afforded by the current site.
- 6 **Drainage:** Site is Flood Zone 1 but predicted to be at risk of localised surface water flooding in the 100 year plus climate change scenario. In terms of surface water, the scheme will require a 20% betterment over pre-development discharges for both peak flow and volume.
- 7 **Other:** comments made in relation to design, waste, noise etc. which would need to be taken into account but are not considered significant issues.

3.14 These technical matters have been considered in detail within the accompanying promotional document (Appendix 2) and the following is noted:

- 1 The site has been designed to provide 3ha of woodland planting on the northern edge to reinforce Royal Wootton Bassett's historic character as a hilltop settlement within woodland, whilst also mitigating potential views of the new development from Registered Parkland to the north-east of the site.
- 2 Development would not extend any further north than existing thereby limiting the risk of coalescence with Hook and Coped Hall. Development would not contribute to coalescence with Swindon as development would not extend any further east than the existing settlement. The significant strategic planting will also provide a new defined edge for the settlement.
- 3 The scheme is demonstrated to be capable of extending the Sustrans Royal Wootton Bassett/Swindon cycle route to provide a direct cycle link between the site and south Swindon. Existing PROW across site will be retained/enhanced and 3km of new walking and cycling routes including trim and natural trails are provided within the site itself.
- 4 Grade II listed Midge Hall is located circa 250m to the north, separated from the site by agricultural land and farm buildings. Although impact is expected to be minimal, restricting development from the northern extents of the site will help protect the setting of the listed building. A significant landscape buffer is therefore proposed to the north of the site to maintain separation and limit impact. The geophysical survey also highlighted anomalies suggestive of the impact of modern ploughing practices and it is likely that the underlying archaeological remains will have been truncated by this activity. Further investigation may be necessary (i.e. trial trenching), but it is not expected that any remains present will be of such significance as to warrant retention.
- 5 The site is in Flood Zone 1, confirming a low level of flood risk. Parts of the site are predicted to have localised surface water flooding, but classified as a low risk. Surface water drainage from the site will use SuDS features to manage the 1 in 100-year storm event plus 40% increase for climate change and accommodate a 10% increase in impermeable area for urban creep and 20% betterment to greenfield runoff rates. Surface water discharge will be in accordance with the sustainable drainage hierarchy.

- 6 A preliminary ecological review has not identified any ‘in principle’ constraints on ecological grounds such as statutory and non-statutory designations, or habitats of notable importance.
- 7 The North Meadows SAC is c.10.5km to the north of the site and is not hydrologically or physically connected. In terms of recreational pressure, the ‘Wiltshire Core Strategy Submission Draft –Assessment under the Habitats Regulations’ (WYG, February 2012) document states that the distance that people are prepared to travel for recreational purposes is c. 5km for most natural green spaces. As such, it is unlikely that residents from the proposed development will be using the SAC for recreation on a regular basis. The likelihood is reduced further due to a lack of parking at the SAC. Notwithstanding the above, it is understood that user surveys are to be undertaken to establish potential impact. Whilst it is likely that the site will be outside the zone of influence for which recreational impacts will need to be mitigated, a recognised means of mitigating is to provide areas of alternative recreational greenspace. In line with this requirement, the site masterplan includes significant areas of green infrastructure including 3km of walking routes.

Stage 2 Methodology – Key Concerns

3.15

In addition to concerns as to how site 3366 has been defined and assessment. Concern is raised more generally on the scoring and assessment process adopted for the stage 2 sifting process. A summary of the key concerns are as follows:

- 1 Concern is raised over the consistency of the scoring within the Stage 2 site sifting table generally. For example, site 3366 was scored as ‘amber’ for flood risk despite its location wholly within Flood Zone 1, whereas site 3357 which is partially within Flood Zone 2 received a ‘green’ scoring. Site 3366 was also scored down to ‘amber’ for heritage due to its proximity to a listed building circa 250m to the north whereas site 3357 was scored ‘green’ despite directly abutting a Grade II listed building and a scheduled ancient monument to the west. This requires a significant review into the next stage otherwise the evidence base will remain flawed and seriously impair the soundness of the draft plan.
- 2 The Royal Wootton Bassett Strategic Context Table (Page 9) states that “*Capacity at Swindon Road and M4 Junction 16 may constrain further development to the north of the town.*” We contest that this is clearly not the case. All sites at RWB will generate a degree of residual traffic impact at Junction 16 and none offer alternative road routes that avoid this. To be clear, sites south of RWB offer no alternative road routes to sites to the east or north for travel to/from the Motorway network or to Swindon, they will all rely upon the A3102 Swindon Road and Junction 16. It is therefore unreasonable to score any sites down for this reason. See Appendix 3 for further details.
- 3 The mainline railway, that skirts the current southern urban edge of RWB, forms a physical barrier to travel to the town and the key transport corridor towards Swindon. The railway acts to constrain travel by virtue of the limited points of connection over it, as well as the physical capacity of those crossings and ‘pinch points’. Development south of the railway will be significantly constrained by this and the cost of mitigation works to make the sites suitably accessible, would be very high. There is clearly a significant constraint to locating development to the south of RWB due to the capacity of High Street to accommodate a significant increase in flows. This important factor has not been sufficiently factored into the comparative site assessments to date. See Appendix 3 for further details.
- 4 Given the above constraints, a hierarchy of travel should be rigorously adopted whereby land-uses and locations are chosen that in the first instance minimise the need to travel, followed by minimising the distance required to travel to fulfil everyday needs, and then the ability to undertake that travel by sustainable modes. In addressing travel needs in this

hierarchical way, the extent to which residual impacts occur and new infrastructure is required - both of which have carbon implications, is kept to a minimum. This approach will correctly promote sites that are best able to deliver sustainable travel by virtue of their closer proximity to key trip destinations and ability to deliver sustainable travel, as opposed to their arbitrary proximity to strategic roads. With regards to RWB, this approach will see greatest emphasis placed on sites that can best access existing services and facilities (education, healthcare, leisure, retail, and employment) on foot or by cycle whilst also making best use of existing infrastructure and transport services. The location and connectivity of sites north of RWB are far better than those to the east and south and thereby offer the best option for RWB in terms of addressing the top tiers of hierarchical sustainable development. See Appendix 3 for further details.

- 5 Whilst striving for greater self-sufficiency is commended, RWB's relationship to Swindon as an employment area is material given commuting typically equates to c15% of all daily travel. As such, locating development along sustainable travel corridors (cycle and bus routes) should be a weighted consideration. Land to the north of RWB is located within easy cycle distance of employment areas within Swindon and could readily link to a proposed Sustrans strategic cycle route to Windmill Hill Business Park. Additionally, north RWB is already well served by express bus services to Swindon which are an attractive alternative to car use. See Appendix 3 for further details.
- 6 With regards to a future railway station serving RWB, whilst it may remain a long term ambition for inclusion in future Plans, in terms of the selection of sites within the current plan period to 2036, other than safeguarding land for rail use, the location of development should not be informed or influenced by this requirement for the next plan period. Alternatively, the selection of sites should be informed on their ability to make best use of sustainable travel connections to Swindon station as per the suggested transport strategy. See Appendix 3 for further details.
- 7 Located on a hilltop, the settlement has, over the past 100 years, seen growth extend north-eastwards, with development maximising the level higher ground. It is considered that future development should continue the hilltop settlement pattern, therefore retaining the towns built form and landscape setting character. Other site options to the east of the town on the lower land will diminish the perception of the hilltop town and this 'priority' for the town requires thorough analysis into the next plan stages.

Assessing the Alternatives

- 3.16 The RWBSSR has not considered the final eight sites in any further detail at this stage and thus a thorough assessment has not been undertaken.
- 3.17 However, as discussed above, concerns are raised regarding the consistency of the scoring applied to these eight sites and the accuracy of the information provided.
- 3.18 Utilising the above criteria, in addition to how the sites perform against the place shaping priorities, an assessment of the eight sites is provided at Appendix 1 and a summary is provided below. This demonstrates that when ranking the sites, L&Q's site scores the most highly and is thus the most sustainable location for development.

Table 3.2 Site Ranking Summary (See Appendix 1 for full assessment)

| Site no. | Accessibility | Flood Risk | Heritage | Landscape | Coalescence | Congestion / Traffic | Noise, Air, Odour, Lighting | Ecology / Biodiversity | Safeguarding Canal | Housing Need | Mix of uses | Green / Blue Infrastructure | Score | Rank |
|-------------------|---------------|------------|----------|-----------|-------------|----------------------|-----------------------------|------------------------|--------------------|--------------|-------------|-----------------------------|-------|------|
| 1 | +1 | +1 | 0 | 0 | 0 | +1 | -1 | +1 | +1 | +1 | +1 | +1 | 7 | 2 |
| 2 (L&Q site area) | +1 | +1 | 0 | 0 | +1 | +1 | 0 | +1 | +1 | +1 | +1 | +1 | 9 | 1 |
| 3 | +1 | +1 | +1 | +1 | +1 | -1 | +1 | 0 | +1 | 0 | -1 | -1 | 4 | =3 |
| 4 | 0 | +1 | 0 | 0 | +1 | -1 | +1 | +1 | +1 | 0 | -1 | -1 | 2 | =5 |
| 5 | 0 | 0 | 0 | -1 | 0 | -1 | 0 | 0 | 0 | +1 | +1 | +1 | 1 | 7 |
| 6 | 0 | 0 | +1 | 0 | +1 | -1 | -1 | 0 | +1 | -1 | 0 | -1 | -1 | 8 |
| 7 | 0 | 0 | +1 | -1 | +1 | -1 | -1 | 0 | 0 | +1 | +1 | +1 | 2 | =5 |
| 8 | 0 | 0 | 0 | -1 | -1 | +1 | 0 | +1 | +1 | +1 | +1 | +1 | 4 | =3 |

4.0 **Addressing climate change and biodiversity net gain**

Policy Theme 2 – Enhancing Green/ Blue Infrastructure (GBI) and biodiversity

- 4.1 This theme is broadly supported and it is commented that L&Q's site to the east of Swindon Road in Royal Wootton Bassett provides opportunity to significantly enhance and create a new Green and Blue Infrastructure asset (to be known as Coped Hall Woodland Park) which will also provide significant opportunity for recreation with circa 3km of walking routes proposed. Due to the previous intensive farm use of this site, there is significant opportunity for biodiversity net gain potentially above the required 10%.
- 4.2 That said, the Council proposes that all new development will provide a minimum of 10% net biodiversity gain on site, or off-site in accordance with measures to be set out in policy and the emerging GBI Strategy. As raised by the HBF, L&Q Estates is also of the view that the Council's policy approach to biodiversity should not deviate from the Government's proposals on biodiversity gain as set out in the Environment Bill. This legislation will require development to achieve a 10% net gain for biodiversity. It is the Government's opinion that 10% strikes the right balance between the ambition for development and reversing environmental decline. 10% gain provides certainty in achieving environmental outcomes, deliverability of development and costs for developers. 10% will be a mandatory national requirement, but it is not a cap on the aspirations of developers who want to voluntarily go further. The mandatory requirement offers developers a level playing field nationally and reduces the risks of unexpected costs and delays.
- 4.3 The Environment Bill will introduce new duties to support better spatial planning for nature through the creation of Local Nature Recovery Strategies (LNRSs). LNRS will detail existing areas of high biodiversity value as well as those areas where habitat creation or restoration would add most value. The intention is that the whole of England will be covered by LNRSs with no gaps or overlaps. Each LNRS will include a statement of biodiversity priorities for the area covered by the strategy and a local habitat map that identifies opportunities for recovering or enhancing biodiversity. Each LNRS will be produced locally, with a relevant public body appointed as the responsible authority by the Secretary of State. This will achieve the best combination of local ownership and knowledge and national consistency and strategy. Such spatial environmental mapping will help developers to locate their sites strategically to avoid biodiverse sites that would be difficult to achieve net gain on.

Policy Theme 3 – Sustainable Design

- 4.4 The document rightly acknowledges the 'climate emergency' and it is appropriate that that this issue must be addressed in the forthcoming plan. It is a key issue permeating every part of the plan from the spatial strategy to building design and infrastructure.
- 4.5 That said, the document refers to more stringent building standards with reference to net zero carbon development by 2030. Whilst no detail is provided, it is considered that building requirements in Wiltshire should be reflective of Government requirements and should not seek to run ahead of these. Whilst greater levels of sustainable construction are supported in principle, in the context of the significant housing requirement, this cannot be to the detriment of delivery, particularly that of affordable housing. It is therefore considered that viability must be at the heart of any decisions which could significantly increase build cost.
- 4.6 The Council should rely on proposed changes to the Building Regulations. The 2019 NPPF confirms that Local Plans should avoid unnecessary duplication (para 16f). The Council is

referred to the Government's proposed changes to Parts L (Conservation of Fuel & Power), F (Ventilation), M (Access to & Use of Buildings), R (Physical Infrastructure for High-Speed Electronic Communications Networks) & S (Electric Vehicle Charging in Residential & Non-residential Buildings) of the Building Regulations and the Government's proposals for biodiversity gain set out in the Environment Bill. As set out in the Planning for the Future White Paper a simpler planning process improves certainty.

Policy Theme 5 – Sustainable Transport

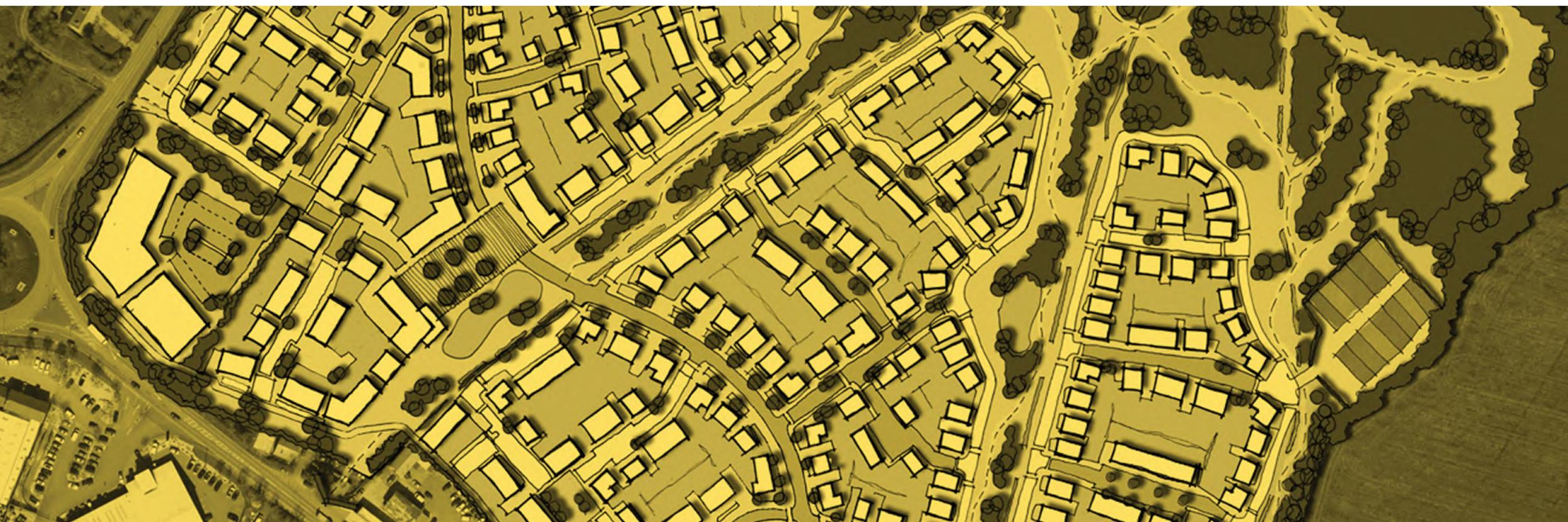
- 4.7 The document highlights the importance of sustainable development and it is agreed that development that comes forward must be sustainably located. This means locating new development where people are capable of meeting their day to day needs without the use of the private car. In this regard, it is considered that L&Q's site at Swindon Road in Royal Wootton Bassett is considered the most appropriate site in the town for meeting this objective.
- 4.8 As set out in Appendices 1 and 3, in terms of the assignment of traffic from site locations, those sites located to the north of Royal Wootton Bassett would put the least proportion of traffic through the town centre whereas the sites located to the south and west will inevitably put the most strain on the town centre.
- 4.9 Sites located to the north of the town also provide the greatest opportunity for sustainable travel. L&Q's site is within easy walking distance of a number of services and facilities including education, health, retail, employment, leisure, bus services, the town centre and the Sustrans strategic cycle route providing access to Windmill Hill Business Park and Swindon. Development of this site should be supported as it provides an excellent opportunity to locate growth sustainably in close proximity to local facilities and capable of responding to the local community's priorities of future growth.

Appendix 1 Assessing the Alternatives

| | NORTH-WEST | NORTH-EAST | WEST | | SOUTH | | | EAST |
|----------------------------------|---|--|---|---|---|--|--|---|
| | Site 1 | Site 2 (L&Q boundary) | Site 3 | Site 4 | Site 5 | Site 6 | Site 7 | Site 8 |
| Accessibility | Sites to the north of town are located within easy walking distance of a number of services and facilities including education, health, retail, employment, leisure, bus services, the town centre and Sustrans strategic cycle route to Windmill Hill Business Park. | Sites to the north of town are located within easy walking distance of a number of services and facilities including education, health, retail, employment, leisure, bus services, the town centre and Sustrans strategic cycle route to Windmill Hill Business Park. | Site 3, located to the west is within close proximity to the town centre and various services and facilities. However, it is located further from sustainable travel corridors to Swindon. | Site 4, located to the west is within close proximity to the town centre and various services and facilities. However, it is located much further from sustainable travel corridors to Swindon and would likely increase car travel through the town centre to reach Swindon. | Within reasonable walking distance of the town centre but over 2km from the majority of the employment areas and sports/leisure facilities. Significant distance from Swindon. | Within reasonable walking distance of the town centre but over 2km from the majority of the employment areas and sports/leisure facilities. Significant distance from Swindon. | Within reasonable walking distance of the town centre but over 2km from the majority of the employment areas and sports/leisure facilities. Significant distance from Swindon. | Located more on the periphery of the settlement. Limited services and facilities within easy walking distance. Circa 2km walk from the town centre. Benefits from proximity to the Sustrans strategic cycle route to Windmill Hill Business Park. |
| Flood Risk | Flood Zone 1 | Flood Zone 1 | Flood Zone 1 | Flood Zone 1 | Flood Zone 1, 2 and 3 | Flood Zone 1, 2 and 3 | Flood Zone 1 and 2 | Flood Zone 1 and 2 |
| Heritage | Grade II listed The Marsh adjacent to site boundary | The site does not contain any designated heritage assets. An archaeological and heritage assessment has identified that there is only the potential for an affect on two heritage assets, comprising the Grade II listed The Marsh and Grade II listed Midge Hall. This affect could be minimised through sensitive masterplanning, but it is considered that these listed buildings are unlikely to form such a constraint that would inhibit the site's overall deliverability or greatly affect its capacity. | No known heritage constraints | Foreground setting to Grade II* St Bartholomews church. Potential for effect on Wootton Bassett Conservation Area, which may influence site capacity. Overlap with landscape comments (setting). | Grade II Hunts Mill Farm on site and Grade II listed Hunts Mill Road Bridge located adjacent to the site. Wilts and Berks canal (non-designated). | No known heritage constraints | Wilts and Berks canal (non-designated) | Does not contain any designated heritage assets. However, given close proximity to the Grade II listed Lower Woodshaw Farm and Lower Woodshaw medieval settlement scheduled monument, it is likely that the development of this site may affect the setting of these assets. This may influence the masterplanning process, such as in requiring retention of open space. |
| Landscape | Sits on elevated ground and development would be in keeping with character of hilltop settlement. Sits within area previously designated rural buffer. The site is highly visible from surrounding roads including the M4. | Hilltop position, sits on elevated ground and development would be in keeping with character of hilltop settlement. The land falls to the north-east towards the M4 from which transient views of the site are possible. Longer range views are possible from south of Lydiard Park and Hook Road. However, the M4, existing built form of Royal Wootton Bassett and infrastructure such as overhead utility cables, are all visual detractors in the landscape setting. | Hilltop position, sits on elevated ground and development would be in keeping with character of the hilltop settlement. The site is well located in landscape terms for additional housing. There are potential views to the north and west, and any design would need to consider surrounding green corridors. | The site lies on lower slopes and development would extend outside of the hilltop settlement. | Development would extend outside of the hilltop settlement and would be isolated from town by railway. The site is highly prominent with key views across to the skyline of Royal Wootton Bassett and surrounding countryside. There should be no development south of the Brinkworth Brook as this significantly undermines the hilltop identity of RWB by encroaching onto adjacent topography/ rising land to south. | Development would extend outside of the hilltop settlement onto valley floor. | There should be no development south of the railway and Brinkworth Brook in this location as this significantly undermines the the hilltop identity of RWB by encroaching onto adjacent topography/ rising land to south. Whilst generally well screened and visually unobtrusive there could be views from Brynards Hill (Site 507) onto the site which would be difficult to mitigate, that would create urban encroachment into the countryside and detract from the views to the AONB ridge line beyond. | Development would extend outside of the hilltop settlement onto adjoining floodplain areas with no delimiting topography between here and Swindon, significantly undermining the identity of the settlement. The site has views over the countryside to the north and distant views to th North Wessex Downs AONB to the south. |
| Coalescence | Would visually and perceptually bring development further north towards Hook than existing. | Development would not extend any further north than existing thereby limiting the risk of coalescence with Hook and Coped Hall. Development would not contribute to coalescence with Swindon as development would not extend any further east than the existing settlement. | Limited risk of coalescence. Will not bring development nearer Ballards Ash than existing | No risk of coalescence | If the site were developed it would risk coalescence with the small hamlet of Vastern and surrounding farmsteads. There is also the risk of coalescence with the Wiltshire Crescent development on the nearby Golf course, in a rural setting. | No risk of coalescence | No risk of coalescence | There is a clear risk of coalescence between the settlements of Royal Wootton Bassett and Swindon. There is no logical defensible boundary to the east of Site 8 meaning that future potential growth is likely to further erode the gap along the A3102. |
| Town Centre Congestion / Traffic | In terms of the assignment of traffic from site locations, those to the north of RWB would put the least proportion of traffic through the town (32.7%) - see Appendix 2. | In terms of the assignment of traffic from site locations, those to the north of RWB would put the least proportion of traffic through the town (32.7%) - see Appendix 2. | In terms of the assignment of traffic from site locations, sites to the west of RWB would put the greatest proportion of traffic through the town (89.5%) - see Appendix 2. | In terms of the assignment of traffic from site locations, sites to the west of RWB would put the greatest proportion of traffic through the town (89.5%) - see Appendix 2. | Sites to the south of RWB would put the second greatest proportion of traffic through the town (68%) - see Appendix 2. The mainline railway also forms a physical barrier to the town and Swindon due to limited connection points, as well as the physical capacity of those crossings. Mitigation would be very high cost. | Sites to the south of RWB would put the second greatest proportion of traffic through the town (68%) - see Appendix 2. The mainline railway also forms a physical barrier to the town and Swindon due to limited connection points, as well as the physical capacity of those crossings. Mitigation would be very high cost. | Sites to the south of RWB would put the second greatest proportion of traffic through the town (68%) - see Appendix 2. The mainline railway also forms a physical barrier to the town and Swindon due to limited connection points, as well as the physical capacity of those crossings. Mitigation would be very high cost. | In terms of the assignment of traffic from site locations, those to the east of RWB would put the second least proportion of traffic through the town (37.9%) - see Appendix 2. |
| Noise, Air, Odour and Lighting | Site abuts M4. Possible noise disturbance from adjacent sports pitches and light spill from flood lights. | Site is circa 320m from the M4 motorway which lies to the north, adjacent to the A3102 to the south, and Hook Street to the east. On the southern boundary is the Esso Petrol filling station and an associated car sales unit. On the opposite side of the A3102 are some commercial and retail units. Just north of the site boundary is Midge Hall, Westlea Landscaping Limited and the Hedgeworks Ltd. | Situated south of Jubilee Nature Reserve and north of Lucy Pets boarding kennels which could result in noise and odour nuisance. Also possible disturbance from adjacent playing fields | Potential noise from Bowman House Business Centre to the south, off Whitehall Lane - further residential to the east | Proximity to sewage treatment works may result in odour nuisance to large areas of the site which will limit developable area. Proximity to Aggregate Industries Hills Quarry and Great Western railway line to the north and commercial units to east (off Marlborough Rd). | Close proximity to sewage treatment works with potential odour nuisance. Great Western Railway line and commercial units to the north (off Marlborough Rd). | Council Depot to the west including storage of council waste collection vehicles could result in noise, odour and light nuisance especially if operations start early in the morning. Sewage treatment works to the southwest with potential odour nuisance. Great Western Main Line to north and the Glenville Park, Traveller site off Marlborough Road. | Great Western Main Line to the south - A3102 to the north - resi to west. Potential odour nuisance as Sewage Treatment works down wind to the South west. |
| Ecology / Biodiversity | No known constraints | No known constraints | Local Nature Reserve on Site. Priority Habitat (Deciduous woodland) on site | No known constraints | Watercourse/ wetland habitat on site. | Watercourse / wetland habitat on site. | Priority Habitat (Deciduous woodland) on site. | No known constraints |

| | | | | | | | | |
|--|---|---|--|--|---|--|--|--|
| Safeguarding canal | n/a - located away from canal corridor | n/a - located away from canal corridor | n/a - located away from canal corridor | n/a - located away from canal corridor | The proposed route of restored Wilts and Berks Canal runs to the north and should be respected in any development. | n/a - located away from canal corridor | The proposed route of restored Wilts and Berks Canal runs to the north and should be respected in any development. | n/a - located away from canal corridor |
| Meeting Housing Need | The site is constrained in terms of its proximity to the M4 and to a listed building. However, site could deliver a range of housing to meet local needs. | Limited constraints and capacity for circa 400 homes | More limited scale of development possible due to northern woodland. | About 50 per cent of the site (the northern half) is shown as a town park supported in RWB NP Policy 3. More limited housing capacity. | Large site but flood, landscape, traffic, odour and noise constraints will limit development. | Constraints limit suitability for housing. Employment use would be preferred to housing, to avoid sterilising the existing employment site to the north. | Large site but flood, landscape, traffic, odour and noise constraints will limit development. | Constraints will limit development to the south. Surface water flooding may limit development capacity to north. |
| Mix of uses: Employment, Education Health etc. | Previous application for Mixed 320 Dwellings, Community Hub and sports uses. | Promotional document demonstrates ability to provide an attractive landscaped mixed use scheme including on-site employment and community uses. | Limited potential for mixed use due to size of site. | Limited potential for mixed use due to size of site. | Size of site means likely capable of a mix of uses. | Likely to only be suitable as an employment site. | Size of site means likely capable of a mix of uses. | Size of site means likely capable of a mix of uses. |
| Green / Blue Infrastructure | Constraints to north provide opportunity to deliver large areas of green and blue infrastructure. | Promotional document demonstrates ability to provide an attractive landscaped scheme, including significant areas of green and blue infrastructure. | Limited potential due to site size | Limited potential due to site size | The Brinkworth Brook Green Infrastructure corridor provides a logical landscape boundary feature in the area south of Wootton Bassett. There are opportunities to sensitively design wetland areas to accommodate SUDS and areas prone to flooding adjacent to the Brinkworth Brook, while creating new habitat and amenity features. | Limited potential due to site size | Large site, constraints provide opportunity to deliver large areas of green and blue infrastructure. | Large site, constraints provide opportunity to deliver large areas of green and blue infrastructure. |

Appendix 2 Promotional Document



LAND NORTH OF SWINDON ROAD: ROYAL WOOTTON BASSETT

PROMOTIONAL DOCUMENT

MARCH 2021

THE DESIGN TEAM

| | |
|---|--|
|  | Masterplanning, Landscape, Ecology, Archaeology and Heritage |
|  | Planning |
|  | Transport |
|  | Drainage |
|  | Air Quality and Acoustics |

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1. INTRODUCTION

1.1 Document Purpose

This Promotional Document has been prepared by The Environmental Dimension Partnership Ltd. (EDP), Lichfields Planning and Neil Brant Consulting on behalf of L&Q Estates.

The purpose of this document is to demonstrate the sustainability, suitability and deliverability of Land north of Swindon Road, Royal Wootton Bassett (hereafter referred to as 'the site') for a range of uses including housing, employment, open space and leisure.

The Promotional Document demonstrates that the site could sustainably deliver much needed market and affordable housing to support the economic growth of Royal Wootton Bassett (RWB). The site will also deliver land for potential employment/community use at Coped Hall, adjacent to Swindon Road and Hook Road roundabout, which would contribute towards improving the self-containment of the town. Built form is focused on the higher areas to the south-west of the site, where development will maintain the town's elevated historical setting. The remainder of the site will deliver substantial areas of strategic open space to the north-east, providing space for community and leisure activities and enhanced landscape planting. These open space areas will be connected through a series of green corridors that will extend through the site along existing Public Rights of Way (PRoW).

In summary, the proposals include:

- Circa 400 dwellings;
- Potential for commercial/employment uses;
- Potential for local hub area to include new community/co-working centre;
- Mix of housing types and tenure suitable for local needs;
- Opportunity for new skate park, play areas and allotments;
- A new vehicular access junction onto Hook Road and A3102;
- New bus route and traffic calming treatment along primary route to discourage 'rat running' between Hook Road and Swindon Road; and
- Extensive open space networks, including new woodland planting, green corridors, sustainable drainage features, ecological improvements and a network of new footpaths and cycleways.

The following sections provide an introduction to the client and team, site context, establish a vision, explain the design considerations and constraints and opportunities. Leading from this, the concept masterplan sets out the aspirations and potential form of the development. The document concludes with a summary of the deliverability of the site and explains the next steps to this land promotion.

*'Royal Wootton Bassett is a distinct settlement with an identifiable character. Its hilltop location, surrounded by productive farmland on the edge of an escarpment, makes it "easy to read".'**

Land north of Swindon Road presents the opportunity to be a new sustainable development creating a locally identifiable northern gateway to the hilltop settlement of Royal Wootton Bassett, delivering a mix of employment, housing, transportation and community facilities to Coped Hall.

*Royal Wootton Bassett Neighbourhood Development Plan (2017-2026), Preserving our Environment (1.5)

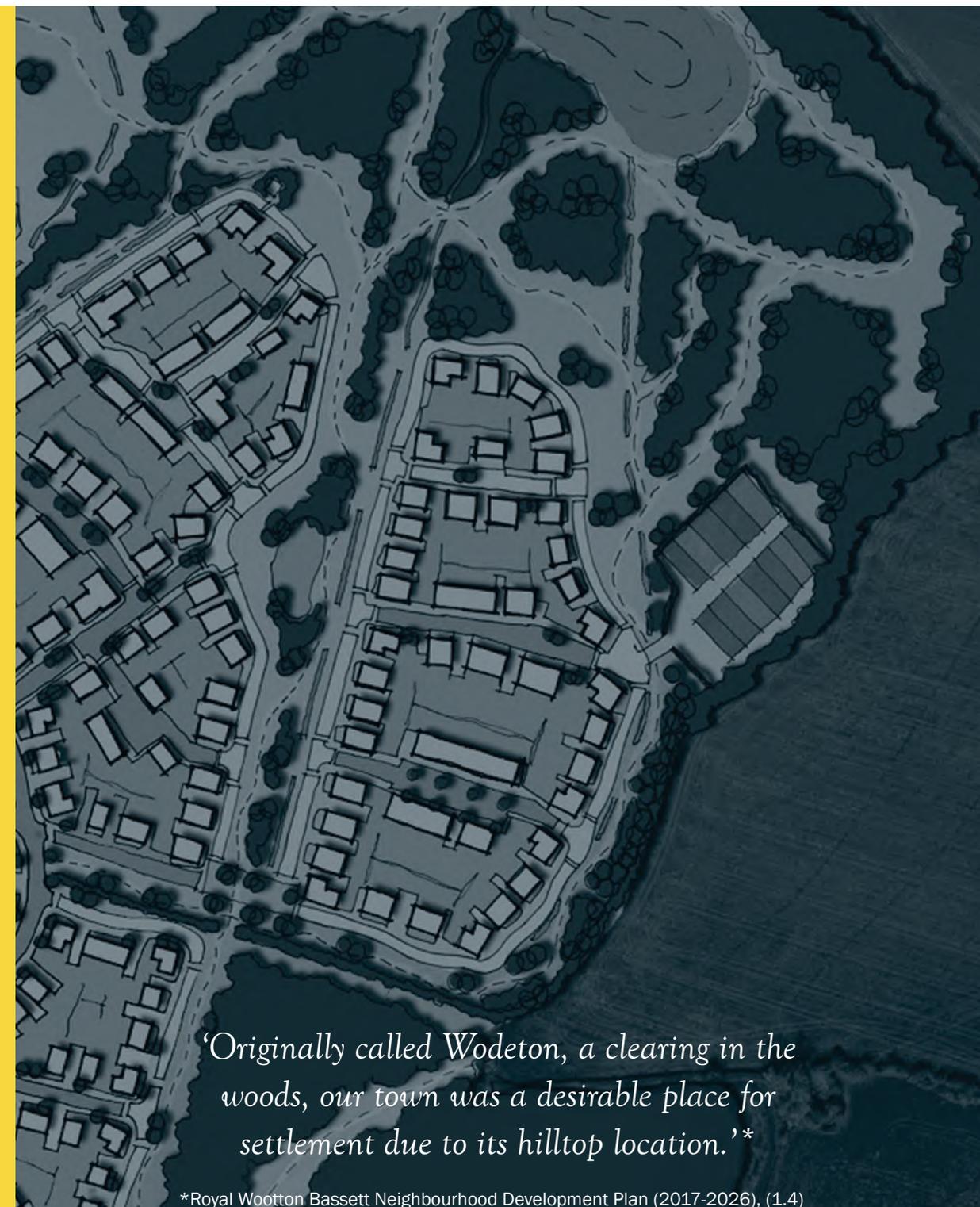
2. THE VISION

Land north of Swindon Road presents the opportunity to be a new sustainable development creating a locally identifiable northern gateway to the hilltop settlement of Royal Wootton Bassett, delivering a mix of housing, community facilities, transport infrastructure and employment to Coped Hall, aiding the self-containment of the town.

The original historic character of a 'hilltop settlement within the woods' will be reinstated - built form will be positioned on the higher area of the site, contiguous with the existing settlement, and new areas of woodland will be planted within green open space located on the gently sloping hillside to the north-east.

The site is well located with good access to local services, amenities and sustainable travel links, and provides the opportunity to improve the sustainable travel network by providing an important cycle link to both the town and the western areas of Swindon.

Local character will be celebrated through vernacular references. Alongside a mix of built form uses, the development will also create areas of extensive public open space, which will provide a multitude of recreational and environmental benefits to the local area.



*'Originally called Wodeton, a clearing in the woods, our town was a desirable place for settlement due to its hilltop location.'**

*Royal Wootton Bassett Neighbourhood Development Plan (2017-2026), (1.4)

2.1 Objectives

Protect the Identity of the Town



Landscape

Reinforce the town's historical setting by siting built form at higher elevations and woodland on lower slopes. A defensible boundary, defined by topography, which reinforces the separation of Royal Wootton Bassett and Swindon, including new parkland, woodland and biodiverse habitats.

New Homes for Local Needs

A range of new quality homes catering for the local housing needs of families, first time buyers and those wishing to downsize, positioned on the higher ground to reinforce the historic hilltop settlement character of the town.



Improve Self-containment



Employment Area Expansion

Expansion of the Coped Hall employment area supporting local businesses, aiding self-containment and reducing the need for out-commuting.

Supporting the Town Centre

New housing that can access and enhance the sustainable transport networks locally, thereby increasing the vitality of the town centre.



Promote and Encourage Non-car Travel



Sustainable Transportation

Potential for a new bus route, designed to prioritise bus movements and discourage commuter 'rat running', to serve north Royal Wootton Bassett with quick links to the town centre, Windmill Business Park and Swindon.

Connectivity

New formal paved cycle routes and informal pedestrian trails improving connections between north Royal Wootton Bassett and the wider countryside. As well as enabling and providing a missing cycle link along Swindon Road frontage connecting to the town centre and employment areas in western Swindon.



3. THE TEAM

3.1 L&Q Estates

L&Q Estates is a long-established property development and investment company specialising in the identification, acquisition and promotion of strategic land. L&Q Estates have a substantial in-house team of planners and engineers who work with a consultant team to deliver the optimal solutions across their portfolio of land.

L&Q Estates have been at the forefront of the industry for over 60 years, building up an enviable track record of delivery. They focus on the delivery of medium and large scale strategic development sites utilising their significant resources, experience and expertise to assemble land, promote and secure planning and deliver the infrastructure required to facilitate much-needed development. Key to L&Q Estates' success is our willing and proactive attitude to engaging with the key stakeholders and communities in which we operate.

L&Q Estates are part of the L&Q Group, a charitable housing association with a focus on the delivery of affordable housing with returns recycled into L&Q to aid the delivery of much-needed housing across the Group's target areas.



Wixams, Bedford



Love's Farm, St Neots

3.2 The Design Team

L&Q Estates have appointed a multidisciplinary team of environmental, design and technical consultants to assess the site's physical constraints to generate a clear vision for how the site could be developed in the future.

As lead environmental consultant, EDP have carried out a series of landscape, ecology, heritage, archaeology and masterplanning baseline studies to analyse the key design environmental issues on and near the site, resulting in the production of a constraints and opportunities plan and illustrative masterplan. The design process has been informed by planning inputs from Lichfields, transport assessment inputs from Neil Brant Consulting, hydrology assessment inputs from Andy Clay Consulting and air quality and acoustic assessments from Air & Acoustics Consultants to ensure proposals are robust in planning policy and sustainability objectives.

With industry leading national experience, this multidisciplinary team are skilled in analysing and developing sustainably-led masterplans from initial site feasibility testing, to promoting mixed use developments through the planning process.



Integrated mixed-use development, Buckinghamshire (EDP)



High quality residential development and open space design, Herefordshire (EDP)

4. ROYAL WOOTTON BASSETT

4.1 About the Town

Royal Wootton Bassett is a vital and viable market town located approximately 2 miles south of the M4 motorway in the county of Wiltshire, and is strategically located between London to the east and Bristol to the west.

The town significantly benefits from being located approximately 5 miles south-west of Swindon town centre which is a significant employment and retail centre in the area and also has a major regional rail station. Swindon is a key automotive and engineering centre as well as hosting a number of energy, insurance and financial service companies. Major employment areas are located within 2 miles of Royal Wootton Bassett at Windmill Business Park and Blagrove Employment Area on the southern edge of Swindon.

Another key employer in the area is the Ministry of Defence (MoD) Lyneham, which is located 4 miles south-west of the market town and has recently been redeveloped as a Defence Technical Training Centre.

With a successful high street, close to employment centres and strategic infrastructure, the town is a desirable place to live.

4.2 Planning Context and Housing Requirement

The current Local Plan is the Wiltshire Core Strategy. Under the Core Strategy, Royal Wootton Bassett had an indicative housing requirement for 1,070 dwellings between 2006–2026. In the period 2006-2019, 1,081 dwellings had been completed with a further 57 committed units.

The largest developments have been the completion of 432 dwellings at the former St Ivel factory site, Wainhomes' development of 285 dwellings at Brynard's Hill and 129 dwellings at the Gerard Buxton Sports Ground.



Images from Royal Wootton Bassett

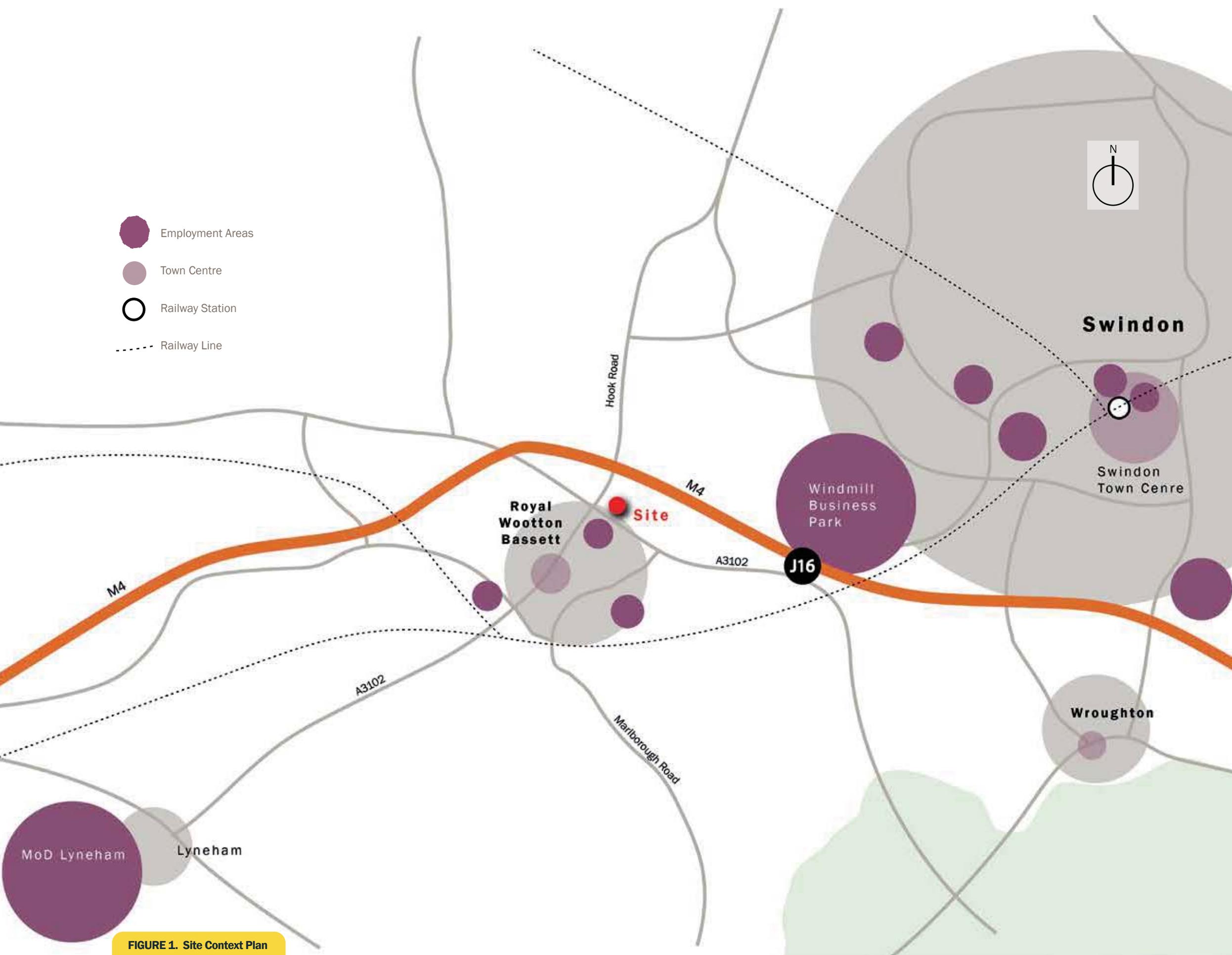


FIGURE 1. Site Context Plan

4.3 Emerging Local Plan

Wiltshire Council commenced work on the Local Plan Review in 2017. The plan is still in the early stages although the informal Regulation 18 consultation documents (published January 2021), forecasts that Wiltshire will need between 40,840 and 45,630 new homes over the plan period of 2016 to 2036 (40,840 homes being the minimum required using the government's standard method).

Within Royal Wootton Bassett, the draft plan estimates the housing requirement to be 1,255 homes for the plan period 2016-2036. When the number of committed homes is taken into account, it leaves a further 990 homes to be accommodated in the town up until 2036. In addition, the plan seeks to allocate circa 6ha of land for employment development.

The January 2021 Local Plan consultation documents also contain a set of place shaping priorities for each main settlement, which will play a central role in developing planning policies and proposals for development. For Royal Wootton Bassett, these are:

- 1** Protecting the distinct character and identity of the town, recognising its proximity to Swindon;
- 2** Maintaining capacity at M4 Junction 16 throughout the Plan period;
- 3** Maximising the use and availability of sustainable modes of transport along with managing levels of congestion on strategic routes and in the town centre;
- 4** Safeguarding land for a Swindon parkway station;
- 5** Provision of additional employment to improve self-containment;
- 6** Infrastructure improvements to promote and encourage non-car travel;
- 7** Increased primary education, GP and cemetery capacity;
- 8** Safeguarding the historic alignment of the Wilts and Berks Canal and taking forward canal restoration;
- 9** Conserving and enhancing environmental assets around Royal Wootton Bassett; and
- 10** Maintaining the town's elevated historical setting and central conservation area.

How L&Q's site is capable of responding to these place shaping priorities is discussed further in Section 8.3.

4.4 Royal Wootton Bassett Neighbourhood Plan

The town adopted a Neighbourhood Plan in August 2019. This plan does not allocate any housing sites but states that the town infrastructure requirements are as follows:

- 1** Provision of, and improvements to, new allotments;
- 2** Improvements to the canal;
- 3** Provision of a skate park;
- 4** Improvements to the local cemetery;
- 5** A town park;
- 6** Dedicated pedestrian cycle routes;
- 7** Community facilities (meeting spaces and mixed use facilities); and
- 8** Provision of an appropriate level of school places to satisfy any additional demand generated by development.

The plan also makes reference to the need for additional employment floorspace, visitor accommodation, a new theatre, railway station and the better promotion of travel by walking, cycling and public transport within the town and with neighbouring Swindon.



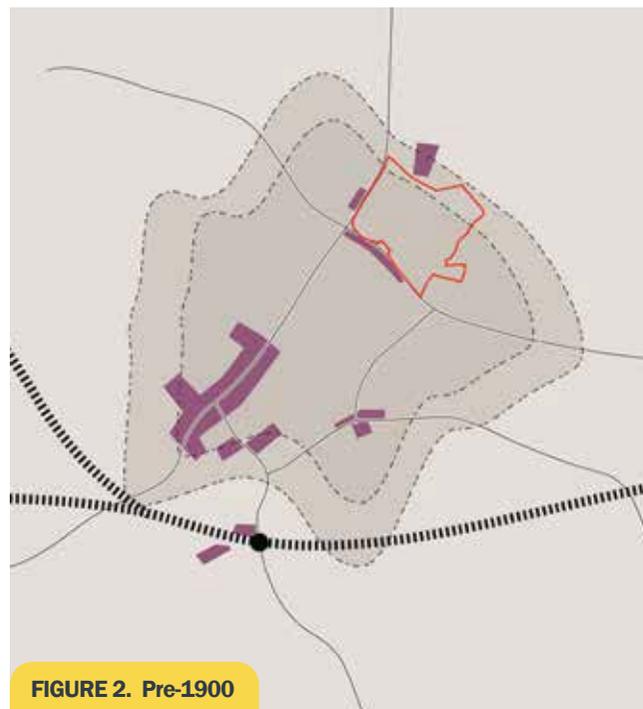
View of Royal Wootton Bassett High Street and Town Hall Museum

4.5 The Settlement Growth Pattern of Royal Wootton Bassett

Dating back to AD681, Wootton Bassett was originally called Wodeton (a settlement in the woods), and over time has developed into a thriving market town that supports the surrounding area. Located on a hilltop, the settlement has, over the past 100 years, seen growth extend north-eastwards, with development maximising the level higher ground. The following diagrams show the sequential growth of the town since the 1900s, and demonstrates how development at Land north of Swindon Road would continue the hilltop settlement pattern, therefore retaining the town's built form and landscape setting character.

Pre 1900

Development was focused along the High Street, which acted as an important meeting and trading place, with the 17th Century town hall building providing a focal point to the settlement. The Great Western Railway was located south of the town and the first station was opened in 1840. The high street demonstrates a variety of architectural ages and styles that form a strong, distinctive and continuous frontage to the street.



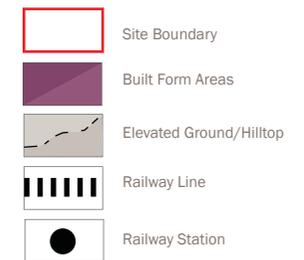
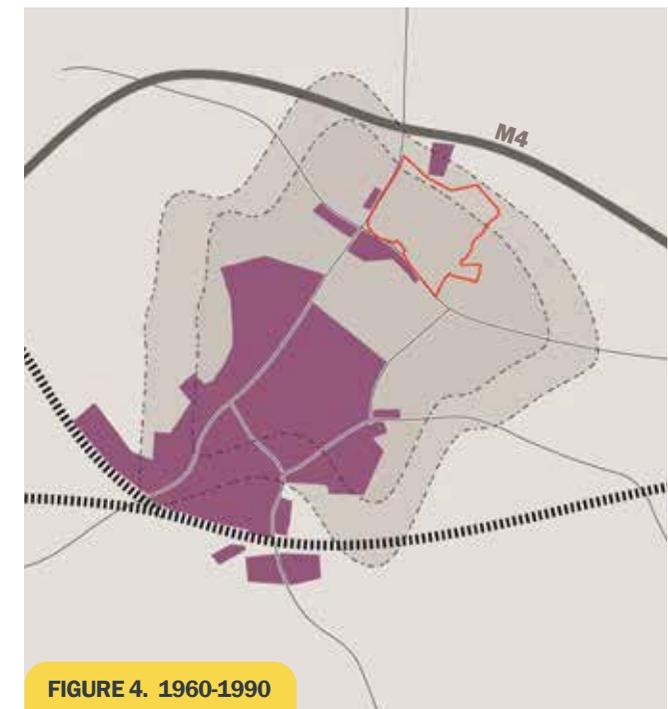
1900-1960

Alongside some industrial uses, this period only experienced some small scale inter-war housing occurring south of the high street towards the railway.



1960-1990

The town rapidly expands to the north, south and east with large scale estate developments that have a focus on mainly lower density semi-detached house and bungalow types. During this period there was a transportation revolution seeing the closure of the town's railway station and the construction of the M4, Hook Road and Swindon Road widening, and also Coped Hall roundabout was introduced.





Views from south west of Royal Wootton Bassett illustrating character and identify of the town on hilltop and slopes (but not extending onto surrounding flatter areas) © Google Earth

1990-2000

Development continues to extend north to Swindon Road. This era of development is characterised by cul-de-sac street layouts, and is often associated with a poor building/street relationship.



FIGURE 5. 1990-2000

2000-2021

A sharp reduction in the amount of new housing being built, with only some development limited to infill locations with a mix of higher density house types.



FIGURE 6. 2000-2021

2021+

Land north of Swindon Road presents the opportunity for a new sustainable mixed use development connecting to the north-east of Royal Wootton Bassett. This logical growth area retains the settlement's hilltop character and would offer a new strategic open space area located to the north of the town. This new recreational space would provide both a green wedge between Royal Wootton Bassett and Swindon, and opportunities for woodland planting to reinstate the historic wooded character of the settlement.



FIGURE 7. 2021+

5. SITE CONTEXT

5.1 The Site

The site is located immediately to the north of the town of Royal Wootton Bassett in Wiltshire at a location known locally as Coped Hall. It lies to the north of Swindon Road (A3102) and to the east of Hook Road (C414). Although located in the Lydiard Tregoze Parish, the site has a strong association with the urban edge of north Royal Wootton Bassett.

The site, as illustrated on the plan opposite (Figure 8), consists of a number of irregular field parcels and an area of newly planted woodland covering a total area of 24.3 hectares (ha). Due to the agricultural nature of each of the field parcels, their interiors are generally featureless, each being separated by mature well-trimmed hedgerows with few hedgerow trees present. To the south, the site is generally flat, occupying local high ground (circa 138m above Ordnance Datum (aOD) to the south-east) – and slopes down to the north towards Midge Hall Farm and the M4 Corridor (circa 124m aOD to the north-east). The western and southern boundaries of the site are formed by busy vehicular corridors and existing residential, commercial and amenity uses. While the northern and eastern boundaries are formed by well-trimmed agricultural hedgerows.

Land use surrounding the site broadly comprises open countryside to the north and east, with a number of detracting features present (notably the M4 and power infrastructure/pylons), and urban areas of Royal Wootton Bassett to the south and west, which includes a recently constructed sports facility (Gerard Buxton Sports Ground) and lighting infrastructure to the west.



View from within site looking east towards petrol station



View from within site looking west at newly planted woodland



View looking north-east at urban edge of Royal Wootton Bassett



FIGURE 8. Site Location Plan

5.2 Local Facilities

Located in the 'Coped Hall' area, to the north of Royal Wootton Bassett, the site benefits from being in close proximity to a number of local businesses and community facilities, as well as a cluster of employers immediately south-west of the site associated with Coped Hall Business Park. The town's historic high street provides a mix of town centre facilities (including a weekly market) which can also be conveniently accessed via a number of different public transportation routes from the site.

Beyond Swindon Road, located in the Longleaze area, are a number of facilities including: a key bus route to the town centre, Swindon and the local area; a primary school and local shop. To the north-west of the site are a number of recreational facilities including Jubilee Park, Gerard Buxton Sports Ground and Royal Wootton Bassett Rugby and Football Club.

Travel Times to Key Local Facilities

| Facility | Distance | Walk Time (min) | Cycle Time (min) |
|------------------------------------|----------|-----------------|------------------|
| Education | | | |
| Learning Curve Day Nursery | 500m | 6-7 mins | <2 mins |
| Longleaze Primary | 930m | 11-12 mins | 3-4 mins |
| Royal Wootton Bassett Academy | 1,000m | 12-13 mins | 3-4 mins |
| Healthcare | | | |
| Tinkers Lane GP Surgery | 1,100m | 13-14 mins | 4-5 mins |
| Dental Surgery | 1,200m | 15 mins | 4-5 mins |
| Pharmacy | 1,050m | 13-14 mins | 3-4 mins |
| Retail | | | |
| Convenience Store – Coped Hall PFS | 75m | <1 min | <1 min |
| ALDI Supermarket | 75m | <1 min | <1 min |
| Town Centre | 1,150m | 13-14 mins | 4-5 mins |
| Employment | | | |
| Coped Hall Business Park | 200m | 2-3 mins | <1 min |
| Interface Business Park | 1,800m | 22-23 mins | 6-7 mins |
| Windmill Hill Business Park | 3,000m | <40 mins | 11-12 mins |
| Swindon Town Centre | 8,000m | n/a | 30 mins |
| Leisure | | | |
| Gerard Buxton Sports Ground | 640m | 8 mins | 2-3 mins |
| Ballards Ash Sports Ground | 800m | 10 mins | 3 mins |
| Jubilee Lake | 400m | 5 mins | 1-2 mins |
| Transport | | | |
| No. 60 Swindon Road | 75m | <1 min | n/a |
| No. 54/55 Gold – Marlowe Way | 250m | 3 mins | n/a |

The preferred maximum walking distance for commuting journeys is 2km¹
 Journeys of up to 8km (a 30-minute cycle time) are considered to be a comfortable distance for a reasonably fit person.²

¹ Guidelines for Providing for Journeys on Foot 2000, Institution of Highways & Transportation
² Cycle Audit and Cycle Review 1998, Institution of Highways & Transportation

The adjacent figure (Figure 9) illustrates 400m (5 minute), 800m (10 minute) and 2,000m (25 minute) indicative walk distances from the development site and how they encompass public transport services and a broad range of local facilities and amenities within Royal Wootton Bassett. Additionally, the table (below left) summarises the proximity of key trip destinations within Royal Wootton Bassett and west Swindon and their associated walk and cycle times from the site. These have been assigned traffic light style colour coding on their level of accessibility.

As illustrated in the figure and summarised in the table, existing local facilities and amenities can be reached within easy walk and cycle times. A large part of the town is within a 25 minute walk of the site and furthermore, the whole of the town is within a cycle ride of less than 8 minutes. This makes the prospect of sustainable active travel a real option for this site.

For existing and future residents commuting to Swindon for work, sustainable travel options could be improved, such as the Royal Wootton Bassett - Windmill Hill cycle route and improvements to the 55 Gold bus service.

Placing development where existing facilities and services can be best accessed by walking, cycling and public transport will promote the most efficient means of achieving genuine modal shift to sustainable modes of transport.

Development at Land north of Swindon Road presents the opportunity to support and expand the Coped Hall business area, creating a hub for employment growth, supported by the delivery of a range of new homes and community facilities to suit local needs.



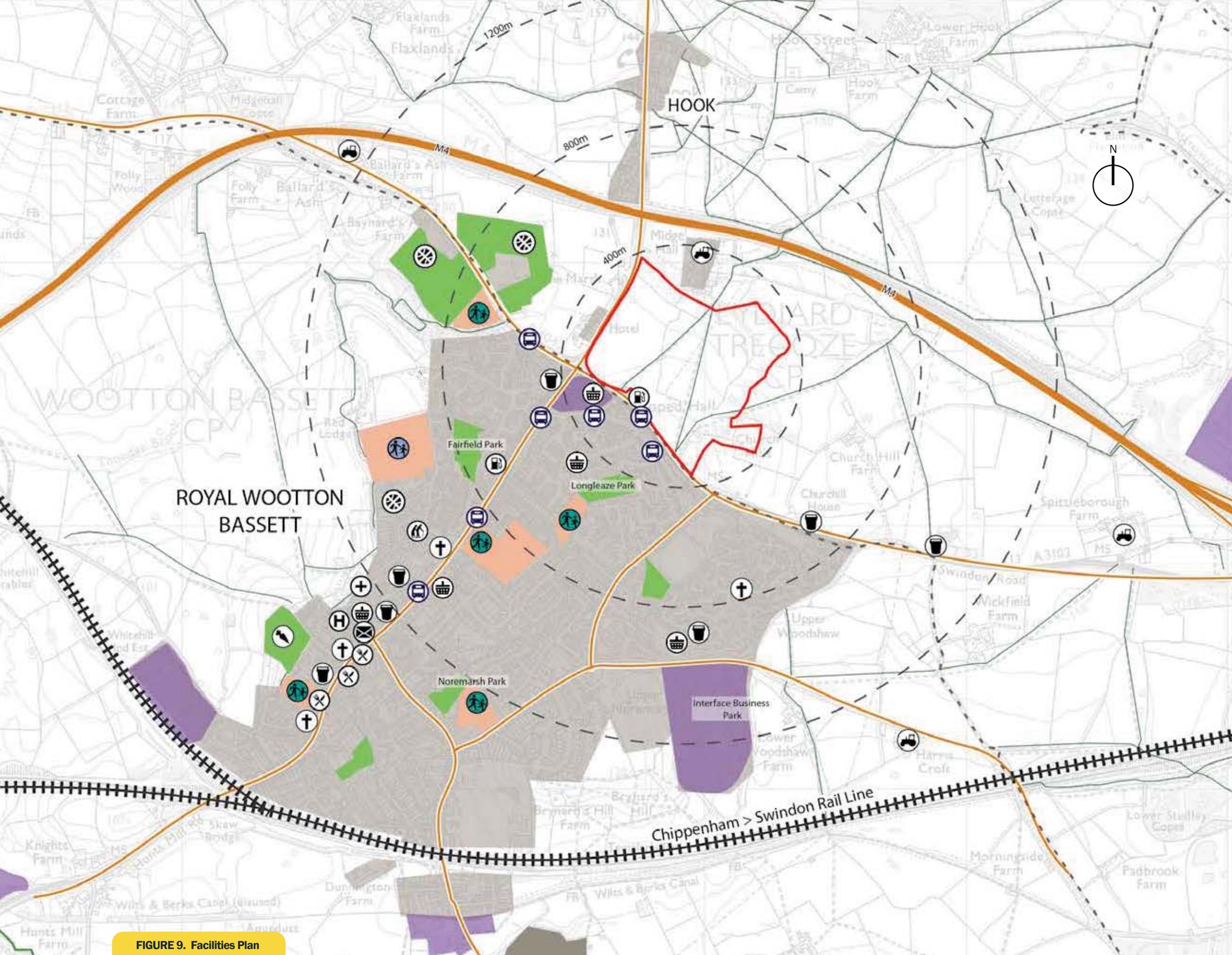


FIGURE 9. Facilities Plan

6. DESIGN CONSIDERATIONS

6.1 Ecology

Designated Sites

There are four nationally designated Sites of Special Scientific Interest (SSSI) within 5km of the site, and the Jubilee Lake Local Nature Reserve (LNR) is located 350m west of the site. There are no international designations (Special Protection Areas, Special Areas of Conservation and Ramsar Sites) within 10km of the site, however, North Meadow and Clattinger Farm SAC is located 11.3km to the north-west.

Onsite Habitats and Protected Species

The preliminary ecological review has not identified any ‘in principle’ constraints on ecological grounds such as statutory and non-statutory designations, or habitats of notable importance. The site is not within, or immediately adjacent to, any area known to be designated for nature conservation value at either international or national level. There are no significant adverse direct effects to designated sites considered likely, owing to their ecological context, degree of geographical separation and lack of ecological connectivity with the site.

As shown in Figure 11 overleaf, the majority of the site is considered to be of negligible intrinsic ecological value owing to intensive arable cultivation, which provides significant habitat restoration/enhancement potential. There is a real opportunity to retain/protect and enhance/extend valuable boundary habitats including hedgerows, trees and off-site woodland. Further opportunities exist to create complementary habitats associated with public open space, including community orchards, woodland and/or species-rich grassland.

Any increase in recreational pressure/disturbance to off-site designations arising from the proposals can be mitigated through on-site public open space provision, integrated with existing PRoW, to provide accessible green spaces and a community resource.

Further consideration of protected species and habitats will be required to address legislation and national/local planning policy related to biodiversity. However, subject to further clarification of the status of habitats and species on-site, and appropriate controls being secured through planning, there is potential to ensure a net gain in biodiversity.

Biodiversity Impact Assessment

A Biodiversity Impact Assessment was carried out based on the existing habitat information illustrated in the Extended Phase 1 Habitat Survey and proposed habitats illustrated in the Concept Masterplan. The scale and extent of new habitat proposed is considered to outweigh the losses anticipated to result from the development proposals. The proposals have potential to deliver a net gain in biodiversity, thereby exceeding planning policy requirements and delivering tangible benefits to local habitat networks and species populations.

6.2 Agricultural Land Classification

The Agricultural Land Classification (ALC) system divides agricultural land into five grades. Grade 1 of the ALC is described as being of excellent quality and Grade 5, at the other end of the scale, is described as being of very poor quality. Agricultural land within Grades 1, 2 and Subgrade 3a of the ALC is considered the “best and most versatile agricultural land”. This is land which is most flexible, productive and efficient in response to inputs.

A detailed ALC survey has been carried out and has determined that agricultural land across the site comprises of Grade 3b quality land and below (see Figure 10) which falls outside the best and most versatile agricultural land (BMV) classification.

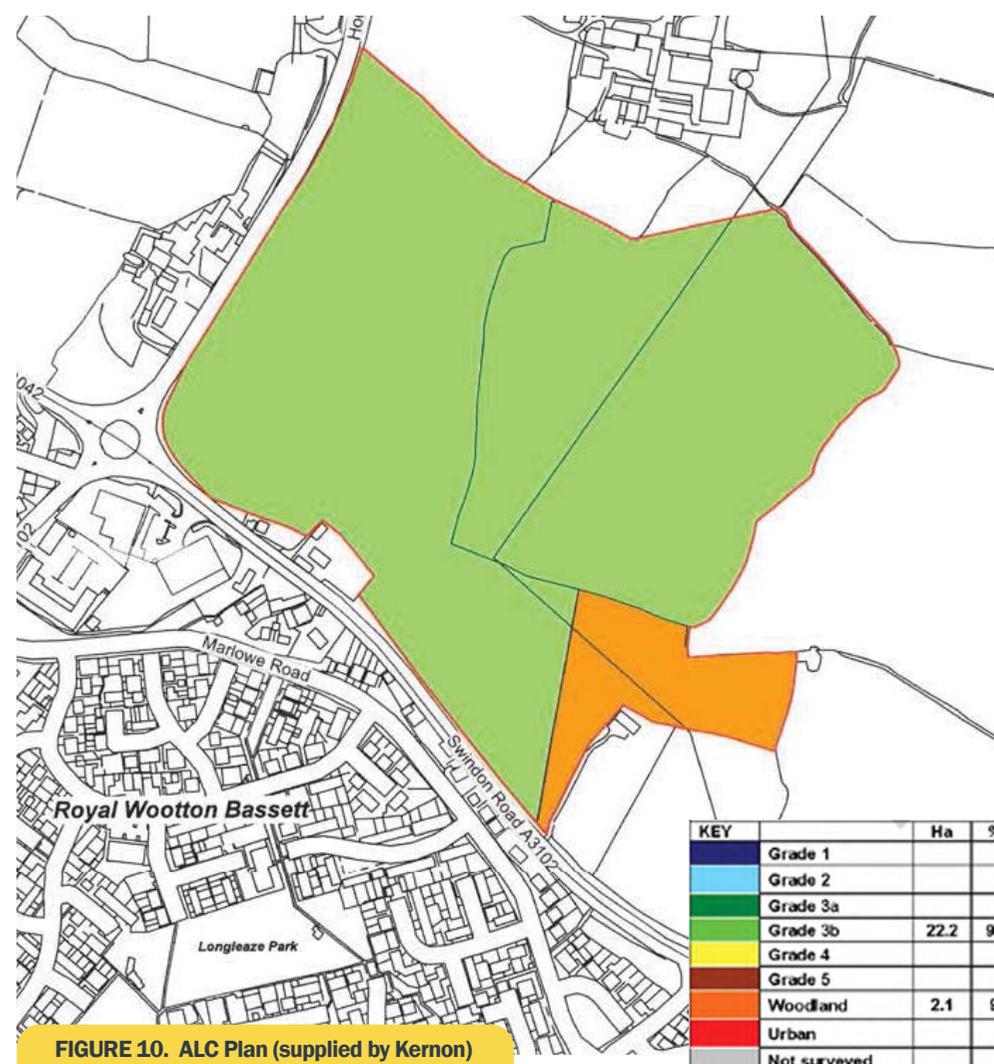


FIGURE 10. ALC Plan (supplied by Kernon)

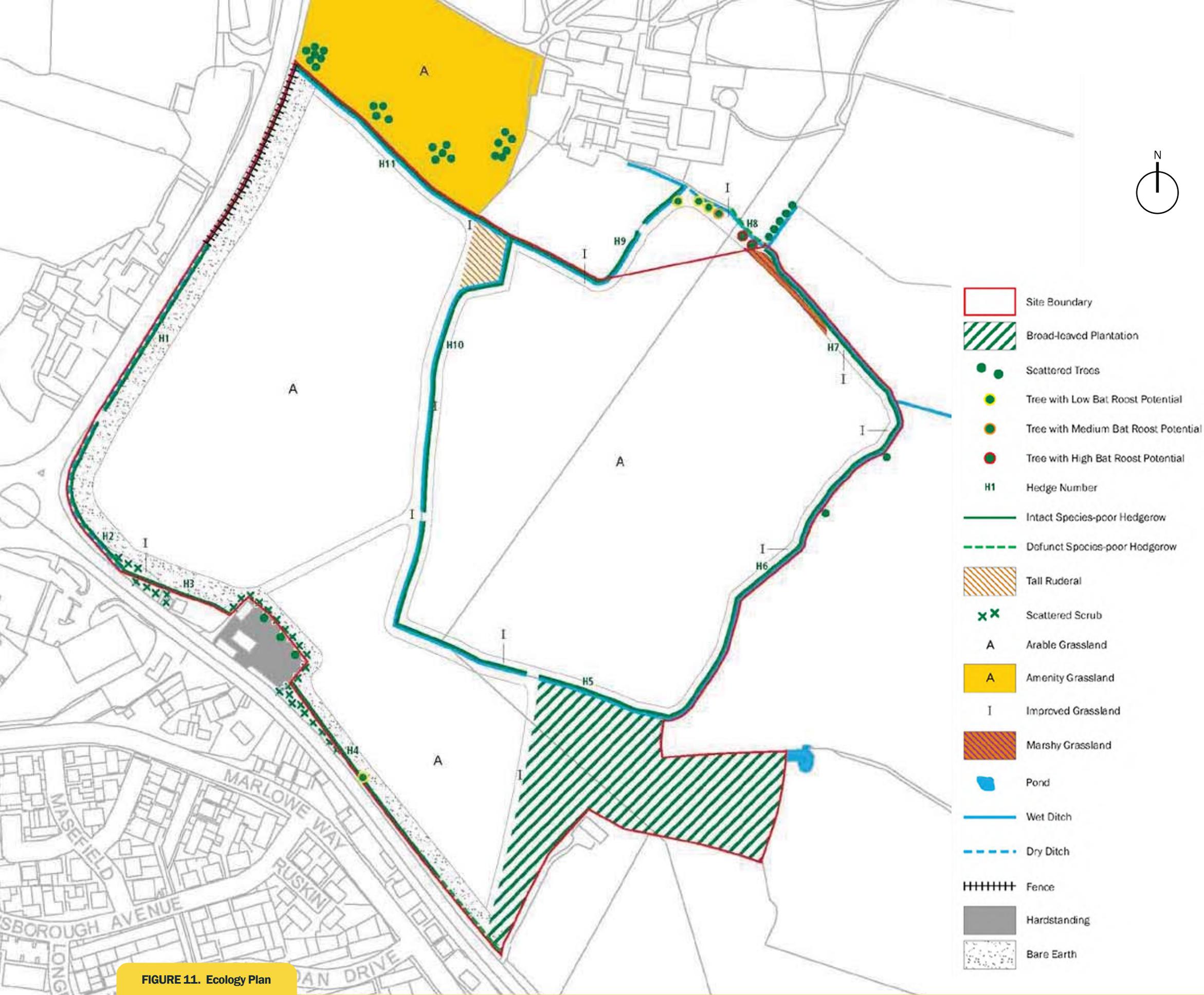


FIGURE 11. Ecology Plan

6.3 Heritage and Archaeology

The preliminary archaeology and heritage review, including a geophysical survey undertaken in 2020, has not identified any ‘in principle’ constraints to the allocation of the site for development.

A scheduled monument - the Post Mill at Church Hills - lies adjacent to the south-east of the site. However, this enjoys a southerly aspect and is well screened from the site, such that adverse effects can be avoided.

There are some listed buildings in close proximity to the site, in particular The Marsh Hotel to the west, and Midge Hall to the north. There is expected to be some visibility between development within the site and these buildings; however, screening from existing trees and the extensive farmstead surrounding Midge Hall are such that effects on the setting of these buildings will be minimal.

Nevertheless, careful consideration is being given in masterplanning to minimise any effects on the settings of these assets and the potential change to views from Lydiard Park registered park and garden. With regard to the latter, it is considered that there are suitable opportunities to successfully mitigate any perceived harm through careful placement of development and new woodland/structure planting on the lower slopes of the site.

Effects on the setting of other listed buildings in the vicinity, and on Royal Wootton Bassett Conservation Area, which lies some 850m to the south-west of the site, are considered unlikely as a result of the existing intervening built form of the town and a lack of any important views that will be affected.

There is the potential for below ground archaeological remains within the site, indicated by cropmarks identified from aerial photographs and recorded on the Historic Environment Record (HER). A geophysical survey in 2020 has further clarified the spread of archaeology and suggests a concentration of remains in a thin strip within the central south-eastern portion of the site, mainly comprising a possible trackway and field boundaries. Within the wider site there is a low-density scatter of possible features, including a possible localised pit alignment in the eastern corner and three tentatively identified kilns to the north (albeit these may represent more recent ferrous anomalies), along with other linear and pit-like features that may simply be the result of modern farming practices or geological activity.

The geophysical survey also highlighted many anomalies suggestive of the impact of modern ploughing practices and it is likely that the underlying archaeological remains will have been truncated, possibly substantially, by this activity. As such, whilst further investigation may be necessary in due course (i.e. trial trenching), it is not expected that any remains present will be of such significance or of such quality of preservation as to warrant retention and influence the masterplan.

In terms of off-site non-designated heritage assets, consultation advice from the Council highlighted a possible blacksmith building a short distance to the south-west and that, should this survive, this would be considered to be an “undesigned Heritage Asset”. The PPG is clear that it is important for the identification of non-designated heritage assets to be based on “sound evidence” and that, regardless, “[o]nly a minority [of buildings] have enough heritage significance to merit identification as non-designated heritage assets”. As such, the possible location of the off-site blacksmith building will be considered in due course to identify whether any such remains survive and whether they are of sufficient interest as to warrant consideration as a non-designated heritage asset. Thereafter, if it is identified as a constraint, the remains should be treated proportionately to its significance, but could not be expected to be of more than local interest and have no more than a very localised influence on the masterplan (if any).



View looking north towards Midge Hall

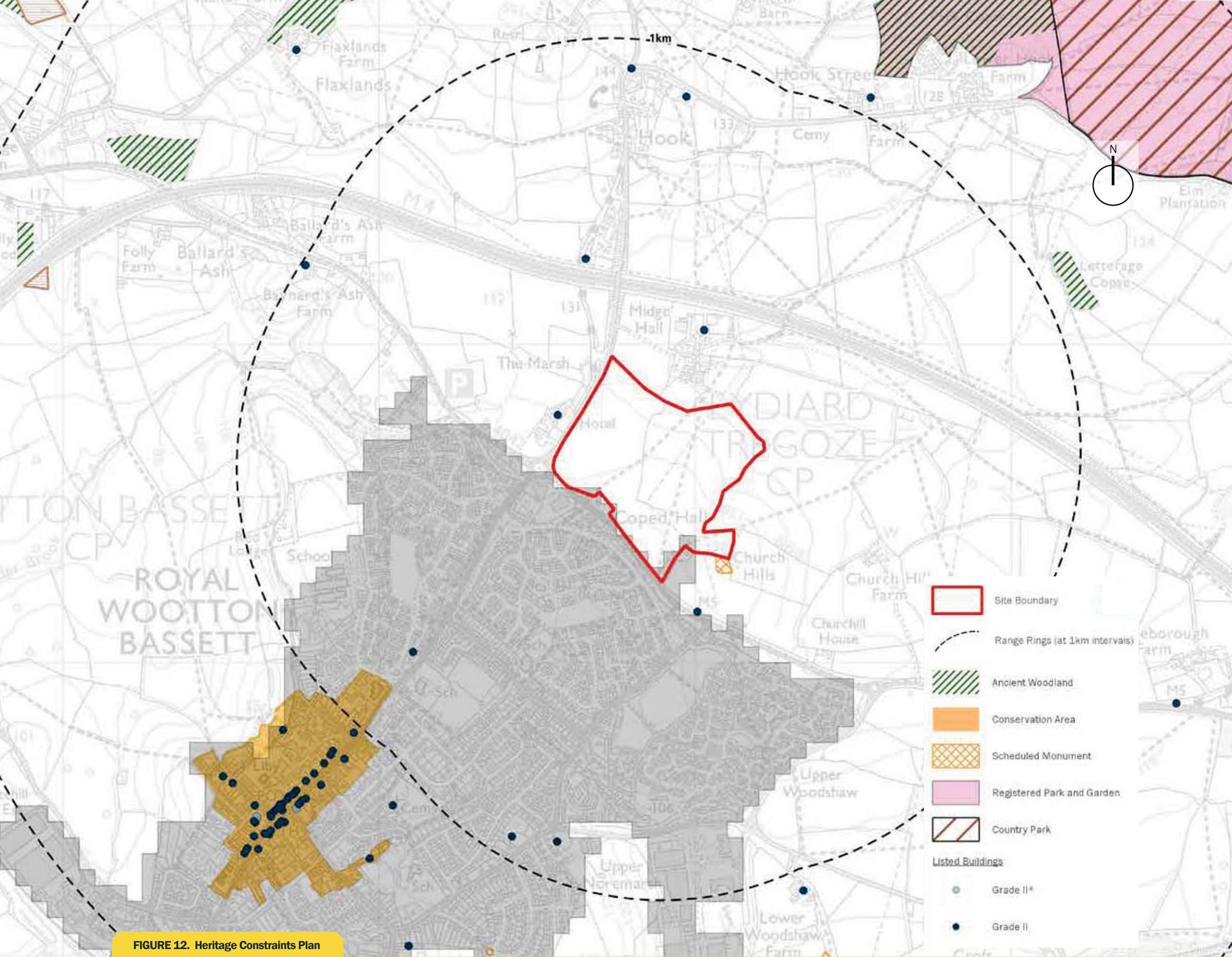


FIGURE 12. Heritage Constraints Plan

6.4 Landscape Character and Visual Amenity

Overall, the site covers undulating landform that rises to the northern edge of Royal Wootton Bassett. A field assessment found that, due to the site's location within an undulating landscape combined with mature landscape features aligning busy vehicular corridors, the visibility of the land is surprisingly limited.

In short-distance views from Hook Road, as illustrated on page 27, the open frontage/clipped hedgerows (at the time of visiting) on the western boundary of the site enable open views across the land to the southern fringes of Swindon (and the very distant horizon of the North Wessex Downs). This also enables direct views of commercial uses on Swindon Road and glimpsed views of residential built form to the south.

Across the central areas of the site, land falls to the north-east, and is seen in views from up to 1.5km, including from land to the south of Lydiard Park. In these views (from the north of the site), as illustrated in Figure 16, elements of existing built form at Royal Wootton Bassett can be seen on the horizon, along with numerous visual detractors in the foreground, particularly tall overhead utility cables and traffic on the M4. In the wider context, it is considered that the surrounding landscape character is influenced by existing built form and numerous visual detractors throughout the local context.

These observations accord with the topographic positioning of Royal Wootton Bassett on an area of local high ground formed by a mudstone/clay bedrock outlier to the North Wessex Downs. First edition OS maps support the notion that the town originated on this area of high ground – the centre being at a commanding position to the south – and the area of Coped Hall to the north. In this sense, the town is perceived as a 'hilltop settlement' and it is noteworthy that it is visible as such from a number of orientations.

Whilst the landscape in which the site lies has been subject to national landscape character publications, the local landscape-related publications are most relevant. As set out within the North Wiltshire Landscape Character Assessment (NWLCA) (2004), the site lies wholly within Character Area 3: the Swindon Fringe Landscape Character Area. The key characteristics noted within the assessment, of relevance to the site, include *"elevated ground"*, *"significant areas of housing"*, *"views from elevated positions... to development edge of Swindon"*, *"degraded agricultural landscapes"*, the *"presence of power lines"* and *"a comprehensive network of public footpaths"*.

Long-term management strategies set out within the NWLCA are particularly relevant, seeking to:

- Ensure development reinforces the locally distinctive character and respects the vernacular, and incorporates landscape mitigation to minimise adverse effects on the landscape and visual amenity;
- Identify and seek opportunities to create new woodland belts and copses, in particular to help screen and contain settlement; and
- Maintain and use footpath network to offer local people recreational opportunities in terms of countryside access routes and cycleways.

In addition, the site provides the opportunity to respond to the 'key views management strategy' within the NWLCA, by enhancing existing woodland planting and improving the condition of field boundaries and enhancing the screening of development edges.

Landscape Designations

The site is not subject to any local or national landscape designations. However, there are a number of environmental planning considerations within the surrounding context. Although the North Wessex Downs AONB lies within 5km to the south-east, there was not found to be any material intervisibility between it and the site (largely because of the north facing aspect of the site).

Following this initial review, it has been found that no part of the site is, or has been, designated for its landscape value or scenic qualities at any level, nor is it identified as being locally valued.



FIGURE 13. View from M4 footbridge looking south-west

Landscape Planning Policy

Following an initial review of local planning policy, the site is not found to be the subject of any site-specific landscape policies.

However, Core Policy 19, within the Wiltshire Core Strategy (2015), defines Royal Wootton Bassett as a market town and states that development proposals within Royal Wootton Bassett should respond to a set of considerations. In particular, this includes “... *The open countryside should be maintained to protect the character and identity of the area in accordance with Core Policy 51*”. Core Policy 51: ‘Landscape’ deals with landscape matters generally, stating that “*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.*”

Core Policies 19 and 52 both make reference to ‘The Great Western Community Forest’ Plan, the objectives of which are to increase tree cover, preserve the character and special/separate identity of towns and villages, and increase opportunities for public recreational access in and around Swindon.

The Wiltshire and Swindon Structure Plan (2016) defines Wootton Bassett within Policy HE6: Landscape Settings which states, that “*Proposals for development should not adversely affect the landscape setting...*” of a number of towns including Royal Wootton Bassett.

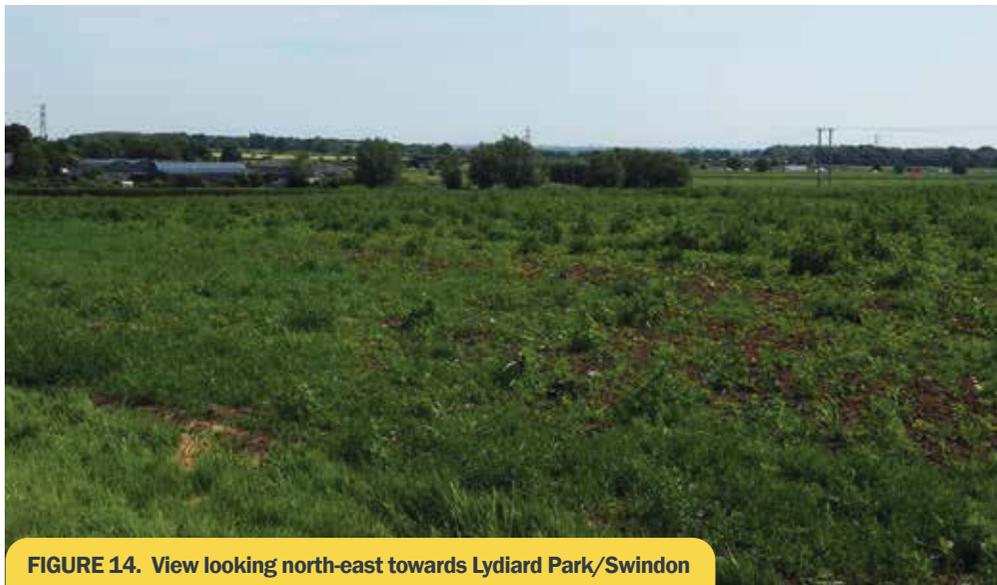


FIGURE 14. View looking north-east towards Lydiard Park/Swindon

Landscape Summary

The following provides a summary of the key landscape issues of the site and provides a series of design suggestions for the development of the masterplan, these include;

- No part of the site is, or has been, designated for its landscape value or scenic qualities at any level, nor is it identified as being locally valued;
- The initial studies suggest that the site, subject to the development of a suitable landscape mitigation strategy that addresses the base of the slopes, forms a logical location for residential development as an extension to the town of Royal Wootton Bassett;
- Any future masterplanning of the site should retain existing mature landscape fabric, where possible, as this contributes to the physical containment, landscape characteristics and provides an immediate maturity to the site. However, it is recognised that the site benefits from very little structure, which can be greatly reinforced and extended with likely benefits to biodiversity;
- The layout should have careful regard to the contribution made by the north-eastern portion of the site to the wider perception of the rural area between Swindon and Royal Wootton Bassett, as seen in views from Hook Street and Lydiard Park. In turn, these considerations would contribute towards compliance with local planning policy requirements and the aspirations of the North Wiltshire Landscape Character Assessment; and
- Urban development should be focused in the south and west of the site, leaving the more sensitive areas to the north and east to perform the function of rural separation between Royal Wootton Bassett and Hook and Swindon. There is potential here for areas of new woodland planting to provide strong tree cover and create a soft, well-integrated settlement edge and form an effective landscape transition to the wider countryside, whilst also supporting the aims of ‘The Great Western Community Forest’ Plan objectives to increase tree cover and opportunities for public recreational access, and preserve the separate identity of neighbouring towns and villages.

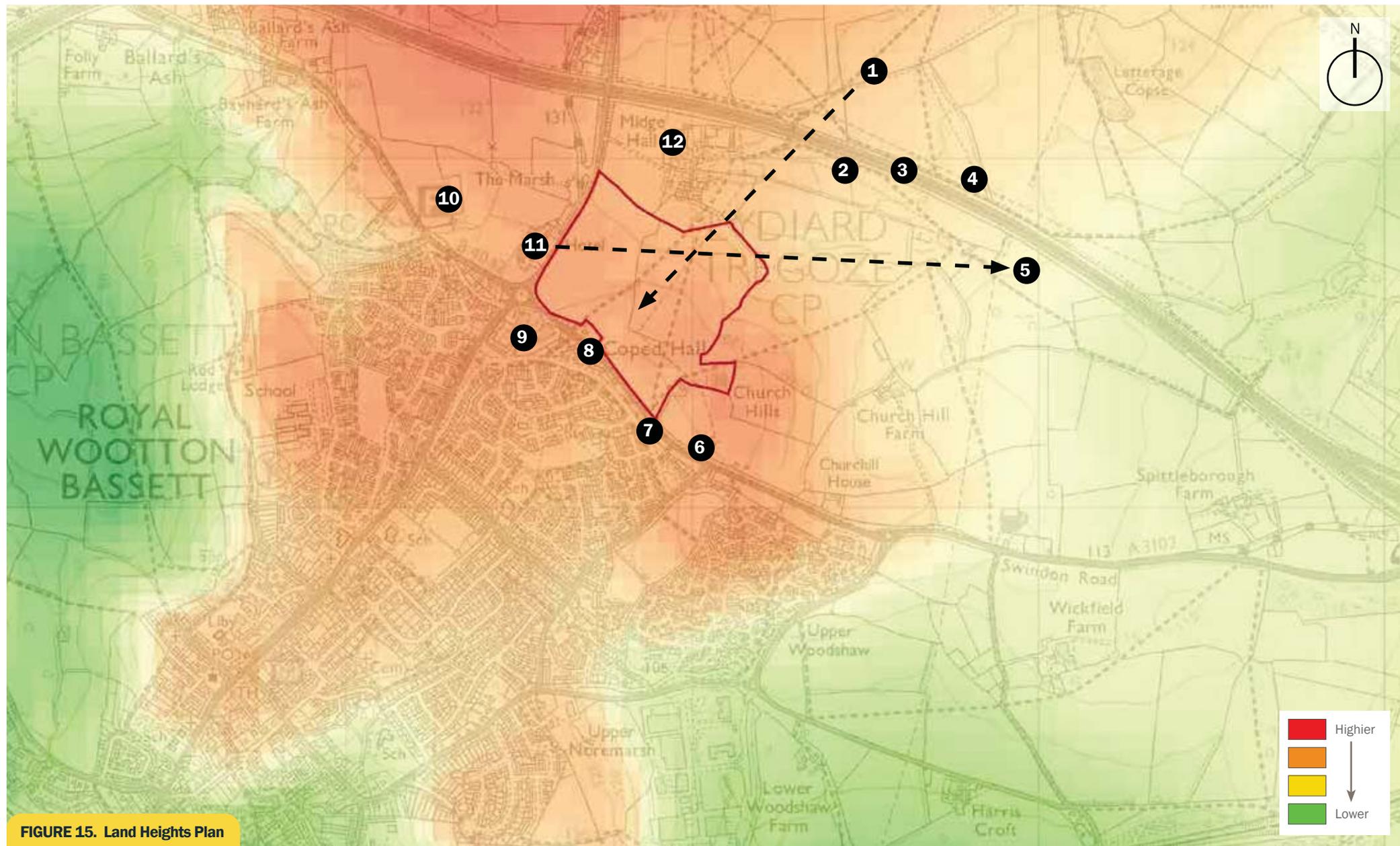


FIGURE 15. Land Heights Plan

- | | | |
|---|--|---|
| <p>1 Longer views are possible from land to the south of Lydiard Park (see Figure 16).</p> <p>2 Land falls to the north-east towards the M4 from which transient views of the site are possible.</p> <p>3 The M4 has a visual and audible influence on the landscape context.</p> <p>4 Tall overhead pylons are dominant features within the local context.</p> | <p>5 Longer views are possible from Hook Road (see Figure 14) towards the southern fringes of Swindon.</p> <p>6 Mature vegetation aligning Swindon Road limits inter-visibility with the site.</p> <p>7 Views from the south are limited to short distance views from adjacent road corridors.</p> <p>8 Residential dwellings and commercial units on high ground at the northern edge of Royal Wootton Bassett are visible in long views from the north-east.</p> | <p>9 Existing built form to the south-west limits visual connections with the site.</p> <p>10 A new sports facility, including its lighting infrastructure, impacts on views from the north.</p> <p>11 Mature vegetation and existing built form on Hook Road limit views from the west.</p> <p>12 Views into the site will be possible for visitors to Midge Hall Nurseries.</p> |
|---|--|---|



FIGURE 16. View from Hook Street looking south-west



FIGURE 17. View from Hook Road looking south-east

6.5 Hydrology

Flooding and Drainage

An appraisal of flood risk sources to the site has been completed. The EA Flood Map for Planning locates the whole site in Flood Zone 1, indicating a low level of risk from fluvial sources. Sites located in Flood Zone 1 are considered to have passed the Sequential Test. The Long Term Flood Map shows some overland flow paths and ponding from surface water flooding. There are surface water flow paths originating from the centre of the site and draining to the north-east. These have been classified with a low level of risk. The proposals are committed to delivering a surface water drainage strategy in accordance with current best practice. This will mitigate the risk from surface water flooding and also manage changes to surface water runoff resulting from the proposals. The sustainable drainage systems (SuDS) incorporated into the layout would be designed to prevent the surface water runoff from the site having an adverse effect across the site and surrounding areas.

Surface Water Drainage

The majority of the site is underlain by bedrock geology of the Ampthill Clay Formation and with the Stanford Limestone Formation to the north, with no superficial deposits recorded. Local soils are classified as loamy and clayey across the majority of the site and with shallow loamy soils to the north, which are typically more freely draining. An infiltration-led drainage strategy is anticipated to be limited, although there may be some potential for source control features.

There is a fall in ground levels across the majority of the site to the north and north-east, with the southern part of the site draining south. There are existing drainage channels adjacent to the northern site boundary and the majority of the western and southern boundaries, and some along internal field boundaries. The existing drainage channels offer viable discharge locations for an attenuation-led drainage strategy. These drainage channels also offer conveyance routes for surface water runoff, which will be supplemented by additional swales within the layout.

The proposals incorporate SuDS features in the form of detention basins at locations across the site, to manage the surface water runoff to greenfield runoff rates with additional betterment. The detention basins would be designed to drain the surface water runoff from the impermeable surfaces of the site at an attenuated rate and including an allowance for climate change and urban creep, with sufficient space to provide shallower and deeper pond areas in the basin.

The use of SuDS provide a number of additional environmental and community benefits, in particular to the existing surface water runoff regime, water quality, biodiversity, landscape, amenity and recreation by providing a well-connected network of green and blue corridors.

Foul Drainage

The site would require foul sewers to be provided within the proposed development, with Wessex Water the local public sewerage authority. A foul drainage connection with Wessex Water would therefore be agreed.

There is a foul sewer rising main that drains from a pumping station in Hook, to the north-west of the site. This passes in a southerly direction through the site, and the easement has informed the layout. The foul drainage for the proposals is also likely to require a pumping station, likely to be located in the north-eastern part of the site, and a rising main through the site.

Further consultation with Wessex Water will ascertain the available capacity of the existing network to accommodate the additional foul flows.

Drainage Summary

- The site is located wholly within Flood Zone 1, indicating a low level of risk from fluvial flood sources. The proposals are considered to be an appropriate land use based on this flood risk classification and would pass the Sequential Test;
- There are surface water flow paths from the centre of the site draining to the north-east, indicating how surface water currently drains. There is not currently any control on these surface water flows. The drainage strategy will replicate this drainage direction to the drainage channels, and use SuDS to manage the surface water runoff from the site using sustainable solutions;
- A comprehensive drainage strategy will ensure that the proposals will attenuate surface water runoff within the site and not increase runoff above existing rates. A well-incorporated series of SuDS features including detention basins and swales will manage the runoff rate;
- In addition to managing the surface water runoff from the site, these SuDS features would provide additional environmental and community benefits, notably to water quality, biodiversity, landscape, amenity and recreation by providing a well-connected network of green and blue corridors; and
- The existing foul drainage would be incorporated into the layout of the proposed development. It is anticipated that the foul drainage requirements of the proposals would be provided through a connection into the local foul sewerage infrastructure, anticipated to require a foul pumping station and rising main passing through the site.

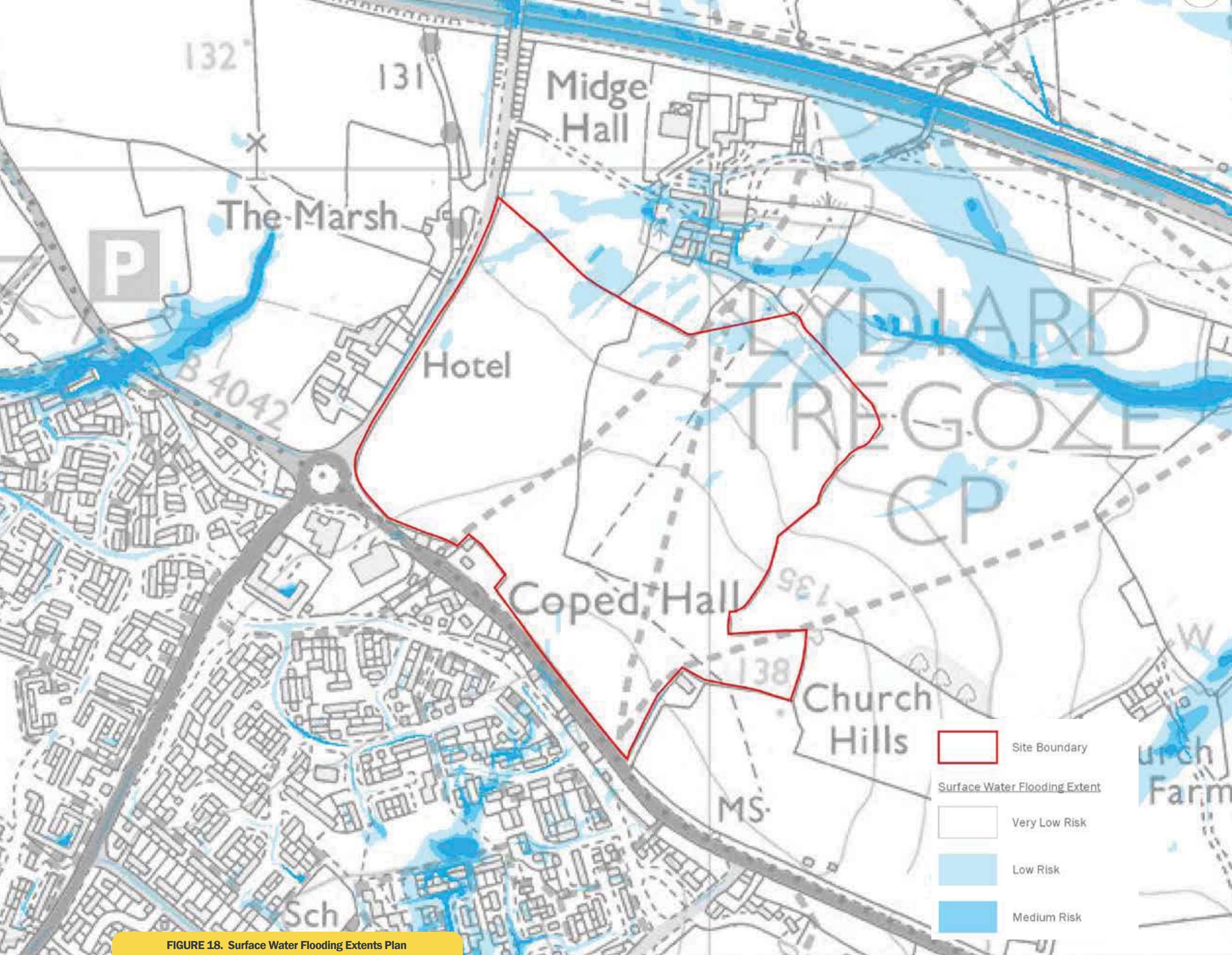


FIGURE 18. Surface Water Flooding Extents Plan

6.6 Access and Transport

Opportunities must be taken to make cycling, walking and public transport the modes of choice and these modes must be made more convenient for the majority of journeys than car usage, to promote genuine modal shift.

A significant benefit of this site is its proximity to key local facilities and amenities, as identified in Section 5.2. In particular, this site is well placed to encourage higher levels of active travel use for travel to employment and education destinations within Royal Wootton Bassett than other competing sites. The travel to the significant employment areas west of Swindon, Lydiard Fields and Windmill Hill, would also be expected to attract significant public transport patronage whilst cycling would be a significant opportunity with the proposed new RWB-Windmill Hill route in place.

Active Travel

The scheme would make provision for a comprehensive network of walking and cycling routes catering for all needs and abilities.

Walking

Within the scheme pedestrian routes will be integral to the overall layout, with the addition of recreational routes – circular dog walking routes and walking/jogging trails. The 3 No. PRoW across the site will be incorporated into the linear green space provision. In addition to the two main site access points, permeability of the scheme with further active travel connections is made along the two highway frontages as well as linking to the PRoW as recreational routes.

Cycling

Sustrans and Wiltshire Council are seeking to deliver a 3km (2 mile) segregated shared use cycle/pedestrian path between RWB and Windmill Hill Business Park in Swindon. By way of an extension, utilising the highway verge on the north side of the A3102, the proposed route could be extended to include north Royal Wootton Bassett and via a link through the site onto the existing cycle route to the town centre.

Public Transport

The site is primarily served by the 55 Gold and 54 bus services that operate along Marlowe Way, a walking distance of 250m (3 minutes). The 55 Gold operates a frequent service connecting Chippenham to Swindon via RWB and the Lydiard Fields Retail Park, adjacent Windmill Hill. With increased patronage and changed travel patterns there may be a future need to route bus services along the A3102 and through the scheme. The central access road through the scheme would be designed to cater for bus services and a centrally located bus gate could safeguard journey times and prevent other through traffic.

Vehicular Access

Primary vehicular access would be on to the A3102 (Swindon Road) on the eastern side of the scheme. To better integrate pedestrians and cyclists the main access would be signal control, as opposed to a roundabout, and bus priority could be introduced into it if necessary. Access on to the Hook Road would be secondary and generally lower key to that on to the A3102, such as a priority junction. The Hook Road would benefit from the current 40mph speed limit being extended for the full site frontage of this road. Swindon Road is a principal road aligned east to west providing a gateway to south-western Swindon and wider areas via the M4 to the east. Hook Road is a more minor road leading to rural areas north of Royal Wootton Bassett.

To prevent through traffic the spine road would be a sinuous indirect route designed with Manual for Streets design guidance to a 20-30 mph limit and could incorporate a bus gate, which could also provide journey time benefits to public transport use.



View looking north-west along Swindon Road

6.7 Technical Summary

Ground Conditions

Review of the geological map for the general site area indicates the site is underlain by the Amptill Clay formation.

No contamination is expected due to the greenfield nature of the site.

Utilities

The site is crossed by the overhead 11kv electricity cables shown on the constraints plan, which will be diverted prior to the commencement of construction works.

The various other utilities running across and around the periphery of the site will be diverted as part of the site access construction works.

Air Quality

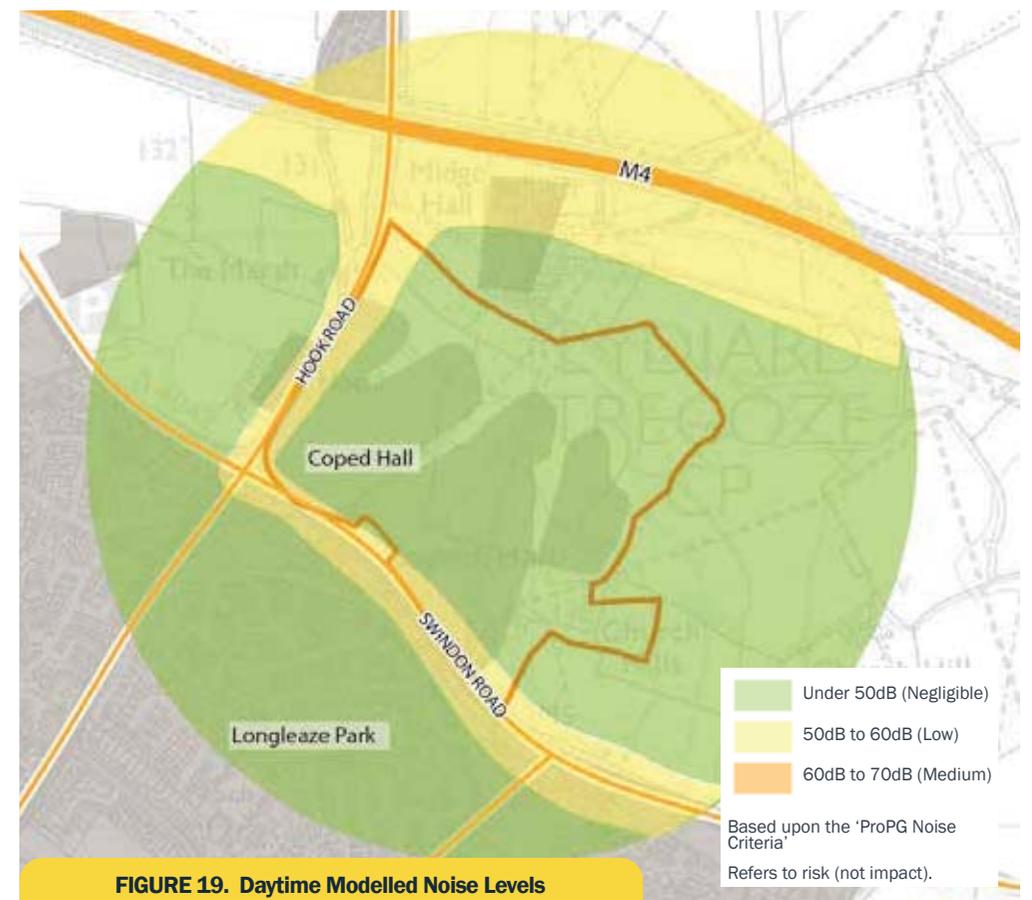
There are no Air Quality Management Areas near the site, so it is considered that the dominant source of pollution will be the local highway network. These local roads are not particularly congested, so it is likely that the M4 will be the dominant source of air pollution, however, it is situated to the north of the site and therefore downwind from the prevailing wind and is at a lower level, making it unlikely to have a significant effect on the site. With the anticipated air quality concentrations in the locality of the site, it is assumed that any impacts can be mitigated to within an acceptable level.



Noise

The site is bounded by the A3102 Swindon Road to the south and C414 Hook Road to the west, most of which are subject to a 40mph speed limit. The M4 is located to the north of the site, in a cutting over 200m away from the site boundary and over 300m away from the northern edge of development currently shown on the masterplan. The low speed limits on adjacent roads and separation distance from the M4 means that any traffic noise generated will not be a significant constraint on the site's development, as it is anticipated that most of the site can achieve the required criteria without onerous acoustic measures.

Whilst there is potential for higher noise levels on a limited number of units on the most exposed boundaries/facades, acoustic design options (such as building orientation, internal layout, setback, landscaping, high specification glazing and acoustic ventilation) can be considered to aid in reducing exposure.



7. CONSTRAINTS AND OPPORTUNITIES

7.1 Key Elements

The main opportunities and constraints to development, as identified from initial environmental studies, are illustrated on Figure 20. The key elements are summarised below.

Access and Connectivity

- Development will benefit from two vehicular access points onto Swindon Road and Hook Road;
- All existing PRow will be retained on-site and located within a series of green corridors, improving access to new areas of open space for recreational purposes;
- Opportunity to improve pedestrian and cycle permeability connections into existing street network south-east of Swindon Road, to potential future development north-west of Hook Road, and to provide an off-road cycle connection to the proposed Sustrans route to Swindon; and
- A new bus route could be created through the development, or a diversion be made to the existing route 55, improving local bus services to the town centre and the local area.

Landscape and Visibility

- Development to be limited to south-west areas of site to retain Royal Wootton Bassett's historic hilltop settlement character;
- Opportunities for new woodland planting will improve landscape structure on-site, contributing to local landscape characteristics and benefiting local biodiversity, as well as contributing to the aims of The Great Western Community Forest Plan; and
- A landscape-led masterplan will respond to any potentially sensitive views from the north.

Ecology and Green Infrastructure

- Wherever possible all existing woodland, hedgerows and trees will be retained and incorporated into open space areas;
- Opportunity to establish a number of green corridors connecting open spaces across and beyond the site, providing a series of multifunctional spaces with ecological screening, amenity and drainage purposes; and
- New landscape areas to contribute to biodiversity net gains through sensitive planting to support local wildlife.

Local Character and Context

- Development to be restricted to hilltop locations on-site to retain the local characteristic of the town, its elevated historical setting, and reinforce the existing settlement pattern of Royal Wootton Bassett;
- Ensure an appropriate scale and massing of northern development area to reflect a soft transition between urban and rural edge conditions;
- Utilise the best characteristics from the district to create a development of recognisable local character and one which integrates with its context; and
- Opportunity for views north to woodland areas and Lydiard Park, as well as long views east towards the North Wessex Downs.

Heritage

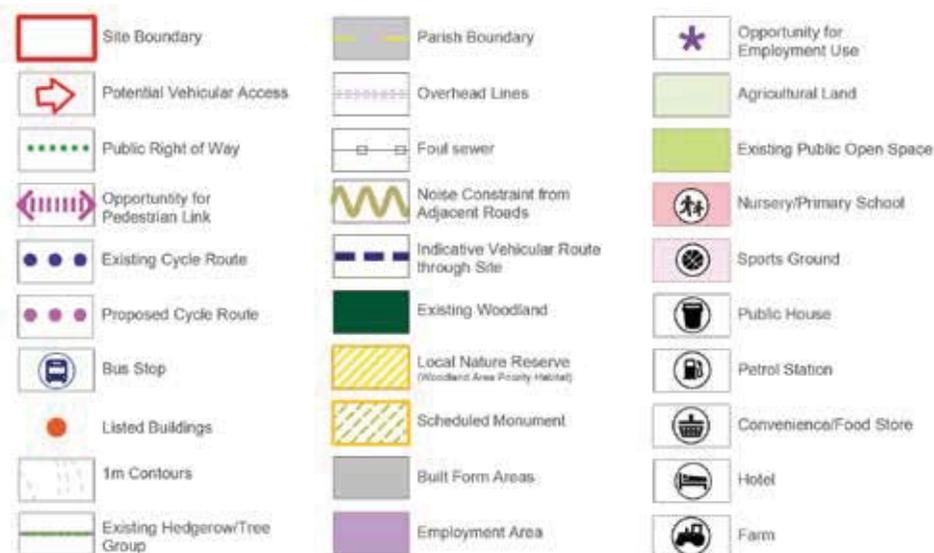
- Development will be offset from the scheduled monument site at Post Mill at Church Hills to the south-east of the site, the retained existing woodland will provide additional screening;
- Although impact is expected to be minimal, restricting development from the northern extents of the site will help protect the setting of the listed building at Midge Hall; and
- The masterplan will respond to any sensitive views from Lydiard Park Registered Park and Garden to the north-east of the site.

Drainage

- The site is located wholly within Flood Zone 1 and does not have any existing flood risk constraints;
- A comprehensive drainage strategy will ensure that development will attenuate surface water within the site and not increase run-off above existing field rates; and
- The proposed layout will accommodate the alignment of the existing foul sewer rising main, which runs across the site.

Economic and Community

- The site presents the opportunity for an employment area to be located in the south-west corner of the site that is close to the existing Coped Hall Business Park and petrol station;
- The offer of an employment area would sustainably support the growth of the town and local businesses, and improve self-containment;
- New open space areas will improve the recreational offer to existing local residents with opportunities for new play areas, sports pitches, walking trails and allotments; and
- The site benefits from being in close proximity to existing schools, and recreational facilities at Gerard Buxton Sports Ground, Royal Wootton Bassett Rugby and Football Club and Jubilee Lake.



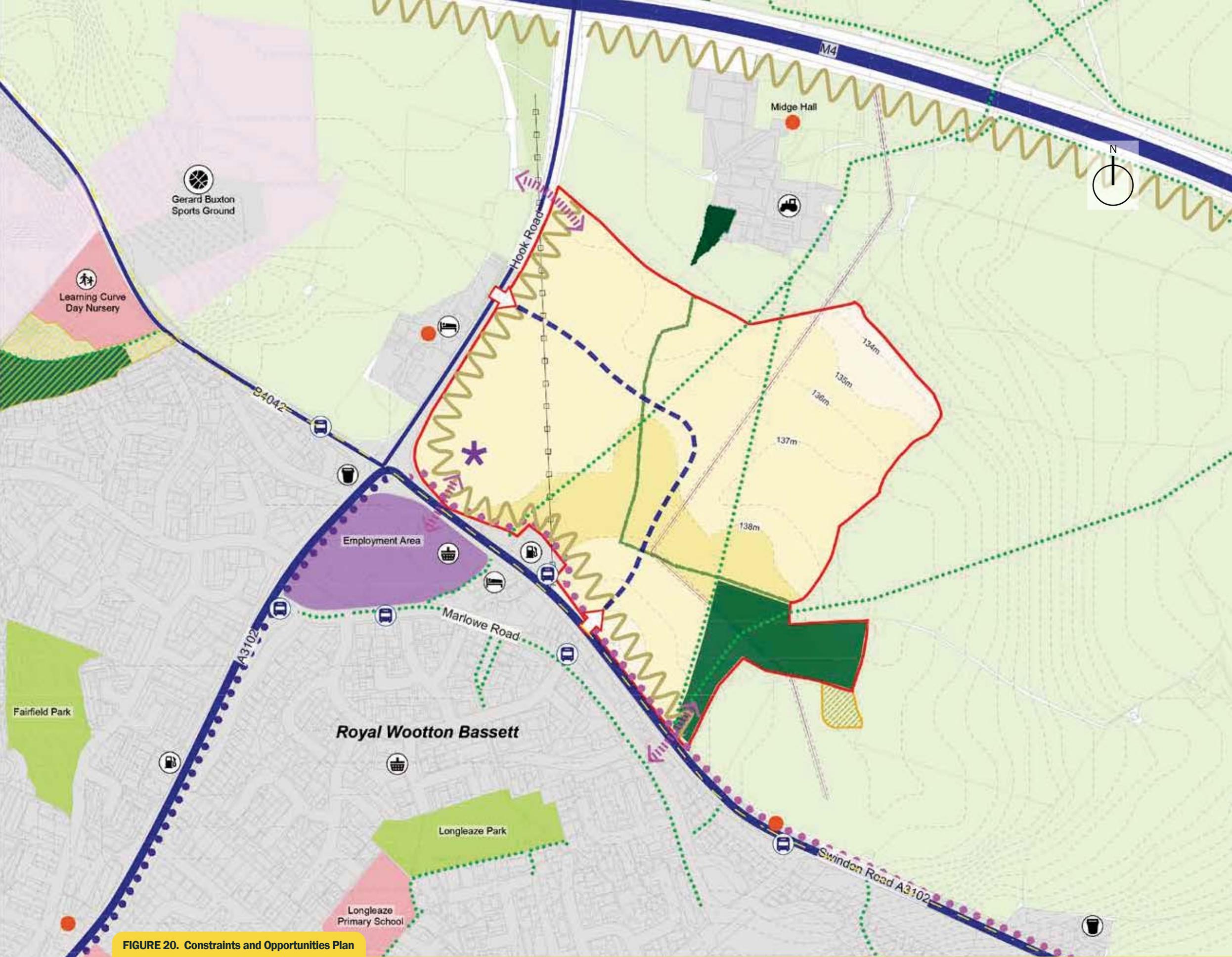


FIGURE 20. Constraints and Opportunities Plan

8. CONCEPT MASTERPLAN

8.1 Design Evolution

A consideration of the site's constraints and opportunities has led to the formation of the following concept sketches, which draw upon the key assets of the site and look to integrate the proposed development into the surrounding context in terms of landscape, movement route structure and neighbouring uses.

Landscape

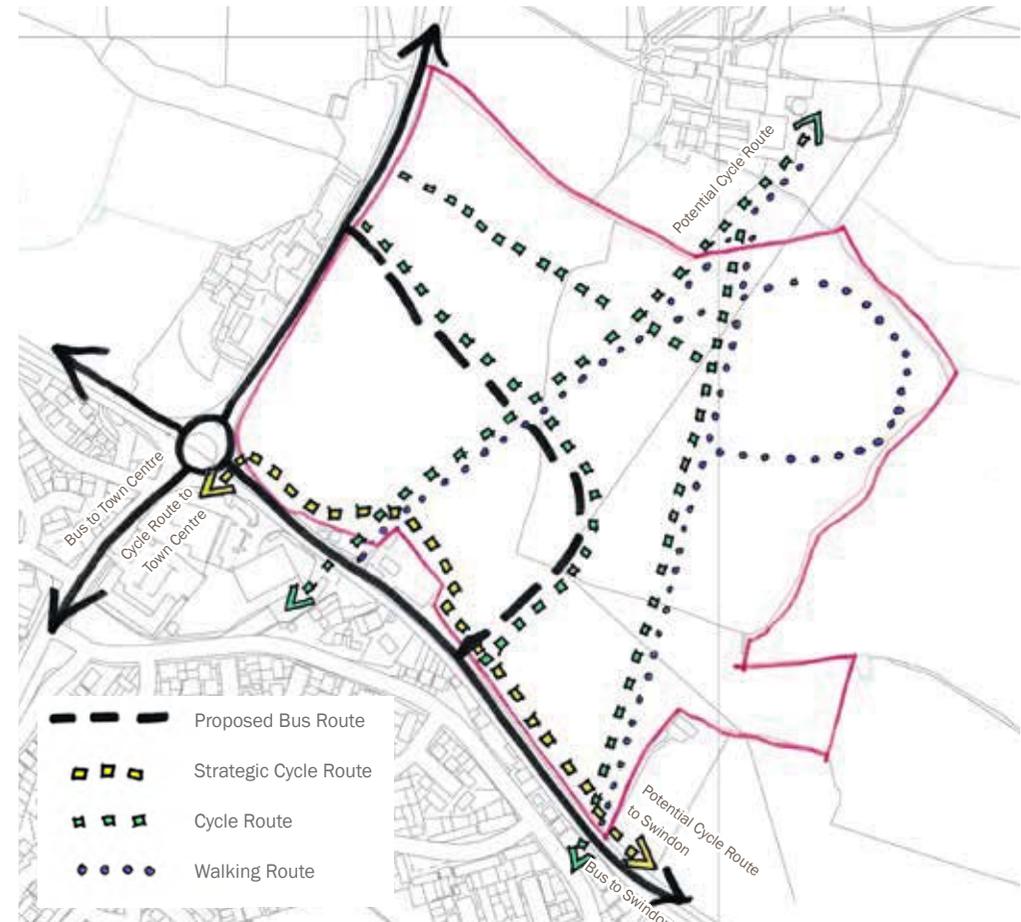
Woodland planting on the northern edge of the site aims to reinforce Royal Wootton Bassett's historic character as a hilltop settlement within woodland, whilst also mitigating potential views of the new development from Registered Parkland to the north-east of the site.

Tree planting and green space will be further brought into the development to strengthen this historic woodland character, whilst in addition providing a green setting for new development.



Movement

A new traffic calmed road through the development would provide access to existing traffic and bus routes into both Royal Wootton Bassett town centre and to Swindon. To promote and encourage non-car travel, existing public rights of way could be upgraded and new off-road cycle routes opened up to form a link in the strategic cycle network to create cycle connections to both locations. New walking and recreational routes through the proposed new woodland planting could be provided.



8.2 Initial Concept

The initial concept masterplan (Figure 21) emerged from the aspirations set out in The Vision, and has been holistically informed by the design considerations set out in Section 6 and the constraints and opportunities identified in Section 7. The plan provided an initial suggestion for the land uses on the site, which includes a mixed use development with substantial open space areas.

The below lists the emerging key elements of the masterplan:

- ① Opportunity for commercial/employment use with links to a shared space with community uses;
- ② Vehicular access to site from Hook Road via ghost island junction (subject to Highway Engineers design);
- ③ Vehicular access to site from Swindon Road via traffic-lighted junction (subject to Highway Engineers design);
- ④ Opportunities for range of landscape uses to northern part of site including woodland planting, landscape mitigation and ecological habitat;
- ⑤ Proposed Green Infrastructure to connect/integrate with existing public rights of way that cross the site;
- ⑥ Lower density development located to the northern part of site with opportunities for punctuated edge with Green Infrastructure uses; and
- ⑦ Traffic calming treatment to primary route to avoid 'rat running' between Hook Road and Swindon Road.
- ⑧ Potential new strategic, off-road cycle route.

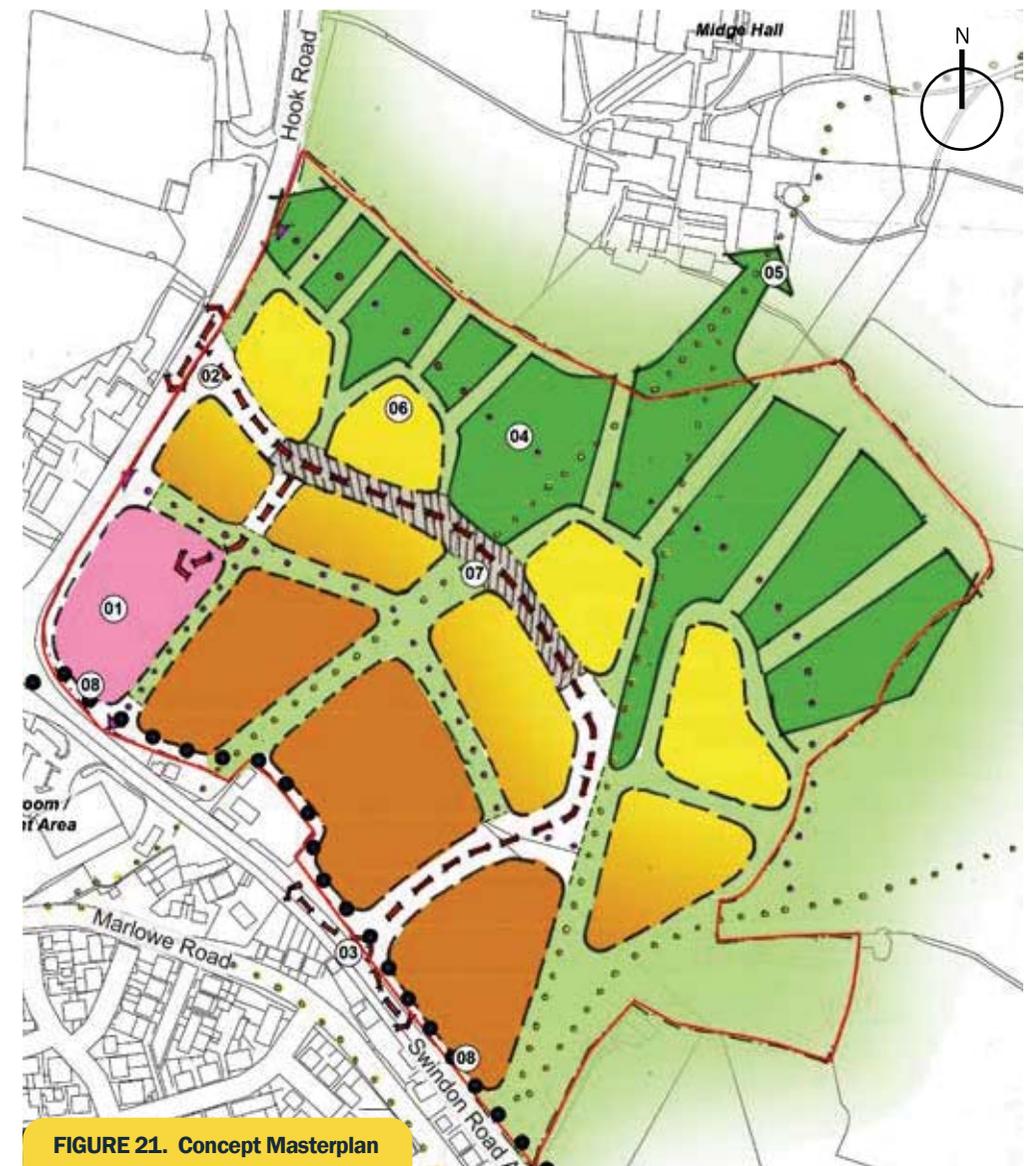
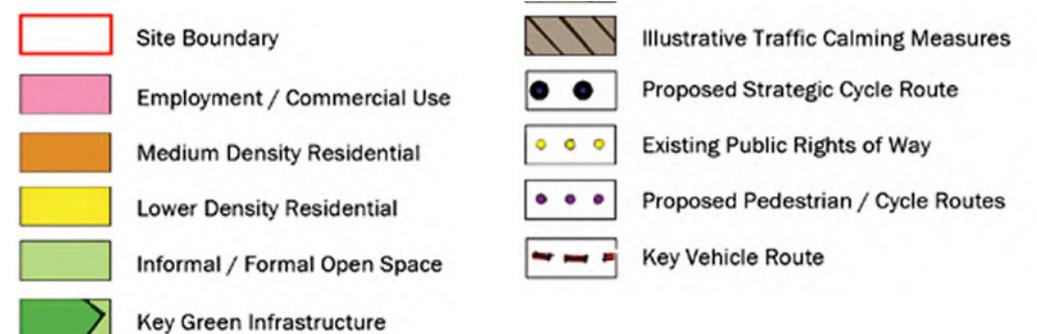


FIGURE 21. Concept Masterplan



8.3 Addressing Draft Local Plan Placemaking Policies

Protecting Character and Identity of Hilltop Settlement

The plan opposite shows the town in its context as a hilltop settlement. The conservation area is highlighted and constitutes the historic core of the settlement. The historic expansion of the town is discussed in detail in Section 4.5.

The site presents opportunities to develop a strong wooded landscape buffer along the north and east of the site to create a soft, well-integrated settlement edge to the wider countryside, which is in keeping with the edge condition of much of the rest of the town.

Development is positioned on the highest ground and the sloping ground which surrounds the hilltop would have historically been covered in vegetation, which would help soften and filter the development edge and help to assimilate it into the surrounding countryside. The most successful edges of the town, when viewed from a distance, are those where development is offset by the presence of vegetation, which performs this screening and filtering function.

The proposal therefore seeks to follow this precedent and restrict development to the hilltop plateau in the southern and westerly parts of the site and retain the northern and eastern portion of the site as green space, with the potential for woodland planting in keeping with the character of the town.

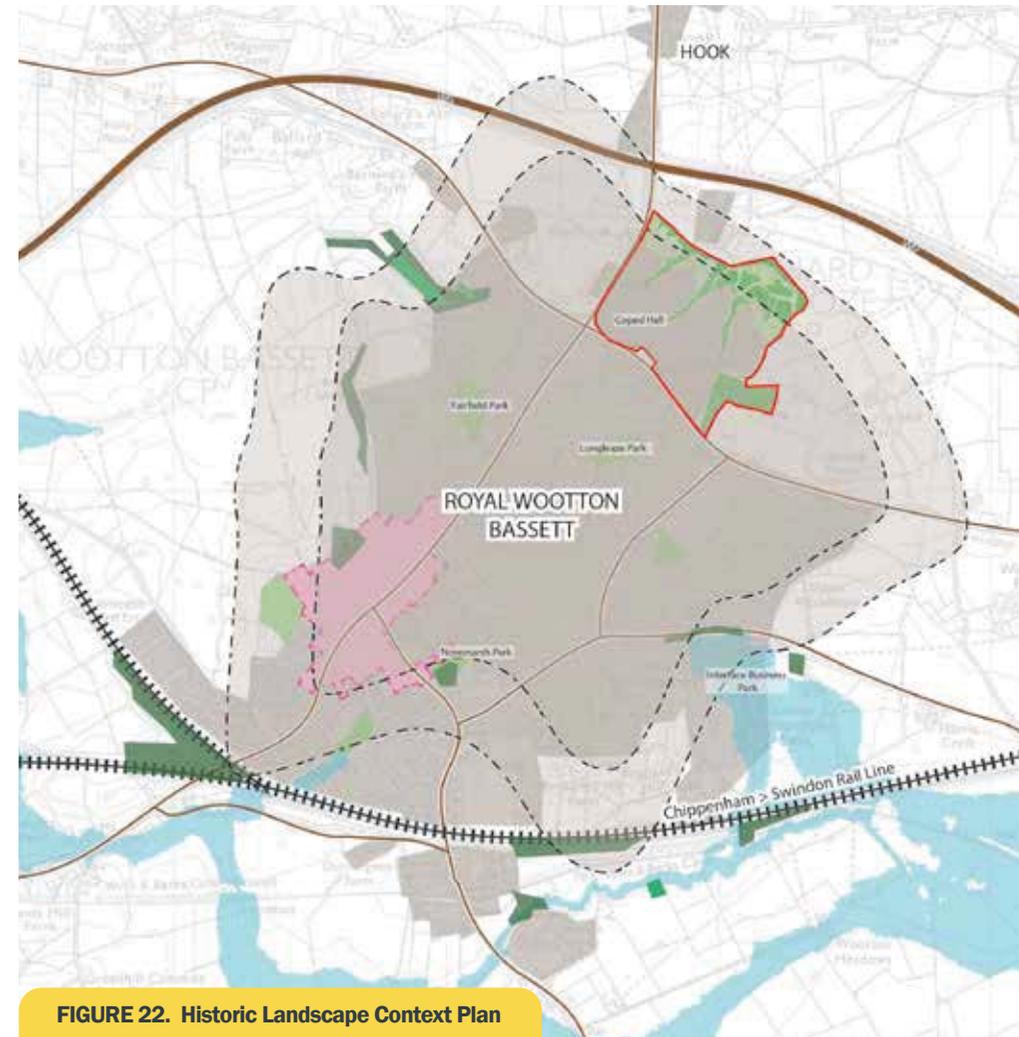


FIGURE 22. Historic Landscape Context Plan



Preventing Coalescence and Retaining Separate Identity of Settlements

Development of the site would retain the rural gap between Royal Wootton Bassett and Swindon to the north-east, and between Royal Wootton Bassett and Hook to the north. Despite the development extending the boundary of the town northwards, the separation of the landscape by the M4 is such that this would have negligible effect on the coalescence of the two settlements.

Sustainable Transport Strategy

Given the real opportunities for sustainable travel from the site, the masterplan benefits from a significant focus on active travel and permeability whilst the vehicular access proposals have been made fully inclusive of pedestrians and cyclists. The overall layout places greatest emphasis on active travel and overcoming barriers to connectivity.

The plan opposite shows the proposed access strategy and demonstrates how a potential re-routing of the existing number 55 Gold bus route, which runs half-hourly between Swindon and Chippenham, could serve the Site. This route could incorporate a bus gate to provide journey time benefits to public transport use. Also shown is the proposed Sustrans cycle route and the potential off-road cycle link from the site to connect into this route. The cycle route from the site to the town centre is also highlighted.

The plan below further demonstrates the proposed cycle infrastructure and how development would benefit from easy access to both Royal Wootton Bassett town centre and the Windmill Hill Business Park in Swindon, just 3.5 km away. Both plans demonstrate how an extension to the proposed RWB-Windmill Hill cycle route could bridge the gap by forming the missing piece of the cycle network connecting to the town centre and employment areas in western Swindon.

The site by virtue of its close proximity to local services, amenities and sustainable travel, can deliver a suitably sustainable scheme achieving higher levels of sustainable travel than comparable schemes in Royal Wootton Bassett. Improved sustainable infrastructure would not only meet the needs of the development but also have significant wider benefit to the town.

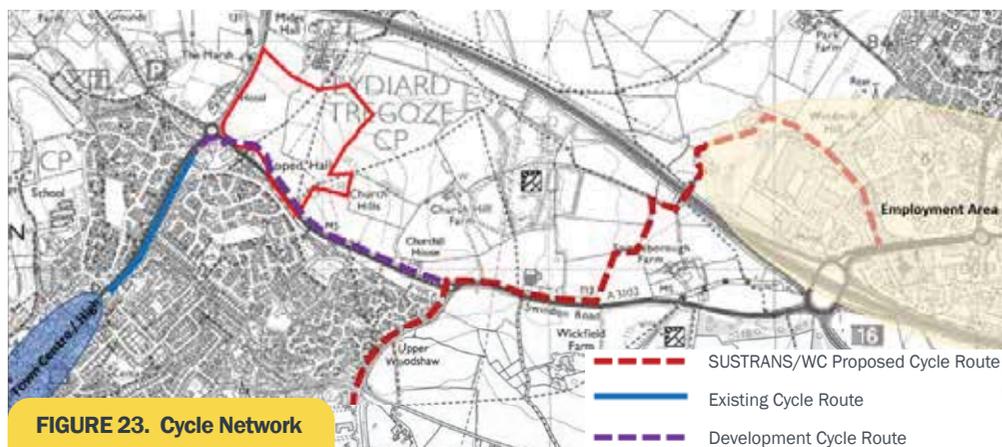


FIGURE 23. Cycle Network

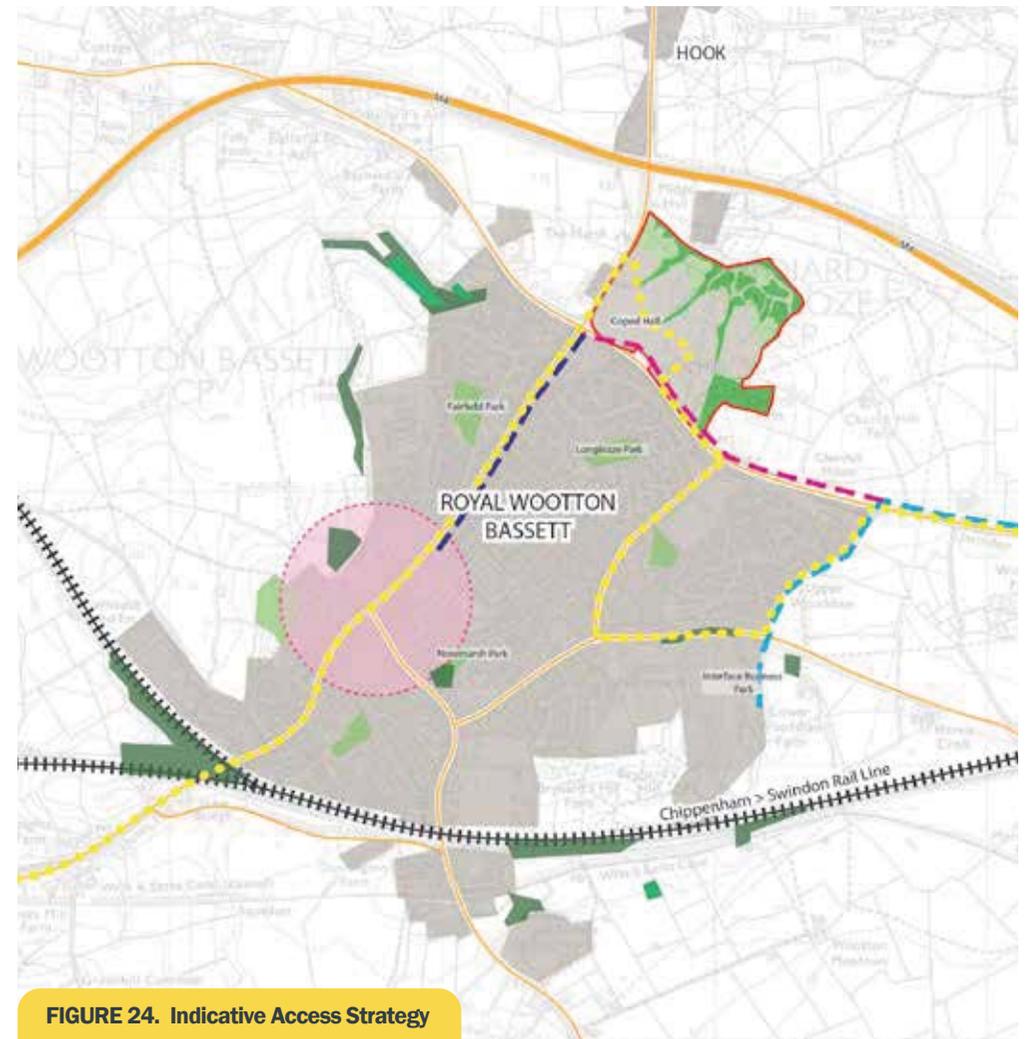
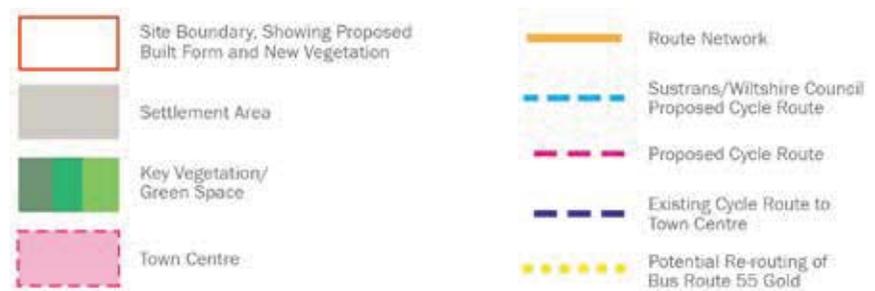


FIGURE 24. Indicative Access Strategy



9. THE PROPOSAL

Land north of Swindon Road presents the opportunity to be a new sustainable development creating a locally identifiable northern gateway to Royal Wootton Bassett, delivering a mix of employment, housing, transportation and community facilities to Coped Hall.

9.1 The Masterplan

The masterplan overleaf (Figure 25) shows a potential layout and form of the development that has been designed around a strong landscape structure, respecting the local settlement characteristics and establishing a central neighbourhood hub close to the existing employment uses along Swindon Road.

The site has the potential to deliver circa 400 dwellings, extensive open space areas, potential employment area and community facilities.

The table below provides an approximate land budget for the site and the adjacent annotations highlight the key design drivers behind the masterplan.

| Initial Land Uses | Approximate Areas (Ha) |
|------------------------------|------------------------|
| Residential Area | 10.6 |
| Employment/Mixed Use Area | 0.5 |
| New Woodland/Scrub Planting | 3 |
| Existing Woodland Plantation | 2 |
| Green Corridors/Open Spaces | 7.2 |
| Road Infrastructure | 1 |

- 1 A local hub focused around shared space/play area with connections to public transport links along new spine road and Swindon Road;
- 2 Multifunctional building with opportunity for gym/nursery/community centre/arts centre;
- 3 Flexible block—either higher density apartments/town houses or alternatively could be an extra care facility;
- 4 Employment area—suitable for co-working centre, office or retail uses, with excellent access to public transportation to RWB town centre/Swindon and close to the M4;
- 5 Potential location for new skate park with parking and good access for emergency services with sufficient offsets to proposed dwellings and well screened;
- 6 Two new allotment areas with parking areas to cater for town’s under supply;
- 7 New woodland planting—provide screening from M4 and longer views of development from Lydiard Park;
- 8 New woodland planting reflecting historical reference to Royal Wootton Bassett as a ‘hilltop settlement in the woods’;
- 9 Ecologically designed SuDS including surface water attenuation areas and swales;
- 10 A mix of housing types - form and materials to reflect local architectural character of Royal Wootton Bassett;
- 11 Lower density housing and informal arrangement to soften development edge to the north;
- 12 Network of walking/cycling/trim trails through green corridors and woodland park area; and
- 13 Connections along footpaths over motorway footbridge to Swindon and wider recreational network.

The following pages (39-43) take a look at key areas of the masterplan in more detail, providing the reader with an impression of what could be achieved through the proposals.

- ● ● ● Existing Off-Road Cycle Route
- ● ● ● Proposed Off-Road Cycle Route
- ● ● ● Existing Public Right of Way



FIGURE 25. Concept Masterplan



9.2 Coped Hall Local Centre

Focused around a shared space, the local hub could provide a mix of employment and community uses to support the growth of the town and establish Coped Hall as a new northern gateway to Royal Wootton Bassett.

Key Opportunities:

- 1 A combined multi-purpose community centre with access to shared function rooms, café, gym studio and space for local nursery;
- 2 High quality landscaping and play area will be easily accessible and provide point of focus and activity to the space;
- 3 Hub space to support local businesses of all sizes, providing flexible/co-working office and meeting spaces;
- 4 Layout and building design to adopt smart and energy efficient technologies with opportunities for grey water harvesting and electric car charging spaces;
- 5 Green corridor with pedestrian and cycleways will improve access to existing local shop at the petrol station;
- 6 Act as a catalyst to improve existing Swindon Road interface and pedestrian/cycle connections;
- 7 Possible location for assisted living/retirement accommodation, with opportunity for shared facilities to front shared space; and
- 8 Local centre conveniently located close to existing Swindon Road bus services to Royal Wootton Bassett town centre and Swindon.



Precedent images of potential building types and materials for the local centre

9.3 Delivering a Mix of High Quality Homes

The masterplan presents the opportunity to deliver a mix of housing types and tenures to suit local needs through all stages of life. Delivering a diverse housing choice ensures a vibrant community can be created and a mix of community facilities can be provided.

Key Opportunities:

- 1 Key buildings creating an entrance to development from Swindon Road with building materials and styles to take influence from local Royal Wootton Bassett characteristics through carefully chosen material palettes;
- 2 Access to a new bus route along spine road within a 5 minute walk from all housing areas;
- 3 Housing will be designed around a series of connected, safe and attractive streets;
- 4 Adequate on-plot and street parking to ensure public spaces are safe and attractive;
- 5 Opportunity for higher density housing close to neighbourhood hub creating a sense of enclosure to main public space;
- 6 Mix of family homes, starter homes, private/social renting, shared ownership options; and
- 7 New housing will face onto open space areas, green corridors and woodland creating a distinctive character to the development.



Precedent images of potential types of building forms and materials that could be used to create a distinctive character to development

9.4 Coped Hall Woodland Park

Reflecting historic references to ‘Wodeton’ (a settlement in the woods), a new woodland park will create a substantial publicly accessible green space to the north of the town. As well as improving the ecological function of the site, the park also presents the opportunity to deliver new community facilities and support the health and well-being of local residents.

Key opportunities:

- 1 A new skate park with good access for emergency services from Hook Road and with sufficient screening from dwellings;
- 2 Provision of allotment areas to cater for town’s existing shortage;
- 3 Establish over 3ha of new woodland, scrub planting and wetland wildlife habitats;
- 4 New tree and woodland planting to screen development from M4 and longer views from Lydiard Park to the north-east;
- 5 Woodland areas to provide containment to new settlement edge and create a green/rural wedge between Royal Wootton Bassett and Swindon;
- 6 New glade and meadow planting areas to provide attractive walking routes through woodland and enhance the local landscape character;
- 7 Provide over 3km of new walking and cycling routes including trim and natural trails;
- 8 Establish a series of key green routes from Swindon Road to open space establishing valuable wildlife corridors connecting to meadow and woodland areas; and
- 9 New sensitively designed play areas suitable for a variety of children ages.



Precedent images of potential landscaping and uses to be included in the Woodland Park (including trim trail; informal paths; SuDS features; skate park; allotments and natural play)



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10. CONCLUSION

10.1 Delivering a Sustainable Development

This document has demonstrated the deliverability of the site with a comprehensive analysis of the contextual, planning and technical parameters.

The site has limited physical constraints and is able to accommodate development that reflects the existing settlement pattern and is in keeping with the town's elevated historical setting - protecting the distinct character and identity of the town. Substantial new areas of open space are created, reinstating historic local woodland characteristics and establishing a defensible green wedge between Royal Wootton Bassett and Swindon.

Development of the site would have a strong focus on promoting active and sustainable modes of transport, with opportunities to connect into the existing bus provision and cycle infrastructure. A new off-road cycle route would connect with strategic cycle infrastructure, linking the site to Royal Wootton Bassett town centre and Swindon's western employment areas, providing benefits to both the development and the wider town.

The site offers a unique opportunity to provide a high-quality mixed-use development to create a new northern gateway to Royal Wootton Bassett and improve the town's self-containment. New businesses could be accommodated and new community infrastructure provided to both support the prosperity of the town and provide additional community uses for all residents to benefit from.





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Appendix 3 RWB Transport Review

Access and Movement

Land at Royal Wootton Bassett

1. INTRODUCTION

- 1.1 Neil Brant Consulting (NBC) has been appointed by L&Q Estates Ltd. (L&Q) to provide advice on matters of highways and transportation in respect of land north of Royal Wootton Bassett (RWB).

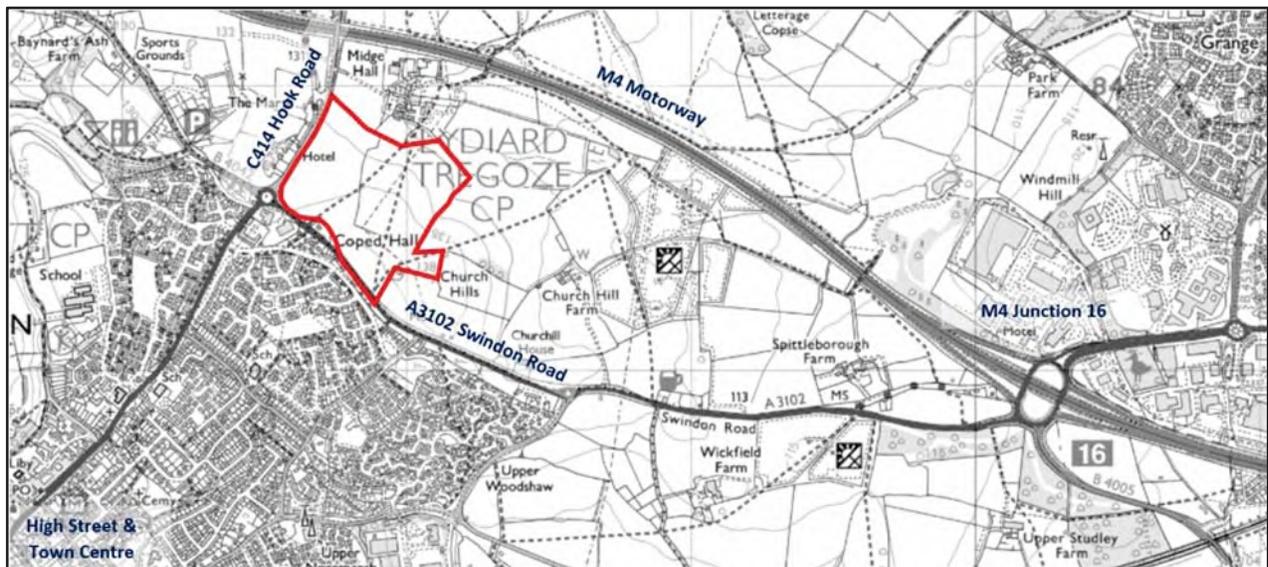
Scope and Purpose

- 1.2 This note considers matters of access to the L&Q land and other assessed sites, as set out in the Site Selection Report¹, Settlement Plan² and Transport Review³ prepared and submitted for consultation by Wiltshire Council.

L&Q Site

- 1.3 The L&Q site forms part of the land identified as part of Strategic Housing & Economic Land Availability Assessment (SHELAA) reference 3366, as per Figure 2 of the Wiltshire Local Plan (WLP) Site Selection Report. For the purposes of clarity and context to access, the actual extent of the L&Q land is illustrated in **Figure 1** below.

Figure 1: L&Q Site Location and Extent



¹ Wiltshire Council, *Local Plan Looking to the Future, Site Selection Report for RWB* (Wiltshire Council, January 2021)

² Wiltshire Council, *Local Plan Looking to the Future, Planning for RWB* (Wiltshire Council, January 2021)

³ Atkins, *Wiltshire Local Plan Transport Review* (Wiltshire Council, January 2021)

Note Content

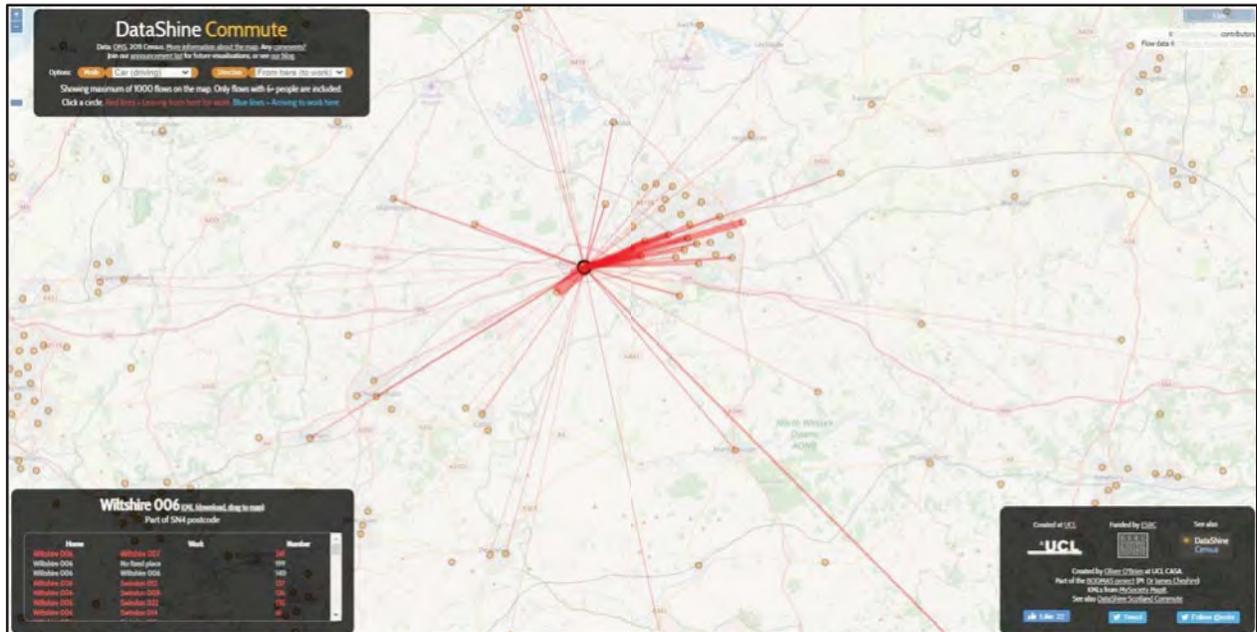
1.4 This note provides a high level overview of access and accessibility of the L&Q site at RWB, as well as comparing it to other assessed sites, so as to inform the consultation of the Local Plan Review in respect of the feasibility of access as well as how sites address issues of sustainability relevant to accessibility. The remainder of this note is structured as follows:

- Section 2 – looks at current travel and commute patterns in RWB;
- Section 3 – establishes the accessibility of the L&Q site within the context of RWB and employment areas west of Swindon;
- Section 4 – sets out the transport vision for the L&Q site given the findings of the review of RWB travel patterns and accessibility of the site;
- Section 5 – provides a review of the WLP site sifting at RWB, and makes representations to where it is established that constraints and opportunities have not been correctly or consistently assessed.

2. ROYAL WOOTTON BASSETT TRAVEL PATTERNS

2.1 Commute travel patterns for MSOA *Wiltshire006* illustrate the relationship of RWB to employment areas and how that manifests itself in travel behaviour. Reference has been made to this data via the Datashine software⁴ and an extract provided below at **Figure 2**.

Figure 2: RWB Commute to Employment



2.2 Using 2011 Census data, Nomis provides information on the distances travelled to work for residents living in RWB, with the results shown in Table 1 on the following page, and can be compared against the same data for Wiltshire and the south west to establish how it compares regionally. As can be seen, 43.9% of residents either work at home or work within 2km (thus within RWB), which is significantly higher than the averages for Wiltshire (35.6%) and the South West (32.7%). The relative benefits of this to promote and achieve sustainable travel to work is a material consideration in favour of development at RWB.

2.3 Commute travel patterns at the time of the 2011 Census, by all modes, shows 24.6% of residents worked from within RWB (home or within RWB) and the overall of number working within Wiltshire, inclusive of RWB, being 49.4%. RAF Lyneham accounted for 12.8% of travel leaving the residual 12% across Wiltshire quite dispersed across numerous locations. However, the function of RWB housing and the MoD as a significant employer in the region is evident with 18.7% of all commuting occurring to locations with a significant MoD presence. Of the remaining commuting from RWB, Swindon accounted for 35.8% and, when considered as a single location, is the most significant employment destination serving RWB.

2.4 The journey length of residents of RWB, travelling to work, is summarised in **Table 1** on the following page and comparison is made with the other key settlements within Wiltshire. Residents of RWB have an average

⁴ DataShine, *Interactive mapping for large, open demographic data sets*, *Journal of Maps* (Oliver O'Brien & James Cheshire, 2016)

journey to work of just 10.6km, which is significantly lower than the Wiltshire average and ranked ordered in the upper half of Wiltshire towns in terms of sustainability. This demonstrates that when compared to other settlements, RWB has the fourth most sustainable travel to work pattern in terms of average distance travelled and residents working within 2km of home and thereby offers significant opportunity for mode shift to sustainable travel.

Table 1: Distances Travelled to Work

| | Royal Wootton Bassett | Wiltshire | South West |
|-----------------------|-----------------------|-----------|------------|
| Work from Home | 15.8% | 14.7% | 12.8% |
| Less than 2km | 28.1% | 20.9% | 19.9% |
| 2km - 5km | 4.2% | 11.5% | 17.8% |
| 5km - 10km | 19.4% | 13.4% | 15.0% |
| 10 - 20km | 12.0% | 14.9% | 13.6% |
| Over 20km | 9.1% | 16.3% | 12.5% |
| No fixed place | 11.4% | 8.1% | 8.4% |
| Average Distance (km) | 10.6km | 25.3km | 15.2km |

Source: Nomis – Distance Travelled to Work (Census 2011). Local Geography = MSOA2011:E02006649:Wiltshire 006.

2.5 Regarding RWB, the majority of Swindon can be reached within 5-10km and therefore it is reasonable to assume that the majority of those 19.4% travelling 5-10km to work are travelling to Swindon. However, this is clearly not an unsustainable travel pattern, particularly when compared to the other settlements, with a comparatively high proportion of RWB residents working within a comfortable cycle distance and Swindon being easily accessible by existing bus services. From a sustainability perspective, there would therefore seem little benefit in trying to stem this flow of out-commuting but to provide improved sustainable travel options, such as the RWB-Windmill Hill cycle route and improvements to the 55 Gold bus service.

Table 2: Distance Travelled to Work by Key Settlement

| | Work from Home / less than 2km | 2-10km | Over 10km | No Fixed Place | Average Km Travelled |
|------------------------------|--------------------------------|--------------|--------------|----------------|----------------------|
| Trowbridge | 37.7% | 28.9% | 26.3% | 7.1% | 9.0 |
| Warminster | 53.1% | 17.9% | 22.6% | 6.4% | 9.1 |
| Bradford on Avon | 43.2% | 29.6% | 17.2% | 10.0% | 9.6 |
| Royal Wootton Bassett | 43.8% | 23.6% | 21.1% | 11.4% | 10.6 |
| Melksham | 44.6% | 23.8% | 20.0% | 11.7% | 10.8 |
| Westbury | 42.2% | 27.3% | 17.8% | 12.7% | 11.1 |
| Calne | 50.9% | 15.7% | 21.7% | 11.7% | 11.5 |
| Salisbury | 36.6% | 23.1% | 34.7% | 5.7% | 13.2 |
| Chippenham | 34.8% | 25.4% | 32.9% | 6.9% | 15.4 |

Source: Nomis (Census 2011) - Distance Travelled to Work

3. ACCESSIBILITY OF THE L&Q SITE

- 3.1 In order to influence travel behaviour, it is imperative that the future needs of a development or community are considered and captured through good quality planning before infrastructure is put in place. Opportunities must be taken within the planning process to locate development where existing facilities and services can be best accessed by walking, cycling and public transport. Placing development where it will best integrate and make use of these sustainable modes of travel will promote the most efficient means of achieving genuine modal shift.
- 3.2 The document, *Guidelines for Providing for Journeys on Foot*⁵, suggests that the preferred maximum walking distance for commuting journeys is 2km and that approximately 80% of walk journeys in urban areas are less than 1.6km. The publication *Cycle Audit and Cycle Review*⁶ suggests that journeys of up to 8km (a 30-minute cycle time) are considered to be a comfortable distance for a reasonably fit person. *Guidelines for Planning for Public Transport in Developments*⁷ indicates that the maximum walking distance to a bus stop should not exceed 400 metres (5 minutes).
- 3.3 A study published in *Local Transport Today*⁸ established that the distance up to which people would ordinarily walk as being the 85%ile and in respect of all journey purposes catchment for residential development this equates to 1,950m whilst 1,600m represented that for escorted education trips. In respect of cycling the 85%ile catchment was found to be 7,250m of everyday amenities and facilities.
- 3.4 It is the context of the proximity set out above, the L&Q site should be considered with regards to it being a suitably sustainable location minimising the length of trips and the ability for the greatest opportunity for those trips to be made using sustainable modes of travel.
- 3.5 **Figure 3** below illustrates 400m (5 minute), 800m (10 minute) and 2,000m (25 minute) indicative walk distances from the development site and how they encompass public transport services and a broad range of local facilities and amenities within RWB.
- 3.6 Additionally, **Table 3** below summarises the proximity of key trip destinations within RWB and west Swindon and their associated walk and cycle times from the L&Q site, and these have been assigned traffic light style colour coding on their level of accessibility: Green - within recommended distance, Amber - above recommended distance, Red – excessive distance for most people, as measured against the walk and cycle criteria set out above.

⁵ Institution of Highways & Transportation, *Guidelines for Providing for Journeys on Foot* (IHT 2000)

⁶ Institution of Highways & Transportation, *Cycle Audit and Cycle Review* (IHT 1998)

⁷ Institution of Highways & Transportation, *Guideline for Planning for Public Transport in Developments* (IHT 1999)

⁸ *Local Transport Today* 13-26th October 2017

Figure 3: L&Q Site Access to Local Facilities & Amenities

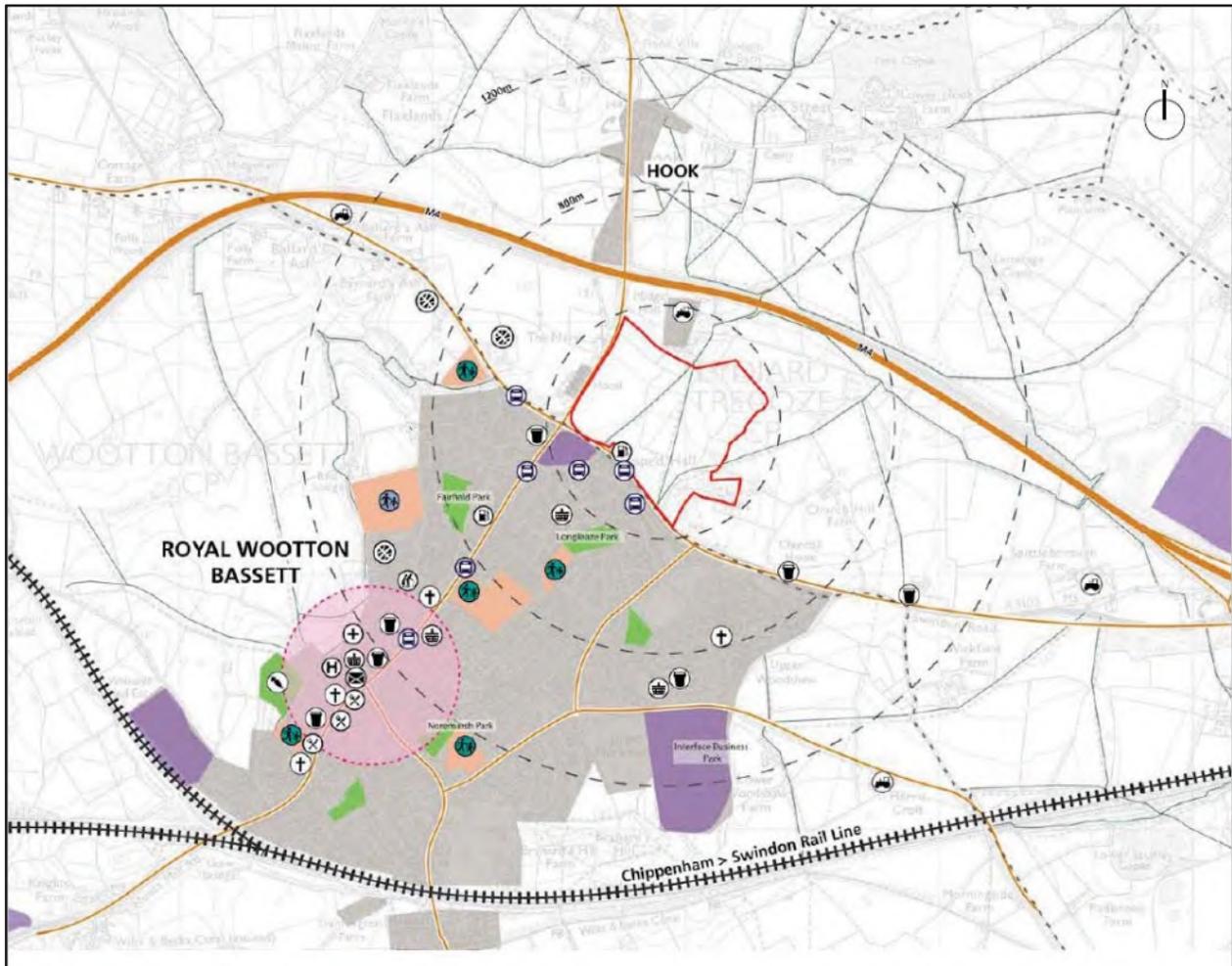


Table 3: Travel Times to Key Local Facilities

| Facility | Distance | Walk Time (min) | Cycle Time (min) |
|------------------------------------|----------|-----------------|------------------|
| Education | | | |
| Learning Curve Day Nursery | 500m | 6-7 mins | <2 mins |
| Longleaze Primary | 930m | 11-12 mins | 3-4 mins |
| Royal Wootton Bassett Academy | 1,000m | 12-13 mins | 3-4 mins |
| Healthcare | | | |
| Tinkers Lane GP Surgery | 1,100m | 13-14 mins | 4-5 mins |
| Dental Surgery | 1,200m | 15 mins | 4-5 mins |
| Pharmacy | 1,050m | 13-14 mins | 3-4 mins |
| Retail | | | |
| Convenience Store – Coped Hall PFS | 75m | <1 min | <1 min |
| ALDI Supermarket | 75m | <1 min | <1 min |
| Town Centre | 1,150m | 13-14 mins | 4-5 mins |
| Employment | | | |

| | | | |
|------------------------------|--------|------------|------------|
| Coped Hall Business Park | 200m | 2-3 mins | <1 min |
| Interface Business Park | 1,800m | 22-23 mins | 6-7 mins |
| Windmill Hill Business Park | 3,000m | <40 mins | 11-12 mins |
| Swindon Town Centre | 8,000m | n/a | 30 mins |
| Leisure | | | |
| Gerard Buxton Sports Ground | 640m | 8 mins | 2-3 mins |
| Ballards Ash Sports Ground | 800m | 10 mins | 3 mins |
| Jubilee Lake | 400m | 5 mins | 1-2 mins |
| Transport | | | |
| No. 60 Swindon Road | 75m | <1 min | n/a |
| No. 54/55 Gold – Marlowe Way | 250m | 3 mins | n/a |

3.7 As illustrated in the figure and summarised in the table, existing local facilities and amenities can be reached within easy walk and cycle times with that a large part of RWB is within a 25 minute walk of the site and furthermore, the whole of the town is within a cycle ride of less than 8 minutes. This makes the prospect of sustainable active travel a real option for the L&Q site.

3.8 Additionally, large parts of Swindon, including the significant employment areas to its west (Lydiard Fields and Windmill Hill), lie within distances of the L&Q site that are within very easy cycling distance whilst the town centre sits just on the edge of the suggested reasonable cycle catchment.

4. TRANSPORT VISION FOR THE L&Q SITE

- 4.1 To influence travel behaviour, it is imperative that the future needs of the development are considered and captured through good quality planning & masterplanning before infrastructure needs are finalised. Opportunities must be taken to make cycling, walking and public transport the modes of choice and these modes must be made more convenient for the majority of journeys than car usage, to promote genuine modal shift. Planners and designers should follow a user hierarchy in the street design process, as follows:

Consider first Pedestrians – Cyclists - Public transport - Service vehicles - Consider last Other motor traffic

- 4.2 A significant benefit of this site, in general, but also particularly in comparison to others in RWB, is its proximity to key local facilities and amenities, as identified in **Section 5.2**. In particular, the L&Q site is well placed to encourage higher levels of active travel use for travel to education, employment and education destinations within RWB than other competing sites. The Travel to the significant employment areas west of Swindon, Lydiard Fields and Windmill Hill, would also be expected to attract significant public transport patronage whilst cycling would be a significant opportunity with the proposed new RWB-Windmill Hill route in place.
- 4.3 Given the real opportunities for sustainable travel from the site, the masterplan benefits from a significant focus on active travel and permeability whilst the vehicular access proposals have been made fully inclusive of pedestrians and cyclists. In summary, the overall layout places greatest emphasis on active travel and overcoming barriers to connectivity.

Active Travel - Walking & Cycling

- 4.4 Cycling and walking are the ultimate forms of zero Green House Gas emission transport. The Government has set an aim to double cycling activity, increase walking to 300 stages per person per year and increase the percentage of children aged 5 to 10 that usually walk to school to 55% by 2025.
- 4.5 The proximity and connectivity of the L&Q site to local amenities and facilities, and opportunities to provide the necessary infrastructure improvements to encourage walking trips to them is set out in this transport strategy below. Development of the L&Q site can be delivered with sustainable transport measures taking priority and which will not only meet the needs of its future residents but will also improve sustainable travel provision for RWB as a whole.
- 4.6 The scheme would make provision for a comprehensive network of walking and cycling routes catering for all needs and abilities. Primary routes will provide for direct, safe and continuous access between key parts of the development as well as points of connection to foot and cycleways across the wider area. Secondary routes will be less direct than Primary ones but provide inter-linking connections across the development

as well as providing for leisure and recreational use. Primary and secondary routes will be lit, and road crossings will give priority to pedestrians and cyclists.

Walking

- 4.7 Within the scheme pedestrian routes will be integral to the overall access layout but with the addition of off-line and recreational routes – circular dog walking routes and walking/jogging trails.
- 4.8 The scheme would not sit remote or isolated from RWB and significant emphasis has been placed on creating good active travel connections that maximise its connectivity and overcome any barriers or severance. The A3102 Swindon Road and B4042 potentially acts as a barrier to active travel and would be dealt with by high quality controlled crossings located on active travel desire lines and where onward footpath connections accommodate those routes.
- 4.9 In addition to the two main site access points, permeability of the scheme with further active travel connections is made along the two highway frontages as well as linking to the PRoW as recreational routes.

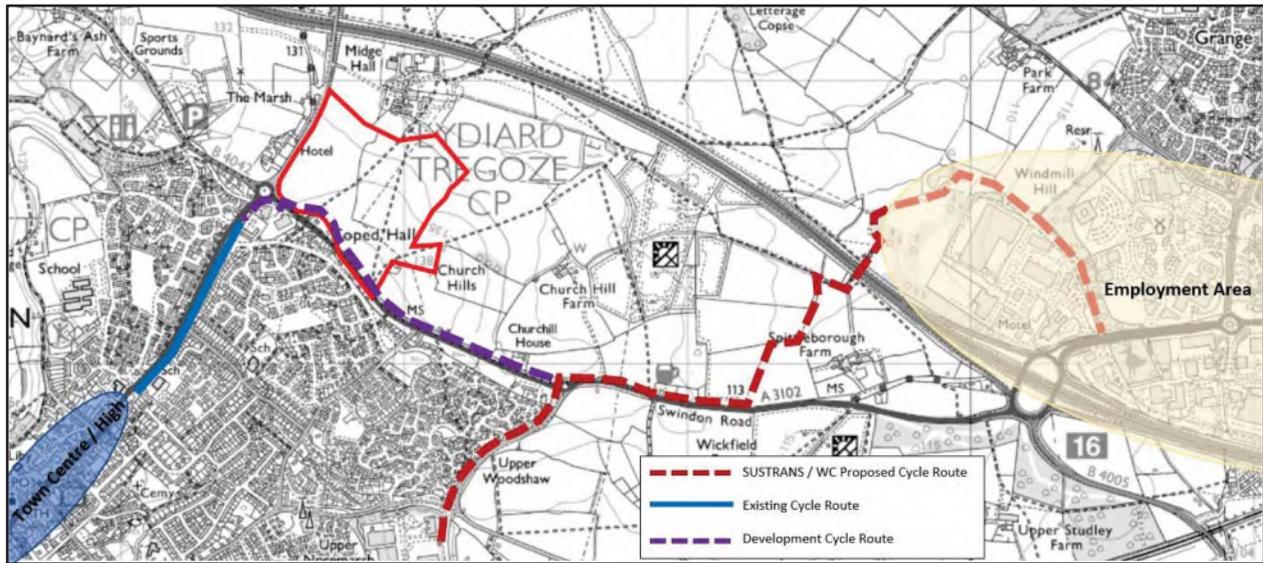
Public Rights of Way

- 4.10 The 3 No. PRoW across the site will be incorporated into the linear green space provision and will further form part of the recreation active travel provision connecting to others to create circular routes as well as outwards connections.

Cycling

- 4.11 Sustrans and Wiltshire Council, in conjunction with Highways England funding, are seeking to deliver a 3km (2 mile) segregated shared use cycle/pedestrian path between RWB and Windmill Hill Business Park in Swindon.
- 4.12 By way of an extension, utilising the highway verge on the north side of the A3102 and routing through the scheme to avoid crossing the slip lanes to the Petrol Filling Station, the proposed route could be extended to include north RWB. A further short extension of the route from the scheme to the south, again within highway verge fronting the Coped Hall Business Park, would connect to the exiting A3102 route towards the High Street.
- 4.13 In conjunction with the development of the L&Q site, the combination of the three routes, totalling nearly 5km long and providing a continuous segregated active travel route from west Swindon to just north of RWB High Street, would present a joined-up network serving an expanded part of the town as opposed to several unconnected routes serving pockets of the town. This is illustrated in **Figure 4** on the following page.

Figure 4: Extension of the Cycle Network

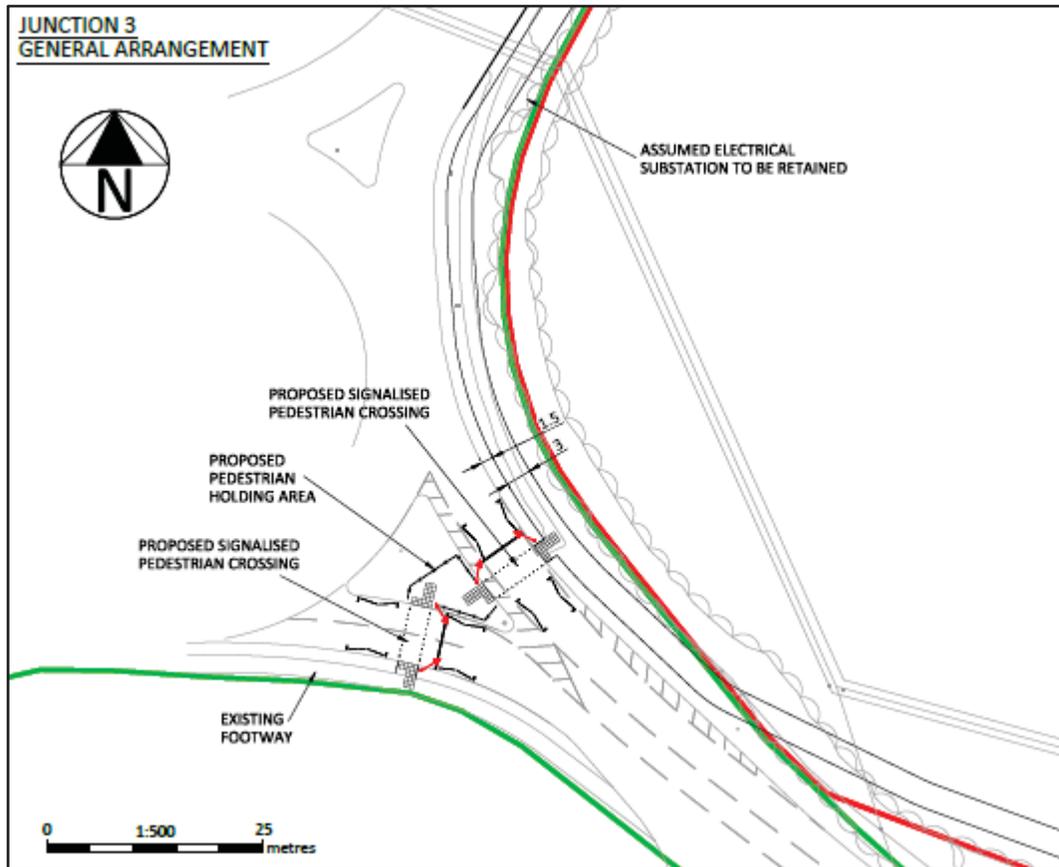


Public Transport

- 4.14 The L&Q site is primarily served by the 55 Gold and 54 bus services that operate along Marlowe Way, a walk distance of 250m (3 minutes). Additionally, the 60 bus service operates along the A3102 Swindon Road, a walk distance of 75m (less than 1 minute), albeit this service is of limited frequency.
- 4.15 The 55 Gold operates a frequent service connecting Chippenham to Swindon via RWB and the Lydiard Fields Retail Park, adjacent Windmill Hill. In the morning the first bus towards Swindon departs RWB at 05:16 and returning in the evening the last bus departs Swindon at 23:30 and between approximately 6am and 10pm the service operates at a minimum of every 30 minutes but with increased service frequencies of every 10-15 minutes during the morning and evening commuting periods. The 54 service also serves the RWB to Swindon route via the Windmill Hill Business Park directly, with five services daily in each direction of travel.
- 4.16 Journey times from Marlowe Way (Masefield bus stop) to Windmill Hill Business Park (Blagrove Roundabout bus stop) is 12 minutes and thereby making for a feasible door-to-door travel time from the site of 30 minutes or less. This represents a suitably attractive commuting journey time when compared to private car travel and presents a realistic opportunity to maximise sustainable travel.
- 4.17 Whilst the site area is contained within reasonable walking distance of these bus routes, if feasible, it may be beneficial to re-route the service through the site. Whichever approach is adopted, all of the site area would nonetheless be within walking distance of a bus service. The central access road through the scheme would be designed to cater for bus services if required and a centrally located bus gate could safeguard journey times and prevent other through traffic.

4.22 In the vicinity of the Coped Hall roundabout, a new controlled pedestrian and cycle crossing would be provided to establish the continuation of the active travel route to the High Street.

Figure 7: Active Travel Crossing of A3102



Summary

- 4.23 In summary, development of the L&Q site north of RWB, by virtue of its close proximity to local services, amenities and sustainable travel, can deliver a suitably sustainable scheme achieving higher levels of sustainable travel than comparable schemes in RWB.
- 4.24 Improved sustainable infrastructure would not only meet the needs of the development but also have significant wider benefit to RWB, such as an extension of the proposed RWB-Windmill Hill cycle route to bridge the gap to that already in place in the town.

5. REVIEW OF TRANSPORT CONSIDERATIONS OF WLP SITE SELECTION FOR RWB

Appendix 2, Royal Wootton Bassett Settlement Statement

Maintaining capacity at M4 Junction 16 throughout the Plan period

National Policy

- 5.1 National transport planning policy does not seek to safeguard or maintain road capacity, as doing so would be contrary to the other overarching national policies on climate change. What national policy requires, in respect of the safeguarding of highways at the plan making stage, is that unacceptable impacts on highway safety and severe residual impacts on operational performance are avoided or mitigated. The national policy position is fundamentally different to the stated objective of maintaining capacity at Junction 16 throughout the Plan period and the wording should be amended to better reflect conformity to national policy.

Relevance of Site Location to Junction 16

- 5.2 All sites at RWB will generate a degree of residual traffic impact at Junction 16 and none offer alternative road routes that avoid this. To be clear, sites south of RWB offer no alternative road routes to sites to the east or north for travel to/from the Motorway network or to Swindon, they will all rely upon the A3102 Swindon Road and Junction 16.
- 5.3 The Royal Wootton Bassett Strategic Context (Table at Page 9 of Site Selection Report) states that: *“Capacity at Swindon Road and M4 Junction 16 may constrain further development to the north of the town.”* We contest that this is not the case exclusively to site in any part of RWB.
- 5.4 As set out below, we believe that all sites in RWB will have equally proportionate impacts on Swindon Road leading to Junction 16, and that sites north of the town will have no greater proportionate impact than those to the south or east. It may be that by virtue of better sustainable travel connectivity for sites north of RWB, their relative impacts on Junction 16 may be less.
- 5.5 The WLP *Transport Review 2021* has not undertaken strategic traffic modelling of specific site locations at RWB, but at this stage a high level assumption made on growth at a town wide level. What appears evident from the county wide strategic traffic modelling is that proposed infrastructure improvements on the A350 at Chippenham and at the associated M4 Junction 17, have a beneficial knock-on effect on drawing traffic away from A3102. i.e. the net result is a reduction in overall traffic through RWB.
- 5.6 Commute travel patterns for RWB are set out in Section 2 above. When sifting the MSOA commuting data for car journeys only, the proportionate assignment to individual road corridors can be determined and is summarised in **Table 4** below.

Table 4: RWB Commute Route Assignment

| Road Corridor | % Commute Assignment |
|----------------------|----------------------|
| Local | 7.3 |
| C414 north | 5.2 |
| B4042 west | 3.9 |
| A3102 south | 21.5 |
| A3102 Jct 16 | 51.6 |
| No fixed destination | 10.4 |

5.7 The location of sites, relative to these road corridors will determine their cumulative assignments through key parts of the network, such as the town centre and Junction 16. **Table 5** below approximates the assignment of commute car travel, based on their location on the network, to the main road corridors.

Table 5: Route Assignment Based on Location within RWB

| | A3102 south of RWB | Through RWB | A3102 to Jct 16 | B4042 | C414 | No fixed route |
|----------------|--------------------|-------------|-----------------|-------|------|----------------|
| Sites to north | 21.5% | 32.7% | 51.6% | 3.9% | 5.2% | 10.4% |
| Sites to east | 21.5% | 37.9% | 51.6% | 3.9% | 5.2% | 10.4% |
| Sites to south | 21.5% | 68.0% | 51.6% | 3.9% | 5.2% | 10.4% |
| Sites to west | 21.5% | 89.5% | 51.6% | 3.9% | 5.2% | 10.4% |

5.8 In terms of the assignment of traffic from site locations, those to the west of RWB would put the greatest proportion of traffic through the town (89.5%) whilst those to the north the least (32.7%). Sites to the south would put 68% of their commute traffic through the town whilst sites to the east 37.9%. As can be seen from the above, other than the proportionate assignment of traffic through RWB, the assignment on other corridors, such as the A3102 to Jct16, would be the same for all site locations. For all site locations, traffic heading for Junction 16 will converge on the A3102 east of Bincknoll Road. From this assessment of traffic assignment, it is therefore clear that all sites will have equally proportionate levels of impact on the A3102 leading to Junction 16, and that this issue in itself does not set apart the impacts or scoring of one site to another.

5.9 However, in terms of proportionate assignments and impacts, what does set apart the site locations are their proportionate assignment of traffic through RWB, with sites to the west and south performing very poorly in this respect and when compared to those in the east and north.

5.10 Aside from traffic impacts, what further sets apart the transport and transport impacts of the site locations within RWB is their ability to access key facilities and amenities by sustainable modes of travel, as well as the local capacity of the transport network.

Physical Constraints Influencing Suitability of Sites

5.11 The mainline railway, that skirts the current southern urban edge of RWB, forms a physical barrier to travel to the town and the key transport corridor towards Swindon. The railway acts to constrain travel by virtue

of the limited (3 No.) points of connection over it, as well as the physical capacity of those crossings. Development south of the railway will be significantly constrained by this and the cost of mitigation works to make the sites suitably accessible, would be very high.

5.12 The A3102 High Street through RWB also acts as a constraint to travel in so much as its physical capacity and sensitivity to traffic impacts.

5.13 In addition to the physical constraint of Junction 16, those also created by the High Street and the railway should have been given suitable weighting in the site selection and sifting process. However, it is our observation that this has not occurred to date and as such we set out below the extent of those constraints and how they should inform and change the sifting of some sites.

'Accessibility' and 'Traffic' Scoring

5.14 The criteria applied to Accessibility and Wider Impacts is set out at Page 8 (Site Selection Report), as follows:

Accessibility: Sites that are relatively inaccessible are much less likely to be reasonable alternatives and may be rejected from further consideration.

Accessibility is represented as a heat map of travel times on foot, cycling and public transport to important destinations for residents - the town centre, principal employment areas (including employment allocations), secondary schools and hospital and health centres (including GP surgeries).

Sites are categorised overall as low accessibility (red), medium accessibility (amber) or high accessibility (green).

Traffic: Developing some sites may generate traffic that causes an unacceptable degree of harm, in terms of worsening congestion. Others may be much better related to the primary road network (PRN). This can lead to other harmful impacts such as poor air quality or impacts upon the local economy.

The results of each of these 'wider impact' assessments are gathered together and categorised as high (red), medium (amber) and low (green) level of effects for each site under each heading."

5.15 We generally agree with this approach but contest that the Stage 2 Site Sifting for RWB has not correctly taken in to account the above criteria and that in respect of 'Accessibility' and 'Traffic' as it erroneously scores sites south of the railway higher than is evidently the case. Conversely, we consider that sites north of the town are, in comparison, scored too low in respect of 'Accessibility' and 'Traffic'.

5.16 We set out below how we have come to this conclusion and why we believe that the Stage 2 Sifting, as it stands, is incorrect.

5.17 Sites to the south of RWB and south of the mainline railway (SHELAA Ref: 3156, 498, 464, 462, 463 & 73894) are constrained by the capacity of connections (roads) across the railway. As stated above, there are only

3 No. crossing points of the railway at RWB, and the degree to which they could serve or constrain development to the south is a very material consideration to the suitability of sites.

5.18 The A3102 crosses the railway where it branches to form the two lines and thereby two overbridges are provided. The southern of these bridges is of limited carriageway width and forward visibility that constrains the freeflow of two-way traffic and its operational capacity over a length of 85m. There is no pedestrian or cyclist provision over the southern bridge and a sub-standard width footway on only one side of the northern bridge. In conclusion, the operational performance of the A3102 crossing of the railway will be significantly impacted by traffic generation of development to the south and the absence of any form of adequate pedestrian and cycle routes will result in unsustainable development unduly relying upon car travel.

Figure 8: A3102 Restricted Road Bridge Width over Southern Railway



5.19 Marlborough Road / Station Road forms the middle crossing point of the railway south of RWB. The bridge is of limited carriageway width and forward visibility that constrains the freeflow of two-way traffic and its operational capacity over a length of 80m. There is only pedestrian provision over the railway on one side of the road and no cycleway provision. In conclusion, and in the same vein as the A3102 bridges, the operational performance of the Marlborough Road crossing of the railway will be significantly impacted by traffic generation of development to the south and the very limited pedestrian accessibility, and no cycle provision, will result in unsustainable development unduly relying upon car travel.

Figure 9: Marlborough Road Restricted Width over Railway



5.20 An unclassified rural lane, Bricknoll Lane to Vowley, forms the eastern crossing point of the railway south of RWB. The lane and bridge are formed as a single track road serving a small number of farms south of the railway and is unsuitable for any material intensification of use. There is no provision for pedestrians or cyclists and forward visibility over the bridge is very limited. In conclusion, this rural lane serves little potential function other than its current use and would be wholly unsuitable to serve any level of development traffic.

Figure 10: Unclassified Lane Restricted Width over Railway



- 5.21 There are two further pedestrian at-grade level crossings of the railway that are not controlled and therefore wholly unsuitable for any degree of increased use, in line with Network Rail policy to seek to remove and not intensify the use of level crossings .
- 5.22 It is evident that none of the three crossing points of the railway are currently of sufficient form to accommodate significant development to the south. Upgrading of the bridges to accommodate free-flowing two-way traffic and full provision for pedestrians and cyclist would be necessary for the sites to be considered to be accessible and without significant traffic impacts.
- 5.23 The recent raising of bridge clearance heights, south of RWB, to accommodate overhead electrification gantries, has highlighted the significant engineering issues involved, and at that time none of the bridges were upgraded to increase their road capacity. Given the significant infrastructure investment on some of these bridges, yet their road capacity remaining constrained, demonstrates the significance of the issue, in terms of cost and deliverability.
- 5.24 The cost, land availability or requirements of Network Rail to upgrade any of these crossing points is not addressed in the Stage 2 Sifting, nor within the WLP Transport Review. At this sifting stage, Network Rail should be consulted on the likely cost and technical requirements of these major engineering works.
- 5.25 Furthermore, to the north the A3102 High Street through RWB also acts as a constraint to travel in so much as its physical capacity and sensitivity to traffic impacts.
- 5.26 In comparison of site locations, we believe that sites north of RWB should not be scored down on 'Traffic' because of their proximity to the A3102, where the impacts will be proportionately equal for all sites. It should be their further traffic impacts, such as crossing network constraints including the railway and though RWB, that differentiates the sites from each other.
- 5.27 In conclusion, we believe that contrary to the Stage 2 Sifting scores for sites south of the railway, they exhibit 'high' levels of traffic impact (Red) and that the sifting scoring should be amended accordingly.
- 5.28 However, in order to minimise this residual traffic impact on the A3102 Swindon Road and Junction 16, the selection of sites that best offer the ability to minimise travel and achieve travel using sustainable modes will be key. This will be done by virtue of a sites' proximity to existing services and facilities as opposed to its proximity to the A3102 corridor or Junction 16.

Maximising the use and availability of sustainable modes of transport along with managing levels of congestion on strategic routes and in the town centre

- 5.29 Identifying sites at the plan making stage that best offer the opportunities to deliver the sustainable travel paradigm, at a local and district level, is a fundamental strand of national policy that forms part of the UK Governments' commitment to reversing climate change. It is essential to plan making that the hierarchy of

travel is rigorously adopted whereby land-uses and locations are chosen that in the first instance minimise the need to travel, followed by minimising the distance required to travel to fulfil everyday needs, and then the ability to undertake that travel by sustainable modes. In addressing travel needs in this hierarchical way, the extent to which residual impacts occur and new infrastructure is required - both of which have carbon implications, is kept to a minimum. This approach will correctly promote sites that are best able to deliver sustainable travel by virtue of their closer proximity to key trip destinations and ability to deliver sustainable travel, as opposed to their arbitrary proximity to strategic roads.

- 5.30 With regards to RWB, this approach will see greatest emphasis placed on sites that can best access existing services and facilities (education, healthcare, leisure, retail, and employment) on foot or by cycle whilst also making best use of existing infrastructure and transport services. The location and connectivity of sites north of RWB are far better than those to the east and south and thereby offer the best option for RWB in terms of addressing the top tiers of hierarchical sustainable development.
- 5.31 In addition to the accessibility of the sites south of the railway to key local facilities and amenities, their proximity, relative to other sites within RWB, does not give them an edge or benefit that would overcome the physical constraints discussed above. Actually, comparatively, they are located further from many key local facilities and amenities, such as education, healthcare, retail, and employment. Compared to sites north of the town they are c2km further from many employment areas, 1km further from Royal Wootton Bassett Academy and no closer to Primary schools. They are at comparable distances to the town centre and healthcare, but c2km further from sport and leisure facilities. In overall balance of all travel purposes, sites north of RWB are better located and thereby more likely to attract travel by sustainable modes, than those to the south.
- 5.32 RWB's relationship to Swindon as an employment area is material and informs that in respect of that element of travel, whereby commuting typically equates to c15% of all daily travel, locating development along sustainable travel corridors (cycle and bus routes) should be a weighted consideration. Land to the north of RWB is located within easy cycle distance of employment areas within Swindon and could readily link to a proposed Sustrans strategic cycle route to Windmill Hill Business Park. Additionally, north RWB is already well served by express bus services to Swindon and whereby travel times are modest and an attractive alternative to car use.
- 5.33 In conclusion, we believe that contrary to the Stage 2 Sifting scores for sites south of the railway, they exhibit 'low' levels of accessibility (Red) and that the sifting scoring should be amended accordingly.

Safeguarding land for a Swindon parkway station

- 5.34 The LP Review has been informed by a transport evidence base prepared on behalf of the Council in their function as the Local Highway and Transport Authority. The *Wiltshire Local Plan Transport Review January 2021*, at Section 3.3.2, acknowledges that:

It is likely to prove challenging to increase the frequency of rail services in response to the Local Plan. The approach is instead to improve access to the main rail hubs in Chippenham, Trowbridge, and Salisbury. These are the busiest stations: they collectively accommodate well over half of all rail passengers in Wiltshire and offer the most frequent and widest destination choice connections.

- 5.35 This approach was itself informed by the Council's 2019 *Swindon and Wiltshire Rail Study*⁹.
- 5.36 The Rail Study assessed two options for new stations within the RWB area. The first of these involves the development of a station close to the A3102 where it crosses the GWML close to Wootton Bassett Junction. The report states that such a station would act as a local rail station for RWB without a specific objective to act as a wider Parkway station, although it would be likely to fulfil such a role for the area to the immediate south of the site around Lyneham. The second option is located to the east side of the town with locations between the B4005 overbridge and the Interface Business Park. The report states that such a station would have a dual role in serving both the South and West side of Swindon as a Parkway station as well as serving RWB.
- 5.37 The first option delivered a low level of Gross Value Added benefit (GVA) and was scored 'Red', whilst the second option scored better and was given a 'Green' score on GVA. Both Options were scored 'Amber' on deliverability. The resulting strategy for the Great Western Connect project, which incorporates changes to services through Wiltshire, proposes three phases of improvement, with stations at RWB being outside of all three phases and remaining an issue subject to further desktop studies.
- 5.38 Given the recommendations of the rail study, the Plan Review transport strategy for rail is to maximise patronage from existing stations within Wiltshire and Swindon by improving their facilities and connectivity to Wiltshire towns.
- 5.39 With regards to a future railway station serving RWB, whilst it may remain a long term ambition for inclusion in future Plans, in terms of the selection of sites within the current plan period to 2036, other than safeguarding land for rail use, the location of development should not be informed or influenced by this

⁹ Wiltshire Council & SWLEP, *Swindon and Wiltshire Rail Study* (SWLEP 2019)

requirement. Alternatively, the selection of sites should be informed on their ability to make best use of sustainable travel connections to Swindon station as per the suggested transport strategy.

Infrastructure improvements to promote and encourage non-car travel

- 5.40 The *Wiltshire Local Plan Transport Review* has not assessed specific transport schemes, supporting Plan growth, outside of the ‘principal’ towns. Regarding RWB, which is included within the ‘market town’ categorisation of the Plan Review, a generalised approach to the sustainable travel hierarchy, as set out in the *Wiltshire Local Transport Plan 3¹⁰ (WLTP3)*, is acknowledged and for which specific schemes will be identified and assessed in due course.
- 5.41 In lieu of specific schemes within the Plan review, the most notable transport project influencing site locations in RWB is the proposed Sustrans, Highways England and Wiltshire Council Royal Wootton Bassett to Swindon inter-urban cycle route. It is stated that the scheme’s strategic objective is to meet the needs of economic growth, and therefore it has a clear function in an evolving transport strategy for RWB supporting the Plan review.
- 5.42 The cycle route best serves sites to the east and north of RWB but is particularly poorly connected to sites to the south. Sites to the north of RWB would necessitate an extension of the route by 1km to enable them to seamlessly connect with it and this could be provided in the highway verge on the north side of the A3102. An added benefit of this route extension is provided by infilling between it and the existing cycle route that runs along the eastern side of the A3102 from RWB town centre to Coped Hall Business Park. This onwards connectivity to the town centre, and infilling of a missing link facilitated by development north of RWB, would be difficult to replicate from sites to the east, which would struggle to deliver a town centre link of similar quality.
- 5.43 The *Wiltshire Local Plan Transport Review 2021* strategy, which complements the *WLTP3*, proposes to make improvements to bus infrastructure and services, such as bus stop facilities, real time information and service frequencies. Typically, for the principal towns this follows a corridor approach, and it is reasonable to assume such an approach would be suitable for RWB. Sites to the north of RWB are located along the express bus service from Chippenham to Swindon and which best offers prospects for mode shift away from car for travel to key destinations, such as Swindon.
- 5.44 Developer funding of infrastructure and service improvements along this existing key bus corridor would deliver significant added value as it would not only facilitate the needs of the development, but all users of that service.

¹⁰ Wiltshire Council, *Wiltshire Local Transport Plan 2011-2026 – Strategy* (Wiltshire Council 2011)

6. SUMMARY AND CONCLUSIONS

- 6.1 RWB has commute to work distances significantly lower than the averages for Wiltshire and the South West and this has the relative benefit of promoting and achieving sustainable travel to work as being a material consideration in favour of development in the town.
- 6.2 The majority of Swindon can be reached within 5-10km of RWB and out commuting to the area is clearly not an unsustainable travel pattern, when compared to the other settlements, and the ability to undertake those trips using sustainable modes of travel.
- 6.3 Existing local facilities and amenities within RWB can be reached within easy walk and cycle times of the L&Q site with that a large part of the town within a 25 minute walk, and furthermore, the whole of the town being within a cycle ride of less than 8 minutes. This makes the prospect of sustainable active travel a real option for the L&Q site. Additionally, large parts of Swindon, including the significant employment areas to its west lie within distances of the L&Q site that are within cycling distance.
- 6.4 Given the L&Q site's opportunities for sustainable travel, the masterplan benefits from a significant focus on active travel and permeability whilst the vehicular access proposals have been made fully inclusive of pedestrians and cyclists. The scheme would make provision for a comprehensive network of walking and cycling routes catering for all needs and abilities. It would not sit remote or isolated from RWB and significant emphasis has been placed on creating good active travel connections that maximise its connectivity and overcome any barriers or severance.
- 6.5 By way of an extension, utilising the highway verge on the north side of the A3102, the County proposed cycle route to Swindon could be extended to include north RWB, including the L&Q site. The combination of existing, proposed and L&Q provision would create a continuous 5km route from west Swindon to just north of RWB High Street.
- 6.6 Whilst the L&Q site is contained within reasonable walking distance of existing bus routes, if feasible, it may be beneficial to re-route the service through the L&Q site.
- 6.7 The feasibility of access to the L&Q site has been established to a high level of confidence, demonstrating the deliverability of development of the land in this respect. The access proposals have been formed to promote sustainable travel and over severance potentially caused by the A3102.
- 6.8 Improved sustainable infrastructure delivered through the L&Q site would not only meet the needs of the development but also have significant wider benefit to RWB, such as an extension of the proposed RWB-Windmill Hill cycle route to bridge the gap to that already in place in the town.
- 6.9 It is not national transport planning policy to safeguard or maintain road capacity, as doing so would be contrary to the other overarching national policies on climate change. What national policy requires, in

respect of the safeguarding of highways at the plan making stage, is that unacceptable impacts on highway safety and severe residual impacts on operational performance are avoided or mitigated.

- 6.10 All sites at RWB will generate a proportionate degree of residual traffic impact at Junction 16 and none offer locations that minimise or remove this and as such all site locations should be considered as being equal in this respect. However, in terms of proportionate assignments and impacts, what does set apart the site locations are their proportionate assignment of traffic through RWB, is that element of traffic that is required to pass through the town, and thereby the sites to the west and south performing very poorly in this respect and when compared to those in the east and north.
- 6.11 Aside from traffic impacts, what sets apart the transport and transport impacts of the site locations within RWB is their ability to access key facilities and amenities by sustainable modes of travel.
- 6.12 Sites located to the south of RWB have not been appropriately assessed in respect of the significant highway constraints of traffic being required to pass over the railway. These constraints have been shown to be very significant, in terms of limiting development capacity, and the ability to mitigate and overcome it. In summary, it is evident that sites south of RWB are capacity constrained and not deliverable from a highway impact perspective without significant and costly infrastructure upgrades, requiring agreement with third parties.
- 6.13 The sifting of sites on the basis of the future delivery of a railway station at RWB, which is an ambition that projects beyond the Plan lifetime, should not be a material consideration for determining the preference of one site over another and should remain as a safeguarding policy only.

Appendix 4 Pre-application Advice

MP Ref: NM/0186

Email: [REDACTED]

Tel: [REDACTED]

2nd July 2020

Lee Burman
Wiltshire Council
VIA EMAIL ONLY

Dear [REDACTED]

Royal Wootton Bassett – Pre-Application Advice: Note of Meeting

Further to our recent meeting on 11 June, I provide you with a letter that serves as a Note of the issues we discussed. For avoidance of doubt, the issues are as follows:

- Technical Matters.
- Principle of Development
- Self-Containment.
- Other Matters.
- Concluding Remarks.

Each are addressed in turn below.

Technical Matters

Thank you for sending us a copy of all the Technical Consultation responses received so for, avoidance of doubt, these are:

- Landscape
- Ecology
- Built Conservation/Heritage
- Waste Collection
- Highways
- Public Rights of Way
- Thames Water
- Open Spaces
- Spatial Planning
- Affordable Housing
- Education
- Public Protection (Noise/Air quality/Contaminated Land)
- Urban Design
- Drainage
- Archaeology



In addition, there is no consultation response form Natural England or Highways England and you have recommended that we approach these parties separately.

They provide a considerable amount of information on the issues that are facing the site and what work needs to be structured in order for the proposal to be better understood.

As we discussed at our meeting, the primary purpose of the Pre-App was to ascertain your colleagues' views on various issues and the overall principle of development, rather than addressing each one of these technical issues in detail. From our discussions, you set out what you saw to be the critical issues with the site's development, based on your experience of the Marsh Farm Applications/Appeals. The critical issues are as follows:

- Highways – traffic generated by the proposed development will be a major issue with the local community. It is understood there are significant concerns relating to Highways capacity and vehicle queues on the A3102 at Coped Hall Roundabout as well as junction capacity at the M4 Junction 16. Any Application will have to demonstrate how these issues are satisfactorily addressed.
- Drainage – there is considerable concern locally about the drainage and flood risk associated with the development of the site. The Marsh Farm Applications saw a significant amount of flood risk and drainage work being undertaken in order to demonstrate to the Council that flood risk was not an issue. You would expect a similar level of input to support any proposals for this site.
- Ecology – aside from the potential for protected species on the site as detailed in your Ecologist's response, there is also a concern from Natural England about visitor pressure on the North Meadow and Clattinger Farm Special Area of Conservation (SAC). Essentially, the focus of the concern is the number of visitors to the SAC and Natural England considers this to be unsustainable, causing damage to it. In terms of how these impacts can be mitigated, it is recommended that further clarification is sought from Natural England as there is no published mitigation strategy in place.
- Landscape – concerns were noted, especially given the outcome of the Leda appeals. The local community and members are extremely concerned about the perceived coalescence of the town with Swindon and the surrounding villages to the north. The site sits in a gap between the town and Swindon. Historically, the site sat in an area subject to a Rural Buffer Policy from the 2011 Local Plan. Although no longer subject to this designation, it helps explain the origins of local sensitivities. However, the comments of the urban designer are equally recognised in terms of the logic of development in this location from a settlement form standpoint.

In addition, other points were made in the responses such as the impact on listed buildings and underground features.

In terms of all other Matters, it was agreed that with the level of information submitted it was not possible to come to a view on the other Site-Specific Constraints and how these could be addressed in the overall balancing exercise regarding the acceptability of the proposal. We are, however, grateful for the unedited comments of your colleagues as we will review these and consider them accordingly in terms of moving forward.

Principle of Development

We discussed at length the proposal and the impact that it would have on the Development Strategy set out in the Wiltshire Core Strategy, the Housing Site Allocations DPD and the Royal Wootton Bassett Neighbourhood Plan (despite the site sitting outside of the

Neighbourhood Plan area). During the course of the discussions you also intimated that the Neighbourhood Plan is being progressed for Lydiard Tregoze Parish and that we should speak to your Planning Policy colleague to check any potential progress on this as we understood that this was not being progressed despite designating a Neighbourhood Plan Area.

In terms of the conflict, contextually, it is a common position between us that Wiltshire County Council is unable to demonstrate a 5-Year Housing Land Supply and that this is an under supply of circa 800 units and Para 11(D) of the NPPF's tilted balance is engaged.

In dealing with the under supply, you indicated that the Council has a recovery plan which looks to bring allocated sites forward as quickly as possible, as well as smaller speculative applications which sit in the system and are not subject to technical or other constraints or issues and where proportionate in scale to the settlement to which the site/proposal applies. This recovery plan is based on a small team of Senior Officers comprising: Director of Planning & Economic Development, Head of Development Management, Head of Spatial Planning, Relevant Area Team Leaders and individual Case Officer to review Applications and their conflict with the Development Plan (or not as the case maybe) and to get those Applications progressed to Committee as rapidly as possible.

It is clear from the proposals that there is a conflict with the Development Plan. The Royal Wootton Bassett Community Area Policy sets a housing target which has been met and exceeded. You have eluded to the fact that the over-provision of housing against the Community Area and town target does attract weight, at the same time of being conscious of the fact that the Council is unable to demonstrate a 5-Year Housing Land Supply and that the tilted balance in Para 11(D) of the Framework is fully engaged. The key issue from a policy conflict point of view is that it is the scale of the proposal and the significant impact that it will have on the Development Plan (despite its failings in Housing Land Supply terms), namely undermining the spatial strategy(as found in the Shurnhold and Marsh Farm appeals). It is the Council's position that the proposal is simply too big to be able to be brought through as a Planning Application without having some form of policy support in terms of an allocation.

We also discussed at length comparisons with the Gleeson Developments Applications at Malmesbury and Lyneham. Significant comparisons can be drawn between Malmesbury and Royal Wootton Bassett in so far as both Settlements are Market Towns in the Settlement Hierarchy and both have housing limits placed on them in their respective Community Area Policies. Finally, both areas have over delivered in terms of the levels of housing development proposed in their Community Area Policies. In recommending planning permission be granted for 70 units at Malmesbury, notwithstanding the fact that it was clearly contrary to the Development Plan and it was subject to a previously refused Appeal, Officers made the recommendation on the basis that:

- The proposal was only for 70 units.
- There were limited constraints to that site
- That they had secured assurances from the Applicant that the site would deliver a significant amount of housing within the 5-Year period. This latter point attracting significant weight in light of the undersupply.

These three points are key in the way the Council differentiates its position at Malmesbury relative to Royal Wootton Bassett. L&Q's proposal will simply not deliver all the housing within 5-Years and is significantly larger relative to the size of the Settlement when compared to the Gleeson proposals and you consider that potentially the site has a significant range of specific constraints that may result in harmful impacts to interests of acknowledged importance that would need to be weighed in the planning balance.

The discussion about reduced levels of development inevitably leads to an analysis as to whether a smaller proposal on the site could be submitted, delivering circa 100 to 150 units, guaranteed within a 5-Year period. You confirmed that members would be unlikely to support a small scheme approach on the basis that there was clearly a longer-term aspiration to see the whole of the site developed totality for 400 homes and that the site did not lend itself to a smaller scheme, particularly in the context of the concerns regarding landscape impact, coalescence and breaching the A3102

Self-Containment

In addition to the above general principle of development concerns and the conflict with the spatial strategy, concern is raised with regard to the conflict with the self-containment objectives of the Core Strategy.

Our conversation focussed on the wider principle of whether Royal Wootton Bassett would be taking significant additional levels of development. A proposal for 400 homes raises issues in policy terms on the matter of self-containment as this is a key thread in the Core Strategy, Housing Site Allocations DPD and the Neighbourhood Plan.

It has already been readily recognised in the Leda Property Appeals at Marsh Farm that the majority of residents of Royal Wootton Bassett leave the town for employment opportunities elsewhere (majority of which go to Swindon). Equally however, it is also recognised by the Council that the town's proximity to the wider urban area of Swindon inevitably means that the employment property market are inevitably drawn to and taken up by Swindon rather than Royal Wootton Bassett.

It's the Council's position that it views the self-containment point as a desire to promote more sustainable patterns of behaviour in trying to get people to essentially live where they work through the planning process. Our discussions also highlighted difficulties the Council has previously experienced with mixed-used developments. This focussed heavily on proposals where employment development was proposed as part of an overall mixed-use scheme. Difficulties in the employment land market in Wiltshire and the proximity/ease of access to Swindon's and Bristol's urban areas as the principle focus for employment activities, inevitably drew occupiers to those locations rather than onto mixed-use sites being proposed in Royal Wootton Bassett. The challenge here is that the Council would look to see any proposals for employment element on this site to be supported by evidence that it has been heavily and actively marketed so that there is a genuine understanding as to what the level of market demand is for employment space at the town and the type of employers that are looking to locate there, as from the Council's understanding there is limited interest and the submission to date didn't provide any details in this regard. Concern was also raised as to the Outline nature of the application and delivery of the employment development. As stated in the Marsh Farm appeal, any level of employment on the site would not be given any significant weight given the concerns set out above.

It was questioned what self-containment meant, whether it was a concern that people were travelling out to work and/or shop. It is recognised that there is commentary within the Core Strategy about the lack of retail space and the concern that people were travelling out of the town to shop. However, it was highlighted that Aldi has now opened across the road from the site and that would in part address that concern. With regards to travelling outside of Wootton Bassett to work, it was questioned why this was a concern, provided that there was sufficient means to do this sustainably, which it was argued that there are means and this will be improved by the committed Highways England shared pedestrian and cycle link to Swindon. Furthermore, it was highlighted/questioned what the difference was between people working at home or commuting out of Wootton Bassett to work, and that you have no control over people's behaviour and choice of where to live. It was argued



that in this new era of increased working from home, that provided you have the day to day services within the settlement that should be sufficient.

Other Matters

In terms of other points that we discussed, there was a strong encouragement that we engage with the Planning Policy Team about the promotion of the site through the review of the Wiltshire Core Strategy.

We have made it clear that L&Q have been an active participant of all stages of the Housing Site Allocations DPD preparation and have had meetings with the Council's Policy Team regarding the developments of the site. You confirmed that you were not aware that the Council has already made a decision about the levels of development to be directed to Royal Wootton Bassett through a review of the Core Strategy, despite the reference in the Policy response to "reasonable alternatives". In terms of the wider 5-Year Housing Land Supply picture, the Council are a little surprised that they have not been inundated with Pre-Apps seeking views on various Settlement Sites coming forward contrary to the Development Plan. It was confirmed however, that anecdotally no other party with a strategic land interest around Royal Wootton Bassett has bought forward a site for Pre-Application Advice at the moment.

In terms of contacts, you have recommended that we approach the following:

- [REDACTED] – Policy Officer responsible for Planning Policy Pre-Application Advice response.
- [REDACTED] – Planning Policy Officer responsible for liaising with Lydiard Tregoze Parish Council on the Neighbourhood Plan.

Subject to us agreeing this Pre-Application Advice Note, we will be looking to enter further dialogue with them.

Concluding Remarks

In terms of concluding points, it was made clear that the Council would not support an application on this site for 400 homes as proposed in the Pre-Application Advice submissions, even if the technical concerns could be overcome with further details to be provided. The fundamental policy conflict with the provisions of the Royal Wootton Bassett Community Area Policy and the significant over provision of housing in this location and the damage that would do to the Core Strategy Policy objectives remains the basis for the Council's opposition to this scheme. However, we were strongly encouraged to engage with Policy Officers with a view to seeking the allocation of the site through the Core Strategy Review.

I trust that this serves as an accurate record of what we discussed, and I would be grateful if I could have any comments so that we can confirm this Note of meeting. I would like to thank you again for your time and no doubt we will speak in due course.

Yours sincerely

Kind regards

[REDACTED]





McLOUGHLIN PLANNING

e: [REDACTED]
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a: 119 The Promenade, Cheltenham , GL50 1NW
w: www.mplanning.co.uk

From: [REDACTED]
Date: Saturday, 30 May 2020 at 10:33
To: [REDACTED]
Cc: [REDACTED]
Subject: RE: 20/03017/PREAPP

Dear [REDACTED]

I'm broadly happy to take this approach. Consultation responses received to date are set out below with relevant attachments but as per my email none of my consultees will be attending a meeting and whilst I have some appreciation the issues raised I am just a generalist DM officer and so will not be in a position to discuss the advice provided in detail with your specialists. As such I again request that we confirm any meeting is just ourselves and not a wider attendance. Please do also respond re: proposed timeslot as my diary for next week is filling up. Kind Regards, [REDACTED]

Ecology:-

I understand from [REDACTED] that you are the case officer for the [REDACTED] which is associated with an informal enquiry from EDP in relation to the scope of ecology surveys. For your information please see my response below. Of particular note I recommend that NE are consulted due to potential impacts from increased visitor pressure on the North Meadow and Clattinger Farm SAC. As described below we understand from Natural England (NE) that the current levels of visitor pressure within the SAC are unsustainable and that NE are in a position where they cannot do anything else to manage adverse impacts from continued increased visitor numbers within the SAC.

- Local species records include: badger, various bird and bat species, reptile, great crested newt.
- The site likely has a mosaic of habitats providing opportunities for a number of protected species. I understand that a preliminary ecological assessment of the site has been conducted, but the details have not been included within the preapplication enquiry submission.
- The site falls a little more than 10km from North Meadow SAC. As a development of this size would inevitably result in an increase in recreational impact on the SAC, it is likely that an appropriate assessment will need to be conducted to accord with the Habitat Regulations 2017. A favourable appropriate assessment will be required.

CP50 and CP52 of the Wiltshire Core Strategy and the National Planning Policy Framework require that the planning authority ensures protection of important habitats and species in relation to development and seeks enhancement for the benefit of biodiversity through the planning system. It will therefore be necessary to assess the site for its potential to support habitats and species of importance to nature conservation. This should be undertaken by a suitably qualified and competent consultant ecologist.

The following ecological information is recommended to support any future planning application submission:

- Ecological survey work will need to be conducted and any subsequent report/s will need to be submitted, in line with CIEEM guidelines. Advice should be obtained from an ecological consultancy about the scope of survey required in relation to the planning application. Results may identify the requirement for further targeted species surveys which should be carried out at the appropriate time of year.

If evidence of protected species is found, sufficient survey effort in line with national guidelines will be required to show how that species uses the site, how that use of the site could be impacted by the development and what suitable mitigation could be designed to remove or substantially reduce that impact. A report of the survey and any necessary proposals for mitigation and enhancements should be submitted in support of the application.

- If survey work has identified potential impact on great crested newts or their habitat, the developer may wish to look at District Level Licensing as a route to obtain a Natural England licence – see here: <http://www.wiltshire.gov.uk/planning-bio-development> .
- A clear plan showing proposed removal of trees/vegetation will be required, and a lighting plan should be considered. This could be incorporated into an ecological parameters plan which would inform the site layout.
- If relied on for mitigation, hedgerows are unacceptable as curtilage of residential dwellings. Mitigation hedgerows need an adequate buffer to allow 2-3 years of growth and maintenance. Hedgerows should be kept in communal ownership where they are being retained for ecological mitigation purposes.
- Applications which have the potential to affect European protected sites will need to comply with the provisions for mitigation in the HRA for the Wiltshire Housing Site Allocations Plan.
- Your consultant may require a data search. I recommend that the ecologist should commission a data search from the Wiltshire and Swindon Biological Records Centre for potential statutory and non-statutory sites, protected species and presence of non-native invasive species within the relevant area.
- Core Policy 50 of the Wiltshire Core Strategy requires all development to demonstrate no net loss of biodiversity and for major applications the expectation is that development will deliver a net gain. The NPPF also encourages applications to deliver measurable net gains (para 175 d) and the government has signalled its intention to bring forward legislation to require development to deliver 10% net biodiversity gain. This is covered in its response to the Net Gain consultation (*Summary of responses and government responses, DEFRA, July 2019*) and in the Environment Bill 2020 which is currently at the Commons committee stages. Natural England has prepared version 2.0 of the Biodiversity Metric and expects this to be finalised in summer 2020. At the current time therefore, the Council expects all applications to demonstrate no net loss of biodiversity and where appropriate to deliver a net gain.

In addition, applicants should make themselves aware of advice and policies in Neighbourhood Plans.

Built Conservation/ Heritage :-

The proposed development would have an impact on the setting of Midge Hall (Grade II) to the North of the Application site and The Marsh (Grade II), Purton Road to the West.

As Midge Hall appears to be a moated site the area may contain Archaeological Evidence.

Map evidence reveals that the Smithy shown on the 1st edition OS Map may survive in the grounds of GR Fisher next to the grounds of the Petrol Filling Station on Swindon Road. This building would be considered to be an undesignated Heritage Asset.

The principle issue in this case would be the loss of the green open landscape and the manner in which this provides a buffer from the existing settlement and the M4 Corridor.

Any forthcoming application will need to consider significant landscape mitigation measures to preserve the existing sense of openness afforded by the current site.

Waste Collection:-

The council requests s106 contributions towards the provision of waste and recycling containers for each residential unit, under policies CP3 and WCS6. The following estimated contribution is required for the proposed development:

| Property type category | Contribution per house/per category | Quantity | Total |
|------------------------------------|-------------------------------------|--------------|----------------|
| Individual house | £91 | 400 | £36,400 |
| Bin store for block of 6-10 flats | £581 | | £ 0 |
| Bin store for block of 11-14 flats | £1,038 | | £ 0 |
| Bin store for block of 15-18 flats | £1,474 | | £ 0 |
| | | Total | £36,400 |

Access to waste collection services:

I attach a guidance document setting out the council’s technical requirements to ensure that residents will be able to use the standard waste collection service. In general terms, following the attached guidance will allow the service to operate as intended and generally will mean that plans are acceptable to the waste management services team. The following paragraphs highlight some areas that would need to be addressed at the next stage of an application.

Vehicle access

Vehicle tracking is required to demonstrate that refuse collection vehicles (RCVs) can move through the development and turn at the ends of roads, especially taking account of cars parked in allocated spaces and at the roadside. Adequate turning room should be provided to take account of the restrictions on carry distances for residents set out in Part H of Building Regulations (25m), the limitations on carry distances for waste collection crews, where the vehicle should be able to stop within 10m of a collection point (see section 4.4 of the attached guidance) and due to the requirement to minimise reversing to meet the requirements of BS 5906:2005. Tracking on plans in future submissions should demonstrate the sufficiency of vehicle access.

The council requires an indemnity in order to operate on any roads that are not adopted, including during any period where the council needs to deliver waste collection services prior to adoption. The required arrangements are set out in section 5.8 of the attached guidance with a sample indemnity provided in Appendix C.

Collection points

Each dwelling should have a collection point that is on level hardstanding off any roadway or footway at the curtilage of the property, as further described in section 5.2 of the waste SPD. Plans should identify these areas for each dwelling and demonstrate that they do not impact on space available on driveways and that soft landscaping won’t prevent or encumber the collection crew when emptying bins.

Storage points

In accordance with the guidance in section 5.4 of the waste SPD, plans in future submissions should demonstrate that each property has suitable storage space that takes account of the guidance. Showing containers to scale in situ will help to demonstrate compliance.

Routes between storage and collection points

As noted in the 'Vehicle access' section above, residents should not have to carry their waste containers more than 25m from the storage point to the collection point. Plans should demonstrate that this is achievable for each dwelling, preferably with a supplementary table listing the carry distances per dwelling, for ease of reference. Section 5.3 of the waste SPD provides further details on matters to consider when designating these routes.

The collection service for flats

If final designs include communal bin stores for flats, the detailed guidance in section 5.6 of the attachment should be followed. Particular attention should be paid to the location and accessibility of bin stores, as the RCV should be able to park within 10 metres of the store without obstructions and with dropped kerbs in place to enable the bins to be safely manoeuvred to the rear of the RCV. We have experienced problems where poor location, insufficient storage space or doorways of inadequate width mean that services can't be delivered, which impacts on the quality of life of residents as waste accumulates. Final designs should demonstrate how these problems are mitigated.

Highways:-

This pre-app has been allocated to me and I believe it would be helpful for you to pass on my details to the prospective applicant, as the response below is not in any way comprehensive.

Having considered the submission, it is clear that the proposed development will require a full Transport Assessment (TA) and Travel Plan.

The TA will require full strategic transport modelling and this should incorporate Wiltshire's West Wilts Strategic Transport Model. It is also considered likely that due to the impact at J16, that a microsimulation model will be required by HE and this request will be supported by Wiltshire Council.

With regards to future years assessments, the proposals may be considered contrary to current Local Plan Policy and hence any assessment should reflect the Local Plan refresh and model a forecast year of 2036; this would provide assurance that the scheme could be considered under either policy context. The 2036 context would also allow for a typical impact assessment of strategic infrastructure, being a minimum of 15 years post operation; J16 was opened in 2019, with remedial works still being carried out and hence a 15 year period from next year is considered reasonable.

Upon geographical scope, Royal Wotton Bassett is subject to congestion, particularly along the A3102 towards J16 and through the town. This corridor should be assessed in SATURN for with and without development scenarios and any junction exhibiting an RFC approaching 0.85 in either scenario should be subject of junction specific assessments in an appropriate tool; please be aware that micro-simulation will not be considered an appropriate tool without appropriate calibration against priority and signalised networks; the latter being against MOVA logs for base-line scenarios and LinSig optimisation for forecast years. The assessments should include J16 and further junctions/networks may be included if 'flagged' through SATURN consideration.

Whilst the Pre-App submission proposes improvements to the bus service network and walking and cycling routes, these will need to be illustrated through mode layered movement frameworks, with all deliverable works itemised and wherever possible costed.

Having considered the promotional materials, I am very supportive of the approach to masterplanning with very few cul de sacs; this should be progressed with through the application stage.

Wiltshire Council, as Local Highway Authority, neither support nor object to the proposals and judgement of the scheme will remain without prejudice until such time as a planning resolution is sought.

- **Bus transport** – the site is located close to the 55 service route into Swindon. Any development would necessitate appropriate bus infrastructure to include real time passenger information. As outlined in pre-app an increase in frequency of buses would potentially be required to meet demand, particularly for Swindon travel.
- **Active travel** – the site is close to shared use paths, west along the B4042 to the Gerrard Buxton Sports Ground, and southerly along the A3102 to the High st. Any development would need to integrate with this infrastructure and ensure appropriate mechanisms to cross the A3102/B4042 are put in place.
- **Cycle routes** – work is taking place in partnership with Highways England to connect RWB with Swindon by bicycle. This work involves the creation of a route parallel to the A3102 easterly before moving north,north east at Spittleborough Farm crossing the M4 there. Any development would need to connect to this infrastructure to promote travel into Swindon.
- **Rights of way** – there are 3 rights of way on the proposed development. Plans should demonstrate how these will be preserved/enhanced to promote usage.



Public Rights of Way:-

The developer has shown on their plans that they are aware that footpaths LTRE13, 15 and 16 pass through the site. It appears they are proposing to retain them as green corridors rather than seeking to divert / extinguish, which would generally be our preference. The greatly increased use and expectations of the residents means we would require them to be surfaced through the site. We may also require some off-site measures as local residents would also increase use of the adjacent rights of way network. Details of surfacing and other upgrade requirements will be considered at the outline planning stage as their proposals are firmed up.

In order to ensure the definitive (legal) lines of the rights of way are properly catered for, it would be worth the developer contacting us prior to submission of the outline planning application. We will then double-check the legal lines and provide them with our mapping layer to overlay on their plans.

Thames Water;-

Waste Comments

The application indicates that SURFACE WATER will NOT be discharged to the public network and as such Thames Water has no objection, however approval should be sought from the Lead Local Flood Authority. Should the applicant subsequently seek a connection to discharge surface water into the public network in the future then we would consider this to be a material change to the proposal, which would require an amendment to the application at which point we would need to review our position.

With the information provided, Thames Water has been unable to determine the waste water infrastructure needs of this application. Thames Water has contacted the developer in an attempt to obtain this information and agree a position for FOUL WATER drainage, but have been unable to do so in the time available and as such, Thames Water request that the following condition be added to any planning permission. "No properties shall be occupied until confirmation has been provided that either:- 1. Capacity exists off site to serve the development, or 2. A housing and infrastructure phasing plan has been agreed with Thames Water. Where a housing and infrastructure phasing plan is agreed, no occupation shall take place other than in accordance with the agreed housing and infrastructure phasing plan, or 3. All wastewater network upgrades required to accommodate the additional flows from the development have been completed. Reason - Network reinforcement works may be required to accommodate the proposed development. Any reinforcement works identified will be necessary in order to avoid sewage flooding and/or potential pollution incidents. The developer can request information to support the discharge of this condition by visiting the Thames Water website at thameswater.co.uk/preplanning. Should the Local Planning Authority consider the above recommendation inappropriate or are unable to include it in the decision notice, it is important that the Local Planning Authority liaises with Thames Water Development Planning Department (telephone 0203 577 9998) prior to the planning application approval.

Water Comments

Following initial investigations, Thames Water has identified an inability of the existing water network infrastructure to accommodate the needs of this development proposal. Thames Water have contacted the developer in an attempt to agree a position on water networks but have been unable to do so in the time available and as such Thames Water request that the following condition be added to any planning permission. No properties shall be occupied until confirmation has been provided that either:- all water network upgrades required to accommodate the additional flows to serve the development have been completed; or - a housing and infrastructure phasing plan has been agreed with Thames Water to allow additional properties to be occupied. Where a housing and infrastructure phasing plan is agreed no occupation shall take place other than in accordance with the agreed housing and infrastructure phasing plan. Reason - The development may lead to no / low water pressure and network reinforcement works are anticipated to be necessary to ensure that sufficient capacity is made available to accommodate additional demand anticipated from the new development" The developer can request information to support the discharge of this condition by visiting the Thames Water website at thameswater.co.uk/preplanning. Should the Local Planning Authority consider the above recommendation inappropriate or are unable to include it in the decision notice, it is important that the Local Planning Authority liaises with Thames Water Development Planning Department (telephone 0203 577 9998) prior to the planning application approval.

The proposed development is located within 5m of a strategic water main. Thames Water do NOT permit the building over or construction within 5m, of strategic water mains. Thames Water request that the following

condition be added to any planning permission. No construction shall take place within 5m of the water main. Information detailing how the developer intends to divert the asset / align the development, so as to prevent the potential for damage to subsurface potable water infrastructure, must be submitted to and approved in writing by the local planning authority in consultation with Thames Water. Any construction must be undertaken in accordance with the terms of the approved information. Unrestricted access must be available at all times for the maintenance and repair of the asset during and after the construction works. Reason: The proposed works will be in close proximity to underground strategic water main, utility infrastructure. The works has the potential to impact on local underground water utility infrastructure. Please read our guide 'working near our assets' to ensure your workings will be in line with the necessary processes you need to follow if you're considering working above or near our pipes or other structures.

<https://eur02.safelinks.protection.outlook.com/?url=https%3A%2F%2Fdevelopers.thameswater.co.uk%2FDeveloping-a-large-site%2FPlanning-your-development%2FWorking-near-or-diverting-our-pipes&data=02%7C01%7CDevelopmentmanagement%40wiltshire.gov.uk%7C535becededef4189b76208d7ec142574%7C5546e75e3be14813b0ff26651ea2fe19%7C0%7C0%7C637237444739672703&odata=Hg%2B64vGVXo76u5eR%2FgVRTR0zIV5I6mLQYd1zel19%2BSU%3D&reserved=0> Should you require further information please contact Thames Water. Email: developer.services@thameswater.co.uk.

The proposed development is located within 15m of a strategic water main. Thames Water request that the following condition be added to any planning permission. No piling shall take place until a piling method statement (detailing the depth and type of piling to be undertaken and the methodology by which such piling will be carried out, including measures to prevent and minimise the potential for damage to subsurface water infrastructure, and the programme for the works) has been submitted to and approved in writing by the local planning authority in consultation with Thames Water. Any piling must be undertaken in accordance with the terms of the approved piling method statement. Reason: The proposed works will be in close proximity to underground water utility infrastructure. Piling has the potential to impact on local underground water utility infrastructure. Please read our guide 'working near our assets' to ensure your workings will be in line with the necessary processes you need to follow if you're considering working above or near our pipes or other structures.

<https://eur02.safelinks.protection.outlook.com/?url=https%3A%2F%2Fdevelopers.thameswater.co.uk%2FDeveloping-a-large-site%2FPlanning-your-development%2FWorking-near-or-diverting-our-pipes&data=02%7C01%7CDevelopmentmanagement%40wiltshire.gov.uk%7C535becededef4189b76208d7ec142574%7C5546e75e3be14813b0ff26651ea2fe19%7C0%7C0%7C637237444739672703&odata=Hg%2B64vGVXo76u5eR%2FgVRTR0zIV5I6mLQYd1zel19%2BSU%3D&reserved=0>. Should you require further information please contact Thames Water. Email: developer.services@thameswater.co.uk

There are water mains crossing or close to your development. Thames Water do NOT permit the building over or construction within 3m of water mains. If you're planning significant works near our mains (within 3m) we'll need to check that your development doesn't reduce capacity, limit repair or maintenance activities during and after construction, or inhibit the services we provide in any other way. The applicant is advised to read our guide working near or diverting our pipes.

<https://eur02.safelinks.protection.outlook.com/?url=https%3A%2F%2Fdevelopers.thameswater.co.uk%2FDeveloping-a-large-site%2FPlanning-your-development%2FWorking-near-or-diverting-our-pipes&data=02%7C01%7CDevelopmentmanagement%40wiltshire.gov.uk%7C535becededef4189b76208d7ec142574%7C5546e75e3be14813b0ff26651ea2fe19%7C0%7C0%7C637237444739672703&odata=Hg%2B64vGVXo76u5eR%2FgVRTR0zIV5I6mLQYd1zel19%2BSU%3D&reserved=0>

The proposed development is located within 15m of our underground water assets and as such we would like the following informative attached to any approval granted. The proposed development is located within 15m of Thames Waters underground assets, as such the development could cause the assets to fail if appropriate measures are not taken. Please read our guide 'working near our assets' to ensure your workings are in line with the necessary processes you need to follow if you're considering working above or near our pipes or other structures.

<https://eur02.safelinks.protection.outlook.com/?url=https%3A%2F%2Fdevelopers.thameswater.co.uk%2FDeveloping-a-large-site%2FPlanning-your-development%2FWorking-near-or-diverting-our-pipes&data=02%7C01%7CDevelopmentmanagement%40wiltshire.gov.uk%7C535becededef4189b76208d7ec142574%7C5546e75e3be14813b0ff26651ea2fe19%7C0%7C0%7C637237444739672703&odata=Hg%2B64vGVXo76u5eR%2FgVRTR0zIV5I6mLQYd1zel19%2BSU%3D&reserved=0>. Should you require further information please contact Thames Water. Email: developer.services@thameswater.co.uk

Supplementary Comments

Thames Water advise that a drainage strategy should be provided with the details of the points of connection to the public sewerage system as well as the anticipated size of the proposed sewer connection/s (including flow calculation method and whether the flow will be discharged by gravity or pumped) into the proposed connection points.

Open Spaces Team:-

I have estimated the requirements for 400 dwellings using 20% 2 bed, 60% 3 bed and 20% 4+ bed dwellings – this will change once the details of the application are submitted in full; I will include a table of requirement per dwelling for clarity.

400 dwellings would generate a requirement 26,400m² POS including 2,400m² equipped play. I note the masterplan included with the pre-app states that there is approx. 7.1Ha POS and that there are allotments and playspace included in these areas so it would appear that there will be sufficient onsite provision. The playspace would need to be as per the attached Wiltshire Council Play Spec. All POS and play would need to be secured and managed in perpetuity and Wiltshire Council would not adopt the onsite POS or Play.

In addition to the POS requirements the site would also generate a requirement for 11,132m² of sport provision; this would be in the form of an offsite contribution for £111,320 – a CIL compliant target site would be identified at application stage.

| Size of Dwelling (No of Bedrooms) | Square Metres of Play | Square Metres of POS | Square Metres of Play & POS |
|-----------------------------------|-----------------------|----------------------|-----------------------------|
| 1 | 0 | 30 | 30 |
| 2 | 3 | 45 | 48 |
| 3 | 6 | 60 | 66 |
| 4+ | 9 | 75 | 84 |

Spatial Planning:-

Policy Response

Development Plan

- Adopted Wiltshire Core Strategy and saved policies in the North Wiltshire District Local Plan (NWDLP) as per Appendix A to the Core Strategy
- Wiltshire Housing Site Allocations Plan (HSAP)
- Adopted minerals and waste development plan documents

The Royal Wootton Bassett Neighbourhood Plan is also a part of the development plan for Wiltshire. The proposal falls outside the Plan area but the Plan's strategy for the town is directly relevant in the context of this proposal.

Emerging development plan

- Local Plan Review: Consultation on the Local Plan is scheduled for summer 2020 as confirmed in the 2020 Local Development Scheme. The plan carries negligible weight.
- Lydiard Tregoze Neighbourhood Plan: Work has not progressed to a draft and so this plan also carries negligible weight.

Other relevant policy / guidance

- National Planning Policy Framework ('the Framework')
- National Planning Policy Guidance (NPPG)

Comments

Planning law requires that applications for planning permission must be determined in accordance with the development plan, unless material considerations indicate otherwise.

Principle of development

CS Core Policy 1 directs most of Wiltshire's identified employment and housing growth to principal settlements and market towns in conjunction with Core Policy 2 and the area strategy policies; in this case, CS Core Policy 19 for the Royal Wootton Bassett and Cricklade Community Area. CS Policy 1 recognises that market towns can support sustainable patterns of development and the potential for significant development. However, as well as seeking to sustain and enhance their services and facilities, the policy also promotes better levels of self-containment, and viable sustainable communities.

CS Core Policy 19 identifies employment land requirements, and the total number of dwellings. It splits the dwelling requirement between the town of Royal Wootton Bassett and the remainder of the community area. It states that growth in the Royal Wootton Bassett and Cricklade Community Area over the plan period may consist of a range of sites in accordance with Core Policies 1 and 2.

The site falls outside the limits of development of the market town of Royal Wootton Bassett which were recently reviewed through the adopted HSAP. CS Core Policy 2 states that development is sustainable in principle if it is proposed on land within limits of development. Limits of development are an important component of the overall delivery strategy and they have an additional function in seeking to protect the countryside. Further, limits of development in the adopted development plan have helped to support development coming forward in a sustainable manner and scales of development have resulted in exceeding the indicative CS requirement for the town as explained below.

CS Core Policy 2 in connection with para 4.25 identifies several exceptions to this general principle. The proposal is predominantly for residential use and therefore it does not constitute an exception.

For example, very limited housing growth can be supported in open countryside where it is for rural affordable housing (CS Core Policy 44) or providing housing for workers to live at or near their place of work in the interest of agriculture, forestry or other employment essential to the countryside (CS Core Policy 48). Plainly, the proposal is for a significant number of open market and affordable dwellings and therefore incompatible with the Core Strategy's approach to housing in the countryside. Further to this,

saved NWDLP H4 restricts residential development in the countryside outside limits of development. The proposals therefore are in direct conflict with this policy. Further comments on the scale of growth, and other housing matters are provided below.

Housing Matters

Five Year Land Supply

In their pre-application letter the promoters refer to Wiltshire's current five-year housing land supply position. Comments below discuss the current situation. The five-year land supply position could change again in the future and would have to be re-considered if a full or outline application were to be registered.

The CS was adopted in January 2015. PPG confirms^[1] that a development plan does not become out-of-date automatically after passage of 5 years. However, housing land supply must now be assessed against Local Housing Need as per para 73 of the NPPF. This stands at 40,840 dwellings. Against the Local Housing Need, the Council can demonstrate 4.42-4.62 years' worth of supply as confirmed in the Purton Road appeal decision^[2] (6 April 2020). As a result, para 11d in the NPPF (the tilted balance) is engaged.

This means the decision maker should grant permission unless:

- i. *the application of policies in this Framework that protect areas or assets of particular importance provides a clear reason for refusing the development proposed; or*
- ii. *any adverse impacts of doing so would significantly and demonstrably outweigh the benefits, when assessed against the policies in this Framework taken as a whole."*

Case law has examined the interpretation and operation of national policy with regards the ability to demonstrate a five-year housing land supply, and the presumption in favour of sustainable development. Court judgments have established that:

(i) Policies that are considered to be out-of-date as a result of a shortage in the 5-year housing land supply are still capable of carrying weight in the planning balance. The weight to be attributed to those policies is a matter for the decision-maker (most recently in *Suffolk Coastal District Council v Hopkins Homes Ltd.* [2017] UKSC 37).

(ii) The extent of any shortfall in the 5-year housing land supply is capable of being a material consideration (most recently in *Hallam Land Management v SoS DCLG* [2018] EWCA Civ 1808).

Linked with this the Purton Road decision notes that the shortfall is currently modest (para 21). The extent of the 5-year housing land supply shortfall, and the potential for the proposal to deliver housing in the current 5-year period of 1 April 2018 – 31 March 2023 to help remedy the current shortage in deliverable supply, would also be taken into account in a future balancing exercise. The implications of the Council's 5-year housing land supply position, and the weight to be attributed to the development plan policies, would have to be taken into account when determining a planning application for this development.

Housing requirements

The pre-application letter describes the scheme as a gateway development for Royal Wootton Bassett. It is therefore assessed against the housing requirement for the town expressed in CS core policies 2 and 19.

The CS identifies an indicative requirement of 1,070 dwellings for the town in core policies 2 and 19. The latest Housing Land Supply Statement has a base date of April 2018. At that time, the indicative requirement had already been met and in fact exceeded by 58 dwellings. The proposal conflicts with policies 2 and 19 since the proposed housing would not meet the housing needs of Royal Wootton Bassett, nor any other settlement contemplated by the CS.

While the requirement is indicative, exceeding it further by approx. 400 dwellings would undermine the spatial strategy in the CS as found in the Shurnhold^[3] and Marsh Farm^[4] appeals. Most pertinent to the latter appeal, the Inspector found that an out of town development of substantial size and scale would be incompatible with the strategy to increase self-containment at RWB (paras 58, 73, 76); and undermine confidence in the plan-led process through over-development (para 72). Further, he concluded that the development failed to comply with the strategy advanced in the RWB Neighbourhood Plan (para 72) which was a consideration in the appeal. The Neighbourhood Area abuts the site to the south.

On the matter of self-containment, the proposed scheme lacks detail on the amount and type of employment that could be developed, and the number of jobs which could be created. Additional employment land adjacent to market towns could in principle be supported via CS Core Policy 2 and CS Core Policy 34. However, Royal Wootton Bassett already has a poor level of self-containment as evidenced by the Council and confirmed by the Inspector in the Marsh Farm appeal decision (para 56). The proposed employment, even if delivered, would not improve the current imbalance when considered together with approx. 400 new homes. Out-commuting to other centres, most notably Swindon, would increase. As noted above, CS Core Policy 1 recognises that market towns have the ability to accommodate significant development, but the development conflicts with the objective of the policy to achieve better levels of self-containment and therefore more sustainable communities.

The spatial strategy embodied in the CS and the RWB NP, and the indicative housing requirements expressed in the CS, are important mechanisms to deliver sustainable development in a plan-led system (the Framework, para 15) alongside maintaining a supply of deliverable housing land. The proposed development would fundamentally undermine the plan-led system and be incompatible with the sustainable development strategy for Royal Wootton Bassett expressed in CS core policies 1, 2 and 19.

County-wide, allocations in the HSAP will serve to boost housing supply over the plan period up to 2026 in a plan-led fashion consistent with the Framework (para 15). Growth after the plan end date will be informed by the Local Plan Review currently in train. Linked with this the applicants are encouraged to submit comments to the next round of consultation, so the Council can consider reasonable alternatives to deliver sustainable development at Royal Wootton Bassett.

Conclusion

If an application was submitted based on this pre-application proposal, it is advised that from a spatial planning perspective, it would fail to accord with NWDLP Policy H4, CS Core Policy 1, CS Core Policy 2, and CS Core Policy 19. It would contravene the CS strategy which seeks to improve the self-containment of settlements. Further, the proposal is at odds with the strategy embodied in the made Royal Wootton Bassett Neighbourhood Plan which would be a consideration.

The five-year land supply position would need to be re-assessed should a full or outline planning application be registered by the Council. The implications of the Council's 5-year housing land supply position, and in particular the weight to be attributed to the development plan policies, would have to be taken into account when determining a planning application.

Affordable Housing Team:- Matters Considered

Policy Requirements:

Core Policy 43 of the Wiltshire Core Strategy, as currently amended by the National Planning Policy Framework, sets out a requirement for 40% on-site affordable housing provision: on all sites of 10 or more dwellings; or on sites of between 5 - 9 dwellings if the development site is 0.5ha or greater, within the 40% Affordable Housing Zone. There is therefore a requirement to provide 160 affordable units within a scheme of 400 dwellings. This would meet the policy requirement and would assist in addressing the need for affordable housing in Royal Wootton Bassett where there is a high level of demand for both affordable rented and shared ownership housing.

Tenure Mix:

To meet need the affordable housing units should be provided with a tenure mix of 60% of the units (96 units) being for Affordable Rented housing, and 40% of the units (64 units) being provided for shared ownership. **Unit Size Mix:**

Core Policy 45 of the Wiltshire Core Strategy states that housing size and type will be expected to reflect that of the demonstrable need for the community within which a site is located. There is currently a need for all sizes of affordable accommodation in Royal Wootton Bassett and Cricklade. An indicative mix which would reflect current need would be:

Affordable Rented:

- 25% (24 units) - 1 bed / 2 person flats or bungalows
- 45% (43 units) - 2 bed / 4 person houses and bungalows;
- 25% (24 units) - 3 bed / min 5 person houses;
- 5% (5 unit) – 4 bed / min 6 person houses.

Shared Ownership:

- 65% (42 units) - 2 bed / 4 person houses;
- 35% (22 units) - 3 bed / min 5 person houses.

However, I would welcome the opportunity to discuss and review the unit size mix as proposals develop.

There is also a demonstrable need for adapted housing in Royal Wootton Bassett. On all schemes which provide more than 10 Affordable Housing units, it is requested that 10% of affordable units are provided as adapted units in order to help meet this need. These units should be provided as ground floor flats / bungalows to Building Regulations M4(2) standards with a level access shower. The adapted units should be provided as a mix of unit sizes of the affordable rented accommodation to meet demonstrable need.

Minimum Size and Design Standards:

Affordable housing in Wiltshire is expected to meet high standards of design and quality, to be visually indistinguishable from open market housing, and to be evenly dispersed, in small clusters, of no more than 12 to 15 units, within mixed tenure developments.

Please note that flats over commercial units or garages are considered unsuitable for affordable units.

All affordable homes would need to be built to, at least, meet minimum size standards of the Homes & Communities Agency’s published guidance relevant to the dwelling type (or any subsequent design guidance which may supersede it), as well as to meet required minimum person eligibility criteria. To ensure that the affordable housing units are eligible for inclusion in Homes England’s Affordable Housing programme, we would advise that all affordable homes are built to meet at least 85% of the Nationally Described Space Standard (NDSS) relevant to the dwelling type and minimum person criteria. NDSS and 85% NDSS are shown in the table below:

NDSS and 85% NDSS

| | | NDSS | Minimum 85% NDSS |
|--|--|------|------------------|
|--|--|------|------------------|

| Number of bedrooms | Number of bed spaces | 1 storey (sqm) | 2 storey (sqm) | 3 storey (sqm) | 1 storey (sqm) | 2 storey (sqm) | 3 storey (sqm) |
|--------------------|----------------------|----------------|----------------|----------------|----------------|----------------|----------------|
| Studio | 1p | 39 (37)* | | | 34 (32)* | | |
| 1b | 2p | 50 | 58 | | 43 | 50 | |
| 2b | 3p | 61 | 70 | | 52 | 60 | |
| | 4p | 70 | 79 | | 60 | 68 | |
| 3b | 4p | 74 | 84 | 90 | 63 | 72 | 77 |
| | 5p | 86 | 93 | 99 | 74 | 80 | 85 |
| | 6p | 95 | 102 | 108 | 81 | 87 | 92 |
| 4b | 5p | 90 | 97 | 103 | 77 | 83 | 88 |
| | 6p | 99 | 106 | 112 | 85 | 91 | 96 |
| | 7p | 108 | 115 | 121 | 92 | 98 | 103 |
| | 8p | 117 | 124 | 130 | 100 | 106 | 111 |
| 5b | 6p | 103 | 110 | 116 | 88 | 94 | 99 |
| | 7p | 112 | 119 | 125 | 96 | 102 | 107 |
| | 8p | 121 | 128 | 134 | 103 | 109 | 114 |
| 6b | 7p | 116 | 123 | 129 | 99 | 105 | 110 |
| | 8p | 125 | 132 | 138 | 107 | 113 | 118 |

*Where a one person flat has a shower room rather than a bathroom the floorspace may be reduced from 39 sqm to 37 sqm (NDSS) or from 34 sqm to 32 sqm (85% NDSS).

Transfer to Registered Provider:

The affordable dwellings will be required to be transferred to a Registered Provider, approved by the Council, or to the Council on a nil subsidy basis.

It is strongly recommended that the applicant makes contact with Registered Providers and Wiltshire Council's Residential Development Team as soon as possible in order to discuss the best option for the affordable dwellings, including an indication of transfer prices that can be expected. A list of Registered Providers who work in partnership with Wiltshire Council can be provided on request.

Nominations:

The Local Authority would have nomination rights to the affordable dwellings, secured through a S106 Agreement.

Education:-

PLANNING REF: 20/03017/PREAPP

SITE NAME/ADDRESS: Land North of Swindon Road, Royal Wootton Bassett (RWB).

ASSESSMENT OF: 400 units = no detailed mix supplied so 30% affordable housing (AH) = 120 units is assumed for the purposes of this assessment. (Please note that should one bed units and/or an alternative level of AH be identified at a later stage in the planning process, we will need to adjust our assessment and consultation response to reflect them.)

EXCLUSIONS/DISCOUNTS APPLIED: standard 30% AH discount applied to 120 AH units = a reduction by 36 units.

NUMBER OF PROPERTIES QUALIFYING FOR ASSESSMENT: 364

SCHOOL PLACES NEEDED BY DVLPT:

PRIMARY = 113 SECONDARY = 80

DESIGNATED AREA PRIMARY/IES:

- Longleaze Primary.
- The other town primaries: Noremarsch Juniors, Wootton Bassett Infants and St Bartholomew’s Primary Academy are all within 2 miles safe walking distance of the development site.

DESIGNATED AREA SECONDARY/IES:

- Royal Wootton Bassett (RWB) Academy
- There are no other secondaries within 3 miles of the development site.

EARLY YEARS ASSESSMENT DETAILS:

- There are currently 1 nurseries and preschools and 9 childminders within a two-mile safe walking route of this proposed development.
- This nursery would not support a development of this size.
- The Local Authority has a duty to provide sufficient childcare for working parents under Section 6 of the Childcare Act 2006.
- Therefore, any increase in population as a result of this development will require additional childcare provision.
- Based on the number of qualifying properties, as specified above:

| Number of units | 2-year olds and below 4 places per 100 dwellings | 3- & 4-year olds 9 places per 100 dwellings | Total of places | Total required: |
|-----------------|---|--|-----------------|-------------------------|
| 364 | 15 | 33 | 48 | £17,522 x 48 = £841,056 |

EARLY YEARS CONTRIBUTIONS REQUIREMENTS: Current pupil products: 0.04 per dwelling for 0-2-year olds (4 per 100 dwellings) and 0.09 per dwelling for 3-4-year olds (9 per 100 dwellings). Current cost multiplier = £17,522 per place. *(Please note however, that the cost multiplier is due to be updated shortly for the 2020/21 financial year, and the new figure will apply to S106s signed in that financial year as per our S106 Methodology).

- Were we assessing this pre-app enquiry today as a registered application, the total required as per calculations above = £841,056* (please see note above), towards the development of Early Years provision.
- This contribution would be secured via a Section 106 Agreement, to which the Council’s standard terms will apply.

PRIMARY ASSESSMENT DETAILS:

Aggregated data for primary provision within 2 miles safe walking distance of the proposed development site:

- Capacity = 1113 places.

- Jan 20 schools census NOR = 987 pupils.
- Current forecasts (including approved housing completed & underway) peak at 1021 pupils in September this year.
- In addition, places required by in area housing already registered/approved but not yet built out & so not yet in forecasts = 26.
- So, there is currently spare capacity available across the RWB primary schools of $92 - 26 = 66$ places.

PRIMARY CONTRIBUTION REQUIREMENTS: Current primary places cost multiplier = £18,758 per place. *(Please note however, that the cost multiplier is due to be updated shortly for the 2020/21 financial year, and the new figure will apply to S106s signed in that financial year as per our S106 Methodology).

- There are 66 places available across the town schools which can be offset against the needs of the next planning application/s to come in. They will be allocated by date of registration priority order, as per our S106 Methodology.
- Were that to be this pre-app having become a registered application, then we would require a developer contribution of $113 - 66 = 47$ primary school places, that the development needs but aren't currently available.
- Using the current, (but soon to be updated, please see note * above), cost multiplier of £18,758 per place, then $£18,758 \times 47 = £881,626$ subject to indexation.
- However, please note that this is an indicative response. Should other planning applications be registered before one for this development proposal, then they will take up spare places and reduce the amount available to be offset for later applications.
- Any contribution required would be secured by a S106 agreement to which the Council's standard terms will apply.

SECONDARY ASSESSMENT DETAILS:

- PAN years 7 – 11 capacity = 1426 places. This includes places for new housing already secured by S106.
- Jan 20 census years 7 -11 number on roll = 1404 pupils.
- Current figures peak at 1404 (and include approved housing completed/underway).
- In addition, places required by in area housing already registered in this area but not yet reflected in our forecasts = 71.
- The school is therefore, already effectively full.
- There is pressure on secondary places here and an expansion of places provision is planned. The school is an Academy and was built under a PFI agreement therefore negotiations are underway between the Academy and PFI provider regarding the expansion.
- Works are expected to commence in 2019/20.
- Contributions towards this are therefore being sought from larger developments being proposed in this secondary area.

SECONDARY CONTRIBUTION REQUIREMENTS: Current (2018/19) secondary places cost multiplier = £22,940 per place. *(Please note however, that the cost multiplier is due to be updated shortly for the 2020/21 financial year, and the new figure will apply to S106s signed in that financial year as per our S106 Methodology).

- RWB Academy is already full.
- Were we assessing this pre-app enquiry as an application registered today, we would therefore require a developer contribution to provide the 80 secondary school places, that the development needs but aren't currently available.

- **Using the current (but please see note * above), capital cost multiplier: 80 places x £22,940 = £1,835,200, subject to indexation.**
- **Any contribution required would be secured by a S106 agreement to which the Council's standard terms will apply.**

CAVEATS: (see attachment)

Public Protection:-

I have looked at the above PREAPP and make the following observations.

Air Quality: Royal Wootton Bassett doesn't have an Air Quality Management Area in respect of the nitrogen dioxide annual mean objective, however significant new development would feed into existing networks causing additional air quality pressure and as such steps would need to be taken to mitigate the additive impact of any development. If development is essential CIL/S106 contributions will be required to enable the council to put in place funding to enable actions to be taken to enable a reduction in emissions and the revocation of the AQ orders where present. Measures to prevent further deterioration or a neutral impact would not be acceptable as the council is bound by Air Quality regulations to work toward reduction of nitrogen dioxide levels. It is desirable that AQ is dealt with at a strategic level with modelling of traffic and AQ impacts, allowing prevention and reduction measures to be incorporated in to the Local plan so developers know the requirements and constraints they must operate within. AQ assessment showing cumulative effect of this development on relevant receptors in locality coupled with emission reduction proposals would be required prior to application; this must include but not be limited to provision of a scheme for conventional car replacement and ultra low energy vehicle infrastructure .

Air quality impacts due to increased car use make the impacts on Air quality significant.

Noise: The site partially abuts the B3102 (busy main road) and as such noise would be a design consideration in terms of achieving acceptable amenity for dwellings. There is also a petrol filling station/garage so noise and odours could be an issue also. The proposed design of residential amenity should follow the principals of ProPG - Professional Practice Guidance on Planning & Noise Guidance for new residential development and ensure noise impacts are incorporated into the early design stages. We will require a noise assessment to confirm noise impact on noise sensitive receptors and appropriate mitigation. Relevant standards are WHO and BS8233:2014.

Contaminated Land: Tanks/energy facilities and unknown filled ground are indicated within the site and as such these would be potentially contaminated land and require investigation in terms of its effect upon development.

Urban Design:-

Introduction

The cover letter states that the purpose of the pre-app request *"is to identify the Council's position on the potential development of the site for a mixed-use urban extension of circa 400 dwellings"* and *"to seek the Council's position on the development of the L&Q site at Royal Wootton Bassett, in light of the Council's case presented at the Purton Road Public Inquiry."*

Of the planning context, the cover letter notes *"to the west of the site is Marsh Farm, this has been the subject of two planning appeals, for mixed use residential-led housing development and retail/care home development. Both appeals were dismissed and in doing so, landscape considerations were raised. To support this PAR, a Landscape Position Paper has been prepared by EDP reviewing the Inspector's decision and the reasons why the L&Q proposal cannot be treated in a similar way."*

Relevant Policy

Wiltshire Core policy 57 states that *"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.” (In 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.”)

The new National Design Guide paragraph 65 and 66 state:

“Built form is determined by good urban design principles that combine layout, form and scale in a way that responds positively to the context. The appropriate density will result from the context, accessibility, the proposed building types, form and character of the development.”

“Well-designed places also use the right mix of building types, forms and scale of buildings and public spaces to create a coherent form of development that people enjoy. They also adopt strategies for parking and amenity that support the overall quality of the place.”

Thus, an applicant should demonstrate, illustratively (not just in writing) that their schemes comply with urban design policies and principles. This means illustrative masterplans unambiguously being able to deliver attributes described in the DAS, especially those which have a spatial component. A sketch ‘proving’ layout showing how the proposed amount and mix of units has been determined is indispensable.

Additional illustrations, plans, vignettes and schedules may be required depending on the complexity of the site or scheme, and the amount of development that is being applied for.

Finally, the NPPF paragraph 124 states; *“Being clear about design expectations, and how these will be tested, is essential for achieving [high quality buildings and spaces]”* hence, outline design packs which cannot meet the above expectations are unlikely to be assessed as able to deliver good design at the REM stage and could not be supported.

Comments

1. No specific request from the applicant is made to understand urban design feedback, and as this is probably to be an application for an Outline, I assume that the applicant will suggest that most urban design issues will be reserved matters, except Amount and Access. However, good outline applications will include various mechanisms such as parameter plans (which can be referenced in planning conditions) to evidence and show how higher quality design could be realistically achieved in the available space, and that is what will likely be expected here too.

2. The site is located on greenfield land farthest from the town centre, and farthest from the railway line, but closest to the M4. There may be other applications for unallocated sites around the town and so I could not support this site over another by assessing only this one. However the site does appear to be a natural extension of the town, that would occur at some point in the future, but I will defer to other officers on the principle of that.

3. A draft DAS, dated 2017, accompanies the pre-app, and this describes the vision and ought to set out an explanation of how the 400 units have been arrived at, as well as the other ‘mixed uses’.

4. Chapter 5 in the DAS shows the constraints and opportunities identified, and chapter 6 shows the Design Concept derived from these, in terms of landscape/GI, access and movement hierarchy, block and density pattern. Together these show the outline of a credible urban design framework and, in principle I am supportive of this initial approach.

5. Chapter 7 lists numerous benefits the scheme could deliver;

- new plays areas including skate park
- 2 allotment areas
- community building for co-working, gym, nursery, art centre etc
- higher density living in apartments and townhouses for open market and/or extracare
- employment in retail and/or office
- new woodland planting
- ecologically designed SUDs
- mix of house types, with form and materials designed to reflect architectural character of RWB
- a network of segregated walking and cycling paths and a woodland trim trail
- new pedestrian/cycle links over nearby main roads

These would all be welcome for the creation of a high quality new residential development. As this is a 2017 vision, some updating might be required (e.g. I assume Spatial Planning officers can comment on amount of employment need) and other officers may highlight other amendments/additions to this list. E.g. more energy reduction features may be requested such as

solar energy, non-generic house types, EV charging etc.

6. As an unallocated site there is no site specific policy securing any list of particular benefits. Thus, weight should probably only be given to these 'opportunities' if they are to be turned into commitments, secured by way of condition or s106. Otherwise any developer taking forward the REM will have the opportunity to omit them all. But otherwise this sort of list is a good starting point for future discussion.

7. The DAS includes a sketch layout in Figure 19, illustrating one way that a layout of the supposed 400 homes could fit onto the concept plan. This indicates that basic urban design principles have been accounted for, e.g.;

- outward looking scheme
- 2 access points avoiding creation of a cul-de-sac
- Perimeter block structure with composed build lines
- active streets fronting public realm and POS edges
- legible movement hierarchy (not too permeable)
- distinctive primary street, tree lined and punctuated with spaces or GI gateways
- mix of accommodation types – with a lot of POS, there is an opportunity to deliver more apartment homes to be more efficient with land.

8. In going forward, I would expect to see some more detail on this sketch layout; it should be possible to confirm that the number of units is 400 + X sqm of employment land and that a realistic amount of parking and private amenity space (where required) is accounted for. Also, space for tree planting in the public realm must be realistic.

9. That is all I can really say at this point on the submitted information, and I suspect that the applicants primary concern is with the principle of development, and any future application's updated DAS may seek to change the proposals.

10. Should a future application be forthcoming, I attach below a generic list which the applicant might like to consider checking off:

For an expedient assessment of any future application, I would recommend the following be included in a design pack:

- *Urban Design Constraints and Opportunities Plan – as much as possible that could be deemed to influence the design should be captured on this.*
- *Urban Design and Landscape Concept Plan as part of design evolution, including active frontages and walking/cycling routes*
- *Evidence of a design evolution, including other options which have been explored.*
- *Statement of Community Involvement showing how local opinions have been analysed and the design has responded to these.*
- *Evidence for why the indicative housing footprints (i.e. detached, semi-detached, terraced or apartments) would be sustainable typologies and satisfy the predominant need in the area.*
- *Brief urban design and architectural character analysis, showing the distinctive theme characteristics in the area and, if relevant, that of exemplar practice elsewhere that has influenced the concept.*
- *Sustainability strategy with a plan annotating how design maximises resilience (see NDG para. 135 -149) . Standard' house types may not be adequate and modifications may be required to their form, depending on their position and orientation.*

FULL/REM ONLY:

- *If useful, some isometric sketches/models of the development, annotated to demonstrate how different elements have been composed to enhance the sense of place.*
- *Indicative lighting plan showing any street tree planting to ensure no conflicts*
- *Indicative plot drainage plan showing any street tree planting to ensure no conflicts*
- *Boundaries plan (colour coded) and boundaries details sheets (elevations +*

sections). Include any boundaries related to changes in levels.

- Building Materials Plans with annotation to explain concept of distribution, and what would make the scheme distinctive.
- Materials Plan or House Types sheets showing notes regarding appearance of all items on façades (or Schedule)
- Proposed adoptable highways plan and POS management plan if any areas fall outside adoption and private conveyance.
- Depending on affordable housing provision, a vignette demonstrating tenure blind house & plot design may be required.
- Parking Plan, showing even spread of visitor parking
- Cycle parking strategy showing details and location of each facility, to ensure adequate space is provided.
- Engineering Plan showing all levels (showing level thresholds), numbers of steps, retaining wall heights or tanking, etc
- Indicative Drainage Runs to show no conflict with Lighting columns of tree planting
- Movement hierarchy plan showing convenient, legible network relating to block structure and development scale.
- SUDs cross sections showing detailing of landscaping, recreation features
- Appropriate street furniture strategy for within the public realm and POS.
- Indicative streetscenes annotated to demonstrate how all elements have been composed

Drainage:-

Here are our drainage and flood risk comments:

- The proposed development constitutes major development, therefore para 165 of the NPPF applies: *165. Major developments should incorporate sustainable drainage systems unless there is clear evidence that this would be inappropriate. The systems used should:*
 - a) take account of advice from the lead local flood authority;*
 - b) have appropriate proposed minimum operational standards;*
 - c) have maintenance arrangements in place to ensure an acceptable standard of operation for the lifetime of the development; and*
 - d) where possible, provide multifunctional benefits.*
- The site is predicted to be at risk of localised surface water flooding in the 100 year plus climate change scenario. Flood risk maps can be viewed on Wiltshire Council's [Strategic Flood Risk Assessment Data Explorer](#) (see appendix E & F).
- Even though the site is located in flood zone 1, the site area exceeds 1 hectare, therefore a site specific flood risk assessment is required, which addresses all sources of flooding. The surface water drainage strategy must demonstrate how flood risk will be managed safely without increasing flood risk to others.
- The site layout should be developed following a sequential approach i.e. putting the most vulnerable development in the lowest flood risk areas.
- The applicant would need to evidence application of the surface water disposal hierarchy - 1st Re-use, 2nd Infiltration, 3rd watercourse/surface water body, 4th surface water sewer, 5th combined sewer. To discount/prove infiltration as a viable option, the applicant will need to provide the following at application stage:
 - Infiltration test results in accordance with British Research Establishment (BRE) Digest 365 – Soakaway Design.
 - Results of a groundwater level assessment (taking into account seasonal variation) to ensure that a minimum of 1m clearance is available between the base of the soakaway and the maximum groundwater level.
- The surface water drainage strategy should take account of climate change in accordance with [EA guidance](#) (40% uplift in peak rainfall intensity) and urban creep.

- The promotional document states that surface water would be discharged at greenfield runoff rates. The applicant should note that with regards the control of surface water discharges from greenfield sites, Wiltshire Council requires post development discharges to provide **20% betterment** over pre development discharges for both peak flow and volume. To demonstrate compliance, the applicant must provide pre and post development runoff rates for a range of return periods (1, 30 and 100 year), and pre and post development runoff volumes for the 100 year, 6 hour rainfall event. This takes account of national policy, as outlined in the [SuDS Technical Standards](#). Proposals to discharge at Q_{BAR} may also be considered.
- The promotional document lists green infrastructure as one of the objectives. National and local policy (Core Policies 52: Green Infrastructure and Core Policy 67: Flood Risk) requires SuDS to provide multifunctional benefits, where possible. There are four main categories of benefits that can be achieved by SuDS: water quantity, water quality, amenity and biodiversity. The applicant must demonstrate how these benefits have been considered and incorporated in the design. The Council’s Landscape and Design team must be consulted to comment on amenity and biodiversity benefits, to ensure high quality SuDS that provide multifunctional benefits.
- The applicant should demonstrate adherence to the new [National Design Guide](#), that includes guidance on integrated water management that enhances the character of a place and makes it more resilient. The design guide forms part of planning practice guidance. It sets out the 10 characteristics that define good design, and supports paragraph 130 of the NPPF which states that permission should be refused for development of poor design that fails to take the opportunities available for improving the character and quality of an area and the way it functions.
- The sewerage undertaker must be consulted on the foul drainage design.
- Finally, the table below outlines the level of information required at each application stage. Provision of the correct information will expedite the processing of your application by the LLFA.

| Pre-app | Outline | Full | Reserved matters | Discharge of conditions | Document to be submitted |
|---------|---------|------|------------------|-------------------------|--|
| ✓ | ✓ | ✓ | | | Flood Risk Assessment / Statement |
| ✓ | ✓ | ✓ | | | Drainage Strategy / Statement & sketch layout plan |
| | ✓ | | | | Preliminary layout drawings |
| | ✓ | | | | Preliminary “Outline” hydraulic calculations |
| | ✓ | | | | Preliminary landscape proposals |
| | ✓ | | | | Ground investigation report (for infiltration) |
| | ✓ | ✓ | | | Evidence of third party agreement for discharge to their system (in principle/ consent to discharge) |
| | | ✓ | | ✓ | Maintenance program and on-going maintenance responsibilities |
| | | ✓ | ✓ | | Detailed development layout |
| | | ✓ | ✓ | ✓ | Detailed flood & drainage design drawings |
| | | ✓ | ✓ | ✓ | Full Structural, hydraulic & ground investigations |
| | | ✓ | ✓ | ✓ | Geotechnical factual and interpretive reports, including infiltration results |

| | | | | | |
|--|--|---|---|---|--|
| | | ✓ | ✓ | ✓ | Evidence of measures to prevent pollution of the receiving groundwater and/or surface waters |
| | | ✓ | ✓ | ✓ | Drawings showing conveyance routes for flows exceeding the 1 in 100 year plus climate change |
| | | ✓ | ✓ | ✓ | Detailed landscaping details |
| | | ✓ | ✓ | ✓ | Discharge agreements (temporary and permanent) |
| | | ✓ | ✓ | ✓ | Development Management & Construction Phasing Plan |

Wilts Police/Crime Prevention /Architectural Liaison:-

I have read the information supplied and was disappointed to find no mention of safety and security considerations in this new development. I would ask that if this development is to go forward, it be built to Secured by Design standards.

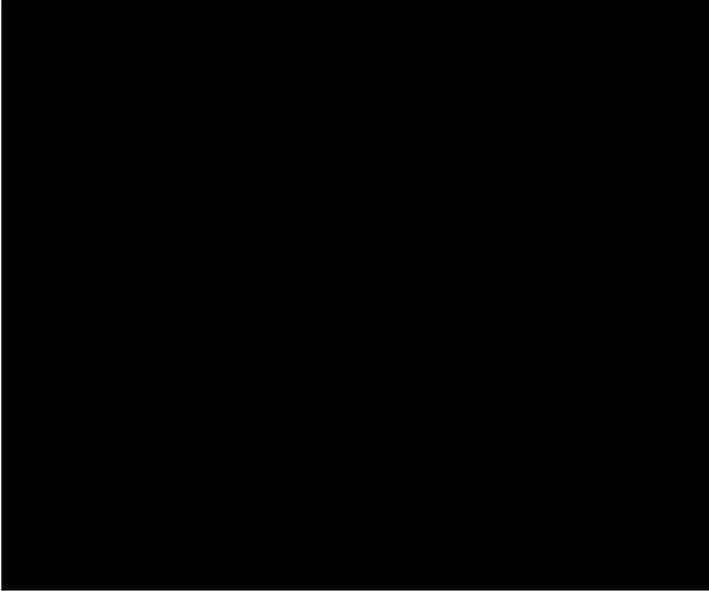
Secured by Design (SBD) is the national crime prevention initiative which ensures that new build developments are built with crime prevention as core to the layout and construction of new homes and associated infrastructure. In particular I would ask that the homes be built with doors and windows complying with PAS 24:2016: this is a higher security standard than PAS 24:2012 which is required by Advance Document Q (NPPF). This would ensure the homes have the highest standard of safety and security.

The National Planning Policy Framework (NPPF) defines three fundamental objectives to achieving a sustainable development: economic, social and environmental (NPPF, page 5, para 8). Crime has a direct impact on all three objectives. This has been reinforced throughout the NPPF where the government makes clear its view of what sustainable development, in England, means in practice for the planning system. Specifically, Section 8 ‘Promoting healthy and safe communities’, para 91, states that ‘planning policies and decisions should aim to achieve healthy, inclusive and safe places which....are safe and accessible so that crime and disorder, and the fear of crime, do not undermine the quality of life or community cohesion’. Furthermore, section 8, para 95 states ‘Planning policies and decisions should promote public safety and take into account wider security and defenceThis includes appropriate and proportionate steps that can be taken to reduce vulnerability, increase resilience and ensure public safety and security. Similarly the NPPF Para 124, states ‘Good design is a key aspect of sustainable development, is indivisible from good planning, and should contribute positively to making places better for people; paragraph 127 (f) states that ‘planning policies and decisions should aim to ensure that developments create places that are safe, inclusive and accessible... where crime and disorder, and the fear of crime, do not undermine the quality of life or community cohesion and resilience

With the publication of the accompanying National Planning Practice Guidance (NPPG) the government has reiterated that designing out crime and designing in community safety should be central to the planning delivery of new development. Specifically the Planning Practice Guidance on design reminds practitioners that local authorities are duty bound to adhere to Section 17 of the Crime and Disorder Act 1998 and exercise their functions with due regard to their likely effect on crime an disorder, and do all that they reasonably can to prevent crime and disorder. Furthermore, practitioners are also reminded that the prevention of crime and the enhancement of community safety are matters that a local authority should consider when exercising its planning functions under the Town and country Planning legislation. Paragraph 10 of the NPPG states; planning should address crime prevention – designing out crime and designing in community safety should be central to the planning and delivery of new development. It goes further stating that crime should not be seen as a stand-alone issue, which is why guidance on crime has been embedded throughout the guidance on design rather than being set out in isolation.

In addition Core Strategy; Core Policy 57 Ensuring high quality design and place shaping states ‘A high standard of design is required in all new developments.... (viii) - Incorporate measures to reduce any actual or perceived opportunities for crime or antisocial behaviour on the site and in the surrounding area’.

I would therefore, ask that I be consulted by the developer prior to full planning being submitted to ensure that all opportunities are taken to ensure that crime prevention is considered in all aspects of this development. My services are free of charge.



From: [Redacted]
Sent: 29 May 2020 15:58
To: [Redacted]
Cc: [Redacted]
Subject: Re: 20/03017/PREAPP

Dear [Redacted]

Thanks for coming back to me on this.

Turning to discussion of written advice/meeting – I'd like to suggest a hybrid approach if at all possible, with a view of keeping your workload to a minimum, but at the same time, providing us with a clear response on the proposals and the Council's position.

Would it be possible to have all the written internal consultee responses received, so that we can review them to understand what the key matters are and have a discussion on Teams regarding the matter of principle. Following that discussion, I would issue a Note of the Meeting which would serve as a formal record of what was discussed (which we would obviously agree with you). Appreciate that the consultee responses would be 'raw' and not moderated with a planning balance and we can treat them with a level of caution.

The reason for suggesting this approach is clearly a site of this size raises a number of technical issues which need to be fully understood and having the consultee responses will go a great way in understanding how your colleagues think. However, the issue of principle is more nuanced, especially in light of the recent Strategic Planning Committee meeting and the difficulties of housing land supply/Core Strategy Review.

Would this be of interest to you? If so, can we have sight of all the consultation responses received so far to assist in preparing for a meeting.

Look forward to hearing from you.

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STRAT291

Wiltshire Local Plan Review Representations

Land at Boundary Farm, Melksham

On behalf of Baker Estates Ltd
March 2021

Turley

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Our reference
BAKA3001

March 2021

1. Introduction and Context

- 1.1 These representations are prepared by Turley on behalf of Baker Estates Ltd ('Baker Estates') in response to the Wiltshire Local Plan Review ('LPR') consultation with respect to the Baker Estates interests at the land at Boundary Farm, located to the west of Melksham. The site is identified at 'Site 11' in the Council's 'Planning for Melksham' document. The extent of the Baker Estates land control ('the site') is demonstrated on Figure 1 below:

Figure 1- Site Location Plan Extract



- 1.2 This Representation is accompanied by a Framework Masterplan (ref: 3002 rev D) included at **Appendix 1**, which demonstrates a possible masterplan for the site informed by initial technical work on ecology, landscape and highways, and has also been submitted to Wiltshire Council under pre-app reference 21/01224/PREAPP.
- 1.3 Our representations are structured to firstly comment on the 'Emerging Spatial Strategy' consultation document which considers the County wide spatial strategy for the LPR. We then consider the 'Planning for Melksham' consultation document which sets out the town of Melksham's role in this strategy and potential development sites to meet the identified housing requirements.

2. Wiltshire Emerging Spatial Strategy

- 2.1 We have considered the 'Emerging Spatial Strategy' document and supporting documents including the Local Housing Needs Assessment (ORS, April 2019), the Chippenham HMA: Formulating Alternative Development Strategies (ADSs) and Interim Sustainability Appraisal.
- 2.2 On review of the Council's online comment form it appears there is one key question formulated/posed for this document – 'Please enter any comments you have regarding the Emerging Spatial Strategy'.
- 2.3 We have therefore considered the emerging spatial strategy and set out comments by relevant section in turn below. The context for our comments is based in the guidance by the National Planning Policy Framework ('the Framework'), which states that for Plans to be considered sound they should be:
- a) Positively prepared** – providing a strategy which, as a minimum, seeks to meet the area's objectively assessed needs; and is informed by agreements with other authorities, so that unmet need from neighbouring areas is accommodated where it is practical to do so and is consistent with achieving sustainable development;
 - b) Justified** – an appropriate strategy, taking into account the reasonable alternatives, and based on proportionate evidence;
 - c) Effective** – deliverable over the plan period, and based on effective joint working on cross-boundary strategic matters that have been dealt with rather than deferred, as evidenced by the statement of common ground; and
 - d) Consistent with national policy** – enabling the delivery of sustainable development in accordance with the policies in this Framework.
- 2.4 We have considered the Emerging Spatial Strategy document with a view to highlighting where, in our opinion, there may be potential for compliance with the above tests of soundness with the draft Plan strategy. Our comments are therefore intended to maximise the future success of the LPR process by ensuring that the emerging plan, when scrutinised in later stages, is adjudged to be sound and provides a clear framework for future growth.

Growth and climate change

- 2.5 We generally support the objectives set out in relation to Carbon Neutrality by 2030 and recognise the potential role that the Baker Estates site can and could play in delivering these outcomes being an option for housing development at a key Market Town. The proposed climate change outcomes appear realistic and deliverable in principle, all of which the Baker site can contribute to. However when these objectives are carried through into LPR Policy, caution must be exercised on retaining deliverability and viability of the LPR allocations.

Delivering the spatial strategy

- 2.6 We generally support the spatial strategy delivery principles set out, and assume that the delivery principles are not intended to be presented in order of importance, as they are fundamentally interconnected in the way that they function – for example the need to allocate land for development to meet identified requirements is also a central part of ‘place shaping priorities’.
- 2.7 A further possible delivery principle might be to make clear that working closely with promoters and developers of the required large greenfield/strategic sites will form a key part of delivering the strategy. The intention being to explore and address deliverability issues in relation to infrastructure requirements, land ownership, housing density expectations and development viability. This will help to encourage effective delivery of the LPR strategy once adopted.
- 2.8 We suggest removal of delivery principle (5) which appears to suggest that greenfield housing development will be restricted through phasing, to ‘ensure a priority is maintained on brownfield land’. Although we agree development of brownfield land should be encouraged, we do not consider restricting other forms of development is a justified approach to take to delivering a spatial strategy. Taking the view that withholding deliverable, sustainable sites which are required to meet the full objectively assessed needs for the County would not amount to positive preparation of the LPR. It is important that the Council does not impose unnecessary constraints on allocated sites as that can result in adverse effects on deliverability.

Formulating the spatial strategy

Plan Period

- 2.9 The LPR Period is proposed as being up to 2036. We acknowledge that the 2036 figure is derived from the Strategic Housing Market Assessment and Functional Economic Market Area Assessments previously produced as part of the Plan evidence base, which both consider the requirement for new homes and jobs up to 2036.
- 2.10 Although we acknowledge there is efficiency for the Council in using the evidence base that has already been commissioned and produced, it must be fit for purpose to produce a positively prepared and effective Plan.
- 2.11 Fundamentally we caution against progressing the LPR with what we consider to be a relatively short plan period, and promote updating the relevant evidence base to allow adoption of a longer plan period for the LPR. This will allow the Council to plan for longer term strategic needs such as new infrastructure and large housing sites. The Framework states:
- “22. Strategic policies should look ahead over a minimum 15 year period from adoption, to anticipate and respond to long-term requirements and opportunities, such as those arising from major improvements in infrastructure.” (our emphasis)*
- 2.12 The Council’s latest Local Development Scheme (July 2020) anticipates adoption of the LPR in Q2 2023, this would leave just 13 years from adoption to the expiry of the plan

period, less than advised by the current, and emerging draft NPPF. On this basis the emerging LPR is not being positively prepared and is inconsistent with national policy.

- 2.13 In addition to this, the current consultation draft NPPF (January 2021)¹ adds wording to this paragraph to state:

“Where larger-scale development such as new settlements form part of the strategy for the area, policies should be set within a vision that looks further ahead (at least 30 years), to take into account the likely timescale for delivery.” (our emphasis)

- 2.14 This is particularly relevant in Wiltshire where larger scale developments are proposed across the County and particularly at the Principal Settlements, including more than 1,800 homes for Trowbridge and over 5,000 homes at Chippenham. Given the scale of these developments it would seem prudent to allow for development to be delivered over a longer plan period.
- 2.15 We note that there are references within the consultation documents to strategic sites delivering a significant quantum of homes beyond the current plan period.
- 2.16 We advise formulating the LPR for a period of at least 15 years from the possible adoption date to ensure soundness can be demonstrated as a minimum, however in the spirit of positive preparation, and given the scale of development proposed in Wiltshire, recommend formulating the LPR over a longer period such as to 2040 or beyond.

Alternative Strategies

- 2.17 The LPR has tested alternative development strategies within each HMA (which we come on to), and we acknowledge that the Council considers the LPR a review of the Core Strategy which has been the starting point for determining the distribution of growth. However, the Sustainability Appraisal, associated evidence base and resulting spatial strategy does not appear to have considered realistic alternative strategy options for the County. These could for example include; differing distributions of development between the HMAs; or a high distribution to Local Service Centres and Villages.
- 2.18 Whilst our client is generally supportive of the spatial strategy being proposed, our comments are raised in the interests of the Council ultimately securing a sound plan. Currently, it could therefore be argued that we are not commenting on truly realistic alternative strategies for the County, but alternative distributions of development within HMAs which have been set largely by a pre-existing spatial strategy. For example, the Emerging Spatial Strategy document states:

“2.16 Needs vary around the County. There would not be a sustainable pattern of development if most building took place in the south of the county but most need was in the north.”

¹ <https://www.gov.uk/government/consultations/national-planning-policy-framework-and-national-model-design-code-consultation-proposals>

2.19 This statement is unsupported by the evidence base because the option hasn't been assessed. This approach may be argued as a flaw in the soundness of the preparation of the plan, particularly in considering whether the spatial strategy is justified, taking account of the reasonable alternatives.

2.20 The Framework states at paragraph 33:

“33. Policies in local plans and spatial development strategies should be reviewed to assess whether they need updating at least once every five years, and should then be updated as necessary. Reviews should be completed no later than five years from the adoption date of a plan, and should take into account changing circumstances affecting the area, or any relevant changes in national policy. Relevant strategic policies will need updating at least once every five years if their applicable local housing need figure has changed significantly; and they are likely to require earlier review if local housing need is expected to change significantly in the near future.” (Our emphasis)

2.21 Although the LPR is considered by the Council to be a 'review' of the Core Strategy, the review is occurring more than five years after the adoption of the CS, the LPR has its own evidence base including on housing and economic needs, and the CS plan period runs only up to 2026 so is very nearly completed. Furthermore, the LPR is being prepared under different national guidance (the 2018 NPPF and NPPG updates), with significant changes to the housing and economic evidence base (a new evidence base, which utilises a standard methodology for assessing housing need). In this regard, it can be argued the LPR is not a 'review' but essentially a new Plan for Wiltshire.

2.22 We recommend the evidence base is updated to include justification behind the formulation of the proposed spatial strategy, and clarifying that realistic alternative options have been considered in the preparation of the plan (this evidence may already exist but does not appear to form part of this consultation). This will ultimately assist in demonstrating compliance with the tests of the soundness at later stages.

2.23 We bring the Council's attention to the Inspectors' Letter (11 September 2019) on the West of England Joint Spatial Plan ('JSP') which following, among other issues, consideration of the sufficiency of the Councils' evidence to justify the chosen spatial strategy, the Inspectors' recommended returning to first principles and re-preparing the Plan. This ultimately led to withdrawal of the JSP and has caused significant delays in the preparation of up to date plans for the region. This example demonstrates the need to ensure that there is clear and demonstrable justification for the spatial strategy pursued, and that this should be clear at an early stage of the plan-making process.

Emerging Spatial Strategy for Chippenham Housing Market Area

2.24 Notwithstanding the comments above, we support the continued retention of Melksham being identified as a Market Town in the County. This is reflective of the level of facilities and services within the settlement which supports the achievement of a sustainable pattern of growth.

2.25 Again notwithstanding our recommendation above on how the alternative strategies were formulated and on the need to clearly justify how the current strategy was

arrived at, on review of the relevant documents, our opinion is that the judgements made on the alternatives for the Chippenham HMA are relatively sound in relation to how the level of growth has been directed towards Melksham.

- 2.26 Of the three alternative strategies for the Chippenham HMA, we support the hybrid approach taken by the Council which essentially adopts a high growth scenario for both settlements Melksham and Chippenham, blending scenario CH-B and CH-C. We consider this is logical given the findings of the Sustainability Appraisal, our understanding of the context and respective sustainability credentials of each settlement. The Council promoting a high level of growth at the most sustainable locations in the HMA, and where opportunity arises for accommodating an increased growth pattern (for example in accordance with planned infrastructure improvements at each settlement) does amount to positive preparation of the LPR.

3. Planning for Melksham

THE LAND AT BOUNDARY FARM, MELKSHAM

- 3.1 Baker Estates control the site and are committed to the promotion of the site for residential use on behalf of the landowner.
- 3.2 There is currently a planning application on the site under reference W/12/01080/FUL for the creation of a new waterway and towpath for the Wilts and Berks Canal ('the Canal Trust application'). This application was validated in July 2012 and remains undetermined. The Canal Trust application extends beyond Baker Estates' land control, however Baker have been in discussions with the Wilts & Berks Canal trust in relation to appropriate safeguarding of land for an alternative alignment for the Canal Link through the site. A resulting alternative alignment has been considered and forms the central feature of the proposed scheme.
- 3.3 We have undertaken additional preliminary technical assessments on the site including in relation to highways, ecology and landscape which are available on request.
- 3.4 With consideration to constraints identified, the accompanying framework masterplan shows opportunity to provide:
- Delivery of circa 350 homes.
 - Safeguarded land for the Wilts/Berks canal link project.
 - Potential for some associated community uses.
 - Large quantum of land to the west side of the Canal, set aside for a Country Park which can make a significant contribution towards biodiversity net gain and accessible natural green space.
 - A soft edge to Melksham with the delivery of the canal set within a Country Park.
 - Pedestrian/cycle access to the canal via green streets through the proposed development. Creating connections for new and existing residents.
 - In the open space within the site, drainage infrastructure alongside potential for community allotments and a community orchard.
 - Potential for a pedestrian crossing across the canal connecting existing public rights of way.
 - Primary vehicular access taken from the A350 Western Way via a new three arm roundabout which would comply with appropriate design standards.
- 3.5 Our initial assessments of the site and analysis of the constraints informing the supplied masterplan suggest that the site:

- Can be developed in the short term by Baker Estates and make an important contribution to the delivery of both market and affordable homes.
- Can deliver significant public benefits in addition to new housing including a Country Park, assisting the delivery of a long term regional aspiration in the Wilts/Berks Canal link (along a revised alignment that has been discussed with the Canal Trust) and provide significant biodiversity gains.
- Has no overriding identified environmental constraints that would prevent the site from being appropriately developed for residential development in planning policy terms.
- Offers a suitable location for housing development in relation to existing services and facilities in Melksham, and can create new community facilities, connected to the amenity provided by the Canal and new country park.

GROWTH AND PLACESHAPING

ME1. What do you think to this scale of growth? Should there be a brownfield target? Should they be higher or lower?

- 3.6 We support the level of growth proposed for Melksham which recognises the settlement’s sustainability credentials relative to others in the County, acknowledges there is available and deliverable land in the settlement which can contribute to the County’s needs and supports the status, role and vitality of the settlement.
- 3.7 We support the identification of a brownfield ‘target’ as an approach which encourages the use of brownfield land but does not ‘require’ it, in this regard we suggest the brownfield target should be considered a windfall allowance (being based on past delivery rates), with suitable, available and deliverable brownfield sites being allocated through the Development Plan.
- 3.8 It is essential that expectations of delivery from brownfield land are realistic and thoroughly evidenced to be both viable and deliverable. We would urge caution in over reliance and over optimism in the lead in times to delivery of housing on brownfield sites in some of the Wiltshire settlements, which from our experience often take significantly longer to deliver than greenfield housing options due to complications including, but by no means limited to, complex site assembly, remediation, development viability matters, and more challenging planning considerations. This is why we prefer an availability/allocation led approach.
- 3.9 Whilst the supply of housing on brownfield sites will be a relevant and important component, the capacity available from this source of supply within the plan period and in accordance with a required delivery trajectory, should be very carefully and cautiously considered, to ensure that any planned supply is robustly justified.

ME2. Are these the right priorities? What priorities may be missing? How might these place shaping priorities be achieved?

- 3.10 We consider the right priorities are identified for the Town, and welcome specifically in relation to the land at Boundary Farm, the priority to *“Continue to safeguard a future route of the Wilts and Berks canal and to enable its delivery to provide significant*

economic, environmental and social benefits for Melksham". We agree with the Council there are significant potential economic, environmental and social benefits from Melksham arising from delivering the canal.

- 3.11 The land at Boundary Farm enables land to be safeguarded and supports the delivery of this key priority project for Melksham.

POTENTIAL DEVELOPMENT SITES AND SITE SELECTION REPORT

ME3. Is this the right pool of potential development sites? Are there any other sites we should be considering?

- 3.12 We consider the right pool of potential development sites does appear to have been considered in preparation of the LPR, however we do note that the Council should update the SHELAA immediately as part of the LPR, as the latest published version (July 2017) is now dated and does not take account of any sites that have been submitted in the intervening period. This comprises a gap in the evidence base and means that the Emerging Spatial Strategy may not be considered to be justified as sites which are suitable, available and achievable have not been factored into the amount of land available at given settlements.

- 3.13 We can confirm the land at Boundary Farm, as identified on the accompanying Framework Masterplan, is available as a potential development site.

ME4. 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?

- 3.14 We note the Council acknowledge that each potential development site has its own individual characteristics. The Planning for Melksham document states *"Rarely is one site very clearly the best choice. There are a great range of different constraints and opportunities associated with each. Some are common to several or even all potential development sites."*
- 3.15 We place significant weight on the unique opportunity which arises from allocating Site 11 'Land to the west of Melksham' (SHELAA sites 3645, 728, 3105a/b/c/d) for development as it can contribute to one critical factor which others sites cannot - one of the place shaping priorities for the settlement which is to safeguard the future route of the Wilts and Berks canal and to enable its delivery. This is recognised by the Council to provide significant economic, environmental and social benefits for Melksham and, as an enabler of the project, also count as planning benefits associated to the Baker Estates site at Boundary Farm.
- 3.16 The land at Boundary Farm is located relatively close to the Town Centre and within an appropriate walking and cycling distance of the services and facilities available therein. A Transport Feasibility Study (by Myles White Transport) undertaken for the site and submitted to the Council as part of the Pre Application finds that pedestrian and cycle linkages between the site and the Town Centre could be improved through provision of a signalised crossing of the A350 Western Way and appropriate upgrades to existing Public Footpaths and other pedestrian connections. These would also have wider benefits to existing residents of the local area. The proximity and connectivity of the land at Boundary Farm to the Town Centre is an important consideration in selecting

the most appropriate land to build on in the Town, and in our opinion supports our conclusion that the site should be the preferred option for development.

- 3.17 The Planning for Melksham document also identifies other considerations for Site 11 which, following technical assessments undertaken on the site to inform the submitted masterplan, we consider in turn below.

Access may be possible directly onto A350 or from Semington Road.

- 3.18 We can confirm that preliminary technical work suggests that access is achievable directly onto the A350.

Development in the southern part of the site may lead to coalescence with Berryfield which is a 'Small Village' with its own separate character.

- 3.19 The Framework Masterplan demonstrates a form of development which avoids coalescence with Berryfield. This masterplanning approach has been informed by detailed landscape appraisal work undertaken by Tyler Grange, available on request.

Flood zones 2 and 3 cover a large proportion of the site in the north and west which would rule out development in that area and the site abuts the River Avon CWS and Conigre Mead CWS.

- 3.20 The Framework Masterplan for the site demonstrates how Flood Zone constraints can be avoided in the development of the site, and how the River Avon CWS primarily but also likely the Conigre Mead CWS, can be enhanced through an approach which also delivers the Wilts & Berks Canal Link. This is primarily through the Framework Masterplan proposing to facilitate the delivery of a large Country Park area which will result in a significant biodiversity net gain and contribute to the strength of the green infrastructure network in this area.

ME5. Are there important social, economic or environmental factors you think we've missed that need to be considered, generally or in respect of individual site?

- 3.21 We do not consider any important social, economic or environmental factors have been missed.

ME6. Are there any other issues or infrastructure requirements that should be identified?

- 3.22 The Wilts/Berks Canal link should be included as a priority infrastructure objective which relates to multiple of the topics identified including Green and Blue Infrastructure, Sport and Leisure Facilities, the Local Economy and Transport.

4. Summary and Conclusions

4.1 Taking all of the above together, the summary and conclusions of our Representation are as follows:

- We are supportive of the level of housing growth proposed at Melksham, the town's identification as an important location in the Chippenham HMA, and the adoption of the Council of a blended scenario of the alternatives CH-B and CH-C;
- We advocate extending the LPR Plan Period to be in accordance with the NPPF, adjusting one of the delivery principles and considering further how the spatial options have been arrived at against truly realistic alternatives to maximise chances of success/compliance with the tests of soundness;
- The land at Boundary Farm, controlled by Baker Estates, is able to deliver one of the key priorities for Melksham (delivery of land for the Wilts/Berks Canal) and therefore there are significant economic, environmental and social benefits arising from the allocation of the site, which do not arise from any other sites in the settlement.
- We promote the land at Boundary Farm as suitable, available and achievable for the housing development presented in the accompanying Framework Masterplan and a sustainable choice for meeting the needs of Melksham and wider County.

Appendix 1: Land at Boundary Farm - Framework Masterplan



| | |
|-------------------------------------|--------------|
| Land Budget: Red Line Area = 25.9ha | |
| Residential Development | circa 8.2 ha |
| Community Land | circa 0.3 ha |

- Site Boundary
- Developable residential land
- Community or leisure land
- Public Open Space (POS)
- Existing Public Rights of Way to be set within POS
- Existing Public Rights of Way to be diverted
- Proposed key pedestrian routes across the site
- Possible canal alignment, as discussed with the Canal Trust
- Proposed green streets
- Proposed Key frontages
- Existing powerlines to be retained
- 1** Proposed roundabout at site entrance
- 2** Location of secondary access point to be confirmed by highways consultants.
- 3** Community building located overlooking the canal
- 4** Central Green Space with potential for informal play space
- 5** Higher density development in development core
- 6** Lower density development edge
- 7** Proposed nature play space
- 8** Proposed community allotments
- 9** Proposed community orchard
- 10** Attenuation ponds. Location to be confirmed by drainage consultants
- 11** Country Park providing a setting for the proposed canal and creating a soft edge to Melksham
- 12** Proposed planting to new settlement edge

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CLIENT Baker Estates Ltd
PROJECT Land at Boundary Farm, Melksham
DRAWING: Framework Masterplan

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Wiltshire Local Plan Review Consultation (13 January to 9 March 2021)

Response on behalf of Castlewood Commercial
Properties

Wiltshire Local Plan Review Consultation (13 January to 9 March 2021)

Response on behalf of Castlewood Commercial Properties



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| | Appendix 1 Site Location Plan: Land at South Pavenhill Farm, Purton | |

Project: South Pavenhill Farm, Purton
Client: Castlewood Commercial Properties
Job Number: 478102
Status: Open

Document Checking:

Prepared by: [REDACTED]

Checked by: [REDACTED]

1. Introduction

- 1.1. This response is submitted on behalf of Castlewood Commercial Properties ('Castlewood').
- 1.2. On behalf of the landowner, Castlewood is promoting land South Pavenhill Farm, Purton for residential allocation in this Local Plan Review. This site relates to land to the south of the road named Pavenhill and is located immediately adjoining the existing urban area. A location plan showing the site boundaries is provided at **Appendix 1**.
- 1.3. To support the response made to this consultation by Savills on behalf of Castlewood, this submission also includes the following information:
 - Completed Response Form: Emerging Spatial Strategy
 - Site Location Plan: Land at South Pavenhill Farm, Purton

2. Summary of Castlewood's Development Proposals

- 2.1. As part of this consultation response, Castlewood is promoting land South Pavenhill Farm, Purton for residential allocation in this Local Plan Review. This site relates to land to the south of the road named Pavenhill and is located immediately adjoining the existing urban area (see Site Location Plan at **Appendix 1**).
- 2.2. The site has previously been identified by the Council in its Strategic Housing and Economic Land Availability Assessment (SHELAA). The SHELAA identifies Castlewood's site as being Site 3469 (i.e. Land at South Pavenhill Farm). The SHELAA concludes in relation to Site 3469 that the site is suitable (i.e. no suitability constraints), available, achievable (i.e. for residential), deliverable and developable (i.e. in the short term). The SHELAA also states that the site area is 5.1501 hectares and the development capacity is 157 dwellings.
- 2.3. Castlewood agrees with the conclusions in the SHELAA that the site is available, achievable (i.e. for residential), deliverable and developable (i.e. in the short term).
- 2.4. In relation to the developable area of Castlewood's site which is identified in the SHELAA, Castlewood notes that it is only promoting the northern part of the site for residential development in the Local Plan Review (i.e. land parallel with Ringsbury Close). The rectangular southern part of the site is not proposed for built development and could be used for public open space and/or for Biodiversity Net Gain . As a result, the development capacity is not 157 dwellings, as stated in the SHELAA, but approximately 50 dwellings.
- 2.5. The Site Proforma which is included in the SHELAA for Site 3469 also refers to 'All Constraints'. This indicates that Castlewood's site is located within 2km of a SSSI, is within a Source Protection Zone (SPZ) and is within an area of Grade 1 Agricultural land. In this regard, Castlewood notes that all sites in Purton which have been identified in the SHLEAA are identified as being with the SPZ and comprising Grade 1 agricultural land. In addition, Castlewood notes and supports the conclusion reached in relation to its site in the SHELAA that there are no applicable suitability constraints to development at South Pavenhill Farm, Purton.

The Site

- 2.6. The site is an agricultural field, is in single ownership and extends to 5.1 hectares. It is located immediately to the west of the existing built up area of Purton, which includes a residential area at Ringsbury Close, and is located to the south of Pavenhill. Directly to the north of the site is South Pavenhill Farm House and a residential street (Upper Pavenhill). To the south and west of the site are agricultural fields.
- 2.7. The site is not subject of any statutory environmental or landscape designations.
- 2.8. The site is located entirely within Flood Zone 1. The site, along with the whole of Purton and the surrounding area, is also located within a Source Protection Area.
- 2.9. The site is also unlikely to be contaminated given its current agricultural use.
- 2.10. The site is flat and direct vehicular access can be made on to Pavenhill.

- 2.11. A Public Right of Way (PRoW) runs along the western edge of the site in a southwards direction from Pavenhill to Kingsbury Camp (PURT95). This PRoW connects to other public rights of way running to the west (namely PURT99, PURT100 and PURT101). PRoW PURT99 also runs along part of the site's southern boundary and provides eastward connection to Restrop Road. The two public rights of way that run inside the western and southern edges of the site will be retained along their current courses and incorporated into future development proposals for the site, which could include access to public open space within the southern part of Castlewood's proposed development.
- 2.12. Whilst an overhead powerline crosses the southern edge of the site, this part of the site is not proposed for built development. Land further to the south of the site includes a Scheduled Ancient Monument (Kingsbury Camp). To the south and west of Kingsbury Camp is a SSSI (including Brockhurst Wood). These heritage and ecological areas are separated from Castlewood's site by agricultural fields and the proposed development of land at South Pavenhill Farm is not considered likely to have an adverse effect on them.
- 2.13. As identified in Core Policy 19 of the adopted Wiltshire Core Strategy (2015), Purton is classified as a Large Village. In Core Policy 1, Large Villages are defined as "*settlements with a limited range of employment, services and facilities*", within which development "*will be limited to that needed to help meet the housing needs of settlements and to improve employment opportunities, services and facilities*". The site itself is located immediately outside of the defined settlement boundary of Purton, as defined on the Interactive Proposals Map.
- 2.14. The made Purton Neighbourhood Plan (2018) identifies Castlewood's site as being within an area of 'Escarment' which relates to land around the northern, western and south-western parts of Purton. This area is the subject of Purton Policy 5 in the Neighbourhood Plan which relates to "*an area in which locally important views are taken from the public footpath network, both to and from the escarpments to the north of the village, around Francombe Hill (known locally as High Hills), along the western side of the village up to and including the vista leading up to and around the ancient monument known as Ringsbury Camp. These views are shown on Map 5 which indicates sensitive public views related to the existing built areas. The area named as Purton Common also provides significant public views, as shown on Map 5. Any development in this designated area will be required to maintain the quality of these distinctive public views*". In this regard, Castlewood notes that its site is contained within existing and substantial treebelts along the western, southern and south-eastern boundaries which can contain and minimise views of the proposed development from views from outside of the site.
- 2.15. In view of the absence of significant environmental and landscape constraints, it is considered that Castlewood's site at South Pavenhill Farm, Purton is suitable for consideration as a residential allocation in the Local Plan Review.
- 2.16. No viability constraints are envisaged by Castlewood as part of the development of this site.

The Proposed Development

- 2.17. It is considered that the site is located in a sustainable location immediately adjoining the settlement boundary of Purton and that its proposed development could deliver the following:
- Approximately 50 dwellings (including affordable housing).
 - Public Open Space for the benefit of new and existing residents.
- 2.18. Castlewood also consider that the development of this site is capable of being commenced in the short term (i.e. from 2022).

3. The Emerging Spatial Strategy

Overarching Responses to the Wiltshire Local Plan Review

3.1. On behalf of Castlewood we wish to make the following overarching responses to the Local Plan Review Emerging Spatial Strategy (ESS) consultation:

1. The Plan period should be changed with the start date updated from 2016 to 2018 and the end date extended from 2036 to 2040.
2. The housing requirements for the Housing Market Areas should be increased through the inclusion of 4 additional years of housing development (i.e. from 2036 to 2040).
3. Land within the Swindon HMA should include an allocation of land at South Pavenhill Farm, Purton for approximately 50 dwellings and the minimum residual housing requirement for Purton should be increased from 0 dwellings to at least 100 dwellings.
4. Climate Change Outcomes: Development in Purton represents a sustainable location with good access to jobs and services, both within the town and in nearby settlements (i.e. Cirencester, Swindon, Cheltenham and Gloucester). New development in the town will also assist in further improving the self-containment in Purton.

Plan Period

- 3.2. The Plan period should be changed with the start date updated from 2016 to 2018 and the end date extended from 2036 to 2040.
- 3.3. Wiltshire Council proposes that the Plan period for the Local Plan Review should run from 2016 to 2036. We also note that the Council's Local Development Scheme (July 2020) indicates that the Local Plan Review will be adopted in Q2 2023 (i.e. May/June 2023).

Revised Start Date

- 3.4. If the Local Plan Review is adopted in 2023 (as indicated in the Local Development Scheme), the Plan's start date will be 7 years removed from the date of adoption. On the basis that this is a Local Plan Review, which should be carried out every 5 years, the start date of the Plan should – at the very least – be based on a date which is no less than 5 years from the date of adoption. In the case of this Local Plan Review the start date should therefore be 2018.
- 3.5. Without this proposed change to the Local Plan Review, in rural settlements like Purton, the result of maintaining the 2016 start date will be that there will either be very limited development or no development at all until the end of the Plan period. This is because, as identified in Tables 2.3 and 2.6 of the Empowering Rural Communities (ERC) consultation document, the baseline indicative housing requirements for the period 2016-2036, are already taken up by completions (2016-2019) and commitments (1st April 2019).
- 3.6. In the case of Purton, the baseline requirement is 140 dwellings and completions/commitments already total 140 dwellings. This leaves a residual housing requirement of 0 dwellings for the Plan period which Castlewood considers to be unacceptable.

- 3.7. By not enabling communities to grow, as a result of identifying new allocations in this Local Plan Review, the approach in the ESS and ERC consultation documents to the identification of a suitable start date runs contrary to National planning policy on rural housing. In paragraph 78 of the NPPF, the Government promotes sustainable development in rural areas and states that “*housing should be located where it will enhance or maintain the vitality of rural communities*”. The NPPF also states that “*Planning policies should identify opportunities for villages to grow and thrive, especially where this will encourage local services*”. This should include the allocation and development of suitable sites, including Castlewood’s site at South Pavenhill Farm, Purton.
- 3.8. In making this change to the period covered by the Local Plan Review, the Council should also change its calculations of the residual housing requirements for each HMA. The Local Plan Review’s residual requirements currently take into account housing completions for the period 2016-2019. This should be changed to only account for completions which have taken place from 2018-2019.

Extended End Date

- 3.9. If Wiltshire Council maintains its current position and adopts its Local Plan Review with an end date of 2036, the timeframe of the Plan will only be 13 years from the date of adoption. This is an unacceptably short timeframe and is contrary to Government planning policy, in particular Paragraph 22 of the NPPF which states that “*Strategic policies should look ahead over a minimum 15 year period from adoption, to anticipate and respond to long-term requirements and opportunities, such as those arising from major improvements in infrastructure*” (our emphasis).
- 3.10. Instead of the maximum 13 year timeframe, which could be the case if the Council adopts its Local Plan Review in 2023, we propose that the Plan period should – at the very least – cover a minimum of 15 years (post adoption). Indeed, we consider that it is important in the case of this Local Plan Review that the Plan period covers a longer period, as identified in Paragraph 22 of the NPPF. For example, in the case of Purton this would include the delivery of additional housing to accommodate local housing needs and which would also assist in supporting local facilities and services.
- 3.11. There is established precedent for having Local Plan timeframes which are a minimum of 15 years post adoption. **Table 1** below identifies all of the neighbouring districts around the Wiltshire Council administrative area and the timeframes associated with those adopted and emerging Local Plans. Of those authorities identified below, the following have or will have Local Plans with timeframes of 15 or more years: Vale of White Horse; West Berkshire; Test Valley; Dorset; Mendip; and South Gloucestershire.

| Table 1: Neighbouring Authorities – Local Plan Timeframes | | |
|--|---|--|
| District Adjoining Wiltshire | Adopted or Emerging Local Plans | Plan Period / LDS Information / Timeframe |
| Swindon | Local Plan (Proposed Submission Draft) (December 2019) | 2018-2036 (LDS 9/20 identifies adoption as Q3 2022) (Timeframe of 14 years from adoption) |
| Vale of White Horse | Local Plan 2041 (Call for Sites stage April 2020) | 2021-2041 (LDS 2/20 identifies July 2023 adoption) (Timeframe of 18 years from adoption) |
| West Berkshire | Local Plan Review (Draft December 2020) | 2020-2037 (LDS 4/20 identifies December 2022 adoption) (Timeframe of 15 years from adoption) |
| Test Valley | Next Local Plan: Refined Issues and Options Consultation 2020 (June 2020) | To 2036 or up to 2040 (to be decided) (LDS 1/20 identifies Q3 2024 adoption) (Timeframe of 16 years from adoption in 2024) |

| Table 1: Neighbouring Authorities – Local Plan Timeframes | | |
|--|---|---|
| District Adjoining Wiltshire | Adopted or Emerging Local Plans | Plan Period / LDS Information / Timeframe |
| New Forest | Local Plan (Adopted July 2020) | 2016-2036 (No current LDS) (Timeframe of 16 years from adoption) |
| Dorset | Local Plan (Options Consultation January 2021) | 2021-2038 (LDS 9/20 identifies 2023 adoption) (Timeframe of 15 years from adoption) |
| South Somerset | Local Plan Review (Preferred Options) (June 2019) | 2016-2036 (LDS 4/17 adoption estimate is out of date, i.e. 12/20) (Timeframe of 13 years if adopted in 2023) |
| Mendip | Local Plan Review (No consultation undertaken to date) | 2020-2040 (Cabinet confirmed in 1/20 to review Local Plan Part 1) (No current LDS) (Timeframe of 16 years if adopted in 2024) |
| Bath and North East Somerset | Local Plan (Partial Update Options Consultation) (January 2021) | 2011-2029 (LDS identifies adoption in 3/22) (Timeframe unchanged because the consultation relates to a partial update of an adopted Local Plan) |
| South Gloucestershire | Local Plan 2020 (Phase 1 Issues and Approaches) (November 2020) | 2023-2038 (Local Plan Delivery Programme 1/21 identifies adoption in 12/23) (Timeframe of 15 years from adoption) |
| Cotswold | District Local Plan (Adopted August 2018) | 2011-2031 (Cabinet confirmed in 6/20 that a Partial Review would be undertaken with no change to the 2031 end date) |

- 3.12. As identified in **Table 1**, six of the neighbouring authorities have or will adopt Local Plans with timescales of 15 or more years. There is also precedent for the Local Plans having a timescale which runs to 2040 and beyond. For example, the Vale of White Horse proposes a Plan end date of 2041, Test Valley proposes an end date of up to 2040 and Mendip proposes an end date of 2040.
- 3.13. We are also mindful that National Planning Policy is under review and that a new draft version of the NPPF is currently being consulted upon. In particular, we note that Government is proposing a change to Paragraph 22 of the NPPF which adds to the existing policy guidance and states that “*Where larger-scale development such as new settlements form part of the strategy for the area, policies should be set within a vision that looks further ahead (at least 30 years), to take into account the likely timescale for delivery*”.
- 3.14. We consider that this proposed change to National Planning Policy should be taken into consideration by the Council in the preparation and adoption of its Local Plan Review. This proposed change to the NPPF shows a clear direction of travel in Government Planning Policy which places emphasis on looking to the longer term, to sustainable development and the adoption of Local Plan Visions which will support them.
- 3.15. The proposed change to the NPPF also adds further weight to our argument that the Local Plan Review should have a timeframe to 2040. The extended timeframe of the Local Plan Review will enable sustainable development which supports rural communities to be planned for within their likely and deliverable timescales.

Overall Housing and Employment Requirements – Wiltshire and the Housing Market Areas

- 3.16. We support the general principle behind the Council's decision not to use the Standard Method calculation of additional dwellings but instead to base its calculation of housing requirements upon a Local Housing Need Assessment.

- 3.17. This is consistent with National Planning Policy Guidance which states that *“The standard method set out below identifies a minimum annual housing need figure. It does not produce a housing requirement figure”* (NPPG Paragraph: 002 Reference ID: 2a-002-20190220). We also note that NPPG states that *“Strategic policy-making authorities will need to calculate their local housing need figure at the start of the plan-making process. This number should be kept under review and revised where appropriate”* (Paragraph: 008 Reference ID: 2a-008-20190220).
- 3.18. In setting the overall housing requirement for the Local Plan Review period, we also note that NPPG states that *“The government is committed to ensuring that more homes are built and supports ambitious authorities who want to plan for growth. The standard method for assessing local housing need provides a minimum starting point in determining the number of homes needed in an area. It does not attempt to predict the impact that future government policies, changing economic circumstances or other factors might have on demographic behaviour. Therefore, there will be circumstances where it is appropriate to consider whether actual housing need is higher than the standard method indicates”* (Paragraph: 010 Reference ID: 2a-010-20201216).
- 3.19. However, we do not consider that the appropriate levels of housing requirement have been identified in the Local Plan Review, either in relation to the overall housing requirement for Wiltshire or in relation to the HMAs.
- 3.20. In relation to the Swindon HMA, which is of particular interest to Castlewood, we consider that the level of housing requirement identified in the Emerging Spatial Strategy is below what we consider to be appropriate for this location.
- 3.21. The level of housing identified for the Swindon HMA does not adequately take into consideration the sustainability of Purton to accommodate non-strategic levels of growth to meet future housing needs and to support existing facilities and services. Nor does it fully reflect the proximity of Purton to Swindon and its employment opportunities and higher order facilities, which can be shared with residents of Purton using sustainable modes of transport.
- 3.22. In view of this, we consider that the housing requirement for Wiltshire and the Swindon HMA should be increased, as outlined below.
- **Increase Housing Requirements to 2040 (4 Additional Years Supply)**
- 3.23. On the basis of extending the timeframe of the Local Plan Review from 2016-2036 to 2018-2040, we propose that that the overall housing requirement for Wiltshire is increased to take account of these additional 4 years.
- 3.24. This proposed increase in housing requirements for Wiltshire is identified in **Table 2** below.

| Table 2: Proposed Changes to Housing Requirements – Wiltshire 2018-2040 | | | | |
|--|--|--|---|--|
| Housing Market Area | Local Plan Review: Local Housing Need Assessment (Additional dwellings 2016-2036) | LHNA (Additional dwellings annum) | Savills Proposal: 4 Years additional dwellings (2036-2040) | Savills Proposal: Housing Requirement (2018-2040) |
| TOTAL | 45,630 | 2,282 | 9,128 | 50,204 |

3.25. The apportionment of the proposed additional 4 years of development should be a matter for further consideration. In relation to Purton, we consider that the minimum residual housing requirement for the town should take into consideration the opportunity to allocate Castlewood's site for the delivery of approximately 50 dwellings. As a result, the minimum residual housing requirement for Purton should be increased from 0 dwellings to at least 100 dwellings.

3.26. This proposed development by Castlewood and its allocation in the Local Plan Review is capable of being supported by the existing infrastructure, facilities and services which are available in Purton. In addition, the level of growth proposed by Castlewood would assist in supporting local facilities and services through increased patronage by new residents.

- **Conclusion: Housing Requirements for Wiltshire and the Swindon HMA**

3.27. On the basis of the arguments identified above, we consider that the overall housing requirement for Wiltshire should be increased from 45,630 dwellings to 50,204 dwellings for the period 2018-2040. In relation to Purton, we consider that the minimum residual housing requirement for the town should take into consideration the opportunity to allocate Castlewood's site for the delivery of approximately 50 dwellings. As a result, the minimum residual housing requirement for Purton should be increased from 0 dwellings to at least 100 dwellings.

3.28. This proposed development by Castlewood and its allocation in the Local Plan Review is capable of being supported by the existing infrastructure, facilities and services which are available in Purton. In addition, the level of growth proposed by Castlewood would assist in supporting local facilities and services through increased patronage by new residents.

Delivering the Spatial Strategy

- **Large Villages**

3.29. Castlewood notes that the hierarchy of settlements as set out in the Wiltshire Core Strategy (Core Policy 1: Settlement Strategy) will not be changed as a result of the Local Plan Review. As identified in Core Policy 19, Purton is classified as a Large Village. In Core Policy 1, Large Villages are defined as "*settlements with a limited range of employment, services and facilities*", within which development "*will be limited to that needed to help meet the housing needs of settlements and to improve employment opportunities, services and facilities*".

3.30. Castlewood supports the classification of Purton as a Large Village and considers that development in settlements like Purton should be allocated where it meets the housing needs of the settlement and improves services and facilities.

3.31. We also consider that development of the scale proposed by Castlewood at South Pavenhill Farm, Purton will meet local housing needs and will make an important contribution to supporting local facilities and services. In view of this, we consider that Castlewood's proposed development will assist in achieving greater self-containment for Purton and is of a sufficient scale that it should be allocated in this Local Plan Review and not left to be decided through the next Neighbourhood Plan.

- **Climate Change Outcomes**

- 3.32. We note the statement on Page 4 of the ESS that focusing new development within the County's main settlements reduces carbon in different ways. However, we request that the Council also makes reference to contribution that development in settlements which are classified as Large Villages can make to the achievement of sustainable development and the reduction in carbon.
- 3.33. Although the development of sites in Large Villages would be at a smaller scale than strategic developments in the main settlements, we consider that developments of approximately 50 dwellings in settlements like Purton can contribute towards supporting local facilities and services, be capable of being accessed by new residents by sustainable modes of transport.
- 3.34. In terms of the points made in the ESS in relation to climate change outcomes, we note the following in relation to Purton and the site at South Pavenhill Farm, which is being promoted by Castlewood for residential development:
- (i) New development at Purton, as proposed by Castlewood, will be within walkable and cycling distance of a range of existing facilities and services which are present in the settlement, including shops, community facilities and schools (i.e. primary and secondary). Purton is also connected to Swindon by a public transport corridor which provides access to employment and higher order services. As a result, the potential exists to encourage the use of sustainable modes of transport and to reduce the need to travel, in particular by private car.
 - (ii) It is anticipated that the development proposed by Castlewood at South Pavenhill Farm, Purton will also be capable of being served by existing energy networks.
 - (iii) An increase in the scale of development at Purton and population will also assist in supporting existing businesses in the settlement as a result of increased spending.

- **Delivery Principles**

- 3.35. We support the aims of the 5 delivery principles identified on Page 6 of the ESS. The Local Plan Review should be led by the 'place shaping priorities' in order to ensure that settlements such as Purton have the opportunity to become more sustainable and more attractive places to live, work and socialise.
- 3.36. These place shaping priorities should, in turn, focus upon the identification of development allocations in settlements like Purton that can deliver development which is needed by existing and new residents. In the case of Castlewood's site at South Pavenhill Farm, Purton, the proposed development would also be capable of delivering new public open space which can be used by new and existing residents.
- 3.37. With regard to the third delivery principle, we request that its emphasis is changed. The Local Plan Review's delivery principles should not be led by simply finding sites to meet the housing requirement which is currently identified in the Plan. Instead, the Local Plan Review should seek to enable the allocation of development which improves the sustainability of settlements like Purton and provides opportunities to deliver infrastructure (such as public open space) to serve existing and new residents.
- 3.38. We also request that the delivery principles should be clarified in order to state that the Local Plan will identify the allocation of sites which are of a scale similar to the land being proposed by Castlewood on land at South Pavenhill Farm, Purton, particularly because of the contribution that they can make to the establishment of more self-contained settlements and to the support that they can give to existing facilities and services.

- 3.39. In addition, we also restate our view that development of the scale proposed by Castlewood at South Pavenhill Farm, Purton, and the contribution which it can make to achieving greater self-containment for the settlement is of a sufficient scale that it should be allocated in this Local Plan Review and not left to be decided through the next Neighbourhood Plan.

Swindon Housing Market Area

- Alternative Development Strategies

- 3.40. On the basis that the overall housing requirement for Wiltshire and the HMAs is increased in line with our request, we consider that the allocation and development of land at Purton can form part of and be consistent with whichever development strategy is ultimately selected for the Swindon HMA. This includes the allocation of non-strategic sites to meet short term housing needs and strategic sites to meet medium to longer term housing and infrastructure needs.
- 3.41. In selecting the development strategy for the Swindon HMA, we request that further explanation is given in the Local Plan Review to the ability of Large Villages, like Purton, to deliver smaller scale levels of development which can improve their self-containment and sustainability.

Meeting the Residual Housing Requirement at Purton

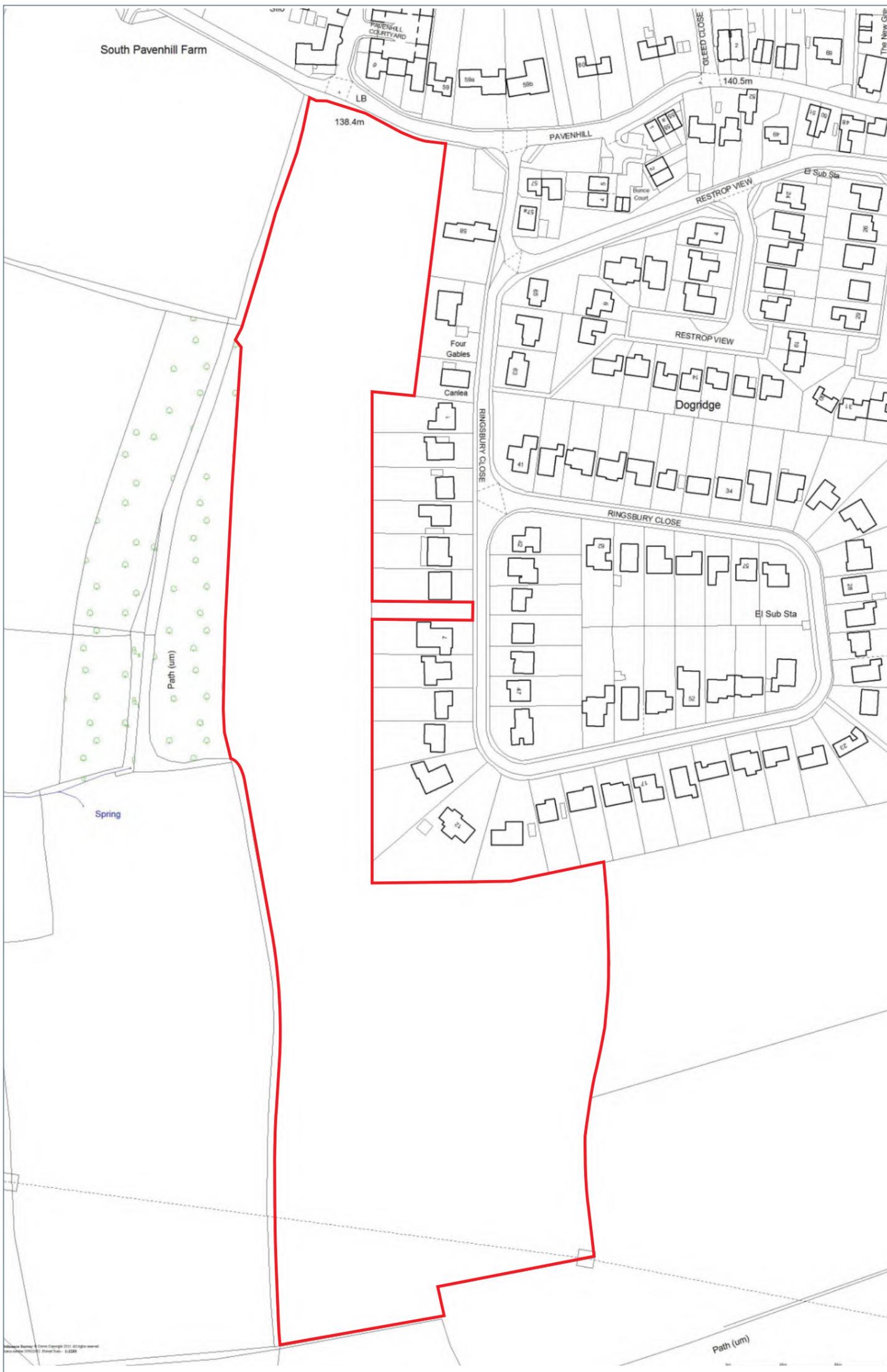
- 3.42. On the basis that the housing requirement for Wiltshire and the Swindon HMA is increased, as identified in our response to the Emerging Spatial Strategy, the housing requirement for the period up to 2040 will require the delivery of new housing allocations.
- 3.43. In order to accommodate the housing requirement which will be set for the Swindon HMA for the period up to 2040, Castlewood propose the allocation of its land at South Pavenhill Farm, Purton. The development of this site could deliver the following:
- Approximately 50 dwellings (including affordable housing).
 - Public Open Space for the benefit of new and existing residents.
- 3.44. The proposed development at South Pavenhill Farm, Purton will not result in significant impacts relating to landscape, ecology, heritage and transport. In addition, the proposed development is capable of being served by existing infrastructure in Purton, including schools (primary and secondary) and healthcare facilities, and be of a scale which can provide support to existing facilities and services, such as local shops.

Concluding Summary

- 3.45. On the basis of the responses made above to the Emerging Spatial Strategy, we request that the Plan period should be changed from 2016-2036 to 2018-2040. In doing so, the overall housing requirement for Wiltshire should be increased from 45,630 to 50,204 dwellings.
- 3.46. The residual housing requirements for the HMAs and towns identified in the Local Plan Review also require further consideration. The process of deciding the level of housing requirements for these areas should be based on place shaping principles and seeking to make settlements more sustainable and attractive places to live, work and socialise. In relation to Purton, we consider that the minimum residual housing requirement for the town should take into consideration the opportunity to allocate Castlewood's site at South Pavenhill Farm for the delivery of approximately 50 dwellings. As a result, the minimum residual housing requirement for Purton should be increased from 0 dwellings to at least 100 dwellings.
- 3.47. This proposed development by Castlewood and its allocation in the Local Plan Review is capable of being supported by existing infrastructure, facilities and services which are available in Purton. In addition, the level of growth proposed by Castlewood would assist in supporting local facilities and services through increased patronage by new residents.
- 3.48. In addition, we consider that development of the scale proposed by Castlewood at South Pavenhill Farm, Purton, and the contribution which it can make to achieving greater self-containment for the town is of a sufficient scale that it should be allocated in this Local Plan Review and not left to be decided through the next Neighbourhood Plan.

Appendices

Appendix 1
Site Location Plan: Land at South Pavenhill Farm, Purton



KEY

-  Existing development
-  Site boundary

Land at South Pavenhill Farm, Purton

on behalf of C J Wells and Sons

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| drawing no. | SK01 | drawing | Red line plan |
| rev | A | job no. | |
| scale | 1:2000 @ A3 | date | 26 March 2015 |
| drawn by | BH | | |
| checked by | SWT | | |



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