

STRAT314

Representations to the Wiltshire Local Plan Review

Redrow Homes

March 2021

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1.0 **Introduction**

- 1.1 On behalf of Redrow Homes (SW) Ltd and the landowners, Lichfields have been instructed to prepare and submit representations to Wiltshire Council's Local Plan Review consultation. This is with particular reference to land at Blind Lane, Southwick which is being promoted by Redrow Homes.
- 1.2 This document sets out our comments and concerns to the emerging Local Plan Review document and the evidence which sits behind it and makes a number of recommendations necessary to ensure the resulting plan is sound.

2.0 **Emerging Spatial Strategy**

Plan Date

- 2.1 The proposed plan period extends from 2016 to 2036 which is an approach inconsistent with the requirements of the National Planning Policy Framework [NPPF].
- 2.2 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.
- 2.3 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 housing requirement, with the Council 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.
- 2.4 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

- 2.5 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).
- 2.6 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.
- 2.7 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.
- 2.8 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 (NPPG, ID 2a-010-20190220). As such, in line with comments made by the HBF, Redrow Homes believe that the Council should be must more ambitious in terms of housing requirement.
- 2.9 As also stated above, it is considered that the Plan period should be amended to 2020 – 2040, with the housing requirement amended accordingly. However, this would be expected to be broadly be in line with the 45,630 units currently proposed for the period 2016-2036.

- 2.10 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

- 2.11 Paragraphs 3.15-3.16 sets out that the Council has determined the housing requirement for each 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).
- 2.12 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.
- 2.13 Furthermore, a number of the strategic sites allocated under the Core Strategy have been slow to deliver and will not actually deliver completely in the period to 2036. As such, only housing which will actually be delivered on these sites within the plan period should be deducted.
- 2.14 For example, land at the south-east of Trowbridge (Ashton Park) was allocated in the Core Strategy for 2,600 units and in 2015, an outline planning application was submitted for up to 2,500 units but is as yet undetermined. The Council's housing trajectory states that the site will start delivering in 2024/25 which does not seem unreasonable if approval is imminent. However, this would still require the site to deliver c. 208 units per annum. As set out in Figure 2.2 below and Appendix 1, based on evidence presented in the Housing Land Supply Statement (2018) and Lichfields' Start to Finish research, c.155 units/annum (ramping up in the first two years) is more realistic which would see the delivery of 1,750 dwellings at this site in the period to 2036. This would automatically require the Council to allocate land for a further 750 units within Trowbridge under the plan review.
- 2.15 Put simply, for the Council to deduct commitments from the requirement it must be evidenced that the houses being deducted are actually deliverable within the plan period.

Trowbridge HMA

Alternative Development Strategies

- 2.16 Redrow Homes is generally supportive of the spatial strategy for the Trowbridge HMA in terms of Trowbridge remaining the focus for growth. However, as explored below in the response to TB3, concern is raised as to how the area deemed appropriate to meet Trowbridge's housing need has been defined. The methodology adopted appears pre-determined with the Council giving consideration to the extension of the existing villages of Staverton and Hilperton but not to North Bradley and Southwick which are arguably in closer proximity to the town centre and more sustainably located. Our concerns relating to the methodology adopted and the Council's failure to consider all the reasonable alternatives for delivering the required levels of growth within this area is set out further below.

Housing Distribution

- 2.17 Under the proposed spatial strategy, Trowbridge will take circa 53% of the growth within this HMA. Whilst this is less than the 59% pursued through the Core Strategy, it is still in line with its role as a principal settlement and the County town. This distribution across the HMA is therefore broadly supported.

- 2.18 However, the table on Page 22 of the document states that due to completions since 2016 and other commitments, the residual requirement for Trowbridge is just 1,805 dwellings.
- 2.19 This is explained further in the Planning for Trowbridge document which sets out that 398 dwellings have been built between 2016-2019 and, at 1 April 2019, 3,627 dwellings already either had planning permission, resolution to grant planning permission or are allocated for development in the Wiltshire Core Strategy or Wiltshire Housing Site Allocations Plan.
- 2.20 No breakdown of the sites which have been deducted from the total has been provided although based on the 2019 Housing Land Availability Statement, it is assumed that this includes 2,500 dwellings at Ashton Park. As stated above, given the significant delays with this site it is extremely unlikely that this site will be built out over the plan period. As such, the whole 2,500 units cannot be deducted from the total.
- 2.21 It is requested that the Council be transparent regarding which sites have been deducted from the housing requirements for each settlement and provide a trajectory (supported by evidence) to demonstrate whether these sites are in fact deliverable within the plan period. If they are not deliverable, they cannot be deducted and additional allocations must be made.

Brownfield Target

- 2.22 We note that the Council has provided brownfield housing targets over the period of 2021 and 2031 which for Trowbridge is 370 units (37/annum). This allowance does not appear to be unreasonable although it must be noted that brownfield sites can often be subject to delays due to viability, site abnormalities and other constraints.

However, it is acknowledged that the brownfield target figures have not been deducted from the residual requirement for the town. As such, given these sites will contribute to windfall delivery only, this is approach supported.

3.0 **Planning for Trowbridge**

TB1. What do you think to this scale of growth? Should there be a brownfield target?

- 3.1 As stated in our representations to the Emerging Strategy document, the scale of growth within Trowbridge is broadly supported, as is the brownfield target which has been made in addition.
- 3.2 However, concern lies with how the residual requirement for housing within the town has been calculated. Indeed, as set out in further detail both above and below, it is considered that the Council needs to allocate sites for at least an additional 992 dwellings which are capable of being delivered in the period to 2036.

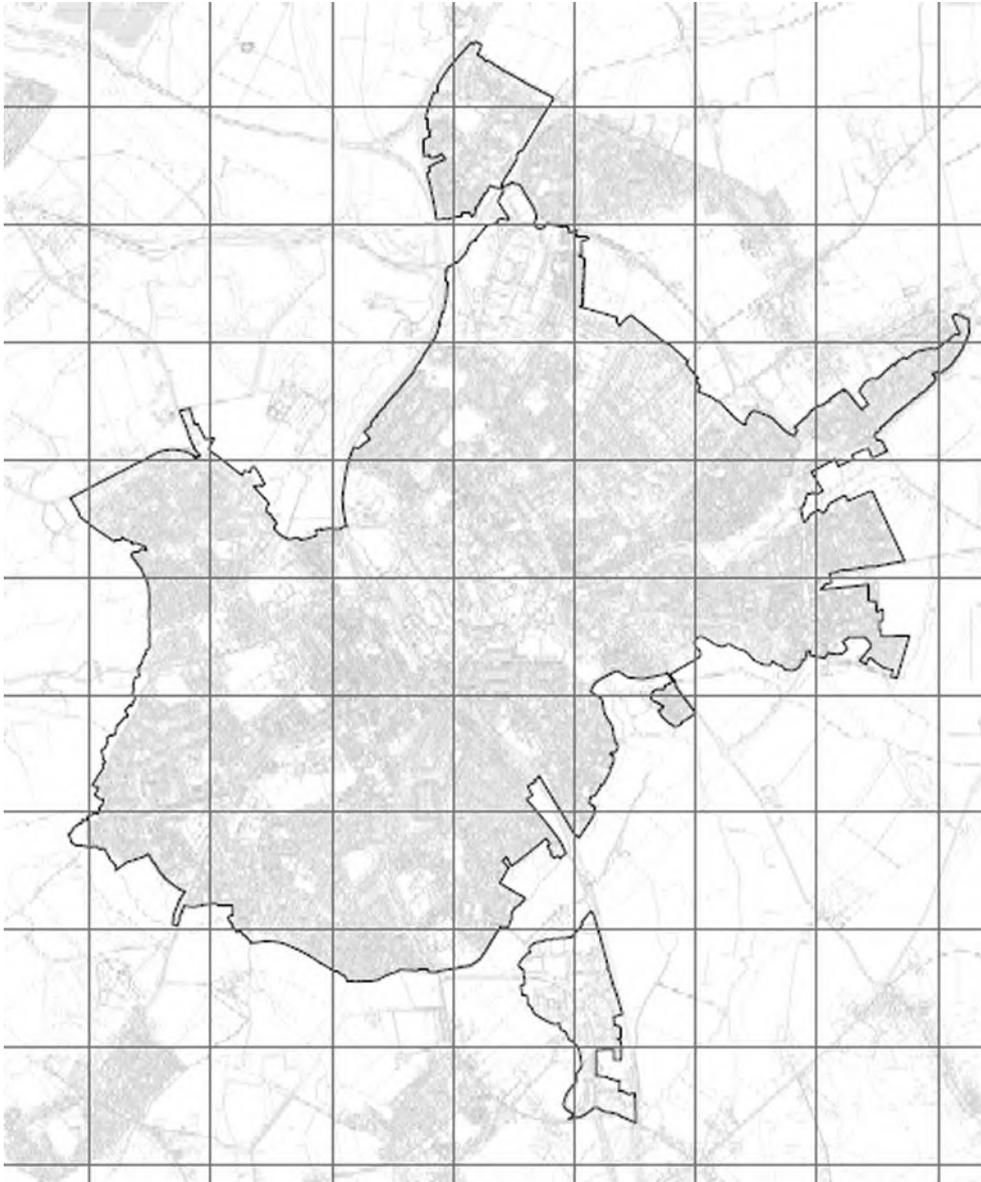
TB2. Are these the right priorities? What priorities may be missing? How might these place shaping priorities be achieved?

- 3.3 Redrow Homes is broadly supportive of the stated priorities.
- 3.4 However, in terms of Priority (i), whilst Redrow Homes supports an appropriate mix, tenure and type of housing to meet local needs this should be market led. A prescriptive policy relating to housing mix would not be supported.
- 3.5 Priority (iv) should be expanded to also focus on improving sustainable travel modes between the town and the key villages such as Southwick. For example, existing bridleways SWCK59, SWCK60 and NBRA3 could be easily upgraded to an off-road cycle route, which will further improve opportunities for sustainable travel in and around the town. In addition, there is opportunity to improve pedestrian and cycle infrastructure along Frome Road. The stretch between Trowbridge and Southwick is just 400m and will also serve Southwick Country Park and the Animal Park which are key attractors. Priority (vii) appears to be missing reference to Staverton village.

TB3. Do you agree these sites are the most appropriate upon which to build? If not, why not?

- 3.6 Paragraphs 24-31 broadly set out the methodology adopted by the Council in terms of narrowing down the potential pool of development sites, although a significant amount of detail is missing, which is also not provided in the Site Selection Report (SSR).
- 3.7 Paragraph 24 states that the Council has assessed the land around Trowbridge which has/is being promoted which has then been whittled down to smaller pool of potential sites and finally to the preferred sites. The corresponding SSR includes a plan which demonstrates 23no. sites were considered by the Council in its initial site sift.
- 3.8 In terms of how these sites were identified, Paragraphs 22 and 23 of the SSR states that *'land parcels that are not or could not be extensions to the existing built up area are not included'*. However, what defines the 'built up area' is not clarified.
- 3.9 A Settlement Boundary Review was undertaken by the Council as part of the Wiltshire Housing Site Allocations Plan. This clearly shows the settlement boundary for Trowbridge as being some way south of the village of Hilperton but including the village of Staverton and the White Horse Business Park.
- 3.10 However, the 'built up area' for the purposes of the SSR appears to include the village of Hilperton which appears to have been subsumed into the built area of Trowbridge but the reason for this has not been clarified.

Figure 3.1 Trowbridge Settlement Boundary



Source: Wiltshire Council

- 3.11 As such, of the sites assessed, very few can actually be considered to be sited adjacent to the settlement boundary of Trowbridge and thus could not be considered extensions to Trowbridge. Indeed, of the Council's preferred sites, Site 4 is an extension to Staverton and Site 5 is an extension to Hilperton.
- 3.12 Given that clearly the Council do not consider an extension to the settlement boundary of Trowbridge to be preferable and thus have looked to extend the existing villages of Staverton and Hilperton, the question is raised as to why the Council did not give any consideration to the extension of other villages within close proximity to Trowbridge such as Southwick and North Bradley.
- 3.13 The fact that these villages were not even considered within the initial Stage 1 sifting process clearly demonstrates that the Council has failed to consider all the reasonable alternatives for

delivering the required levels of growth within this area. This is a significant flaw in the assessment undertaken to date and will seriously impair the soundness of the draft plan moving forward if it is not adequately addressed.

- 3.14 Clearly distance / relationship to the town was not a factor in this decision making process. Indeed, when considering the relative proximity of Sites 4 and 5 to key facilities in Trowbridge to that of Southwick, there is very little difference when comparing walking distances:

Table 3.1 Walking Distance Comparison

	Distance from Sites 4/5 (taken from Marsh Road)	Distance from Southwick (taken from Blind Lane)
Trowbridge railway station	2 miles	2.1 miles
County Hall	2.2 miles	2.2 miles
The Shires Shopping Centre	1.9 miles	2.3 miles
White Horse Business Park	3.3 miles	2.1 miles
Wiltshire College	3 miles	1.2 miles
Trowbridge Sports Centre	2.6 miles	1.6 miles

- 3.15 In addition, the northern point of site 5 is circa 1.4km north of Marsh Road when measured in a straight line (2km if following the canal path), which will significantly add to the above journey times. In comparison, for Redrow’s site in Southwick, the furthest point would add a further circa 800m to the above journey times. When considering all future residents, this would make development in Southwick closer to all of these key facilities and thus more sustainable. This is not a fact that can be easily overlooked by the Council.
- 3.16 As distance / relationship to the town was not a factor and neither was a site’s location adjacent to the settlement boundary of Trowbridge, it is questioned how the Council determined which sites were to be assessed. Reviewing the SSR documents for both Chippenham and Salisbury which consider sites all round these settlements, the Trowbridge assessment is at odds and appears pre-determined.
- 3.17 The absence of an assessment of all the villages in close proximity to Trowbridge and their comparative sustainability and scope to accommodate growth is a significant flaw in the assessment and plan review strategy to date. The Council has pre-determined that growth should be to the north only and has not adequately assessed the alternative options – the cropped plan on figure 2 of the Trowbridge SSR clearly demonstrates this. If this is not addressed transparently and the assessment re-run, it will seriously impact on the soundness of the strategy for the Trowbridge HMA.
- 3.18 It is therefore requested that the preferred sites be discarded and the site assessment process be restarted to include land adjacent to villages in the Trowbridge HMA including land promoted adjacent to the settlements of Southwick and North Bradley.

Allocating a Range of Sites

- 3.19 In accordance with the NPPF, both short-term and long-term strategic sites should be included within the Council’s housing land supply (paragraphs 67-68). Indeed, there should be a sufficient mix of sites, taking into account their availability, suitability and likely economic viability. As such, a mix of land should be provided in terms of location and size to increase the likelihood of the housing supply being delivered within the plan period. This would also allow for a range of housing tenures to be provided, meeting the needs of the local population.

- 3.20 In terms of Trowbridge, the Council is proposing to locate all the proposed growth on two large sites, next to each other, to the north of the town. As such, there is absolutely no mix proposed in terms of size or location which will limit delivery rates.
- 3.21 As such, the Council should reconsider locating all proposed growth in this one location and should instead provide a wider range of sites that can be built out within the plan period to meet housing need. This would ensure the Plan would be consistent with the aims of the NPPF set out above.
- 3.22 The adopted Core Strategy similarly allocated significant growth in one major location and as a result delivery was significantly impacted due to the well documented HRA complications. Despite allocation for the period 2006 – 2026, this site has not even achieved outline permission as yet. This emphasises the critical importance to provide a variety of site sizes and locations in the emerging strategy particularly in the Trowbridge HMA. The current proposals do not achieve this.

Land south of Southwick

- 3.23 In terms of other sites which should have been considered, Redrow Homes control land of c.31 hectares (77 acres) on the edge of Southwick which can be brought forward in a phased approach to provide sustainable expansion of the settlement. A promotional document is provided in support of the representations (Appendix 2) which demonstrates that the site can be developed to complement and enhance Southwick whilst bringing forward a sustainable supply of new homes to meet the needs of both the village and Trowbridge.
- 3.24 The document presents three different growth options for the village between 100 and 550 homes, with the more housing development proposed, the greater the ability to enhance services and facilities within the village to ensure long term sustainable development.
- 3.25 The Council is urged to consider all the development options presented within the promotional document. However, the 550 unit scheme provides a clear opportunity to create a strong viable community through the greater enhancement of existing services and facilities for the village. Under this development option, the site should be allocated for:
- 1 550 new market and affordable dwellings to meet the recognised national and local housing need;
 - 2 A new 2FE primary school with playing fields;
 - 3 New community / retail facilities, which could include a village shop and a nursery;
 - 4 Ecological corridors and mitigation for protected bat species;
 - 5 Public open space, including opportunities for play, a full size astro turf pitch, MUGA, tennis courts and allotments; and
 - 6 Enhanced green and blue infrastructure, sustainable urban drainage and appropriate flood risk mitigation measures, which could achieve betterment for the village.
- 3.26 The site is fully accessible by a variety of modes and due to its proximity to Trowbridge, it provides significant opportunity to promote active travel through improvements to existing cycle and pedestrian infrastructure.
- 3.27 Ecologically, the site falls within the yellow (medium) impact risk zone identified within the Trowbridge Bat Mitigation SPD and previous surveys identified relatively low numbers of bats principally along the stream corridors and certain hedgerows.
- 3.28 Additional surveys are required to determine the exact extent of any required mitigation, including development buffers. However, as demonstrated on the Masterplan for Option C in

the promotional document, it is considered that significant landscape buffers can be provided within and on the boundaries of the site to maintain adequate habitat for bats and other wildlife. Existing trees and hedgerows across the site will be retained wherever feasible to do so.

- 3.29 The site is primarily within Flood Zone 1 and all proposed built development would be provided within these areas. Development would be well-integrated into its countryside setting by the inclusion of wide landscaped corridors and the retention of existing trees and hedgerows between and bordering the development parcels. As a result, each phase of development will have a landscape border to adjacent agricultural fields, forming a managed and defensible new edge to the settlement. Given the availability of major recreation opportunities at Southwick Country Park it is unlikely that residential-led growth at Southwick would lead to significant additional recreational pressure on the SAC.
- 3.30 There are some listed buildings within close proximity to the site, However, any potential effects to the setting of nearby heritage assets will be appropriately managed through the design of the development and will not impact site capacity or setting of the listing buildings.
- 3.31 Overall, the site is suitable, available and deliverable for a major new development to the south of Southwick and is not the subject of any technical or environmental constraints that would prevent it coming forward for a mixed residential-led development. It is therefore requested that the Council give the site due consideration in the site assessment process.

TB4. What are the most important aspects to consider if these sites are going to be built on?

- 3.32 Other than suitability and sustainability which must be clear drivers in any decision making process on site selection, the availability and deliverability of sites has to be the other key factors to ensure the Council can maintain a rolling five year housing land supply.
- 3.33 In this regard, whilst it appears (based on the limited evidence provided) that sites 4 and 5 are deliverable and available, the timescales for delivery over the plan period are unjustified and simply do not stack.
- 3.34 The SSR states that Site 5 would be allocated for approximately 2,100 dwellings, 1,600 of which will deliver within the plan period to 2036. Site 4 is proposed to deliver 500 dwellings to 2036. There are no applications currently submitted on these sites which means they are right at the start of the planning process.
- 3.35 Using Lichfields' 'Start to Finish' Research (Appendix 3), which has been accepted by Inspectors in numerous Local Plan Examinations, the average timeframe from validation of the first planning application to completion of the first dwelling for sites of 2,000+ units is 8.4 years. This would mean if an application is submitted on Site 5 in 2023, it would likely take until summer 2031 until the first house is completed. Thus to achieve delivery of 1,600 units, the developer would need to deliver c.320 units/annum which is highly unlikely to be achieved based on past build rates in Trowbridge. In addition, the longer it takes for an application submission, the more unrealistic these timescales become.
- 3.36 Site 4 is more realistic. Start to Finish has found that the average timeframe from validation of the first planning application to completion of the first dwelling for sites of 500-999 units is 5 years. This would mean if an application is submitted on Site 4 in 2023, first completion would be 2028 and the site could be built out in circa 8/9 years at a steady rate of 65 units/annum.
- 3.37 In terms of housing delivery, according to the 2019 Housing Land Supply Statement, Trowbridge delivered 3,187 dwellings in the period 2006-2019 which equated to 245 units / annum. In the period 2016-2019 it only delivered 398 dwellings in total. This only further

highlights the unrealistic assumptions being applied to Site 5 with this site expected to deliver more on a per annum basis than has been achieved in the whole town over the current plan period. As set out in Figure 2.2 below (see also Appendix 1), based on evidence presented in the Housing Land Supply Statement (2018) and Lichfields' Start to Finish research, c.155 units/annum (ramping up in the first two years) would seem a more realistic figure (665 units in the period 2031 – 2036).

- 3.38 On the basis of the above, the expected delivery figure for sites 4 and 5 is 1,165 units over the plan period to 2036. This would require the Council to allocate sites for at least a further 640 dwellings in the town.
- 3.39 Within the Planning for Trowbridge document, the Council considers there is a requirement of 5,830 homes for the plan period 2016-2036 but subtracts 4,025 allocated / completed / committed units, leaving a requirement of just 1,805 dwellings. We strongly object to this approach as it assumes that all these dwellings will be completed in the period to 2036.
- 3.40 Taking land at the south-east of Trowbridge (Ashton Park) as an example. This site was allocated in the Core Strategy for 2,600 units and in 2015, an outline planning application was submitted for up to 2,500 units but is as yet undetermined. The Council's housing trajectory states that the site will start delivering in 2024/25 which does not seem unreasonable if approval is imminent. However, this would still require the site to deliver c. 208 units per annum. As set out in the table below, it is considered that the delivery of 1,750 dwellings in the period to 2036 is more realistic. This would automatically require the Council to allocate land for a further 750 units under the plan review.

Figure 3.2 Lichfields' Assessment of likely Housing Delivery in Trowbridge (See Appendix 1 for a larger version of this table)

	24/25	25/26	26/27	27/28	28/29	29/30	30/31	31/32	32/33	33/34	34/35	35/36	36/37	37/38	38/39	39/40	2016-2036	2020-2040
Minimum Housing Requirement																	5830	5830
Completions (2016-2019)																	398	0
Commitments (excl. Ashton Park)																	1525	1525
Site 4				5	65	65	65	65	65	65	65	40					500	500
Site 5								80	120	155	155	155	155	155	155	155	665	1285
Ashton Park	80	120	155	155	155	155	155	155	155	155	155	155	155	155	155	155	1750	2370
Total Delivery																	4838	5680
Shortfall in Housing Delivery																	-992	-150

Assumptions:

- Applications on sites 4 and 5 submitted in March 2023
- Site 4: Lichfields' Start to Finish Research states it takes on average 5 years for sites of this size to start delivering from validation of first application (first house expected March 2028)
- Site 5: Lichfields' Start to Finish Research states it takes on average 8.4 years for sites of this size to start delivering from validation of first application (first house expected August 2031) - assuming similar delivery rates as Ashton Park and Castlemead (3 outlets providing 155 dwellings per annum total)
- Ashton Park: assumes permission by June 2021. Lichfields' Start to Finish Research states it takes on average 2.9 years for sites of this size to start delivering from approval of outline (first house expected May 2024). The 2018 Housing Land Supply Statement contends that the developers will operate three outlets (Persimmon Homes, Charles Church, and an affordable housing provider) with build rates similar to Castlemead of 40-50 units per annum for each outlet). This would assume up to 150/annum. Lichfields' Start to Finish suggests 160/annum. Mid point therefore adopted and 155/annum assumed, with 2 year ramp up in numbers.

Source: Lichfields

- 3.41 This is just one example and we have not sought to scrutinise the Council's housing trajectory further. It is absolutely clear that additional allocations of at least 992 dwellings are required to meet Trowbridge's housing need in the period to 2036.
- 3.42 Furthermore, even if the plan period were extended to 2040, housing delivery would still be expected to fall short by at least 150 dwellings. However, this is considered a best case scenario as it does not allow for further slippage and does not allow for any degree of non-implementation. For example, even 1 year slippage to the delivery of Ashton Park and Site 5 would equate to a need for a further c. 300 units in the period to 2040, with neither site expected to be built out in full in this time.

- 3.43 The Council is therefore directed to the accompanying promotional document (Appendix 2) for land to the south of Southwick which clearly demonstrates that a sustainable development of c. 550 dwellings and associated infrastructure can be delivered which will meet some of this need. As per Site 4, this site is of a scale capable of being delivered within the next 16 years, even when applying a relatively conservative delivery rate of 60 units/annum.

TB5. Considering the environmental constraints around the town, what other reasonable options should the Council consider investigating in order to address the identified forecast development needs for the place?

- 3.44 As set out in our response to question TB3, through the SSR, the Council is seeking to promote extensions to the villages of Staverton and Hilperton rather than Trowbridge.
- 3.45 In this context, it is questioned why promoted land within the other villages of Southwick and North Bradley which also lie immediately adjacent to the built up area of Trowbridge were not considered at all within the site sifting process. This seems a stark inconsistency in approach and demonstrates that the Council has not sought to consider all the reasonable alternatives available for meeting Trowbridge's housing need.
- 3.46 Clearly given our analysis in Table 2.1, distance to Trowbridge's town centre / key facilities was not a factor in this decision making process and no explanation is offered in the consultation documents or evidence base.
- 3.47 It is therefore requested that the preferred sites be discarded and the site assessment process be restarted to fully examine opportunities around the whole of Trowbridge including the land being promoted by Redrow adjacent to the settlement of Southwick. In order to assist the Council in assessing this site, a promotional document is provided at Appendix 2. The document demonstrates that the site, which is technically and environmentally relatively unconstrained, is capable of delivering up to circa 550 dwellings and associated infrastructure, including a new school which will not only make the village more sustainable, but will also assist Trowbridge in meeting its growth requirements.

TB6 – TB10: Assessing Sites 4 and 5

- 3.48 As per our response to question TB4, the main concern with Site 5 is its ability to deliver the required level of growth. As set out, the Council anticipates the site being capable of delivering 1,600 units, but using Lichfields Start to Finish Research and past build rates, it is considered that 665 units would represent a more realistic figure.
- 3.49 In terms of appropriateness, as stated, both sites 4 and 5 are extensions to the villages of Staverton and Hilperton. Staverton is within the settlement boundary for Trowbridge, whereas Hilperton remains a village in its own right. The proposed allocation of Sites 4 and 5 will essentially merge Trowbridge, Staverton and Hilperton, resulting in the coalescence of these three settlements and significantly undermining the purpose of the Hilperton Gap. This is at odds with previously adopted plans, where the Council has sought to resist the coalescence of Hilperton and Trowbridge which was seen as a priority. Given the importance of this strategic issue it is imperative that all alternatives are fully explored through the preparation of the Local Plan Review.
- 3.50 Conversely, development at Redrow's site in Southwick, which has been demonstrated to be closer in terms of distance to Trowbridge town centre and its key facilities than both Sites 4 and 5, would not bring development any closer to Trowbridge and thus would have no implications regarding coalescence and thereby goes much further in protecting the integrity of all of these settlements.

- 3-51 We consider below how Redrow's site performs in relation to the placeshaping priorities of the Planning for Trowbridge document (page 5) compared to Sites 4 and 5 :
- Priority i – Redrow's site is equally capable of providing an appropriate mix, tenure and type of housing to meet local needs.
 - Priority ii – as demonstrated, Redrow's site, is located either equidistant or closer to Trowbridge town centre and key facilities, particularly when considering the site as a whole and not just the closest point. This will make sustainable trips to the centre more likely via sustainable modes, particularly if pedestrian / cycle access is improved which will be simple to achieve.
 - Priority iii – Southwick is in close proximity to existing employment opportunities such as White Horse Business Park. Redrow's site also proposes non-residential development including a school and community facilities such as a nursery or shop which will generate jobs in the village. Further, the improvement of facilities generally, including sports fields will greatly improve the self-sufficiency of the village whilst supporting Trowbridge.
 - Priority iv – due to its proximity to Trowbridge (just 400m settlement to settlement), it is considered that significant improvement can be achieved to walking and cycling infrastructure along Frome Road. Further, as set out in the promotional document (Appendix 2), opportunities exist to facilitate off-road connections, such as by upgrading Ash and Cleaver Lane Bridleway. It is considered that opportunity for sustainable travel from Redrow's site is superior to that of Sites 4 and 5.
 - Priority v – as demonstrated in the promotional document (Appendix 2), the requirements of the Trowbridge Bat Mitigation Strategy in terms of landscape buffers etc. can be met whilst still achieving a level of growth of circa 550 dwellings and associated infrastructure.
 - Priority vi – as demonstrated in the promotional document, a primary school can be provided on Redrow's site to support the delivery of the 550 new dwellings.
 - Priority vii – development at Redrow's site would not lead to any form of coalescence, allowing Southwick to retain its individual identity. Conversely, the allocation of Sites 4 and 5 will merge the settlements of Trowbridge, Staverton and Hilperton and completely undermine the purpose of the Hilperton Gap and the identity of those settlements.
 - Priority viii – the promotional document (Appendix x), clearly demonstrates how both green and blue infrastructure can be enhanced to the south of Southwick.
- 3-52 These representations have demonstrated that the Council needs to make additional allocations of at least 992 dwellings to meet Trowbridge's housing need in the period to 2036. As such, regardless of the suitability or otherwise of Sites 4 and 5, additional allocations must be made.
- 3-53 It is therefore requested that Redrow's site at Southwick be assessed by the Council for its ability to meet the identified need in Trowbridge.
- 3-54 The promotional document accompanying these representations summarises the opportunities the site presents (Appendix 2). In addition, a fuller assessment of Redrow's site against the Council's assessment criteria is provided below.

Site Assessment – Land to the south of Southwick

- 3-55 These representations have questioned the Council's applied methodology to the site sifting process, specifically with regard to the absence of assessment of sites adjacent to the villages of Southwick and North Bradley in terms of their ability to assist in meeting the identified need for Trowbridge.

3.56 It is imperative that the site assessment process be restarted to include other opportunities in the villages surrounding Trowbridge including the land being promoted by Redrow to the south of Southwick. In order to assist the Council in assessing this site, a promotional document is provided at Appendix 2 which demonstrates that the site, which has no technical and environmental constraints that impact the extent of development, is capable of delivering up to circa 550 dwellings and associated infrastructure, including a new school which will not only make the village more sustainable, but will also assist Trowbridge in meeting its growth requirements.

3.57 To further assist the Council a SWOT analysis has been undertaken of the site based on its development for 550 dwellings (see development Option C in the accompanying promotional document), using the same criteria as for Sites 4 and 5 under ‘Stage 4 Selection of Sites’ in the SSR.

PSP1 Housing	Strength	The site is of a size that could deliver a range of housing to meet local needs, with supporting infrastructure at a level that recognises the range of environmental constraints that affect growth at Trowbridge.
PSP2 Town Centre	Strength	This site is within 2 miles of the town centre and is therefore an easy cycling distance. There is also significant opportunity to improve existing links with the town centre to the benefit of both existing and future residents, which could provide opportunities for people to visit the town centre ensuring it remains vibrant, minimising congestion and improving air quality.
PSP3 Employment	Strength	In terms of employment opportunities, the site lies in close proximity to a number of major employment sites including the West Wiltshire Trading Estate, White Horse Business Park and Dunkirk Business Park. There are also significant employment opportunities in Trowbridge including Wiltshire College, Wiltshire Council offices and the town centre generally. The site will also deliver job generating uses.
PSP4 Traffic	Strength	This is a large site with sufficient capacity to include a network of well-connected footpaths and cycleways. Connectivity for public transport could be provided to/from the town centre, and through into the surrounding countryside. A mixed-use development can be provided which will assist in reducing the need to travel, both for existing and future residents of the village.
PSP5 Biodiversity	Strength	A masterplan for the site demonstrates that sufficient bat mitigation can be provided whilst still providing for a strategic level of residential-led mixed use development. There is also significant scope to enhance green and blue infrastructure and it is considered very likely that biodiversity net gain can be achieved.
PSP6 Education	Strength	This site is of a significant size and in a good location in the village and can include a new primary school in an accessible location.
PSP7 Surrounding Countryside	Neutral	The site is south of the village of Southwick and may affect the landscape setting of the village. However, there is enough capacity within the site to incorporate landscape buffers to better integrate the development with the surrounding area.
PSP8 Green Infrastructure	Neutral	The site is not located near the River Biss. However, there is significant opportunity to improve the green/blue infrastructure within and on the southern boundary of the site.

3.58 On the basis of the above, the site would score better than both Sites 4 and 5.

3-59

Were a smaller development option considered (i.e. development Options A or B in the accompanying promotional document), the site would score similarly. The key differences would be:

- Option A would provide a more limited range of housing simply due to the more limited site size. However, we would consider this site would still score 'green' for PSP1.
- Option A is relatively contained and would have a lesser impact on the landscape setting of the village. It is therefore considered that PSP7 would score 'Green' for this option.
- Option A provides less opportunity to improve green and blue infrastructure due to the size of the site. However, significant landscape buffers are still proposed and therefore a neutral score for PSP8 would still seem appropriate.

4.0 **Empowering Rural Communities**

4.1 As set out in the above representations, Redrow Homes consider that the village of Southwick should be considered with regard to its ability to meet the housing needs of Trowbridge rather than be seen as a rural settlement. The village is just a 400m walk / cycle from the main town and therefore cannot be treated the same in planning terms as unsustainable rural settlements. To consider it on a par with very isolated rural settlements such as Chapmanslade and Steeple Ashton is wholly inappropriate. The Local Plan review needs to positively plan for the future of Southwick, acknowledging the strategic opportunity it presents to address housing need and ensuring the sustainability of the village through improved local facilities.

4.2 Whilst the inclusion of Southwick within the Rural Communities document is objected to in principle, representations to this document are provided below.

Assessing Local Need

4.3 The Empowering Rural Communities document (ERC) states that rural communities should be encouraged to undertake a Rural Housing Needs Survey.

4.4 Concern is raised if rural settlements are determining housing need based on these surveys. In recent experience at Southwick, a RHNS has been used to determine housing need but the methodology used was highly flawed and has thus led to a suppression of housing need. The key issues with the survey were:

- The Survey considered affordable housing need for the following three years yet, the corresponding Neighbourhood Plan was allocating sites to meet need to 2026 (an 8 year period).
- No extrapolation of housing need was made for approximately the two thirds of Parish residents who did not respond with the stated need only a reflection of a third of the Parish's need.
- Respondents were disproportionately owner-occupiers and aged 65 or older. 65% of respondents owned their property outright versus 44.3% across the Parish (ONS Census, 2011). 18.8% of the Parish's population are aged 65 or over (ONS Census, 2011) yet 37.4% of respondents were in this age category.

1.1 It is inappropriate for a RHNS to be the sole determiner of housing requirement. A RHNS is no more than a snapshot and to inform the extent of site allocations for the entire plan period on the basis of a snapshot survey alone is not an approach which would withstand external scrutiny.

Dwelling Size

4.5 Redrow Homes do not consider the Council's proposed blanket approach of removing permitted development rights on new homes to be justified. As recognised in the document, permitted development rights are enshrined in law and should only be removed when absolutely necessary to do so.

Allocating Sites

4.6 The ERC document states that the majority of allocations will come forward through Neighbourhood Plans. This raises concern for Southwick.

4.7 The village has been preparing a Neighbourhood Plan for several years, which is to meet the needs of the Core Strategy to 2026. However, this plan is still in the drafting process and as a

consequence there has been very little housing delivery in the village since before 2006. To leave further allocations to the Neighbourhood Plan will only seek to further delay housing delivery in the village.

- 4.8 It is considered that the Local Plan must make an allocation in Southwick to meet the needs of the village and the wider needs of Trowbridge.

Housing Requirement

- 4.9 Appendix 1 of the ERC sets out the Council's proposed figures for housing requirement within the large villages.
- 4.10 The methodology adopted for determining growth within the villages is unclear. The Empowering Rural Communities document points to assessment work undertaken in August 2019, but having reviewed this information it is not clear how housing requirements were determined.
- 4.11 The document states that the indicative requirements were based on the size of settlements but this is not elaborated on further. Reviewing the figures for Southwick, within the 2019 document a growth rate of circa 7.5% appears to have been applied but no information is provided for why and how this figure was determined. Further, the smaller and rurally isolated settlements such as Chapmanslade had higher growth rates applied (c. 8.5%).
- 4.12 The ERC document states that these 2019 figures were subsequently adjusted to take account of constraints. For Southwick, this document states the village should see growth of c. 85 units which based on existing housing and commitments, represents a growth of c. 9.7% over the plan period. Conversely, Chapmanslade which is the smallest village in the Trowbridge HMA and very isolated, will see growth of 15.3%.
- 4.13 The Council needs to be more transparent in how these figures have been calculated and the reasons why the smallest village in the HMA is set to experience the largest growth proportionately should be reconsidered. Clearly the relative sustainability of villages has not been given sufficient weight.
- 4.14 In terms of Southwick, as well as having a number of services and facilities within the village itself, the settlement is within just 400m walk / cycle from the principal town of Trowbridge. As such, allocating just 85 homes is a missed opportunity. Furthermore, paragraph 29 of the ERC document states that development in the village is required to not only meet housing need but also to improve opportunities for employment, services and facilities. In this regard, it is highly questionable whether an allocation of c.77 units (the residual requirement) would realistically assist the village in meeting these aims.
- 4.15 Through representations to the Planning for Trowbridge document it has been demonstrated that Redrow's site to the south of Southwick represents a logical and sustainable opportunity to contribute to the wider growth needs of Trowbridge. In order to assist the Council in assessing this site, a promotional document is provided at Appendix 2 which demonstrates that the site, which has no technical and environmental constraints of a degree to impact the extent of development, is capable of delivering between 100 and 550 dwellings and associated infrastructure, including a new school which will not only make the village more sustainable, but will also assist Trowbridge in meeting its growth requirements, which has been shown to be deficient.
- 4.16 As also demonstrated, when comparing Redrow's site to the Council's 'preferred sites' it scores better than both Site 4 and 5 and is located in closer proximity to the vast majority of key services and facilities within Trowbridge, making it an all-round more sustainable proposition.

- 4.17 The Council is strongly urged to reconsider the opportunity for a strategic level of growth at Southwick to meet Trowbridge's housing need.

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

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

- 5.1 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.
- 5.2 As raised by the HBF, Redrow Homes 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.
- 5.3 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

- 5.4 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.
- 5.5 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 sustainable construction is 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.
- 5.6 The Council should rely on proposed changes to the Building Regulations noting that it is anticipated that updates to Part L/F of the Building Regulations will be implemented towards the end of Q3 and beginning of Q4 2021. Such updates should be used to inform the drafting of the Local Plan as it progresses. 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

- 5.7 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, the Council's decision to allocate land to the north of Hilperon is questioned, given that development to the south of Trowbridge at Southwick will lead to a more sustainable travel pattern.
- 5.8 The document further emphasises the Council's ambitions to increase the level of self-containment within Wiltshire's settlements. In this regard, whereas Sites 4 and 5 will essentially deliver new communities, Redrow's site will form an extension to Southwick village which will make this settlement significantly more sustainable through provision of education, recreation and community facilities.
- 5.9 In addition, development in this location could assist in improving cycle and pedestrian connections between the village and the town which would also be to the benefit of existing residents.
- 5.10 The benefits of the proposed scheme in terms of sustainability are set out in a promotional document at Appendix 2.

Appendix 1 Figure 2.2 – Housing Delivery

	24/25	25/26	26/27	27/28	28/29	29/30	30/31	31/32	32/33	33/34	34/35	35/36	36/37	37/38	38/39	39/40	2016-2036	2020-2040
Minimum Housing Requirement																	5830	5830
Completions (2016-2019)																	398	0
Commitments (excluding Ashton Park)																	1525	1525
Site 4				5	65	65	65	65	65	65	65	40					500	500
Site 5								80	120	155	155	155	155	155	155	155	665	1285
Ashton Park	80	120	155	155	155	155	155	155	155	155	155	155	155	155	155	155	1750	2370
Total Delivery																	4838	5680
Shortfall in Housing Delivery																	-992	-150

Assumptions:

- Applications on sites 4 and 5 submitted in March 2023
- Site 4: Lichfields' Start to Finish Research states it takes on average 5 years for sites of this size to start delivering from validation of first application (first house expected March 2028)
- Site 5: Lichfields' Start to Finish Research states it takes on average 8.4 years for sites of this size to start delivering from validation of first application (first house expected August 2031) - assuming similar delivery rates as Ashton Park and Castlemead (3 outlets providing 155 dwellings per annum total)
- Ashton Park: assumes permission by June 2021. Lichfields' Start to Finish Research states it takes on average 2.9 years for sites of this size to start delivering from approval of outline (first house expected May 2024). The 2018 Housing Land Supply Statement contends that the developers will operate three outlets (Persimmon Homes, Charles Church, and an affordable housing provider) with build rates similar to Castlemead of 40-50 units per annum for each outlet). This would assume up to 150/annum. Lichfields' Start to Finish suggests 160/annum. Mid point therefore adopted and 155/annum assumed, with 2 year ramp up in numbers.

Appendix 2 Promotional Document



LAND AT BLIND LANE **SOUTHWICK**

PROMOTIONAL DOCUMENT

PREPARED BY PEGASUS AND LICHFIELDS
IN PARTNERSHIP WITH REDROW HOMES

R.0416_24B | MARCH 2021



LAND AT BLIND LANE,
SOUTHWICK

PROMOTIONAL DOCUMENT

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- 02 SITE CONTEXT
- 03 THE OPPORTUNITY
- 04 VISION, CONSTRAINTS & OPPORTUNITIES
- 05 PROPOSED FUTURE GROWTH OPTIONS
- 06 DELIVERING THE VISION
- 07 CONCLUSION



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01

INTRODUCTION

- 1.1 This document has been prepared by Redrow Homes to demonstrate that land to the south west of Southwick is suitable, available and deliverable for residential-led development.
- 1.2 Redrow control land of 31 hectares (77 acres) on the edge of Southwick which can be brought forward in a phased approach to provide sustainable development appropriate for its rural location. This document demonstrates that development will be designed to complement and enhance Southwick whilst bringing forward a sustainable supply of new homes to meet the needs of the village and wider Trowbridge Housing Market Area. The development will also assist in creating a strong, viable community that can support and maintain key services to ensure long term sustainable development within Southwick.
- 1.3 Redrow considers that the site should be allocated for residential led development through the emerging Wiltshire Local Plan 2036. Depending on the scale of development, the site has the potential to provide wide-ranging benefits for the village, which could include:
 - 1 New market and affordable dwellings to meet the recognised national and local housing need;
 - 2 A site for a new 2FE primary school with playing fields;
 - 3 New community / retail facilities, which could include a village shop and a nursery;
 - 4 Ecological corridors and mitigation for protected bat species;
 - 5 Public open space, including opportunities for play and allotments; and
 - 6 Sustainable urban drainage and appropriate flood risk mitigation measures, which could achieve betterment for the village.

REDROW HOMES

- 1.4 Redrow is one of the UK's leading housebuilders. They care about the quality of the homes that they build and the developments that they create. Redrow have a very strong placemaking vision which combined with high quality homes delivers great places to live.
- 1.5 Redrow have completed hundreds of new communities over the last 40 years, by working with local communities to help deliver high quality developments that meet housing need and provide appropriate community infrastructure.

HOMES BY DESIGN

- 1.6 Redrow is dedicated to designing and building homes with character that people are proud to live in. Redrow's Heritage Collection has been inspired by the 1930's Arts and Crafts era, brought up to date with designs to suit 21st century life. While the exteriors celebrate the very best of this classic style, most prevalent in the still much-admired character properties of the 1930s, the interiors boast modern features and a high specification to suit the way we live today.

REDROW 8 – DESIGNING A BETTER WAY TO LIVE

- 1.7 We are committed to delivering thriving communities and creating better places to live, that offer social and environmental benefits for new residents and the wider community. As part of Redrow's innovative placemaking framework we have developed eight design principles that define how we achieve sustainable development on all of our sites.



National Design Guide (NDG) ten characteristics of well-designed places





02

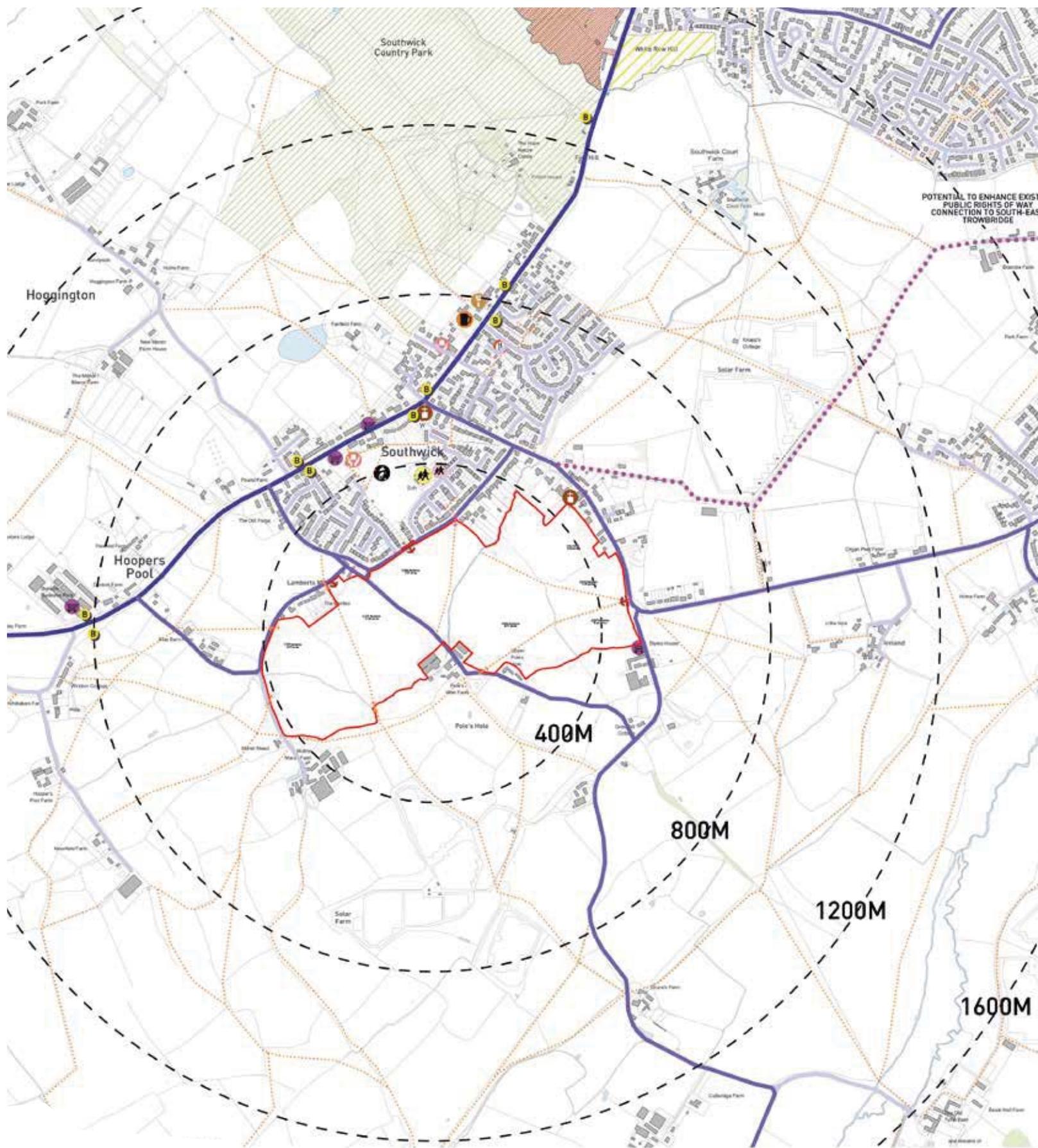
CONTEXT SITE

THE SITE

- 2.1 The area of land within Redrow's control is located to the south west of the village. It is formed of arable agricultural fields and is bounded as follows:
- Blind Lane and Lambert's Marsh to the north along which there are a mix of single storey and 2-storey dwellings. Lambrook stream also runs to the north of the site, to the rear of the Blind Lane properties.
 - Wynsome Street/Goose Street to the east which accommodates predominantly residential dwellings and the Grade II listed Southwick Baptist Church.
 - Field boundaries to the south, as well as the buildings associated with Pole's Hole Farm.
 - Lambert's Marsh to the west.
- 2.2 Wesley Lane also bisects the site, providing a connection between Frome Road and Brokerswood Road. The site benefits from mature hedgerows with sporadic trees along the extent of the boundaries.
- 2.3 Two streams run north-south across the eastern parcel of the site. The site is largely flat and has no landscape designations. Four public rights of way cross the site.

“An understanding of the context, history and the cultural characteristics of a site, neighbourhood and region influences the location, siting and design of new developments. It means they are *well grounded in their locality* and more likely to be acceptable to existing communities. Creating a positive sense of place helps to *foster a sense of belonging* and contributes to well-being, inclusion and community cohesion.”

(Para. 38, NDG 2019)



- KEY:**
- SITE LOCATION
 - B BUS STOPS
 - PUBLIC RIGHTS OF WAY
 - POTENTIAL CONNECTION TO TROWBRIDGE VIA PUBLIC RIGHTS OF WAY
 - FROME ROAD A361
 - B ROADS
 - MINOR ROADS
 - SOUTHWICK COUNTRY PARK
 - WILTSHIRE HOUSING SITE ALLOCATION H2.4 CHURCH LANE, TROWBRIDGE
 - WILTSHIRE HOUSING SITE ALLOCATION H2.5 UPPER STUDLEY, TROWBRIDGE
 - WATERCOURSE
 - 🍷 FARMHOUSE INN PUBLIC HOUSE
 - 👶 BUSY-BEES PRE-SCHOOL
 - 👶 SOUTHWICK C OF E PRIMARY SCHOOL
 - 🏃 PLAYING FIELDS
 - 🌱 ALLOTMENTS
 - ⛪ PLACES OF WORSHIP
 - 🍷 TAKEAWAY
 - 🛒 CONVENIENCE STORE/SERVICES
 - 🏠 VILLAGE HALL/ SCOUT HUT

LOCAL CONNECTIONS AND FACILITIES PLAN

SURROUNDINGS AND CONTEXT

- 2.4 The location of the site is highly sustainable being adjacent to the village of Southwick, which lies less than 1 mile to the south west of the settlement of Trowbridge and approximately 10 miles south east of Bath. The village is located on the A361 which links to Trowbridge and Frome. It also lies in close proximity to the A36 and A350.
- 2.5 The village, which has a population of approximately 2,000 people, benefits from a number of existing facilities including Southwick Church of England Primary School, Southwick Village Hall, public house, takeaway restaurants, hairdressers, convenience store, farm shop, vehicle repairs / car dealership and Southwick Country Park.
- 2.6 In addition, Southwick significantly benefits from its proximity to Trowbridge and the significant amount of services and facilities available within the town. The Site is just circa 2.5 miles (a 15 minute cycle ride) from the town centre, although many services and facilities are within much closer proximity. There are also several traffic free connections via public right of way / bridleway to Trowbridge and North Bradley including SWCK59 which links Breach Lane to Axe and Cleaver Lane and SWCK3 linking Breach Lane to Westmead Crescent / Silver Street Lane.
- 2.7 There are also established bus stops located along Frome Road and Wynsome Street, which provide a sustainable link to Trowbridge, Frome and beyond. This also provides a convenient link to the national rail network, with the nearest train stations located 2.2 miles north in Trowbridge or 5 miles south east in Westbury. Both stations offer direct connections to Bristol, Bath, Southampton and London.
- 2.8 In terms of employment opportunities, Southwick lies in close proximity to a number of major employment sites. The village is under 2 miles from the West Wiltshire Trading Estate, White Horse Business Park and Dunkirk Business Park. There are also significant employment opportunities in Trowbridge including Wiltshire College (0.7 miles), Wiltshire Council offices (1.7 miles) and the town centre generally. The village is therefore sustainably located for a wide range of existing employment opportunities.
- 2.9 In addition, sustainable links are achievable between the village and the Ashton Park urban extension where a further circa 15ha of employment land is proposed.

LAND TO THE NORTH OF LAMBERT'S MARSH

- 2.10 It is noted that other land on the edge of the village is being promoted for development, most notably a field parcel located between Frome Road and Lambert's Marsh, adjacent to land within Redrow's control which is being considered for development in the draft Neighbourhood Plan.
- 2.11 Whilst Redrow considers its site to offer the most logical and suitable form of growth for the village, if strategic scale development is pursued in Southwick, Redrow would be pleased to work with the promoters of this site to develop an overarching masterplan for the village.

“Well-designed new development is integrated into its wider surroundings, physically, socially and visually. It is carefully sited and designed, and is demonstrably based on an understanding of the existing situation...”

(Para. 41, NDG 2019)

03

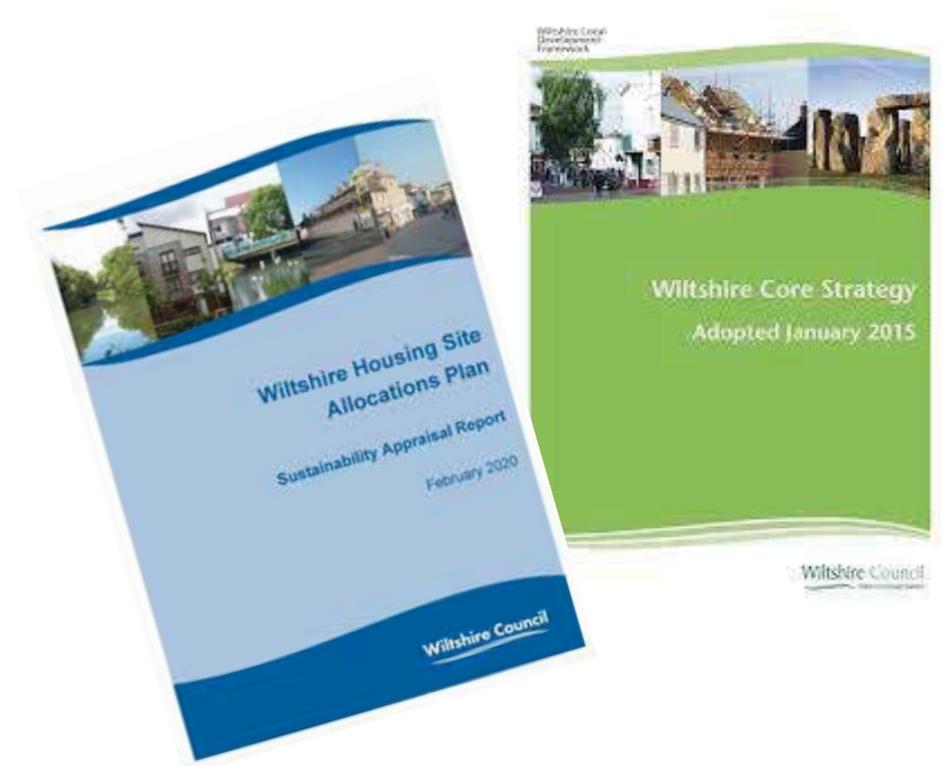
THE OPPORTUNITY

THE NEED FOR HOUSING

- 3.1 The National Planning Policy Framework (NPPF) outlines the Government's commitment to increasing the supply of homes and ensuring that a sufficient amount and variety of land can come forward to meet local housing needs. The provision of housing, affordability and deliverability of strong, vibrant and healthy communities are key themes throughout the Framework.
- 3.2 The development plan for the site currently comprises the Wiltshire Core Strategy (January 2015) and the Housing Site Allocations Plan (February 2020). The Core Strategy sets a housing requirement for at least 42,000 homes between 2006 – 2026 (circa 2,100 dwellings per annum). However, as this plan is now over 5 years old, housing need should be determined using the Government's standard methodology. Under the standard method, requirement over the next 10 years is circa 2,106 dwellings per annum, when applying a 5% buffer.

EMERGING LOCAL PLAN

- 3.3 Wiltshire Council has commenced work on a new local plan and undertook an informal Regulation 18 consultation in early 2021. The consultation document sets out the Council's view that the level of housing growth that would be required to support its employment targets for the period from 2016 to 2036 is 45,630 dwellings. The Council stresses that the c.45,600 dwellings is the minimum figure required to ensure workers are able to live where they work.
- 3.4 Whilst the Local Plan Review is still under preparation, and Redrow has previously raised concerns with the exact level of need that will be planned for, it is recognised by both Redrow and the Council that in broad terms a significant level of new housing development is needed and will be planned for across Wiltshire and in the Trowbridge HMA.
- 3.5 Indeed, the consultation document identifies a need for circa 11,000 dwellings in the Trowbridge HMA between 2016 and 2036 (550 dwellings per year).



WHY SOUTHWICK?

- 3.6 As part of the informal Local Plan Review consultation undertaken to date, Trowbridge is recognised as the preferred focus for growth.
- 3.7 However, the town is a constrained location and although it has been allocated significant growth over the previous ten to twenty-year period, there have been long standing problems with slow delivery rates. The town is the worst-performing location for growth in the HMA, and prioritising at least half of the total housing development in the town has the potential to significantly undermine housing delivery across the HMA. Green Belt to the north west and constraints related to protected bat habitat in the south and east are the notable development constraints. By contrast, allocating development in close proximity to Trowbridge with the opportunity to capitalise on its extensive services has the potential to secure delivery over the plan period through a range of housing sites.
- 3.8 The most recent consultation has identified a preferred development site in Trowbridge to the north of the town. However, this site is considered an extension to the villages of Hilperton (a designated 'large village' with its own settlement boundary) and Staverton (designated as a 'small village' which actually falls within the Bradford on Avon Community Area), rather than Trowbridge and is no closer to key facilities within the town than Southwick is.
- 3.9 Redrow has therefore prepared representations to this consultation, highlighting that the site selection report has failed to consider all the reasonable alternative sites around Trowbridge, including at Southwick which has been completely overlooked. The representations, which should be read in conjunction with this document, further demonstrate why development at Southwick is an appropriate location for sustainable growth that can deliver a strong viable community. Indeed, Southwick, represents a logical and sustainable location for housing delivery, is not subject to any major constraints and is within close enough proximity to the town to meet its housing needs as well as those of the wider HMA.
- 3.10 As such, land to the south of Southwick is suitable and available for development to meet housing need in this area of Wiltshire and should be assessed by the Council accordingly.



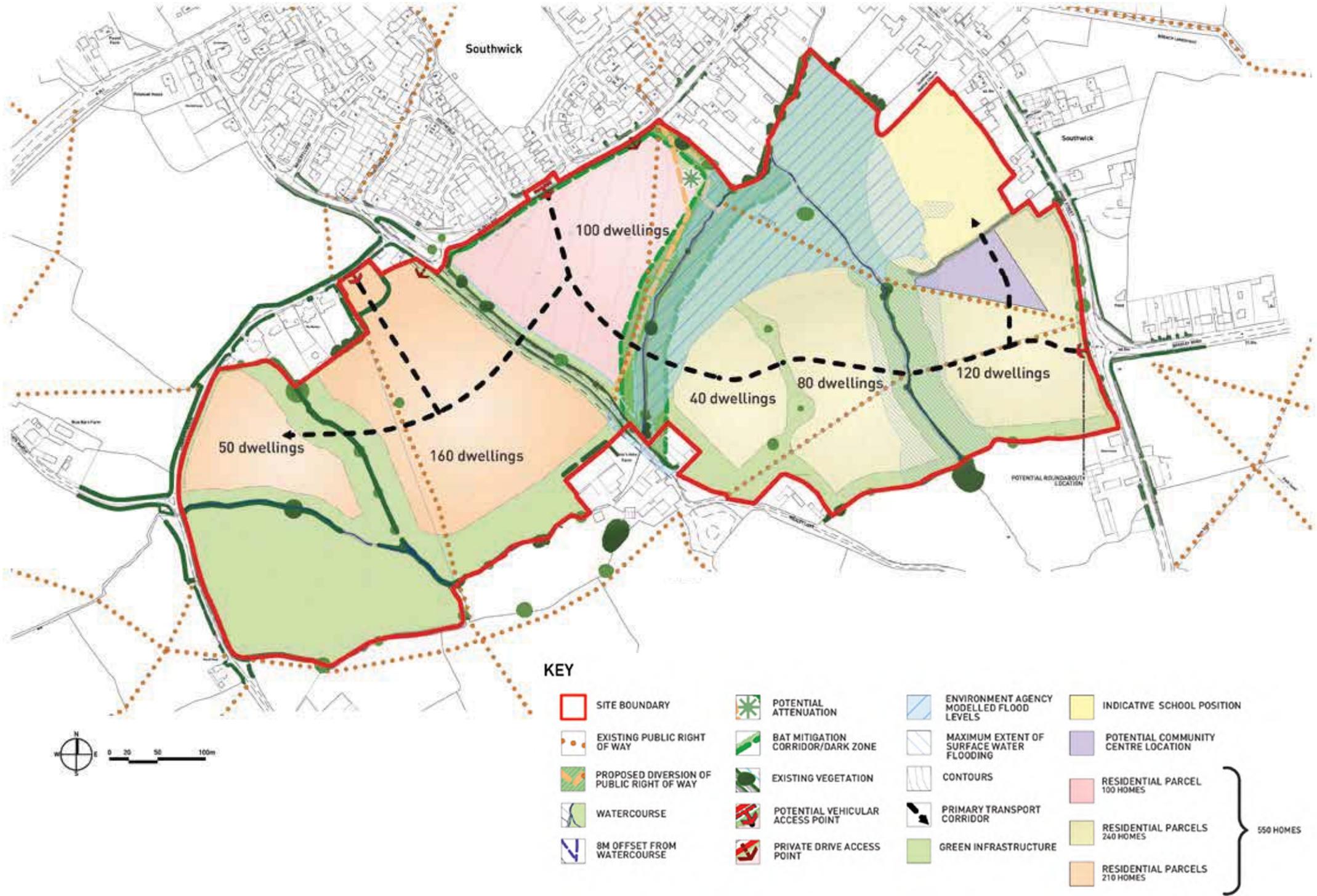
04

THE VISION, CONSTRAINTS & OPPORTUNITIES

SITE VISION

"The delivery of a high-quality and attractive residential-led development outside of the Green Belt, with extensive green infrastructure provision and ecological enhancement in a sustainable location, offering a choice of high-quality new homes to meet housing need and provide opportunity to deliver viable facilities and services to the benefit of the wider community".

- 4.1 Redrow has developed an illustrative masterplan for the site which can deliver this vision. The design and form of development will respond sensitively to the characteristics of the site and the wider setting and will contribute towards the sustainable development of this area.
- 4.2 It is intended that the vision will evolve through further consultation with various stakeholders, including Wiltshire Council, the local community of Southwick, and potentially other land owners. Redrow's vision for the site seeks to meet the following goals:
 - 1 High quality new family homes to meet the needs of the area of Wiltshire and ease pressure on the Trowbridge Green Belt.
 - 2 Achieve a choice of housing locations with a mix of house types, tenures and size to meet identified local needs.
 - 3 Provide high quality, accessible green space for the benefit of existing and future residents – opportunities for extensive areas of strategic green infrastructure have been identified which will provide an attractive setting for the development.
 - 4 Respect the character of the village, the site and its setting.
 - 5 Opportunity for significant biodiversity net gain.
 - 6 Potential to deliver a site for a new 2FE primary school to ease existing capacity issues at the existing village school.
 - 7 Potential to deliver other services / facilities such as a convenience store and a nursery to improve the self-sufficiency of the village.
 - 8 Invest in the community with the creation of additional direct and indirect employment both during and after the development.
 - 9 Create a safe and desirable place to live with a safe and attractive environment that builds upon the strength of the local community.
 - 10 Provide high quality design which will complement and enhance the existing environment and create a good standard of amenity and living environment whilst protecting existing residential amenity.
 - 11 Provision of sustainable urban drainage and appropriate flood risk mitigation measures, which could achieve betterment for the village.



CONSTRAINTS & OPPORTUNITIES PLAN

CONSTRAINTS AND OPPORTUNITIES

- 4.3 The development vision has evolved from a careful analysis of the Site characteristics, its context, and the opportunities and constraints which arise:

CONSTRAINTS

- The need to ensure residential amenity is preserved for properties located north and east of the site;
- Protection of the setting of Southwick Baptist Church (Grade II Listed) and other listed buildings in the vicinity;
- Consideration of landscape impact, particularly from the existing public rights of way;
- A small area of land within flood risk zones 2 and 3 to the north east of the site; and
- Existing watercourses through the site which will need to be accounted for in the design.

- 4.4 There is potential to develop a high quality, characterful scheme set within a coherent landscape structure which conserves natural assets on the site, as well as creating new opportunities for recreation; connecting the site into the existing and proposed pedestrian and cycle network.

OPPORTUNITIES

- The Site's sustainable location in relation to the surrounding residential area and proximity to existing services and facilities;
- Ability to develop outside of the Green Belt negating the need for the release of more sensitive land parcels, ensuring a range of housing sites to ensure delivery;
- Proximity to existing employment opportunities;
- Potential to provide safe highway, pedestrian and cycle access into the Site from Blind Lane, Wynsome Street and Lambert's Marsh;
- Potential to improve existing pedestrian / cycle linkages to Trowbridge and North Bradley, including traffic free routes such as the Axe and Cleaver Lane bridleway;
- The location of existing green infrastructure and opportunity to create green corridors both through the site and on the southern boundary, including a 'recreational trail' loop;
- Potential to strengthen existing vegetation and provide additional landscaping to create an appropriate edge to the new development;
- Potential to enhance the existing services and facilities within the village, including the creation of another Primary School, youth facilities and flexible working spaces;
- Potential to provide designated sports pitches including a full sized Astro Turf and MUGA;
- Potential to retain and enhance key views across the site and of the surrounding countryside;
- Retain and enhance the identity of Southwick village;
- Potential to enhance the local character of the surrounding area, through appropriate development densities, street scenes and housing types; and
- Potential to enhance existing ecological features, including Lambrook Stream and the surrounding vegetation which support a number of wildlife species.

05

PROPOSED FUTURE GROWTH OPTIONS

- 5.1 It is considered that there is significant opportunity for strategic growth within Southwick which can come forward in a number of phases and could potentially extend beyond the plan period of the emerging local plan.
- 5.2 In order to assist the Council, three concept masterplan options of differing scale, from 100 dwellings to 550 dwellings are presented. Each recognises its proximity to the village and existing well-established services and facilities. The different levels of residential development also seek to demonstrate thresholds where additional benefits could be delivered. Such benefits include a new 2FE primary school, a neighbourhood centre, community allotments, sports pitches, MUGA, LEAP and nature walks.
- 5.3 A previous application for 100 units was submitted on this site in Dec 2016 (16/12279/OUT). Despite the resolution of all technical matters, the application was given a single reason for refusal which mainly referred to the suitability of the settlement for a development of the proposed scale. A summary of the response to matters previously raised by officers is as follows:
- No development is proposed within areas that are most at risk of flooding, with these areas being maintained and enhanced into stream corridor walks and new habitat zones, following previous concerns about flooding and surface water run off;
 - Existing public rights of way which run through and surrounding the site are retained and enhanced in order to encourage sustainable forms of movement for current, proposed and future users, both in and around the site. Within Option A, the proposed slight diversion of the public right of way allows the route to retain its rural nature
 - Significant buffers have been created adjacent to the boundaries, including with surrounding properties at Pole's Hole and Upper Pole's Hole, in order to respect any potential visual impact as well as noise and light pollution on their current uses as homes and farms;
- Similarly, previous concerns regarding the loss of hedgerow and additional ecological impacts have been taken into account. Substantial setbacks are proposed along Blind Lane and Wesley Lane, with these contributing to continuing and enhancing the rural nature of Southwick village; and
 - The previous application proposed an area of informal play space, which was not considered large enough to satisfy the local community. This area has been relocated within the scheme in order to provide larger play spaces as 'destinations', including a space dedicated to outdoor sports. In doing so, a full-sized MUGA as well as a number of tarmac courts can be provided for use by existing, proposed and future users.
- 5.4 Redrow has therefore sought to address the feedback received from the initial application and apply it throughout the different growth options. A summary of these is as follows:

OPTION A

- 5.5 Option A, the smallest of the three options, proposes 100 dwellings at a density of approximately 32 dwellings per hectare (dph). Vehicular access is proposed off of Blind Lane to the north, with additional access points for pedestrian and cyclist provided further east along the existing road. The primary route is proposed to run approximately north-west to south-east, with smaller neighbourhood streets and green lanes/private drives branching off the village street to ensure the proposed development is accessible for both pedestrian and cyclist's.
- 5.6 A vegetation buffer is proposed along the northern and north-eastern boundaries to soften these boundaries with the existing dwellings. Additionally, the eastern boundary is partially located within Flood Zone 3, and as such an 8m offset from this boundary is provided to prevent development being proposed immediately along this boundary.



CONCEPT MASTERPLAN: OPTION A

5.7 As a result, the existing public right of way, which overlaps with this flood zone, is re-routed further west to maximise its benefit. This diversion provides opportunities for sustainable pathway routes, ecological enhancements, new habitats and stream corridor walks along Lambrook Stream, which maximise this space.

An architectural sketch of a residential development. The sketch shows a mix of buildings, including a large house with a gabled roof and a smaller structure, surrounded by greenery and a path. A prominent red rectangular box is overlaid on the sketch, containing white text. The text describes 'OPTION B' and lists several numbered points (5.8 to 5.13) detailing the development's features, such as land addition, access points, community areas, school provision, play areas, and landscaping.

OPTION B

- 5.8 Option B illustrates the addition of land to the east of Option A, providing a total of 350 homes at approximately 32 dph. This option is of a scale capable of providing a mixed use development, which will enhance the sustainability credentials of the village to the benefit of both existing and future residents of Southwick.
- 5.9 Under this option, in addition to access from Blind Lane as per Option A, a second vehicular access is proposed off Goose Street, linking through the development. A further pedestrian and cycle access point is proposed, as well as a pedestrian only link to the south which will link with the existing public right of ways running through site.
- 5.10 Whilst the village of Southwick benefits from a number of existing services and facilities, there is potential to enhance the offer to improve its self-sufficiency. Option B therefore includes an identified 'community area'. The exact provision of this area will be subject to an assessment of need in consultation with the local community and Wiltshire Council, as well as a viability assessment. However, one option would be provision of a community hub which could provide a mix of uses including a shop/café, nursery and communal working area.
- 5.11 In terms of school provision, the existing primary school would appear to have scope for expansion which could accommodate children from the development facilitated through a S106/CIL contribution. Should this not be preferred, the community area could potentially be used to accommodate a 1 FE school (with playing fields providing a landscape buffer to the Baptist Church), with a small area reserved for a village shop. The community area is proposed to the east of the site, close to vehicular and pedestrian/cycle access points in order to maximise its accessibility for users.
- 5.12 Further benefits will include a potential destination play area in the northern area of Option B to enhance local facilities for nearby residents and provide a key destination for families and children, which can link with sustainable walks alongside Lambrook Stream.
- 5.13 To retain and enhance the landscape, areas for new planting and woodland are proposed along the southern boundary. Whilst this will create sustainable connections through linear parks and new habitats for wildlife, it also contributes to preserve and protect nearby farms and residential dwellings from the visual and noise aspects of the proposed development. as well as views further south including from Westbury White Horse.



POTENTIAL ROUNDABOUT LOCATION

KEY:

SITE BOUNDARY

EXISTING FEATURES:

- SOUTHWICK C OF E PRIMARY SCHOOL
- ST. THOMAS' CHURCH AND SOUTHWICK BAPTIST CHURCH
- COMMUNITY FACILITIES
- EXISTING RECREATION GROUNDS/ALLOTMENTS
- EXISTING ACCESS ROUTES
- EXISTING PUBLIC RIGHT OF WAY
- EXISTING FLOOD EXTENT
- EXISTING SOLAR FARMS TO THE SOUTH

POTENTIAL FEATURES:

- POTENTIAL VEHICULAR ACCESS
- POTENTIAL PEDESTRIAN CONNECTIONS
- POTENTIAL PEDESTRIAN AND CYCLE CONNECTIONS
- PROPOSED DIVERSION OF PUBLIC RIGHT OF WAY
- OPPORTUNITY FOR PATHWAY ROUTES, ECOLOGICAL ENHANCEMENT NEW HABITAT AND STREAM-CORRIDOR WALK
- AREAS FOR NEW PLANTING TO CREATE LINEAR BELTS OF WOODLAND
- OPPORTUNITY TO PROVIDE ECOLOGICAL HOTSPOTS TO MAXIMIZE HEDGEROW AND HABITAT RETENTION
- BAT MITIGATION CORRIDOR
- POTENTIAL DESTINATION PLAY AREAS
- PROPOSED WOODLAND PLANTING

- EXPLORE POTENTIAL TO PROVIDE ADDITIONAL SAFE PEDESTRIAN CROSSING POINTS AND CYCLE MARKINGS ALONG THE THROUGH ROAD TO MAKE IT MORE PEOPLE FRIENDLY
- POTENTIAL COMMUNITY CENTRE
- POTENTIAL VILLAGE STREET
- POTENTIAL NEIGHBOURHOOD STREET
- POTENTIAL GREEN LANE/PRIVATE DRIVE

- INDICATIVE PRIMARY FRONTAGE
- INDICATIVE GREEN EDGE FRONTAGE
- KEY FRONTAGE BUILDINGS
- INDICATIVE FORMAL STREET PLANTING

CONCEPT MASTERPLAN: OPTION B



OPTION C

- 5.14 Option C includes Options A and B as well as an area of land to the west of Wesley Lane. It provides 550 dwellings at a density of approximately 36 dph. Vehicular access is proposed off of Lamberts Marsh Lane to the north of the site boundary, as well as multiple pedestrian only connections along the northern, western and southern boundaries which link with existing public rights of way.
- 5.15 The south-western parcel of land, separated from the larger body of the site by Lambrook Stream is proposed as a designated outdoor sports space, providing a full-sized Astro turf pitch, MUGA and tennis courts. In doing so, this maximises the benefits of this area and provides a destination for both existing and new residents to visit.
- 5.16 Like Option B, areas for new planting and woodland are proposed along the southern boundary to reduce the visual and noise impact of the development on nearby farms and the surrounding countryside. Additionally, areas for allotments are strategically located to soften boundaries with existing dwellings.



CONCEPT MASTERPLAN: OPTION C

KEY:		POTENTIAL FEATURES:		POTENTIAL FEATURES:		POTENTIAL FEATURES:	
	SITE BOUNDARY		POTENTIAL VEHICULAR ACCESS		PROPOSED WOODLAND PLANTING		EXPLORE POTENTIAL TO PROVIDE ADDITIONAL SAFE PEDESTRIAN CROSSING POINTS AND CYCLE MOVING ALONG THE THROUGH ROAD TO MAKE IT MORE 'PEOPLE' FRIENDLY
EXISTING FEATURES:			EXISTING ACCESS ROUTES		POTENTIAL PEDESTRIAN CONNECTIONS		POTENTIAL VILLAGE STREET
	SOUTHWICK C OF E PRIMARY SCHOOL		EXISTING PUBLIC RIGHT OF WAY		POTENTIAL PEDESTRIAN AND CYCLE CONNECTIONS		POTENTIAL NEIGHBOURHOOD STREET
	ST. THOMAS' CHURCH AND SOUTHWICK BAPTIST CHURCH		EXISTING FLOOD EXTENT		BAT MITIGATION CORRIDOR TO ACCORD WITH POWERSHIRE BAT MITIGATION STRATEGY		POTENTIAL GREEN LANE / PRIVATE DRIVE
	COMMUNITY FACILITIES		EXISTING SOLAR FARMS TO THE SOUTH		PROPOSED DIVERSION OF PUBLIC RIGHT OF WAY		POTENTIAL SCHOOL
	EXISTING RECREATION GROUNDS/ALLOTMENTS		EXISTING SOLAR FARMS TO THE SOUTH		OPPORTUNITY FOR PATHWAY ROUTE, ECOLOGICAL ENHANCEMENT NEW HABITAT AND STREAM CORRIDOR WALK		POTENTIAL COMMUNITY CENTRE / NURSERY/SADP
					POTENTIAL DESTINATION PLAY AREAS		POTENTIAL ALLOTMENTS
					PROPOSED OUTDOOR SPORTS SPACE		INDICATIVE PRIMARY FRONTAGE
							INDICATIVE GREEN EDGE FRONTAGE
							KEY FRONTAGE BUILDINGS
							INDICATIVE FORMAL STREET PLANTING

06

DELIVERING THE VISION

IS THE SITE AVAILABLE?

- 6.1 The proposed development will make a valuable contribution to the future housing requirements of the district and can deliver between 100 – 550 homes including affordable housing.
- 6.2 The Site is being promoted by Redrow, a national housebuilder with a track record of delivering homes within Wiltshire. Redrow is seeking to develop the Site at the earliest opportunity. The site is available for the delivery of housing now and it offers a suitable location for housing.
- 6.3 In terms of timescales, depending on the scale of development, it is considered that it would take between 4 and 12 years for development to be completed post allocation and therefore can be delivered within the plan period to 2036. The Site is therefore fully deliverable.

IS THE SITE SUITABLE?

- 6.4 Trowbridge is one of Wiltshire's largest towns and is the focus of strategic growth for the Trowbridge Housing Market Area. As stated earlier in the document, development opportunities in Trowbridge itself are becoming more limited due to constraints including the West Wiltshire Green Belt, along with ecological constraints such as those set out in the Trowbridge Bat Mitigation Strategy. Therefore, in order to ensure Trowbridge is able to continue to grow sustainably, development at Southwick offers a logical development opportunity in an area which benefits from sustainable links into the main town.
- 6.5 The site is located within close proximity to a number of existing services and facilities and benefits from excellent public transport links. There are also significant opportunities to improve cycling and walking connections to Trowbridge including the bridleway connection to the north east into Trowbridge.

IS THE DEVELOPMENT ACHIEVABLE?

- 6.6 Redrow has undertaken an evaluation of the technical and environmental constraints that could prevent or restrict the development of the land. This assessment has identified that there are no overriding constraints that will impede its delivery.

TRANSPORT AND MOVEMENT

- 6.7 For the 100 unit scheme, vehicular access will be taken from Blind Lane, and were a more strategic level of growth pursued, access points could also be delivered at both Goose Street and Lambert's Marsh. The access strategy is considered suitable for the capacity of vehicles anticipated at the Site and will be designed to ensure emergency vehicles can access the Site.
- 6.8 In addition to pedestrian and cycle access at the vehicular access points, further connections can be facilitated into the existing network (including public rights of way), particularly to the north, east and west.
- 6.9 The availability of local services, such as the existing primary school, within close proximity of the site promotes opportunities for journeys which can be walked instead of using cars. The main centre for these services is 650 metres (9 minutes' walk) from the site.
- 6.10 In addition, if a strategic level of growth is pursued, there is opportunity to provide new and improved facilities which will serve the new residents as well as the wider village. This could include a new 2FE primary school, a village shop and a nursery which will further enhance the sustainability of the village.

“ Well-designed neighbourhoods need to include an integrated mix of tenures and housing types that reflect local housing need and market demand. They are designed to be inclusive and to meet the changing needs of people of different ages and abilities. New development reinforces existing places by enhancing local transport, facilities and community services, and maximising their potential use. **”**

(Para. 109, NDG 2019)

- 6.11 The site is in reasonable walking distance to existing bus stops along Frome Road (600 metres / 8 minutes' walk) and Wynsome Street (500 metres / 7 minutes' walk) which provide direct half hourly services to Trowbridge town centre, Chippenham and Frome. These bus services also provide links to the national rail network.
- 6.12 In addition, if strategic growth is delivered, there may be opportunities to improve public transport as well as pedestrian / cycle connections to Trowbridge.

Route	Days	Number of Services	Approximate Frequency	First Service	Last Service
Frome-Trowbridge-Chippenham	Mon-Fri	17	30 Minutes	07:25	17:44
	Sat	10	60 Minutes	07:53	17:25
Chippenham-Trowbridge-Frome	Mon-Fri	16	30 Minutes	07:32	17:41
	Sat	10	60 Minutes	07:40	17:28



ECOLOGY

- 6.13 In terms of ecology, regarding the 100 dwelling option, ecological surveys determined that the site has potential for breeding birds, foraging and commuting bats, water voles and grass snakes. However, as demonstrated through a previous planning application, these ecological constraints can be fully mitigated.
- 6.14 In terms of the strategic site, of most importance is the potential for bats. The site falls within the yellow (medium) impact risk zone identified within the Trowbridge Bat Mitigation SPD, however previous surveys identified relatively low numbers of bats principally along the stream corridors and certain hedgerows.
- 6.15 Additional surveys are required to determine the exact extent of any required mitigation, including development buffers. However, as demonstrated on the Masterplan for Option C, it is considered that significant landscape buffers can be provided within and on the boundaries of the site to maintain adequate habitat for bats and other wildlife.
- 6.16 Existing trees and hedgerows across the site will be retained wherever feasible to do so.

FLOOD RISK AND DRAINAGE

- 6.17 The site is primarily within Flood Zone 1 and is therefore at a low risk of flooding. However, a small area is located within Flood Zones 2 and 3, as demonstrated on the Constraints and Opportunities plan on page 14.
- 6.18 As such, the Masterplans for Options B and C do not propose any development to be located in this part of the site and instead propose more public open space as a more compatible use.
- 6.19 In terms of surface water drainage, it is envisaged that any level of development will incorporate sustainable urban drainage systems in order to manage the disposal of surface water runoff from the proposed development site. This will need to account for the soil character, which is not suitable for infiltration. Instead, the surface water drainage systems proposed will seek to mimic the surface water flows on the site at present, whilst reducing flood risk to the site itself and elsewhere, taking account of climate change and minimising risk of pollution. This could include various measures including the implementation of a network of pipes, surface water attenuation ponds and swales.
- 6.20 In terms of foul drainage, there is an existing public sewer located to the north of the site. It is proposed to connect to this network to discharge foul water from the site.

“Nature contributes to the quality of a place, and to people’s quality of life, and it is a critical component of well-designed places. Natural features are integrated into well-designed development. They include natural and designed landscapes, high quality public open spaces, street trees, and other trees, grass, planting and water.”

(Para 90, NDG 2019)

LANDSCAPE

- 6.21 The site is situated to the south of the village within the Rolling Clay Lowland landscape character area. The area is characterised for its low hills and open agricultural fields interspersed by small areas of woodland.
- 6.22 Whilst the development falls within this character area it has no protected characteristics. It is recognised that development will have an urbanising effect on the landscape and some views, including from the PROWs and adjacent access roads, will be affected by a growth in the settlement size.
- 6.23 However, it is considered that the site forms a logical extension to the village. It is bordered by existing built form to the north and would be proposed to come forward in a phased approach, adding to the village over a 4-12 year period.
- 6.24 The development would be well-integrated into its countryside setting by the inclusion of wide landscaped corridors and the retention of existing trees and hedgerows between and bordering the development parcels. As a result, each phase of development will have a landscape border to adjacent agricultural fields, forming a managed and defensible new edge to the settlement.

HERITAGE

- 6.25 There are no designated heritage assets within the site. However, a small number of Grade II assets lie in close proximity to the site's boundaries including Southwick Baptist Church and associated open air baptistry and railings (all Grade II listed) to the east, Poles Hole Farmhouse (Grade II) to the south and Mutton Marsh Farmhouse to the west (Grade II).
- 6.26 In closest proximity to the site is Southwick Baptist Church. It is not considered that development to the south of the Church and its associated listed assets will impact upon the settings of these assets.
- 6.27 Pole's Hole Farmhouse is located to the south of the development site and lies in close proximity to the land within Redrow's control. To preserve the house's agricultural, rural setting it is proposed to include a landscape buffer around the farm such that development will not impact upon the setting of the asset.
- 6.28 Mutton Marsh Farmhouse is located c.75m south of the development site to its south west. No development is proposed in the adjacent field parcel to the house and this will preserve the house's agricultural setting.
- 6.29 As a result of these design considerations any potential effects to the setting of nearby heritage assets will be appropriately managed through the emerging design of the development.

OPTION B STRATEGY COMMUNITY AREA

- 6.30 Option B and C proposes either residential development or a 2FE school to the south and west of the Church. However, it will be possible to design the scheme to ensure development is set back and sensitively designed to preserve the Church.



07

CONCLUSION

- 7.1 The site is suitable, available and deliverable for a major new development to the south west of Southwick for between circa 100 - 550 dwellings. The site is not the subject of any technical or environmental constraints that would prevent it coming forward for a mixed residential-led development.
- 7.2 The land is under the control of a housebuilder with a track record of delivering homes within Wiltshire. Redrow would seek to bring forward this opportunity in a phased approach which will deliver growth in a sustainable manner, cumulatively providing improvements for the village in the form of a new 2FE school site, local community / retail facilities and public open space.

- 7.3 In terms of the four pillars of sustainability the site will:

- Support Southwick as a strong viable community and increase its sustainability
- Deliver high-quality housing in an area close to significant employment opportunities, which can be easily accessed via a sustainable transport network.
- Provide a suitable range of dwellings in various types, sizes and tenures to meet the needs of the local population, and establish a mixed and sustainable community.
- Deliver affordable housing homes on-site in accordance with local policy, to meet the identified local need.
- Potentially deliver a new 2FE primary school, nursery, village shop or other services / facilities which will significantly improve the sustainability of the village.
- Provide public open space for both existing and future residents, including allotments.
- Negate the need for Green Belt release within Trowbridge.
- Provide compensatory improvements against the loss of agricultural fields, and seek to retain, enhance or mitigate the existing ecological and environmental features of value on the site, particularly for bats.
- Retain existing hedgerows and trees where possible and provide substantial green corridors to provide an appropriate landscape setting.
- Contribute towards building a strong, responsive and competitive economy within Trowbridge. The proposal will bring a number of economic benefits in terms of job creation (both during and post construction), additional income for the Local Authority and increased expenditure in the economy.



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DESIGN



ENVIRONMENT



PLANNING



ECONOMICS



HERITAGE

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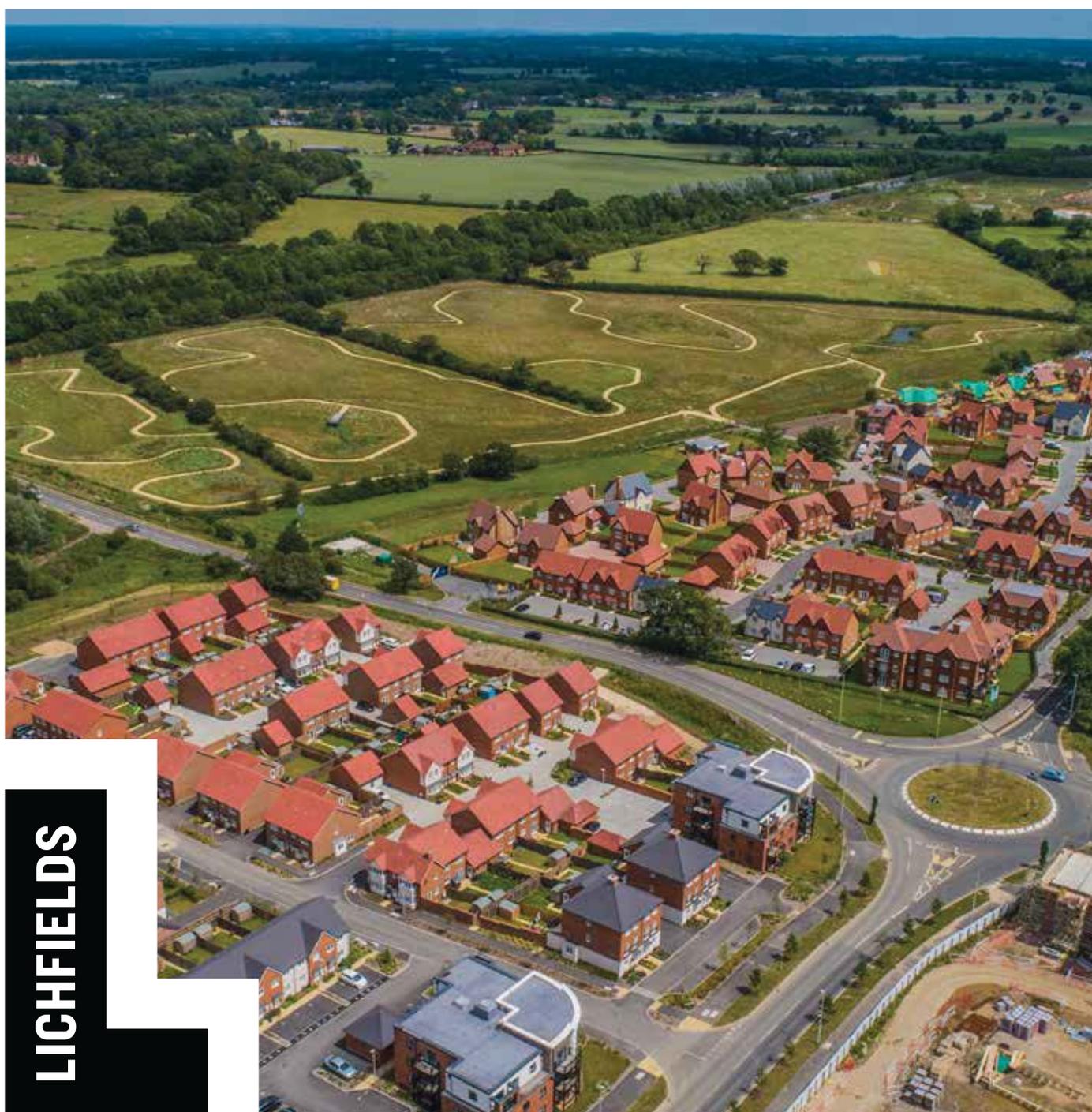
Appendix 3 Lichfields' Start to Finish

INSIGHT
FEBRUARY 2020

Start to Finish

What factors affect the build-out rates of
large scale housing sites?

SECOND EDITION



LICHFIELDS

LICHFIELDS

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Executive summary

Lichfields published the first edition of Start to Finish in November 2016. In undertaking the research, our purpose was to help inform the production of realistic housing trajectories for plan making and decision taking. The empirical evidence we produced has informed numerous local plan examinations, S.78 inquiries and five-year land supply position statements.

Meanwhile, planning for housing has continued to evolve: with a revised NPPF and PPG; the Housing Delivery Test and Homes England upscaling resources to support implementation of large sites. Net housing completions are also at 240,000 dwellings per annum. With this in mind, it is timely to refresh and revisit the evidence on the speed and rate of delivery of large scale housing sites, now looking at 97 sites over 500 dwellings. We consider a wide range of factors which might affect lead-in times and build-out rates and have drawn four key conclusions.

In too many local plans and five-year land supply cases, there is insufficient evidence for how large sites are treated in housing trajectories. Our research seeks to fill the gap by providing some benchmark figures - which can be of some assistance where there is limited or no local evidence - but the averages derived from our analysis are not intended to be definitive and are no alternative to having a robust, bottom-up justification for the delivery trajectory of any given site.

We have drawn four key conclusions:

<p>1 Large schemes can take 5+ years to start</p>	<p>2 Lead-in times jumped post recession</p>
<p>Our research shows that if a scheme of more than 500 dwellings has an outline permission, then on average it delivers its first home in c.3 years. However, from the date at which an outline application is validated, the average figures can be 5.0-8.4 years for the first home to be delivered; such sites would make no contribution to completions in the first five years.</p>	<p>Our research shows that the planning to delivery period for large sites completed since 2007/08 has jumped compared to those where the first completion came before 2007/08. This is a key area where improvements could be sought on timeliness and in streamlining pre-commencement conditions, but is also likely impacted by a number of macro factors.</p>
<p>3 Large greenfield sites deliver quicker</p>	<p>4 Outlets and tenure matter</p>
<p>Large sites seem to ramp up delivery beyond year five of the development on sites of 2,000+ units. Furthermore, large scale brownfield sites deliver at a slower rate than their greenfield equivalents: the average rate of build out for greenfield sites in our sample is 34% greater than the equivalent brownfield.</p>	<p>Our analysis suggests that having additional outlets on site has a positive impact on build-out rates. Interestingly, we also found that schemes with more affordable housing (more than 30%) built out at close to twice the rate as those with lower levels of affordable housing as a percentage of all units on site. Local plans should reflect that – where viable – higher rates of affordable housing supports greater rates of delivery. This principle is also likely to apply to other sectors that complement market housing for sale.</p>

Key figures

180

sites assessed, with combined yield of 213k+ dwellings; 97 sites had 500+ homes

c.3yrs

average time taken from outline decision notice to first dwelling completions on sites of 500+ homes

8.4yrs

the average time from validation of the first planning application to the first dwelling being completed on schemes of 2,000+ dwellings

160 dpa

the average annual build-out rate for a scheme of 2,000+ dwellings (median: 137)

68 dpa

the average annual build rate of a scheme of 500-999 dwellings (median: 73)

+34%

higher average annual build-out rate on greenfield sites compared with brownfield sites

61 dpa

average completions per outlet on sites with one outlet, dropping to 51 for sites of two outlets, and 45 for sites with three outlets

01 Introduction

This is the second edition of our review on the speed of delivery on large-scale housing development sites. The first edition was published in November 2016 and has provided the sector with an authoritative evidence base to inform discussions on housing trajectories and land supply at planning appeals, local plan examinations and wider public policy debates.

Over this period, housing delivery has remained at or near the top, of the domestic political agenda: the publication of the Housing White Paper, the new NPPF, an emboldened Homes England, a raft of consultations on measures intended to improve the effectiveness of the planning system and speed up delivery of housing. Of particular relevance to *Start to Finish* was the completion of Sir Oliver Letwin's independent review of build out ("the Letwin Review"), the inclusion within the revised NPPF of a tighter definition of 'deliverable' for the purposes of five-year housing land supply (5YHLS) assessment, and the new Housing Delivery Test which provides a backward looking measure of performance. The policy aim is to focus more attention on how to accelerate the rate of housing build out, in the context of the NPPF (para 72) message that the delivery of a large numbers of new homes can often be best achieved through larger scale development such as new settlements or significant extensions to existing villages and towns, but that these need a realistic assessment of build-out rates and lead in times of large-scale development.

This second edition of *Start to Finish* is our response to the latest policy emphasis. It provides the planning sector with real-world benchmarks to help assess the realism of housing trajectory assumptions, particularly for locations where there have been few contemporary examples of strategic-scale development. The first edition looked in detail at how the size of the site affected build-out rates and lead in times, as well as other factors such as the value of the land and whether land was greenfield or brownfield. We have updated these findings, as well as considering additional issues such as how the affordability of an area and the number of outlets on a site impacts on annual build-out rates.

We have also expanded the sample size (with an extra 27 large sites, taking our total to 97 large sites, equivalent to over 195,000 dwellings) and updated with more recent data to the latest monitoring year (all data was obtained at or before the 1st April 2019).



Our research complements, rather than supplants, the analysis undertaken by Sir Oliver Letwin in his Review. The most important differentiation is that we focus exclusively on what has been built, whereas each of the sites in the Letwin Review included forecasts of future delivery. Additionally, the Letwin Review looked at 15 sites of 1,500+ homes, of which many (including the three largest) were in London. By contrast, the examples in this research sample include 46 examples of sites over 1,500 homes across England and Wales, the majority of which are currently active. As with the first edition of our research, we have excluded London because of the distinct market and delivery factors in the capital.

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180

sites

97

large sites of 500
units or more

27

additional sites
compared with our
2016 research

8

sites also included
in Sir Oliver Letwin's
review

O2 Methodology

The evidence presented in this report analyses how large-scale housing sites emerge through the planning system, how quickly they build out, and identifies the factors which lead to faster or slower rates of delivery.

We look at the full extent of the planning and delivery period. To help structure the research and provide a basis for standardised measurement and comparison, the various stages of development have been codified. Figure 1 sets out the stages and the milestones used, which remain unchanged from the first edition of this research. The overall 'lead-in time' covers stages associated with gaining an allocation, going through the 'planning approval period' and 'planning to delivery period', finishing when the first dwelling is completed. The 'build period' commences when the first dwelling is completed, denoting the end of the lead-in time. The annualised build-out rates are also recorded for the development up until the latest year where data was available at April 2019 (2017/18 in most cases). Detailed definitions of each of these stages can be found in Appendix 1. Not every site assessed will necessarily have gone through each component of the identified stages as many of the sites we considered had not delivered all dwellings permitted at the time of assessment, some have not delivered any dwellings.

Information on the process of securing a development plan allocation (often the most significant step in the planning process for large-scale schemes, and which – due to the nature of the local plan process – can take decades) is not easy to obtain on a consistent basis across all examples, so is not a significant focus of our analysis. Therefore, for the purposes of this research the lead-in time reflects the start of the planning approval period up to the first housing completion.

The 'planning approval period' measures the validation date of the first planning application on the site (usually an outline application but sometimes hybrid), to the decision date of the first detailed application to permit dwellings in the scheme (either full, hybrid or reserved matters applications). It is worth noting that planning applications are typically preceded

by significant amounts of pre-application engagement and work, plus the timescale of the local plan process.

The 'planning to delivery' period follows immediately after the planning approval period and measures the period from the approval of the first detailed application to permit development of dwellings and the completion of the first dwelling.

Development and data

Whilst our analysis focuses on larger sites, we have also considered data from the smaller sites for comparison and to identify trends. The geographic distribution of the 97 large sites and comparator small sites is shown in Figure 2 and a full list can be found in Appendix 2 (large sites) and Appendix 3 (small sites).

Efforts were made to secure a range of locations and site sizes in the sample, but there is no way of ensuring it is representative of the housing market in England and Wales as a whole, and thus our conclusions may not be applicable in all areas or on all sites. In augmenting our sample with 27 additional large sites, new to this edition of our research, we sought to include examples in the Letwin Review that were outside of London, only excluding them

Box 1: Letwin Review sites

1. Arborfield Green (also known as Arborfield Garrison), Wokingham
2. Ledsham Garden Village, Cheshire West & Chester
3. Great Kneighton (also known as Clay Farm), Cambridge (included in the first edition of this research)
4. Trumpington Meadows, Cambridge
5. Graven Hill, Cherwell
6. South West Bicester, Cherwell
7. Great Western Park, South Oxfordshire
8. Ebbsfleet, Gravesham and Dartford (included in the first edition of this research)

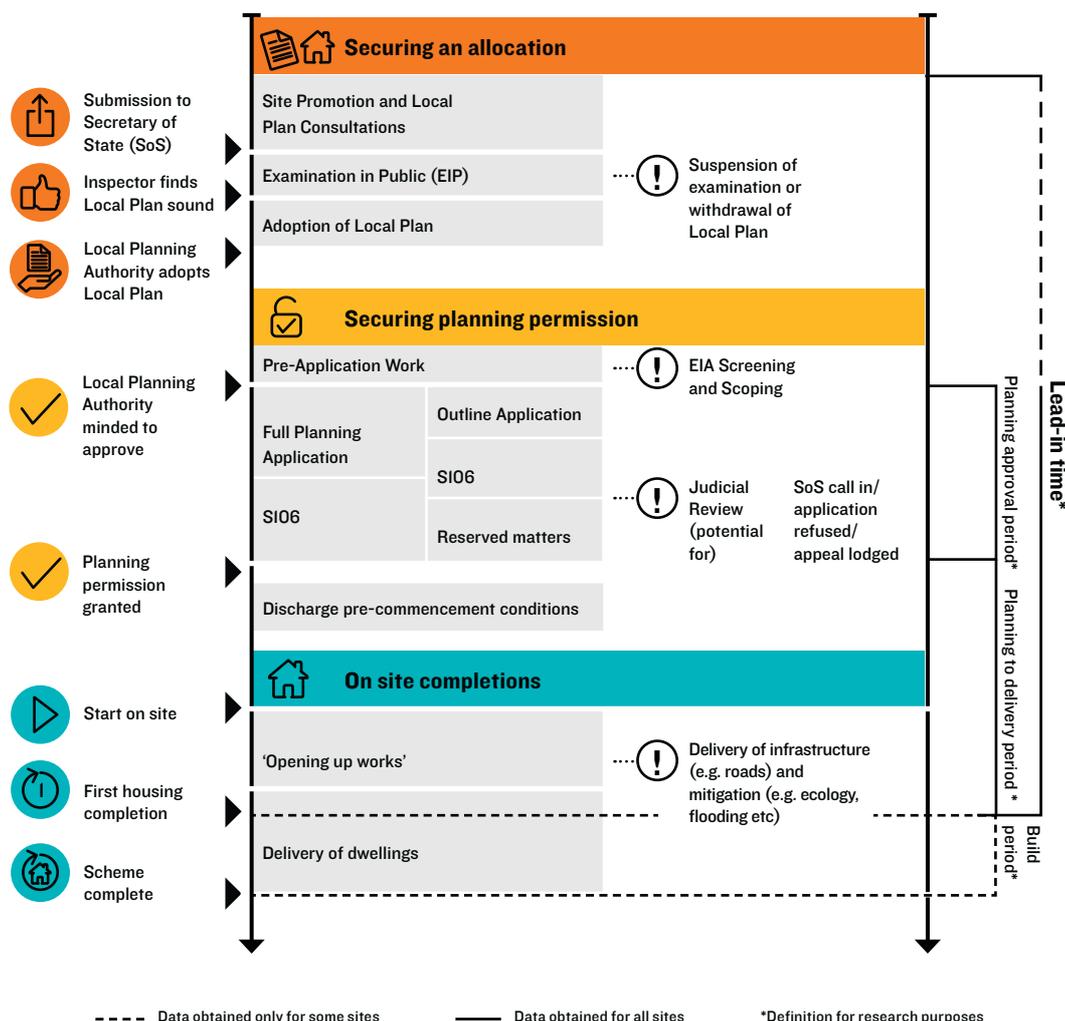
when it was difficult to obtain reliable data. The study therefore includes the Letwin Review's case studies listed in Box 1.

In most instances, we were unable to secure the precise completion figures for these sites that matched those cited in the Letwin Review. Sources for data Lichfields has obtained on completions for those sites that also appear in the Letwin Review are included at the end of Appendix 2.

The sources on which we have relied to secure delivery data on the relevant sites include:

1. Annual Monitoring Reports (AMRs) and other planning evidence base documents¹ produced by local authorities;
2. By contacting the relevant local planning authority, and in some instances the relevant County Council, to confirm the data or receive the most up to date figures from monitoring officers or planners; and
3. In a handful of instances obtaining/confirming the information from the relevant house builders.

Figure I: Timeline for the delivery of strategic housing sites



Source: Lichfields analysis

¹ Monitoring documents, five-year land supply reports, housing trajectories (some in land availability assessments), housing development reports and newsletters

196,714

units on large sites
of 500 or more
homes

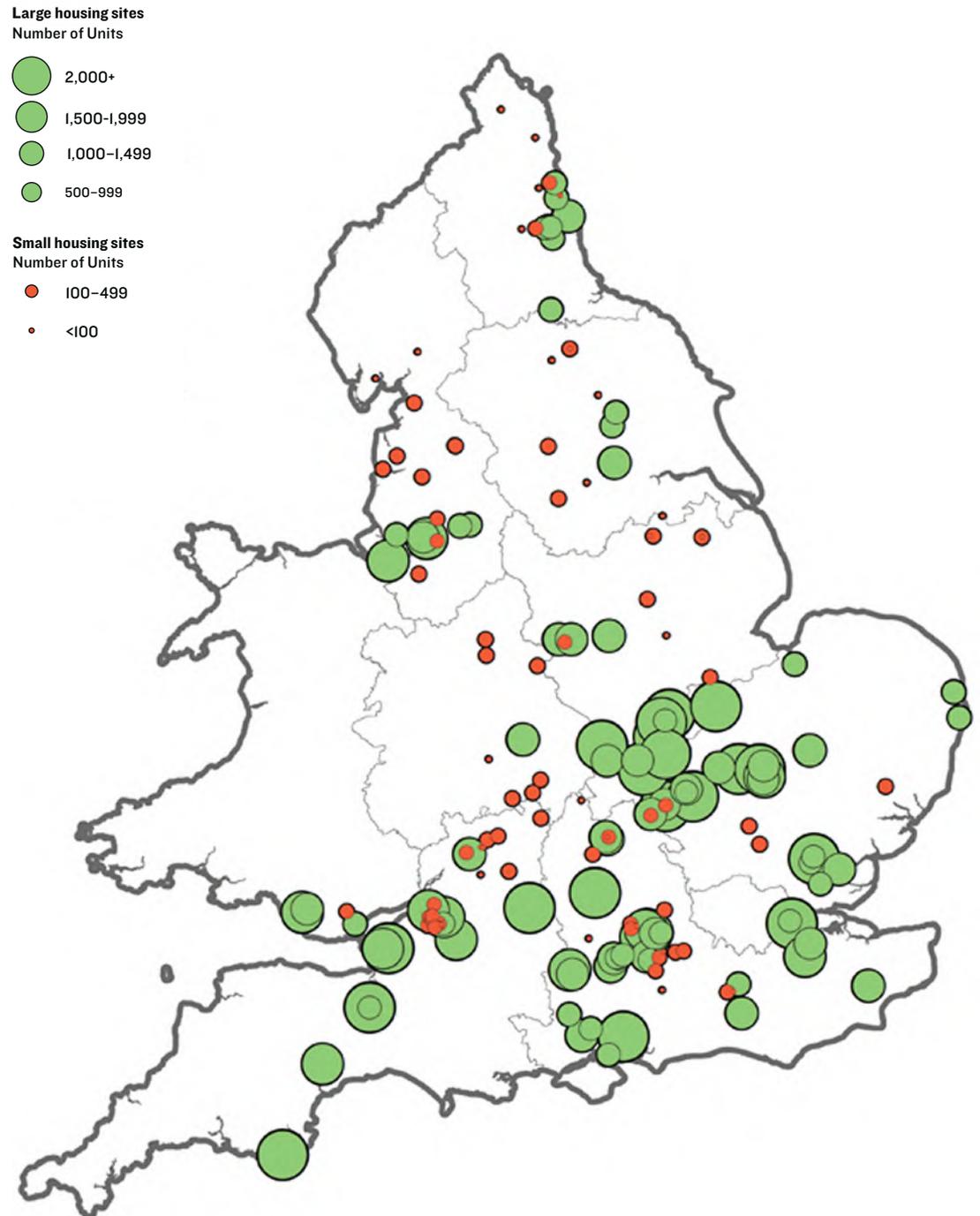
16,467

units on small sites
under 500 homes

35

sites of 2,000
homes or more

Figure 2: Map of site sample by size of site (total dwellings)



Source: Lichfields analysis

03 Timing is everything: how long does it take to get started?

In this section we look at lead in times, the time it takes for large sites to get the necessary planning approvals. Firstly, the changing context of what 'deliverable' means for development. Secondly, the 'planning approval period' (the time it takes for large sites to get the necessary planning approvals). And thirdly, the 'planning to delivery period' (the time from approval of the first detailed application to permit development of dwellings to the completion of the first dwelling).

The new definition of 'Deliverable'

The question of how quickly and how much housing a site can begin delivering once it has planning permission, or an allocation, has become more relevant since the publication of the new NPPF with its new definition of deliverable. Only sites which match the deliverability criteria (i.e. suitable now, available now and achievable with a realistic prospect that housing will be delivered on the site within five years) can be included in a calculation of a 5YHLS by a local authority. This definition was tightened in the revised NPPF which states that:

"sites with outline planning permission, permission in principle, allocated in the development plan or identified on a brownfield register should only be

considered deliverable where there is clear evidence that housing completions will begin on site within five years". (emphasis added)

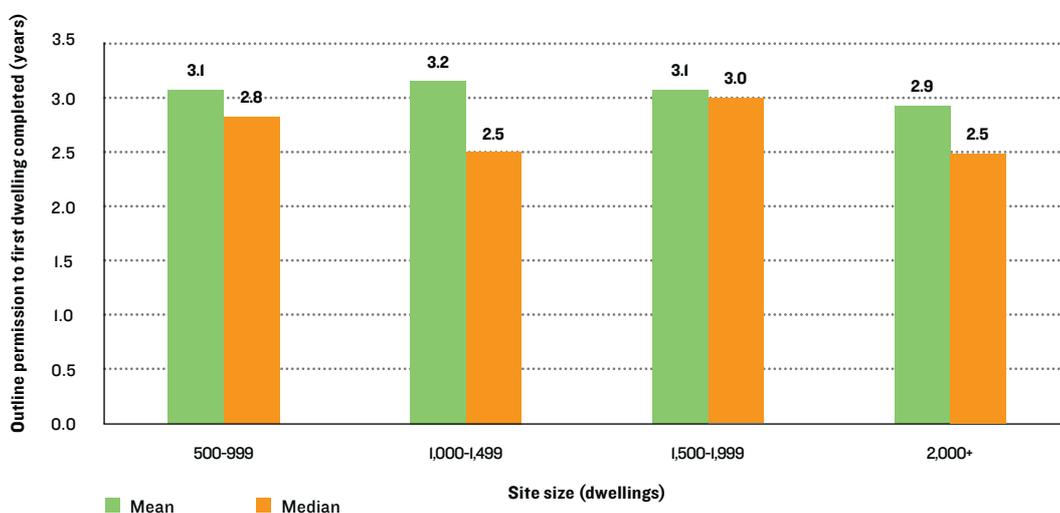
What constitutes 'clear evidence' was clarified in a number of early appeal decisions and in the Planning Practice Guidance² and can include information on progress being made towards submission of a reserved matters application, any progress on site assessment work and any relevant information about site viability, ownership constraints or infrastructure provision. In this context, it is relevant to look at how long it takes, on average, for a strategic housing site to progress from obtaining outline permission to delivering the first home (or how long it takes to obtain the first reserved matters approval, discharge pre-commencement conditions and open up the site), and then how much housing could be realistically expected to be completed in that same five-year period.

Based on our sample of large sites, the research shows that, upon granting of outline permission, the time taken to achieve the first dwelling is – on average c.3 years, regardless of site size. After this period an appropriate build-out rate based on the size of the site should also be considered as part of the assessment of deliverability (see Section 4). Outline planning permissions for strategic development are not

c.3 years

average time from obtaining outline permission to first dwelling completion on sites of 500+ homes

Figure 3: Average time taken from gaining outline permission to completion of the first dwelling on site (years), compared to site size



Source: Lichfeilds analysis

² Planning Practice Guidance Reference ID: 68-007-20190722



Only sites of fewer than 499 dwellings are on average likely to deliver any homes within an immediate five year period.

always obtained by the company that builds the houses, indeed master developers and other land promoters play a significant role in bringing forward large scale sites for housing development³. As such, some of these examples will include schemes where the land promoter or master developer will have to sell the site (or phases/parcels) to a housebuilder before the detailed planning application stage can commence, adding a step to the planning to delivery period.

Figure 4 considers the average timescales for delivery of the first dwelling from the validation of an outline planning application. This demonstrates that only sites comprising fewer than 499 dwellings are – on average – likely to deliver anything within an immediate five year period. The average time from validation of an outline application⁴ to the delivery of the first dwelling for large sites ranges from 5.0 to 8.4 years dependent on the size of the site, i.e. beyond an immediate five-year period for land supply calculations.

Comparison with our 2016 findings

Planning Approval Period

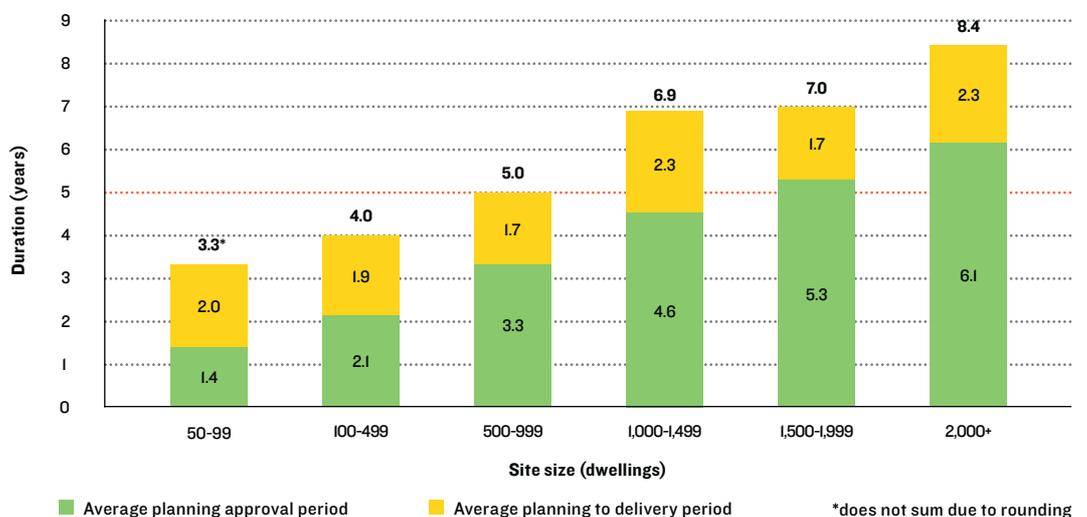
Our latest research reveals little difference between the average planning approval period by site size compared to the same analysis in the first edition (see Table 1). However, it is important to remember that these are average figures which come from a selection of large sites. There are significant variations within this average, with some sites progressing very slowly or quickly compared to the other examples. This is unsurprising as planning circumstances will vary between places and over time.

Table 1: Average planning approval period by size of site (years)

Site Size	1st edition research (years)	This research (years)
50-99	1.1	1.4
100-499	2.4	2.1
500-999	4.2	3.3
1,000-1,499	4.8	4.6
1,500-1,999	5.4	5.3
2,000+	6.1	6.1

Source: Lichfields analysis

Figure 4: Average timeframes from validation of first application to completion of the first dwelling



Source: Lichfields analysis

³ Realising Potential - our research for the Land Promoters and Developers Federation in 2017 - found that 41% of homes with outline planning permission were promoted by specialist land promoter and development companies, compared to 32% for volume house builders.

⁴ The planning approval period could also include a hybrid or full application, but on the basis of our examples this only impacts a small number of sites

Planning to Delivery Period

Although there is little difference between the average planning approval periods identified in this research compared to our first edition findings, the average lead-in time after securing planning permission is higher (Figure 5). It is this period during which pre-commencement planning conditions have to be discharged as well as other technical approvals and associated commercial agreements put in place.

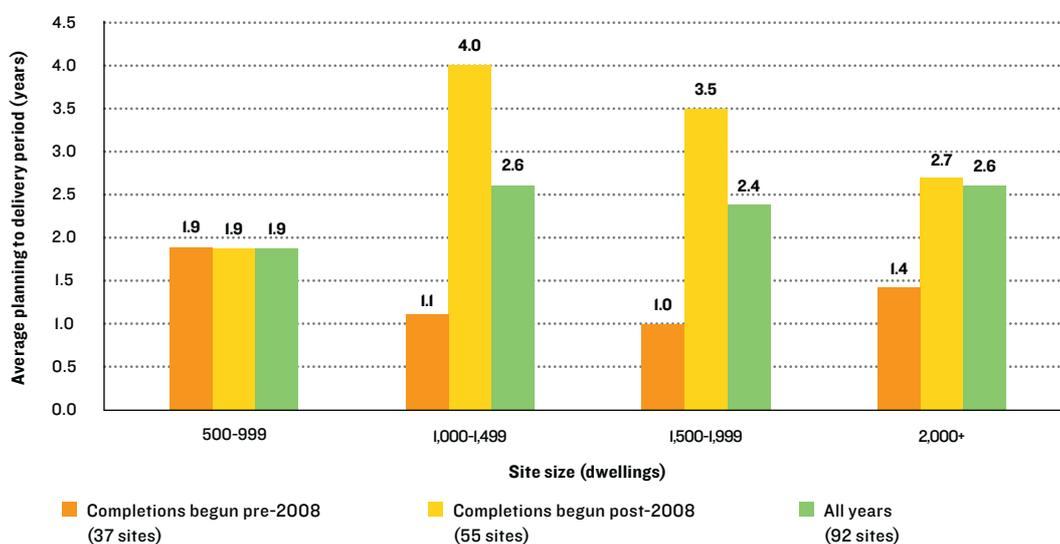
This is likely due to the inclusion of more recent proposed developments in this edition. Of the 27 new sites considered, 17 (63%) completed their first dwelling during or after 2012; this compares to just 14 (20%) out of 70 sites in the first edition of this research (albeit at the time of publication 8 of these sites had not delivered their first home but have subsequently). This implies that the introduction of more recent examples into the research, including existing examples which have now commenced delivery⁵, has seen the average for planning to delivery periods lengthening.

A similar trend is apparent considering the 55 sites that delivered their first completions after 2007/08. These have significantly longer planning to delivery periods than those where completions began prior to the recession. The precise reasons are not clear, but is perhaps to be expected given the slowdown in housing delivery during the recession, and the significant reductions in local authority planning resources which are necessary to support discharge of pre-commencement conditions. However, delays may lie outside the planning system; for example, delays in securing necessary technical approvals from other bodies and agencies, or market conditions.



Sites that delivered their first completion during or after the 2007/08 recession have significantly longer planning to delivery periods than sites which began before.

Figure 5: Planning to delivery period, total average, pre and post-2008



Source: Lichfields analysis

Figure 5: Five of the large sites examples do not have a first dwelling completion recorded in this research

⁵ Priors Hall has been amended since the first edition based on more recent data

In demand: how quickly do high pressure areas determine strategic applications for housing?

Using industry-standard affordability ratios, we found that areas with the least affordable places to purchase a home (i.e. the highest affordability ratios) tended to have longer planning to delivery times than areas that were more affordable. This is shown in Figure 6, which splits the large site sample into national affordability quartiles, with the national average equating to 8.72.

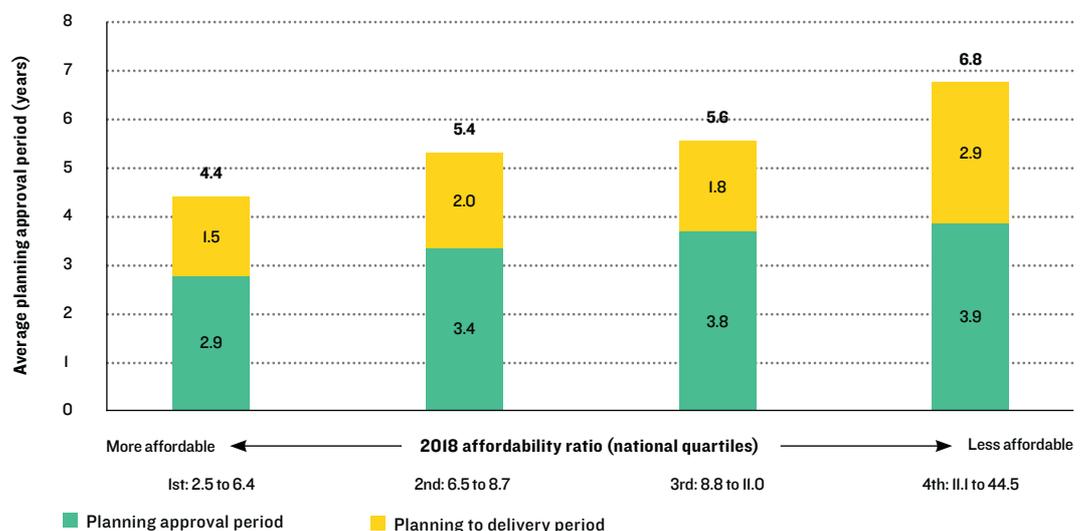
The above analysis coincides with the fact (Table 2) that sites in the most affordable locations (lowest quartile) tend to be smaller than those in less affordable locations (an average site size of c.1,150 compared to in excess of 2,000 dwellings for the three other quartiles). Even the least affordable LPAs (with the greatest gap between workplace earnings and house prices) have examples of large schemes with an average site size of 2,000+ dwellings. It may be that the more affordable markets do not support the scale of up-front infrastructure investment that is required for larger-scale developments and which lead to longer periods before new homes can be built. However, looking at the other three quartiles, the analysis does also suggest that planning and implementation becomes more challenging in less affordable locations.

Table 2: Site size by 2018 affordability ratio

Affordability ratio (workplace based)	Average site size
2.5 – 6.4	1,149
6.5 – 8.7	2,215
8.8 – 11.0	2,170
11.1 – 44.5	2,079

Source: Lichfields analysis

Figure 6: Planning approval period (years) by 2018 affordability ratio



Source: Lichfields analysis

04 How quickly do sites build out?

The rate at which new homes are built on sites is still one of the most contested matters at local plan examinations and planning inquiries which address 5YHLS and housing supply trajectories. The first edition of this research provided a range of 'real world' examples to illustrate what a typical large-scale site delivers annually. The research showed that even when some schemes were able to achieve very high annual build-out rates in a particular year (the top five annual figures were between 419-620 dwellings per annum), this rate of delivery was not always sustained. Indeed, for schemes of 2,000 or more dwellings the average annual completion rate across the delivery period was 160 dwellings per annum.

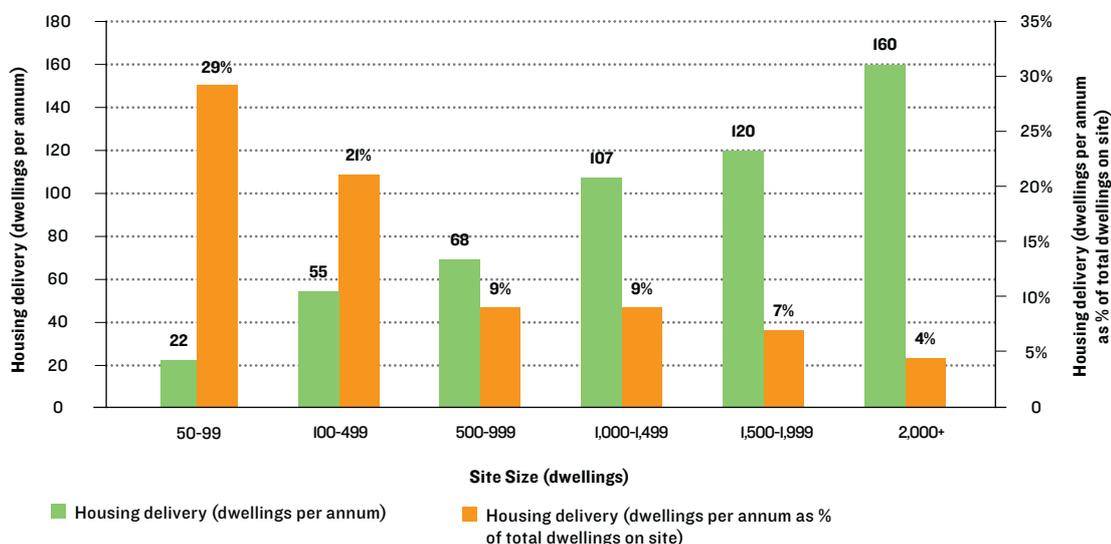
Average Annual Build-out rates

Figure 7 presents our updated results, with our additional 27 sites and the latest data for all sites considered. The analysis compares the size of site to its average annual build-out rate. Perhaps unsurprisingly, larger sites deliver on average more dwellings per year than smaller sites. The largest sites in our sample of over 2,000 dwellings, delivered on average more than twice as many dwellings per year than sites of 500-999 dwellings, which in turn delivered an average of three times as many units as sites of 1-99 units. To ensure the build-out rates averages are not unduly skewed, our analysis excludes any sites which have only just started delivering and have less than three years of data. This is because it is highly unlikely that the first annual completion figure would actually cover a whole monitoring year, and as such could distort the average when compared to only one other full year of delivery data.

160 dpa

the average annual build rate for schemes of 2,000+ dwellings

Figure 7: Build-out rate by size of site (dpa)



Source: Lichfields analysis

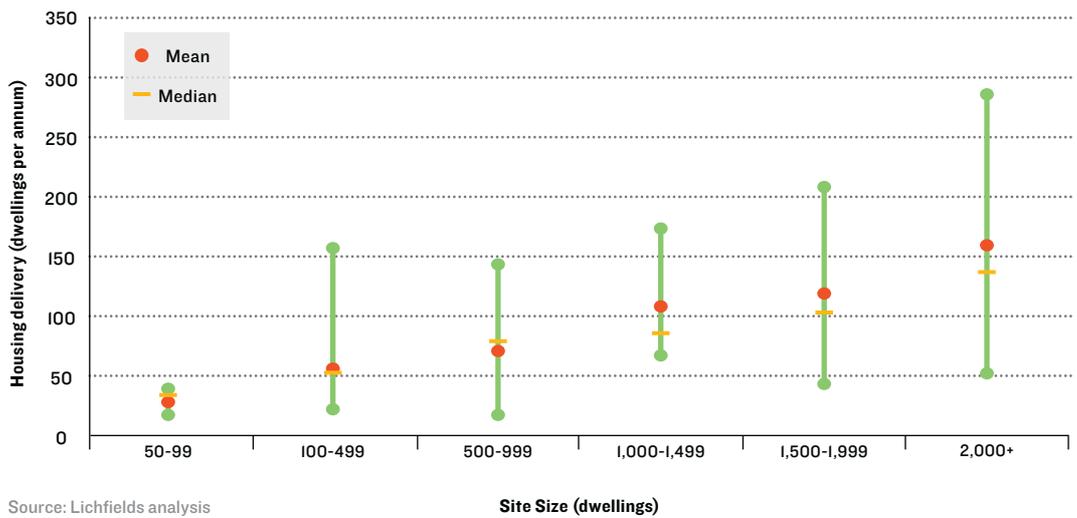


In most cases the median annual delivery rate is lower than the mean for larger sites.

We include the relevant percentage growth rates in this edition's analysis; this shows that the proportion of a site's total size that is build out each year reduces as site size increases.

Our use of averages refers to the arithmetic mean across the sample sites. In most cases the median of the rates seen on the larger sample sites is lower, as shown in Figure 8; this reflects the small number of sites which have higher delivery rates (the distribution is not equal around the average). The use of mean average in the analysis therefore already builds in a degree of optimism compared with the median or 'mid-point scheme'.

Figure 8: Minimum, mean, median and maximum build-out rates by size of site (dpa)



Source: Lichfields analysis

Table 3: Median and mean delivery rates by site size

Site Size	Number of sites	Median housing delivery (dwellings per annum)	Median delivery as % of total on site	Mean annual delivery (dwellings per annum)	Mean annual delivery as % of total units on site
50-99	29	27	33%	22	29%
100-499	54	54	24%	55	21%
500-999	24	73	9%	68	9%
1,000-1,499	17	88	8%	107	9%
1,500-1,999	9	104	7%	120	7%
2,000+	27	137	4%	160	4%

Source: Lichfields analysis

Comparison with our 2016 findings

Comparing these findings to those in the first edition of this research, there is very little difference between the averages observed (median was not presented) for different site sizes, as set out below. The largest difference is a decrease in average annual build-out rates for sites of 1,000-1,499 dwellings, but even then, this is only a reduction of 10 dpa or 9%.

As with the first edition of the research, these are averages and there are examples of sites which deliver significantly higher and lower than these averages, both overall and in individual years. Figure 8 shows the divergence from the average for different site size categories. This shows that whilst the average for the largest sites is 160 dpa and the median equivalent 137 dpa, the highest site average was 286 dpa and the lowest site average was 50 dpa for sites of 2,000+ dwellings. This shows the need for care in interpreting the findings of the research, there may well be specific factors that mean a specific site will build faster or slower than the average. We explore some of the factors later in this report.

Variations for individual schemes can be marked. For example, the 2,605 unit scheme South of the M4 in Wokingham delivered 419 homes in 2017/18, but this was more than double the completions in 2016/17 (174) and the average over all six years of delivery so far was just 147 dwellings per annum.

Even when sites have seen very high peak years of delivery, as Table 5 shows, no sites have been able to consistently delivery 300 dpa.



Site build-out rates for individual years are highly variable. For example, one scheme in Wokingham delivered more than twice as many homes in 2017/18 as it did in the year before.

Table 4: Mean delivery rates by site sizes, a comparison with first edition findings

Site size (dwellings)	2016 edition research (dpa)	2020 edition research (dpa)	Difference
50-99	27	22	-5 (-19%)
100-499	60	55	-5 (-8%)
500-999	70	68	-2 (-3%)
1,000-1,499	117	107	-10 (-9%)
1,500-1,999	129	120	-9 (-7%)
2,000+	161	160	-1 (-0.62%)

Source: Lichfields analysis

Table 5: Peak annual build-out rates compared against average annual delivery rates on those sites

Site	Site size (dwellings)	Peak annual build-out rate (dpa)	Average annual build-out rate (dpa)
Cambourne, South Cambridgeshire	4,343	620	223
Oakley Vale, Corby	3,100	520	180
Eastern Expansion Area, Milton Keynes	4,000	473	268
Clay Farm, Cambridge	2,169	467	260
South of M4, Wokingham	2,605	419	147
Cranbrook, East Devon	2,900	419	286

Source: Lichfields analysis

Table 5: Please note The Hamptons was included as an example of peak annual delivery in the first edition with one year reaching 520 completions. However, evidence for this figure is no longer available and as it was not possible to corroborate the figure it has been removed. The analysis has been updated to reflect the latest monitoring data from Peterborough City Council.

Longer term trends

This section considers the average build-out rates of sites which have been delivering over a long period of time. This is useful in terms of planning for housing trajectories in local plans when such trajectories may span an economic cycle.

In theory, sites of more than 2,000 dwellings will have the longest delivery periods. Therefore, to test long term averages we have calculated an average build-out rate for sites of 2,000+ dwellings that have ten years or more of completions data available.

For these sites, the average annual build-out rate is slightly higher than the average of all sites of that size (i.e. including those only part way through build out), at 165 dwellings per annum⁶. The median for these sites was also 165 dwellings per annum.

This indicates that higher rates of annual housing delivery on sites of this size are more likely to occur between years five and ten, i.e. after these sites have had time to ‘ramp up’.

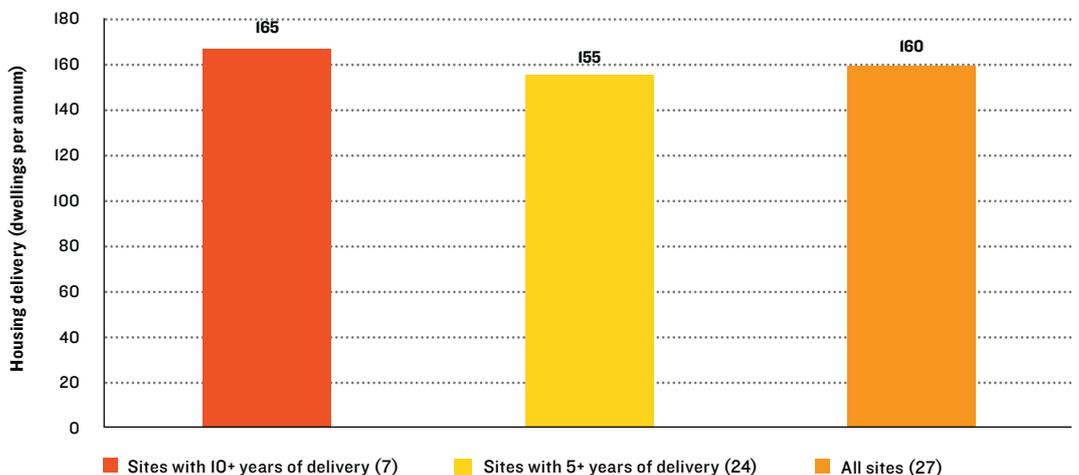
It might even relate to stages in delivery when multiple phases and therefore multiple outlets (including affordable housing) are operating at the same time. These factors are explored later in the report.

The impact of the recession on build-out rates

It is also helpful to consider the impact of market conditions on the build-out rate of large scale housing sites. Figure 10 overleaf shows the average delivery rate of sites of 2,000 or more dwellings in five-year tranches back to 1995/96. This shows that although annual build-out rates have improved slightly since the first half of the 2010’s, they remain 37% below the rates of the early 2000’s. The reasons for the difference are not clear and are worthy of further exploration – there could be wider market, industry structure, financial, planning or other factors at play.

In using evidence on rates of delivery for current/historic schemes, some planning authorities have suggested that one should adjust for the fact that rates of build out may have been affected by the impact of the recession. We have therefore considered how the average rates change with and without including the period of economic downturn (2008/09 – 2012/13). This is shown in Table 6 and it reveals that average build-out rates are only slightly depressed when one includes this period, but may not have fully recovered to their pre-recession peaks. We know that whilst the recession – with the crunch on mortgage

Figure 9: Average build-out rate for sites over 2,000 homes by length of delivery period (dpa)



Source: Lichfields analysis

⁶ This is based on the completions of seven examples, Chapelford Urban Village, Broadlands, Kings Hill, Oakley Vale, Cambourne, The Hamptons and Wixhams

availability – did have a big impact and led to the flow of new sites slowing, there were mechanisms put in place to help sustain the build out of existing sites.

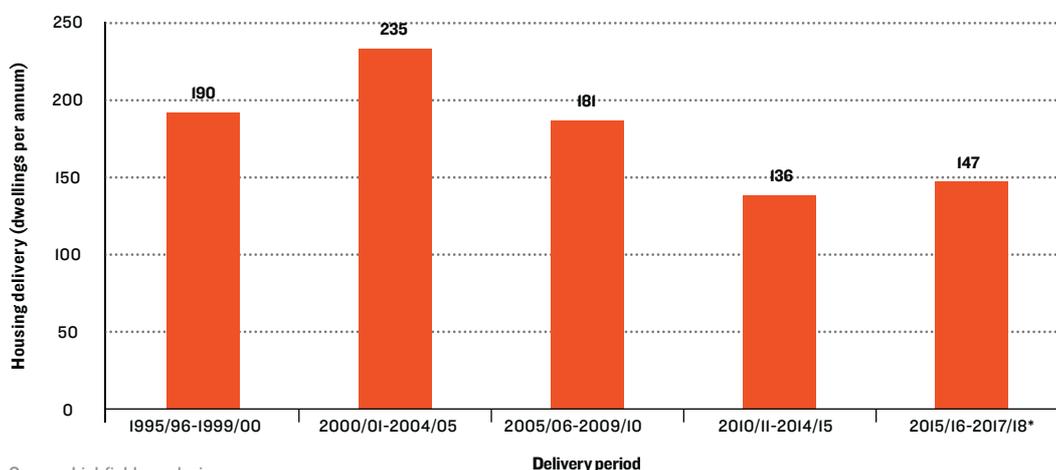
However, setting aside that stripping out the recession has a modest impact on the statistical averages for the sites in our sample, the more significant point is that – because of economic cycles - larger sites which build out over five or more years are inherently likely to coincide with a period of economic slowdown at some point during their build out. It therefore makes sense for housing trajectories for such sites to include an allowance for the prospect that, at some point, the rate of build out may slow due to a market downturn, albeit the effect may be smaller than one might suspect.

Table 6: Impact of recession on build-out rates

	Build-out rates in all years		Build-out rates excluding recession years (2008/9-2012/13)		Build-out rates pre-recession	
	Average rate	Sample size	Average rate	Sample size	Average rate	Sample size
All large sites 500+	115	77	126	68	130	21
All large sites 2,000+	160	27	171	25	242	6
Greenfield sites 2,000+	181	14	198	12	257	3

Source: Lichfields analysis

Figure 10: Average build-out rate by five year period for sites over 2,000 dwellings (dpa)



Source: Lichfields analysis

05 What factors can influence build-out rates?

+34%

higher average annual build-out rates on greenfield land compared with brownfield

Having established some broad averages and how these have changed over time, we turn now to look at what factors might influence the speed at which individual sites build out. How does housing demand influence site build out? What is the impact of affordable housing? Does it matter whether the site is greenfield or brownfield? What about location and site configuration?

In demand: do homes get delivered faster in high pressure areas?

One theory regarding annual build-out rates is that the rate at which homes can be sold (the 'absorption rate') determines the build-out rate. This is likely to be driven by levels of market demand relative to supply for the product being supplied.

This analysis considers whether demand for housing at the local authority level affects delivery rates by using (industry-standard) affordability ratios. Higher demand areas are indicated by a higher ratio of house prices to earnings i.e. less affordable. Whilst this is a broad-brush measure, the affordability ratio is a key metric in the assessment of local housing need under the Government's standard methodology. Figure 11 shows the sample of 500+ unit schemes divided into those where the local authority in which they are located is above or below the national median affordability ratio (8.72) for sites which have

delivered for three years or more. This analysis shows that sites in areas of higher demand (i.e. less affordable) deliver on average more dwellings per annum.

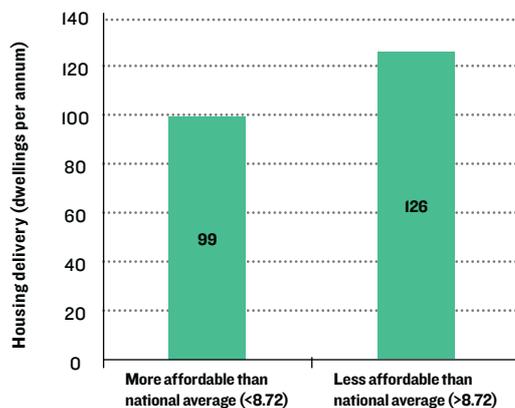
Our analysis also coincides with the fact that sites in less affordable areas are on average c.17% larger than those in more affordable areas. The average site size for schemes in areas where affordability is below the national average is 1,834 dwellings. For those delivered in areas where the affordability is greater than the national average, average site size is 2,145 dwellings. So, it is possible that the size of site – rather than affordability *per se* – is a factor here.

Do sites on greenfield land deliver more quickly?

The first edition of this research showed that greenfield sites on average delivered quicker than their brownfield counterparts. In our updated analysis this remains the case; large greenfield sites in our sample built out a third faster than large brownfield sites.

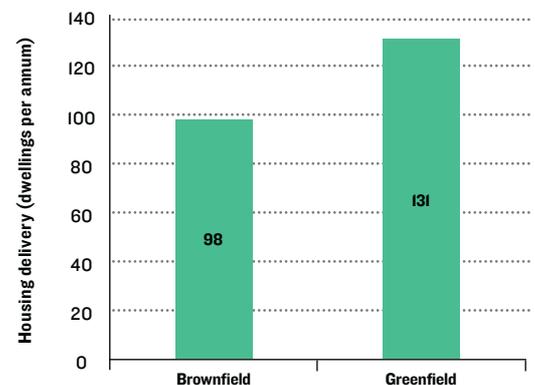
In the life cycle of a site, our data also shows that greenfield sites had shorter planning to delivery periods (2.0 years compared to 2.3 for brownfield sites), although on average, longer planning approval periods (5.1 years compared to 4.6 for brownfield sites).

Figure 11: Build-out rates by level of demand using national median 2018 workplace based affordability ratio (dpa)



Source: Lichfields analysis

Figure 12: Build-out rates on brownfield and greenfield sites (dpa)



Source: Lichfields analysis

Housing mix and variety

Among the more topical issues surrounding delivery rates on large-scale sites is the variety of housing on offer. The Letwin Review posited that increasing the diversity of dwellings on large sites in areas of high housing demand would help achieve a greater rate of build out. The report concluded that a variety of housing is likely to appeal to a wider, complementary range of potential customers which in turn would mean a greater absorption rate of housing by the local market.

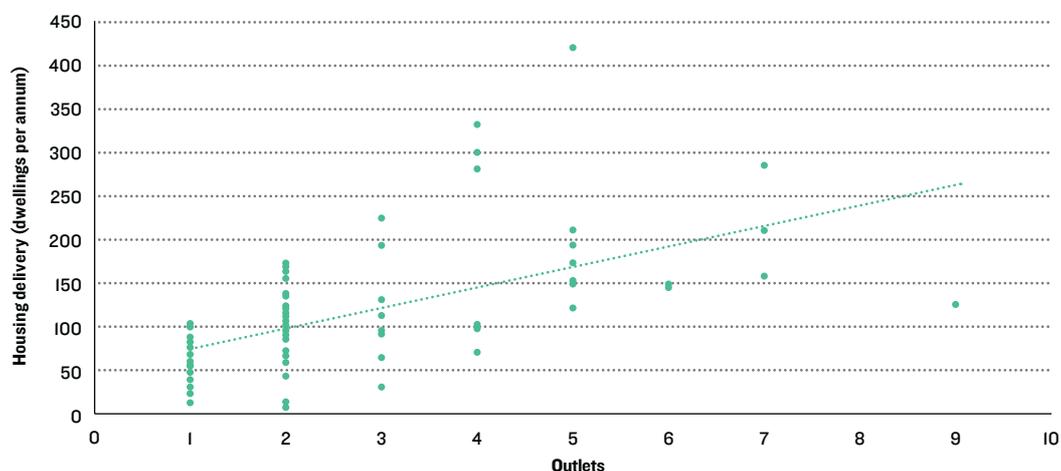
Consistent data on the mix of sizes, types and prices of homes built out on any given site is difficult to source, so we have used the number of sales outlets on a site as a proxy for variety of product. This gives the prospect of multiple house builders each seeking to build and sell homes for which there is demand in the face of 'competing' supply from other outlets (as revealed by the case study of Land South of the M4 in Wokingham). Letwin stated that "...it seems extraordinarily likely that the presence of more variety in these aesthetic characteristics would create more, separate markets"⁷. Clearly, it is likely that on many sites, competing builders may focus on a similar type of product, for example three or four bed family housing, but even across similar types of dwelling, there will be differences (in configuration, design, specification) that mean one product may be attractive to a purchaser in the way another might

not be. On this basis, we use the outlets metric as a proxy for variation. Based on the limited data available for this analysis, if two phases are being built out at the same time by the same housebuilder (e.g. two concurrent parcels by Bovis) this has been counted as one outlet with the assumption there is little variety (although it is clear that some builders may in reality differentiate their products on the same site). This data was derived from sites in a relatively small number of local planning authorities who publish information relating to outlets on site. It therefore represents a small sample of just 12 sites, albeit over many different years in which the number of outlets varied on the same site, giving a total of 80 data points i.e. individual delivery rates and number of outlets to compare.

Our analysis confirms that having more outlets operating at the same time will on average have a positive impact on build-out rates, as shown in Figure 13. However, there are limits to this, likely to be due to additional capacity from the outlets themselves as well as competition for buyers.

On a site-by-site basis, the average number of outlets open over the site's entire delivery lifetime had a fairly strong correlation with annual delivery, both as a percentage of total dwellings and in absolute terms, with a greater number of outlets contributing to higher levels of delivery. However, the completions per outlet did reduce with every additional outlet operating in that year.⁸

Figure 13: Build-out rates by number of outlets present (dpa)



Source: Lichfields analysis



Having more outlets operating at the same time will on average quicken build-out rates.

⁷ Letwin Review draft analysis report (June 2018) - final bullet of para 4.25

⁸ Average completions per outlet on site with one outlet was 61dpa, dropping to 51dpa for two outlets and 45dpa for three outlets.

Geography and Site Configuration

An under-explored aspect of large-scale site delivery is the physical opportunity on site. For example, some schemes lend themselves to simultaneous build out of phases which can have the impact of boosting delivery rates in that year, for example, by having access points from two alternative ends of the site. Other sites may be reliant on one key piece of infrastructure which make this opportunity less likely or impractical. In the first edition of this research we touched on this point in relation to Eastern Expansion Area (Broughton Gate & Brooklands) of Milton Keynes. As is widely recognised, the planning and delivery of housing in Milton Keynes is distinct from almost all the sites considered in this research as serviced parcels with the roads already provided were delivered as part of the Milton Keynes delivery model. Multiple house builders were able to proceed straight onto the site and commence delivery on different serviced parcels, with monitoring data from Milton

Keynes Council suggesting an average of c.12 parcels were active across the build period. In this second edition of this research the Milton Keynes examples remain some of the sites with the highest annual build-out rates.

Table 7: Parcels at Land South of M4, Wokingham

Parcel reference	Developers (active outlets)	Completions in 2017/18
SP1	Bellway (1)	59
SP2w	Bellway and Bovis (-)	None - parcel completed
SP3	Crest Nicholson (1)	47
SP4	Taylor Wimpey and David Wilson Homes (2)	140
SP9_I	Bloor, Bovis and Linden (3)	169
SP10	Darcliffe Homes (-)	None - parcel completed
SP11	Taylor Wimpey (1)	4

Source: Lichfields analysis

Figure 14: Map of parcels at Land South of M4, Wokingham



Source: © Google Earth 2020/ Wokingham Local Plan

In this edition we look at the case study of Land South of the M4 in Wokingham. In 2017/18 the site achieved a significant 419 completions. Using the local authority's granular recording of delivery on the site to date, we have been able to consider where these completions were coming forward from within the wider 2,605 dwelling scheme. As shown in Figure 14, in that year new homes were completed on five separate parcels with completions ranging from 4 to 169 dwellings. On some of these parcels (SP9_1 and SP4) there were two or three separate housebuilders building out, and in total on the site there were seven different house building companies active (the impact of multiple outlets on build-out rates is explored later in this report). The parcels are located in separate parts of the site and each had their own road frontages and access arrangements which meant they are able to come forward in parallel. This can enable an increased build rate.

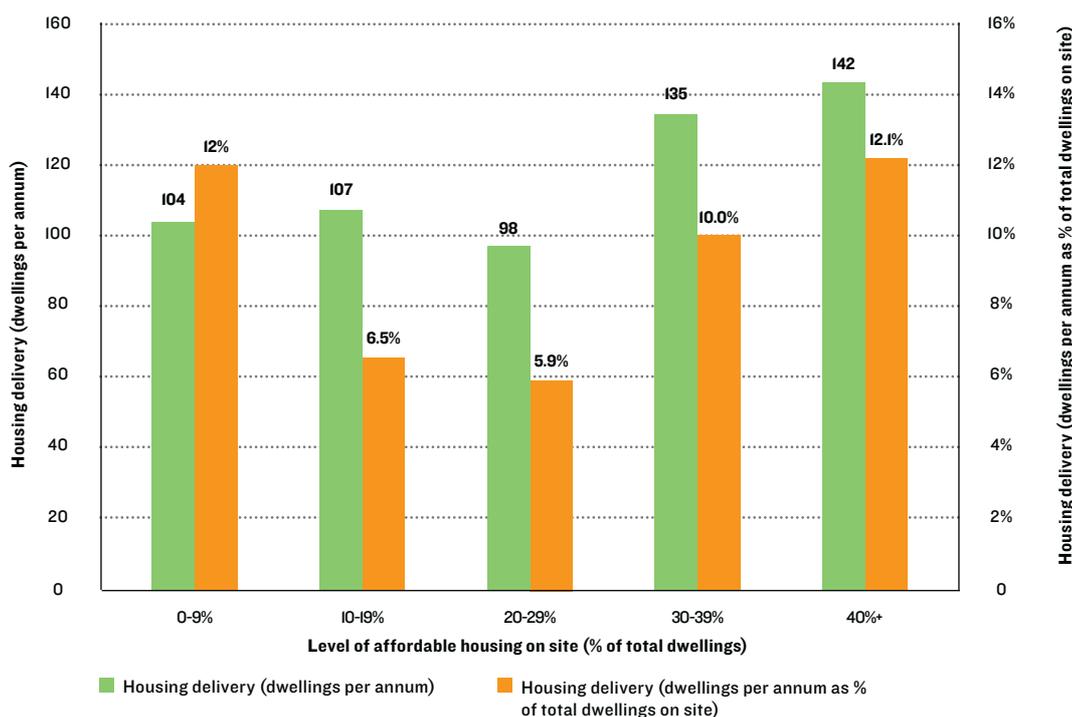
Affordable choices: do different tenures provide more demand?

Our findings on tenure, another form of 'variety' in terms of house building products, are informed by data that is available on about half the sites in our large site sample. From this the analysis shows schemes with more affordable housing built out at close to twice the rate as those with lower levels of affordable housing as a percentage of all dwellings on site. However this is not always the case. Schemes with 20-29% affordable housing had the lowest build-out rates, both in terms of dwellings and proportionate to their size.



Schemes with more affordable housing built out at close to twice the rates as those with lower levels.

Figure 15: Build-out rates by level of affordable housing (dpa and percentage)



Source: Lichfields analysis

06

Conclusions

Recent changes to national planning policy emphasise the importance of having a realistic expectation of delivery on large-scale housing sites, whilst local authorities now find themselves subject to both forward and backward-looking housing delivery performance measures. A number of local plans have hit troubles because they over-estimated the yield from some of their proposed allocations. Meanwhile, it is no longer sufficient for a 5YHLS to look good on paper; the Housing Delivery Test means there are consequences if it fails to convert into homes built.

To ensure local authorities are prepared for these tests, plan making and the work involved in maintaining housing land supply must be driven by realistic and flexible housing trajectories, based on evidence and the specific characteristics of individual sites and local markets. For local authorities to deliver housing in a manner which is truly plan-led, this is likely to mean allocating more sites rather than less, with a good mix of types and sizes, and being realistic about how fast they will deliver so supply is maintained throughout the plan period. Equally, recognising the ambition and benefits of more rapid build out on large sites, it may mean a greater focus on how such sites are developed.

Our research provides those in the public and private sector with a series of real-world benchmarks in this complex area of planning for large scale housing, which can be particularly

helpful in locations where there is little recent experience of such strategic developments. Whilst we present some statistical averages, the real relevance of our findings is that there are likely to be many factors which affect lead-in times and build-out rates, and that these - alongside the characteristics of individual sites - need to be considered carefully by local authorities relying on large sites to deliver planned housing.

In too many local plans and 5YHLS cases, there is insufficient evidence for how large sites are treated in housing trajectories. This research seeks to fill the gap with some benchmark figures - which can be of some assistance where there is limited or no local evidence. But the average derived from our analysis are not intended to be definitive and are no alternative to having a robust, bottom-up justification for the delivery trajectory of any given site. It is clear from our analysis that some sites start and deliver more quickly than the average, whilst others have delivered much more slowly. Every site is different. Therefore, whilst the averages observed in this research may be a good starting point, there are a number of key questions to consider when estimating delivery on large housing sites, based around the three key elements in the three-tier analytical framework at Figure 16.

Key findings:**1 Large schemes can take 5+ years to start**

In developing a local plan, but especially in calculating a 5YHLS position, it is important to factor in a realistic planning approval period dependent on the size of the site. Our research shows that if a scheme of more than 500 dwellings has an outline permission, then the average time to deliver its first home is two or three years. However, from the date at which an outline application is validated it can be 5.0 - 8.4 years for the first home to be delivered dependent on the size of the site. In these circumstances, such sites would make no contribution to completions in the first five years.

2 Lead-in times jumped post-recession

Whilst attention and evidence gathering is often focused on how long it takes to get planning permission, the planning to delivery period from gaining permission to building the first house has also been increasing. Our research shows that the planning to delivery period for large sites completed since 2007/08 has jumped compared to those where the first completion came before 2007/08. This is a key area where improvements could be sought on timeliness and in streamlining pre-commencement conditions, but is also likely impacted by a number of macro factors including the recession and reductions in local authority planning resources.

3 Large greenfield sites deliver quicker

Large sites can deliver more homes per year over a longer time period, with this seeming to ramp up beyond year five of the development on sites of 2,000+ units. However, on average these longer-term sites also have longer lead-in times. Therefore, short term boosts in supply, where needed, are likely to also require a good mix of smaller sites. Furthermore, large scale greenfield sites deliver at a quicker rate than their brownfield equivalents: the average rate of build out for greenfield sites in our sample was 34% greater than the equivalent figure for those on brownfield land. In most locations, a good mix of types of site will therefore be required.

4 Outlets and tenure matter

Our analysis suggests that having additional outlets on site has a positive impact on build out rates, although there is not a linear relationship. Interestingly, we also found that schemes with more affordable housing (more than 30%) built out at close to twice the rate as those with lower levels of affordable housing as a percentage of all units on site, but those with 20-29% had the lowest rates of all. Local plans should reflect that – where viable – higher rates of affordable housing supports greater rates of delivery. This principle is also likely to apply to other sectors that complement market housing for sale, such as build to rent and self-build (where there is demand).

Figure 16: Key questions for assessing large site build-out rates and delivery timelines



Appendices

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Appendix 1: Definitions and notes

The 'lead in'

Measures the period up to first completion of a house on site from the validation date of the first planning application made for the scheme. The lead-in time covers both the planning approval period and planning to delivery periods set out below. The lead-in time does also include the date of the first formal identification of the site as a potential housing allocation (e.g. in a LPA policy document), but consistent data on this for the sample is not available.

The 'planning period'

Measured from the validation date of the first application for the proposed development (be that an outline, full or hybrid application). The end date is the decision date of the first detailed application which permits the development of dwellings on site (this may be a full or hybrid application or the first reserved matters approval which includes details for housing). A measurement based on a detailed 'consent' was considered reasonable and proportionate milestone for 'planning' in the context of this research.

The 'planning to delivery period'

Includes the discharge of any pre-commencement and any opening up works required to deliver the site. It finishes on completion of the first dwelling.

The date of the 'first housing completion'

On site (the month and year) is used where the data is available. However, in most instances the monitoring year of the first completion is all that is available and in these cases a mid-point of the monitoring period (1st October, falling halfway between 1st April and the following 31st March) is used.

The 'annual build-out rate'

Each site is taken or inferred from a number of sources. This includes Annual Monitoring Reports (AMR's) and other planning evidence base documents produced by local authorities (see footnote 1), contacting the local planning authority monitoring officers or planners and in a handful of instances obtaining the information from housebuilders.

Due to the varying ages of the assessed sites, the implementation of some schemes was more advanced than others and, as a function of the desk-based nature of the research and the age of some of the sites assessed, there have been some data limitations, which means there is not a complete data set for every assessed site. For example, lead-in time information prior to submission of planning applications is not available for the vast majority of sites. And because not all of the sites assessed have commenced housing delivery, build-out rate information is not universal. The results are presented accordingly.

Sources for sites also found in the Letwin Review

Arborfield Green (Arborfield Garrison)	Five Year Housing Land Supply Statement and appendix on Strategic Development Locations at 31st March 2018 published 9th October 2018 http://www.wokingham.gov.uk/planning-policy/planning-policy-information/evidence-topics/
Ledsham Garden Village	Various Housing Land Monitor Reports https://consult.cheshirewestandchester.gov.uk/portal/cwc_ldf/mon/
Great Kneighton (Clay Farm)	Partly provided by Cambridgeshire County Council and included in numerous AMR's https://www.cambridge.gov.uk/annual-monitoring-reports
Trumpington Meadows	Included in numerous AMR's for Cambridge and South Cambridgeshire (site crosses boundaries) https://www.cambridge.gov.uk/annual-monitoring-reports and https://www.scambs.gov.uk/planning/local-plan-and-neighbourhood-planning/annual-monitoring-report/
Graven Hill	Various Annual monitoring reports https://www.cherwell.gov.uk/info/33/planning-policy/370/monitoring-reports
South West Bicester (Kingsmere Phase I)	Various Annual monitoring reports https://www.cherwell.gov.uk/info/33/planning-policy/370/monitoring-reports
Great Western Park	Housing Land Supply Statement April 2018 http://www.southoxon.gov.uk/sites/default/files/30.04.2018%20Housing%20Land%20Supply%20Statement%20FINAL%20(2)%20combined.pdf
Ebbsfleet:	First phase at Springhead Park and Northfleet South from Gravesham AMR's 2009/10 to 2012/13
2009-10:	127 completions https://www.gravesham.gov.uk/__data/assets/pdf_file/0010/69823/AMR2010.pdf
2010-11:	79 completions https://www.gravesham.gov.uk/__data/assets/pdf_file/0010/69814/AMR2011.pdf
2011-12:	55 completions https://www.gravesham.gov.uk/__data/assets/pdf_file/0009/92448/Gravesham-Authority-Monitoring-Report-2011-12-May-2013.pdf
2012-13:	50 completions https://www.gravesham.gov.uk/__data/assets/pdf_file/0010/92449/Gravesham-Authority-Monitoring-Report-2012-13-interim-May-2013.pdf
2013/14:	87 dwellings, based on total completions from Gravesham to 2012/13 of 311 and total completions to the start of 2014/15 in the Ebbsfleet Garden City Latest Starts and Completion Figures totalling 398.
2014/15 to 2017/18:	Ebbsfleet Garden City Latest Starts and Completion Figures: https://ebbsfleetdc.org.uk/tracking-our-performance/

Appendix 3:

Small sites tables

Site Name	Local Planning Authority	Size	Site Name	Local Planning Authority	Size	Site Name	Local Planning Authority	Size
Cookridge Hospital	Leeds	495	GCHQ Oakley - Phase I	Cheltenham	262	Auction Mart	South Lakeland	94
Stenson Fields	South Derbyshire	487	Hewlett Packard (Land Adjacent To Romney House)	Bristol, City of	242	Parcel 4 Gloucester Business Park	Tewkesbury	94
Horfield Estate Phase I	Bristol City Council	485	I28-134 Bridge Road And Nos 1 - 4 Oldfield Road	Windsor and Maidenhead	242	York Road	Hambleton	93
Farnborough Business Park	Rushmoor	476	Hoval Ltd North Gate	Newark and Sherwood	196	Land At Green Road - Reading College	Reading	93
Bickershaw Colliery	Wigan	471	Notcutts Nursery, I50 - I52 London Road	Cherwell	182	Caistor Road	West Lindsey	89
Farington Park, east of Wheelton Lane	South Ribble	468	Sellars Farm	Stroud	176	The Kylins	Northumberland	88
Bleach Green	Gateshead	456	Land South of Inervet Campus Off Brickhill Street, Walton, Milton Keynes	Milton Keynes	176	North East Area Professional Centre, Furnace Drive	Crawley	76
Kingsmead South	Milton Keynes Council	450	Queen Mary School	Fylde	169	Land at Willoughbys Bank	Northumberland	76
New Central	Woking Borough Council	445	London Road/ Adj. St Francis Close	East Hertfordshire	149	Watermead, Land At Kennel Lane	Tewkesbury	72
Land at former Battle Hospital	Reading Borough Council	434	Land off Gallamore Lane	West Lindsey	149	Land to the North of Walk Mill Drive	Wychavon	71
New World House	Warrington	426	Doxey Road	Stafford	145	Hawthorn Croft (Off Hawthorn Avenue Old Slaughterhouse Site)	West Lindsey	69
Radyr Sidings	Cardiff	421	Former York Trailers (two schemes - one Barratt, one DWH)	Hambleton	145	Land off Crown Lane	Wychavon	68
Luneside West	Lancaster	403	Bracken Park, Land At Corringham Road	West Lindsey	141	Former Wensleydale School	Northumberland	68
Woolley Edge Park	Wakefield	375	Land at Farnham Hospital	Waverley	134	Land at Lintham Drive	South Gloucestershire	68
Former Masons Cerement Works and Adjoining Ministry of Defence Land	Mid Suffolk	365	North of Douglas Road	South Gloucestershire	131	Springfield Road	South Kesteven	67
Former NCB Workshops (Portland Park)	Northumberland	357	Land to the east of Efflinch Lane	East Staffordshire	130	Land off Cirencester Rd	Stroud	66
Chatham Street Car Park Complex	Reading	307	Land to the rear of Mount Pleasant	Cheshire West and Chester	127	Land south of Pinchington Lane	West Berkshire	64
Kennet Island Phase I - H, M, T, U1, U2	Reading	303	Primrose Mill Site	Ribble Valley	126	Land at Prudhoe Hospital	Northumberland	60
Land at Dorian Road	Bristol, City of	300	Kennet Island Phase IB - E, F, O & Q	Reading	125	Oxfordshire County Council Highways Depot	Cherwell	60
Land at Fire Service College, London Road	Cotswold	299	Land between Godsey Lane and Towngate East	South Kesteven	120	Clewborough House School	Cherwell	60
Land at Badsey Road	Wychavon	298	Bibby Scientific Ltd	Stafford	120	Land at the Beacon, Tilford Road	Waverley	59
Land at Brookwood Farm	Woking	297	Land west of Birchwood Road	Bristol, City of	119	Land to Rear Of 28 - 34 Bedale Road	Hambleton	59
Long Marston Storage Depot Phase I	Stratford-on-Avon	284	Former Bewbush Leisure Centre Site	Crawley	112	Hanwell Fields Development	Cherwell	59
M & G Sports Ground, Golden Yolk and Middle Farm	Tewkesbury	273	Land south of Station Road	East Hertfordshire	111	Fenton Grange	Northumberland	54
Land at Canons Marsh	Bristol, City of	272	Poppy Meadow	Stratford-on-Avon	106	Former Downend Lower School	South Gloucestershire	52
Land off Henthorn Road	Ribble Valley	270	Weeton Road/Fleetwood Road	Fylde	106	Holme Farm, Carleton Road	Wakefield	50
Land Between A419 And A417	Cotswold	270	Former York Trailers (two schemes - one Barratt, one DWH)	Hambleton	96	Land off Elizabeth Close	West Lindsey	50
Hortham Hospital	South Gloucestershire	270	North East Sandylands	South Lakeland	94			

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STRAT315

Wiltshire Local Plan Review 2016-2036: Emerging Strategy

Prepared by Savills
on behalf of Hallam Land Management

1. Introduction

- 1.1 This Representation is made in response to the consultation on the Wiltshire Council (WC) Local Plan Review (LPR) 2016-2036: Emerging Strategy. The representation is submitted by Savills on behalf of Hallam Land Management (HLM) who has an interest in land to the south of Western Way, Melksham. A copy of the Site Location Plan is attached at **Appendix 1**.
- 1.2 By way of context, HLM controls an area of land comprising approximately 10.5 hectares adjacent to the southern edge of Melksham. Prior to the LPR, through the 2017 Strategic Housing and Employment Land Availability Assessment (SHELAA), the site has been identified as suitable, available, achievable, deliverable and developable in the short-term (Reference: 1025).
- 1.3 The site is currently subject to a pending planning application up to 240 dwellings, a 70-bed care home, open space including parkland, community orchard and informal recreation, alongside appropriate supporting infrastructure (App Ref: 20/08400/OUT). We discuss the application in further detail later in the representations.
- 1.4 Our comments on the consultation and supporting evidence base are set out below and are made in accordance with paragraph 35 of the NPPF, to assist in ensuring that the LPR is found sound when examined in the future. We note that there is an ongoing consultation in regard to the changes to the NPPF, and that it is likely, given the published timelines for the LPR, that these will be made prior to the LPR reaching a sufficiently advanced stage, and thus it will be this revised Framework upon which the LPR will be examined.

2. Emerging Spatial Strategy

Plan Period

- 2.1 The proposed timelines for the LPR, with adoption planned for Q2 2023, would mean that it fails to accord with the NPPF's requirement for a "*minimum 15 year plan period from adoption*" (paragraph 22). This must be rectified before proceeding to the next stage of the Local Plan Review. In setting the future end date, we would suggest sufficient flexibility is included to allow for any potential slippages in the plan making process.
- 2.2 In addition, it is not appropriate to retain the base date of 2016. This is already 5 years out of date, and on adoption, the plan would be seven years post-base date. The published evidence base needs a full update, with reliance on reports from the defunct Swindon and Wiltshire Spatial Framework Plan dated 2016/17 not forming a robust evidence base upon which to consider the soundness of the emerging LPR. As such, the plan should be rebased to 2019; with the associated updated evidence base.

Housing Need

- 2.3 We note that WC have not chosen to update the Local Housing Needs (LHN) Assessment (2019) published as part of the informal consultation in August 2019, and recognise that at the point of drafting this consultation document, that the outcome of the national consultation on the standard method was unknown. Subsequently, the Government have published their response, and as such, a comprehensive update of the evidence supporting the proposed housing target is required.
- 2.4 In accordance with the NPPF and PPG, the standard method should be used to identify the 'minimum annual housing need figure'; and then consideration given to whether there is a need for the housing requirement to be higher to account for local circumstances; such as economic projections, previous rates of delivery and the need to deliver affordable housing to meet demonstrable local needs (see PPG 2a-010-20201216 and 2a-024-20190220).
- 2.5 The current 2020 standard method figure for Wiltshire is 2,006 dwellings per annum. As per the PPG, in moving towards the Examination of the LPR, the housing need figure must be "kept under review and revised where appropriate" (PPG: 2a-008-20190220). The updated affordability ratios are due for publication on the 25 March 2021; and thus a 2021 based LHN figure can be calculated prior to the next stage of the LPR. It is noted that the outcome of the 2019 LHN suggest an annualised requirement of 2,285 was required.
- 2.6 In this regard, we note that the LHN cannot be used retrospectively; with the annual affordability ratio responding to any 'oversupply' earlier in the plan period. Thus, the minimum housing requirement for Wiltshire is 2,006 homes per annum from 2020 (32,096 over the current 16 year remaining plan period) – with this to be updated shortly to a 2021 base date; and there is no ability to reduce this due to housing delivery between 2016-2020.

2.7 The implications on the housing requirement for Wiltshire (based on 2020) would therefore be:

Plan Period	Housing Delivered	LHN
2016-2019	7,817 ¹	
2019-2020	2,020 ²	
2020-2036		32,096 ³
Housing Requirement	41,933	

2.8 The PPG questions the appropriateness of a housing target which is lower than previous levels of delivery (PPG: 2a-010-20201216); which is the case for Wiltshire, where housing delivery has been above the LHN figure in seven of the last ten years. A housing target which seeks a reduction in housing delivery cannot be considered to be “significantly boosting” the supply of homes; contrary to the Government’s objective set out in paragraph 60, NPPF.

2.9 In addition to ensuring that the housing requirement is reflecting the national objective of significantly boosting the supply of homes, it is also necessary to consider economic growth projections and strategies: including, but not limited to: “situations where increases in housing need are likely to exceed past trends because of:

- *growth strategies for the area that are likely to be deliverable, for example where funding is in place to promote and facilitate additional growth (e.g. Housing Deals);*
- *strategic infrastructure improvements that are likely to drive an increase in the homes needed locally; or*
- *an authority agreeing to take on unmet need from neighbouring authorities, as set out in a statement of common ground.”*

2.10 The LHN Assessment (2019) recognised this, and considered a number of adjustments to LHN, including anticipated employment growth, and longer term migration trends. In updating this evidence base, it will be necessary to review the economic evidence, including the Economic and Development Needs Assessment (EDNA) (2017) which itself utilised forecasts provided in January 2016 (Oxford Economics) and November 2015 (Cambridge Econometrics); but also to reflect the growth aspirations of the Swindon and Wiltshire Strategic Economic Plan, and the strategies coming forward to support the economic recovery.

2.11 Finally, the PPG affirms that a further adjustment to the housing requirement may be required in response to the need for, and delivery of, affordable housing. We note that at this time, no evidence has been provided on the affordable housing needs of Wiltshire – which should be informing both the overall housing requirement, but also the spatial strategy. This evidence must be published as part of the next consultation stage on the LPR.

¹ Wiltshire AMR

² MHCLG Table 253a Housing Completions by LPA

³ 16 x 2,006

Housing Delivery

2.12 It is not immediately clear within the consultation document the strategy for housing delivery outside of the three Principal Settlements, with references made to both Neighbourhood Plans and a future review of the Wiltshire Housing Site Allocations Plan (WHSAP).

2.13 Paragraph 3.4 of the Emerging Spatial Strategy consultation document stats that:

“At Market Towns, preferred sites have not been selected. Instead, their Planning for Settlement Statements present sites considered to be the reasonable alternatives at each place. Views are invited on the most appropriate to allocate. Generally, only a small number of sites will need to be allocated. They may be selected by local communities if they are progressing or reviewing a neighbourhood plan. In other places, it will be the role of the Local Plan Review”.

2.14 It is concerning to see such a suggestion included within the consultation document, and in our view it is entirely inappropriate to suggest that market towns should only deliver growth as part of a Neighbourhood Plan (if being prepared). Given the plan period proposed and the wider housing need, the LPR must look to allocate sites at the market towns as well as the principal settlements in order to ensure a balanced spread of housing delivery.

2.15 We therefore consider that more emphasis should be placed within the LPR on the need to deliver housing and allocate appropriate sites at the market towns.

2.16 With a plan period of less than 15 years, and a significant existing issue in regard to five year housing land supply, there is a clear need to allocate housing sites which will deliver in the short/medium term. This is emphasised by the requirement for the LPR to be able to demonstrate a five year housing land supply at adoption (paragraph 73, NPPF).

2.17 This will not be accomplished with the singular large scale strategic sites proposed in the Principal Settlements, or indeed any single large scale allocations at any of the Market Towns; which will take years to come forward (particularly if they are tied to the delivery of substantive infrastructure items such as bypasses which are reliant on external funding). This has been illustrated in the Core Strategy strategic sites, where, whilst adopted in January 2015, there are a significant number of strategic sites which have yet to deliver a single unit: including West of Warminster, Ashton Park and Ludgershill – which combined account for nearly 4,000 units; and none will deliver until 2024 at the earliest.

2.18 Housing delivery is best accomplished through a suitable mix of housing sites – indeed this is a requirement of the NPPF (paragraph 67). This should reflect both location and site size to ensure a robust supply of housing land, and a varied housing market; ensuring there is no over-reliance on the delivery of a handful of larger, difficult to deliver sites.

2.19 In this regard, we note that the Market Towns need to identify an additional 7,330 dwellings: 1,240 via brownfield sites, and 6,090 dwellings on greenfield sites. This is substantial, and a significantly higher quantum of development than any Neighbourhood Plans have delivered to date. It forms a significant element of the spatial strategy; thus it must be demonstrated that it is deliverable through the allocation of a suitable range of housing sites.

3. Addressing Climate Change and Biodiversity Net Gain

Land Use Policies

- 3.1 The most appropriate mechanism to address climate change through the local plan process is the distribution of development – directing development to those locations where there are opportunities for employment, and/or are well served by the public transport network

Flood Risk and Sustainable Drainage

- 3.2 Flood risk policy must reflect national policy and guidance. The Environment Agency set the level of greenfield runoff rates, including the appropriate plus climate change scenario. This will change over the course of the plan-making process, and then again over the plan period. As such, we suggest no explicit standard is provided. We assume this pertains to the reference to a 20% betterment – with the delivery of the plus climate change scenario creating a betterment against existing rates of runoff. This should be clarified, and if a separate measure is being proposed locally this must be clearly set out – in terms of precisely what the requirement is and what it is measured against, the additional costings must factor into the LPR Viability Assessment, and the additional land-take identified for the Preferred Sites.

Natural Capital

- 3.3 The introduction of the concept of Natural Capital is unhelpful – this reflects a specific policy approach which differs from the national approach.
- 3.4 The Authorities response to the Green and Blue Infrastructure Network should be captured through the national requirement to draft Local Nature Recovery Strategies, and the forthcoming legislative requirement to deliver net biodiversity gain.
- 3.5 We note that Figures from the GBI Plan have been published within the Topic Papers, but not the strategy in full. This should have informed part of the consultation evidence base, and would have otherwise informed respondent's answers to this question.
- 3.6 We support the intention to implement biodiversity net gain in accordance with the forthcoming regulations, and suggest that it is not necessary to repeat these in detail in the LPR.

Zero Carbon Homes

- 3.7 The Government is progressing with national changes to building regulations associated with zero carbon ready homes through the Future Homes Standard; and we note that an update has been published since the drafting of the consultation document.

- 3.8 The Future Homes Standard is a two-stage approach to reach 'carbon ready homes' by 2025. This is expressly referenced as a staged approach to changing the Building Regulations to reflect the need to develop supply chains, skills and construction practices. The role of developers is to achieve a 75-80% reduction in carbon emissions – with the residual reduction a society wide move towards decarbonised energy sources.
- 3.9 Whilst we generally support the Council's ambition to ensure that new developments mitigate and adapt to the impacts of climate change, we would have very significant concerns if local policies set the bar higher than the Future Homes Standard, and to do so earlier than the proposed timelines set out by the Government.
- 3.10 The NPPF paragraphs 16b), 34 and 57 all relate to the need for Local Plans to be deliverable (at the point of adoption) and have regard to viability and the PPG section in relation to 'climate change' advises that:

"The National Planning Policy Framework expects local planning authorities when setting any local requirement for a building's sustainability to do so in a way consistent with the government's zero carbon buildings policy and adopt nationally described standards. Local requirements should form part of a Local Plan following engagement with appropriate partners, and will need to be based on robust and credible evidence and pay careful attention to viability". [Paragraph Reference ID: 6-009-20150327]

- 3.11 Any standards set above the national Building Regulations, will need to be demonstrated as feasible, viable and achievable in practice, and will need to be balanced against wider aspirations in the LPR, such as the delivery of affordable housing.

Decarbonising Energy

- 3.12 Decarbonising energy through new development is integrated into the Future Homes Standard – there is therefore no explicit requirement for a separate policy. Traditionally, local plan policies have set an explicit standard for the delivery of renewable/low carbon energy on site; however, this will no longer be required with the Future Homes Standard.
- 3.13 Every site and scheme will differ – and the most appropriate technology will need to respond to this. We therefore suggest that the policy should remain flexible, and no particular technologies should be favoured.
- 3.14 In line with the wider societal move to decarbonising our energy supply, and recognising that this pertains to existing housing/development, WC should enact a permissive policy to the delivery of standalone low carbon/renewable energy schemes.

Air Quality

- 3.15 The Department for Transport undertook a consultation in 2019 which considered potential regulations for the installation of smart charging. This included indicative costs, which must be factored into the viability

assessment, but it also recognised that there will be circumstances whereby the costs of charging provision will escalate due to the need for electrical capacity reinforcements; and that in these circumstances, there would be an exemption to the requirement to provide charging points. We suggest that any policy should specifically recognise such circumstances to avoid situations where development may be rendered unviable due to grid capacity constraints.

- 3.16 We recognise that WC have committed to undertaking proactive discussions with the energy providers in this regard, and this is supported. The cost of any upgrades to the energy network to support any draft policy requirement will need to be factored into the Viability Assessment, and also the Infrastructure Delivery Plan.
- 3.17 There will need to be a balance between passive and active charging facilities, and we suggest that this balance needs to be informed by an evidence base on 1) current demand (i.e. ownership), and 2) immediate future ownership (i.e. within the first 5 years of the plan period). Any development plan must be reviewed every five years, and thus the policy will be able to respond to the rapidly evolving technology at its next review.

4. Planning for Melksham

- 4.1 Melksham represents a sustainable location for development – scoring equal to Chippenham in terms of accessibility (Table 6), it has delivered the most employment development out of all the towns in the HMA over the 2006-2018 period (Figure 5) and is projected the largest employment increase, at 128% in WC's economic growth scenarios (Figure 8).
- 4.2 The delivery of the town's residual need, at 2,585 dwellings by 2036, will require a proactive and positive approach to development, and an appropriate delivery mechanism to ensure that proposals can come forward in a timely manner.
- 4.3 This must be through site allocations within the LPR – given the importance of the town, the need for a coordinated approach, and the scale of housing required. There is clearly a role for the local community and Town Council to engage with this process; however it would be entirely inappropriate to allow a Neighbourhood Plan to take the lead in delivering this scale of development.
- 4.4 Whilst this is the case for Neighbourhood Development Plans (NDP) across the UK, in particular regard to Melksham, we note that the Neighbourhood Plan Area was designated on the 14 July 2014, and a draft NDP was published for consultation in February 2021. It has taken 7 years to progress to a draft NDP, with additional time still required before it is made (should it proceed through Examination). The NDP proposes makes a single allocation for 18 units for a settlement of over 24,000 people. This is despite the Town Council being made aware in 2017 that their housing requirement would increase, and with the figures affirmed in 2018. The NDP has sought to resist this emerging housing need.
- 4.5 We would have significant concerns with a strategy which sought to deliver the strategic housing needs of Wiltshire through reliance on a future NDP – and do not consider that this strategy would be effective or justified in accordance with paragraph 35, NPPF. The LPR must allocate the required strategic sites in Melksham; and in accordance with our comments above on housing delivery, must do this through the allocation of a range of housing sites.

Place Shaping Priorities

- 4.6 We support the Place Shaping Priorities identified for the town, and have the following comments to make:
- Out-commuting – we support the objective of improving the employment offer to reduce out-commuting. As set out elsewhere in our representation, this reflects the historical and projected future employment growth of the town.
 - A350 Bypass – whilst we appreciate the objective of delivering a bypass, the case needs to be more clearly evidenced that this is a place shaping priority, or that the cost of delivering the bypass could not be better used on other infrastructure or initiatives

Land to the south of Western Way, Melksham (Site 9/1025)

4.7 The Land South of Western Way, Melksham, is currently subject to a pending planning application (ref 20/08400/OUT) submitted in September 2020. A copy of the latest outline masterplan is enclosed at **Appendix 2**.

4.8 During its determination a number of technical matters have been resolved, and we provide a summary of these below. It is important that this is reflected in the evidence base for the LPR as it progresses.

4.9 We note that the Site Selection Report scores the site 'green' in regard to Accessibility, Flood Risk and Heritage, and this is supported by the planning application submitted (discussed further below). In terms of the two categories which scored red (Landscape) and amber (traffic), we have the following points to make:

Landscape - Red

4.10 The single landscape point raised pertains to the potential of the development to cause coalescence of Bowerhill Industrial Estate and Melksham; however, the Site Selection Reports then concludes that the site is large enough that a degree of separation could be maintained (p14); thus it is unclear why it still scores red.

4.11 The site is surrounded by development – to the north is Western Way (A365), beyond which is housing. Adjacent to the south is the employment area of Bowerhill, which is a designated Principal Employment Area. To the east of the site, there is a planning consent for up to 235 dwellings, primary school with early years nursery and open space provision. This scheme, Pathfinder Place, is under construction, with the site anticipated to be complete by 2025. To the west of the site is the A350 and the A350/A365 roundabout. New residential development is also under construction on land to the west; Land East of Semington Road, Melksham (16/00497/OUT) which was consented in May 2017 for up to 150 dwellings. This site is also under construction, with first completions in 2019/20, with the site due for completion in 2022/23.

4.12 The consented site to the east appropriately dealt with the matter of coalescence and there is no evidence to indicate that this could not be achieved for this site. Indeed, we note that the draft NDP specifically identifies the extent of land required to remain 'open' to maintain the separation between these two areas (as a 'Important Green Gap' draft Policy 17); and our pending planning application appropriately reflects this.

4.13 Therefore, the analysis underpinning the site assessment from a landscape perspective is flawed, and must be revised in accordance with WC's own analysis.

Traffic – Amber

4.14 It is unclear why the site scored amber from a traffic perspective. We note that it references that "direct access onto Western Way may be possible"; but this does not indicate a ground for a negative score.

- 4.15 The outline planning application has been revised, with amended plans submitted in February 2021 to show vehicular access into the site via Pathfinder Place to the east. To support the changes, a Transport Assessment Addendum – Technical Note has also been prepared and submitted alongside the wider pack of information.
- 4.16 The amended plans have been informed by extensive discussions with WC’s Highways Officer in relation to the access options for the site, resulting in the amended proposal for a single vehicular access via Pathfinder Place.
- 4.17 In terms of traffic the planning application documentation, particularly the junction capacity modelling presented in the TA, has demonstrated that the four assessed junctions are forecast to operate within capacity with the addition of the traffic generated by the proposed development. The TA concludes that the proposed development is not anticipated to result in a severe residual cumulative impact and as such no mitigation works are required to the junctions assessed.
- 4.18 We therefore recommend that the traffic analysis supporting the site assessment should be reviewed further, taking into account the technical information provided as part of the pending planning application.

Accessibility – Green

- 4.19 The site scores green for accessibility and this is agreed. The planning application supporting documentation confirms that the site is very well connected to local services and facilities in Melksham and that there are opportunities for sustainable travel by foot, bicycle and bus.
- 4.20 Indeed, the site is located close to many of the services and facilities available in Melksham. Listed below are the distances from the site to a number of the key facilities within the local area.
- Pathfinder Place Primary School (not yet built):- 380 metres walking distance (5 minutes);
 - Aloeric Primary School:- 1,310 metres walking distance (16 minutes);
 - Bowerhill Primary School:- 1,410 metres walking distance (17 minutes);
 - Melksham Oak Community School (Secondary):- 1,320 metres walking distance (16 minutes);
 - Bowerhill Industrial Estate:- 965 metres walking distance (11 minutes);
 - Hampton Business Park:- 1,125 metres walking distance (13 minutes);
 - Melksham Community Hospital:- 1,130 metres walking distance (13 minutes);
 - Spa Medical Centre:- 945 metres walking distance (11 minutes);
 - St Anthony of Padua Church:- 1,360 metres walking distance (16 minutes);

- Playing Fields at Burnet Close:- 930 metres walking distance (11 minutes);
- Morrisons Daily:- 1,105 metres walking distance (13 minutes);
- Sainsbury's Supermarket:- 2,215 metres walking distance (26 minutes);
- Melksham Post Office:- 1,840 metres walking distance (22 minutes);
- Melksham town centre:- 1,600 metres walking distance (20 minutes)

4.21 This demonstrates that development of the site would offer future residents with school aged children safe access to the two closest primary schools, Aloeric Primary School and Bowerhill Primary School, whilst also at an easy walking distance of 16 and 17 minutes respectively. This does not currently account for the new primary school planned to be delivered on the Pathfinder Place site, adjacent to the site. Once delivered this would provide excellent access for primary school children living on the site. For secondary school children, Melksham Oak Community School is also a 16 minute walk from the site (or 6 minute cycle).

4.22 To facilitate walking and cycling, the application proposals include new pedestrian footpaths and cycle ways along Western Way.

4.23 To assist in explaining the proximity of the site to local services and facilities, we have appended a plan at **Appendix 3**. This not only shows how well the site can easily integrate with the existing urban form on the edge of Melksham, but also how the site is located at the centre of an even spread of local services and facilities. In addition, the plans attached at **Appendix 4** shows the walking routes available, split into three key routes, to the town centre to the north, Melksham Oak Community School to the east and both Bowerhill Industrial Estate and Primary School to the south. Figure 4.5 also shows the existing, committed and proposed signalled crossings along these walking routes, including Western Way to the north of the site.

4.24 Overall, given its location, the range of services and facilities available within walking and cycling distance, and the opportunities for public transport, the application site is considered to represent an extremely suitable and sustainable location for residential development.

Flood Risk – Green

4.25 The site scores green for flood risk and this is agreed.

4.26 A Flood Risk Assessment and Drainage Strategy was submitted in support of the outline planning application for the site and this demonstrates that the site falls within flood zone 1 and is therefore in a preferable location for residential development in the context of the sequential test in the Framework. The technical assessment also concludes that the land has a low probability of flooding from overland flow, ground water and sewer flooding.

4.27 The proposed drainage strategy for the development will be to introduce a detention basin in the north west corner of the site. This will manage the surface water runoff from the proposed development. Careful

integration of this feature into the site will create potential habitats for wildlife and promote biodiversity, providing valuable open space and amenity value.

Heritage – Green

- 4.28 We agree with the conclusion that the site scores green for heritage.
- 4.29 The likely harm to heritage assets has already been assessed by a qualified heritage specialist on behalf of HLM as part of the outline planning application. Indeed, the supporting Heritage Assessment, confirms that the site is located beyond the setting of all designated heritage assets within the study area and therefore, there will be no effects on the significance of these heritage assets.
- 4.30 During the determination of the planning application the County Archaeologist sought further information on potential underground remains, and a geophysical survey was subsequently provided. This resulted in the County Archaeologist agreeing that, considering the results of the geophysical survey, it is unlikely that any archaeology surviving within the proposed footprint would prove an overriding constraint to development

Ecology

- 4.31 The site assessment references the site's location within a wider area which supports a meta-population of great crested newts.
- 4.32 The application is supported by an Ecological Appraisal which confirms that, in general terms, other than the boundary features and the arable fields, other habitats are scarce with most grassland field margins restricted in nature with the exception of that on the northern boundary adjacent to the A365 Western Way where the wide band of scrub accommodates a highway drainage ditch and mosaic of scattered native scrub, semi improved grassland and areas of more contiguous scrub. Although arable fields would be lost, the proposed landscaping scheme will buffer and enhance the existing semi-natural habitats and provide larger areas of higher quality habitat post-development. This has been evidenced using the Defra v2 metric demonstrating clearly that the proposed development can achieve a measurable net gain in biodiversity.
- 4.33 The survey work undertaken on site has confirmed via eDNA survey from waterbodies in land adjacent west of the site and given that most habitat on site is suboptimal terrestrial habitat for the species and the proposed development neither involves the loss of any waterbodies nor substantial amounts of suitable terrestrial habitat the District Level Licensing route is considered the most appropriate form of mitigating any potential adverse impacts of the proposed development.
- 4.34 All other protected species (including badger, hazel dormouse and riparian mammals) are not considered likely to constrain the development proposals, and as such precautionary mitigation measures and/or enhancement measures alone have been recommended.
- 4.35 Habitat enhancements have also been recommended, including inclusion of native, wildlife friendly and where possible fruit bearing species in the proposed planting schedule, creation of species rich grassland

wildflower meadows, the inclusion of bat and bird boxes on retained trees and proposed buildings and consideration of a 'hedgehog highway' scheme.

Deliverability

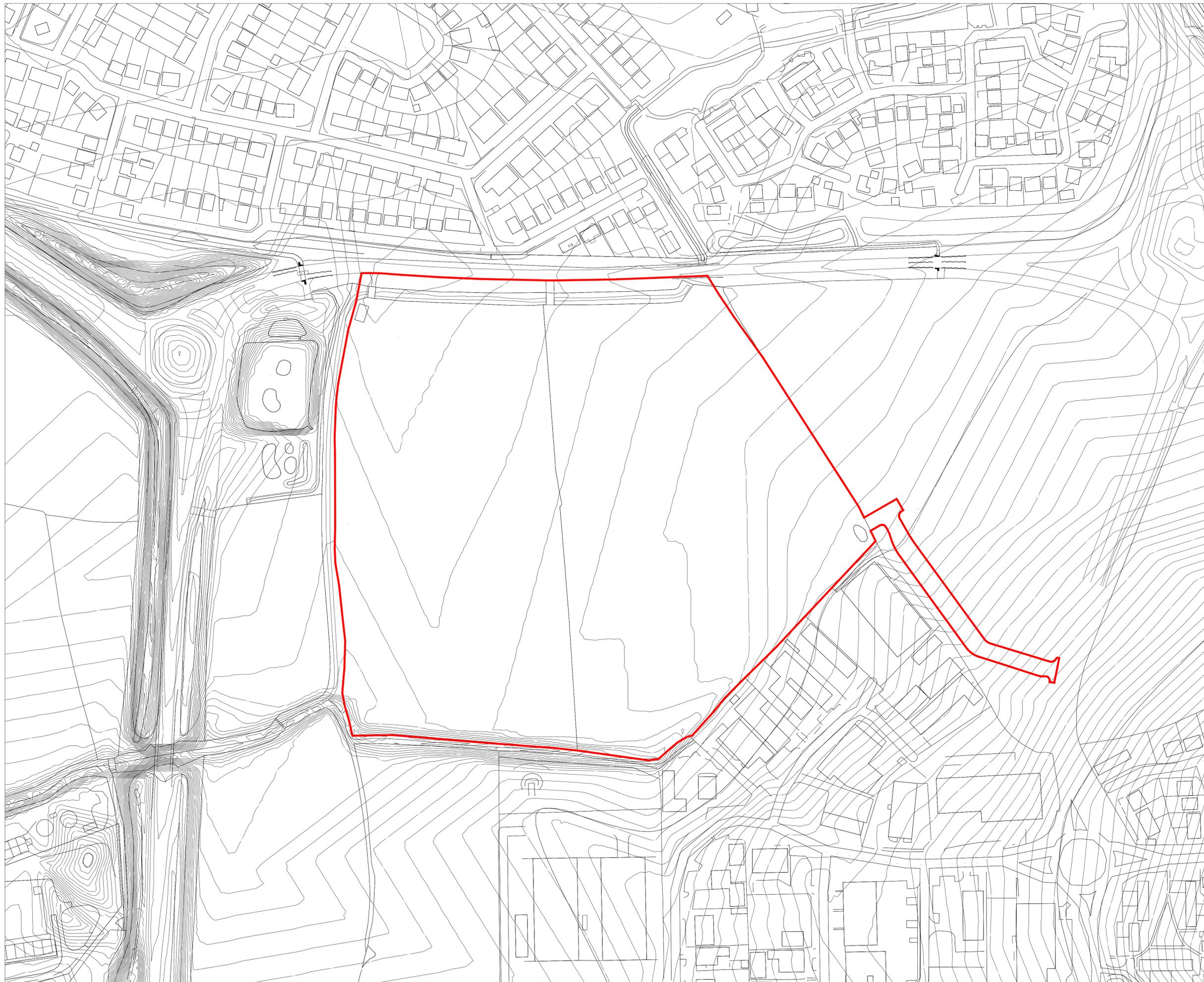
- 4.36 The site is subject to a planning application for up to 240 dwellings and a 70-bed care home. Following the grant of planning consent, the site would progress quickly through the reserved matters process, and we would anticipate construction commencing within a 18/24month period. First completions would then be expected in late year 3/early year 4; ensuring that the site is delivering housing to aid WC in meeting its five year housing land supply requirement.

5. Summary and Conclusions

- 5.1 Overall, we currently have concerns over WC's approach to housing need and the plan period within the consultation documentation.
- 5.2 We note that the evidence base is dated and will require a refresh prior to progressing the LPR, and also that prior to progressing any further, a detailed assessment of affordable housing need should also be undertaken.
- 5.3 Melksham is identified as a sustainable location for further growth reflecting the market town's wide range of services and facilities as well as employment opportunities. The town is also strategically located between Wiltshire's principal settlements of Chippenham and Trowbridge, and is also well placed to provide access to neighbouring settlements and locations further afield, via sustainable transport modes. Directing additional development to the town is therefore supported.
- 5.4 The Land South of Western Way, Melksham (Site 9/1025) is suitably located to the south of the town, and will soon be surrounded by built development on all four sides. The site has been acknowledged by WC as a suitable, available, achievable, deliverable and developable site and was considered as a reasonable option in the 2015 assessment work accompanying the site allocations plan. Furthermore, the fact that there is a pending outline planning application for the site demonstrates that there is a strong intention to deliver the site.
- 5.5 The site represents a logical solution to addressing the identified housing needs of both the town and the Chippenham HMA and we strongly support the inclusion of the site as a draft allocation in the next version of the LPR.



Appendix 1: Site Location Plan



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KEY
 Application Site Boundary 10.9 ha

PLANNING				
D	21.01.2021	Site boundary amendment.	SJD	KEF
C	18.08.2020	Northern boundary landowner amendment.	JUB	KEF
B	17.08.2020	Northern boundary landowner amendment.	JUB	KEF
-	23.07.2020	First issue.	JUB	KEF
rev	date	description	dm	chkd

fpcr

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- environmental assessment
- landscape design
- urban design
- ecology
- architecture
- arboriculture

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Hallam Land Management Ltd

project
**Land off Western Way,
 Melksham**

drawing title
SITE LOCATION PLAN

scale
 1:1250 @ A1

drawn / checked
 JUB / KEF

revision date
 21 January 2021

drawing number
7611-L-06

rev
D

CAD file: J:\7600\7611\LANDS\Plans\7611-L-06 D - Location Plan.dwg



Appendix 2: Illustrative Masterplan

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0 25 50 75 100 125m

-  Site Boundary 10.9ha
-  Proposed Residential Development [main streets]
-  Proposed Residential Development [secondary streets & green lanes]
-  Proposed Care Home
-  Equipped Play Space
1.MUGA
2.LEAP
-  Proposed SuDS Basin
-  Indicative Swales
-  Proposed Vehicular Access
-  Proposed Pedestrian, Cycle & Emergency Access
-  Proposed Pedestrian Access
-  Indicative Pedestrian / Cycle Routes
-  Orchard Tree Planting
-  Proposed Structural Tree Planting
-  Allotments

rev	date	description	JUB / KEF
C	03/02/2021	Updates based on LPA comments	SJD / KEF
B	21/01/2021	New site boundary line added	LAN
-	16.09.20	First Issue	JUB/KEF
			dm / chkd

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project
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drawing title
ILLUSTRATIVE MASTERPLAN

scale
1:1250@ A1

drawn / checked
JUB/KEF

revision date
02.02.21

drawing number
7611-L-07

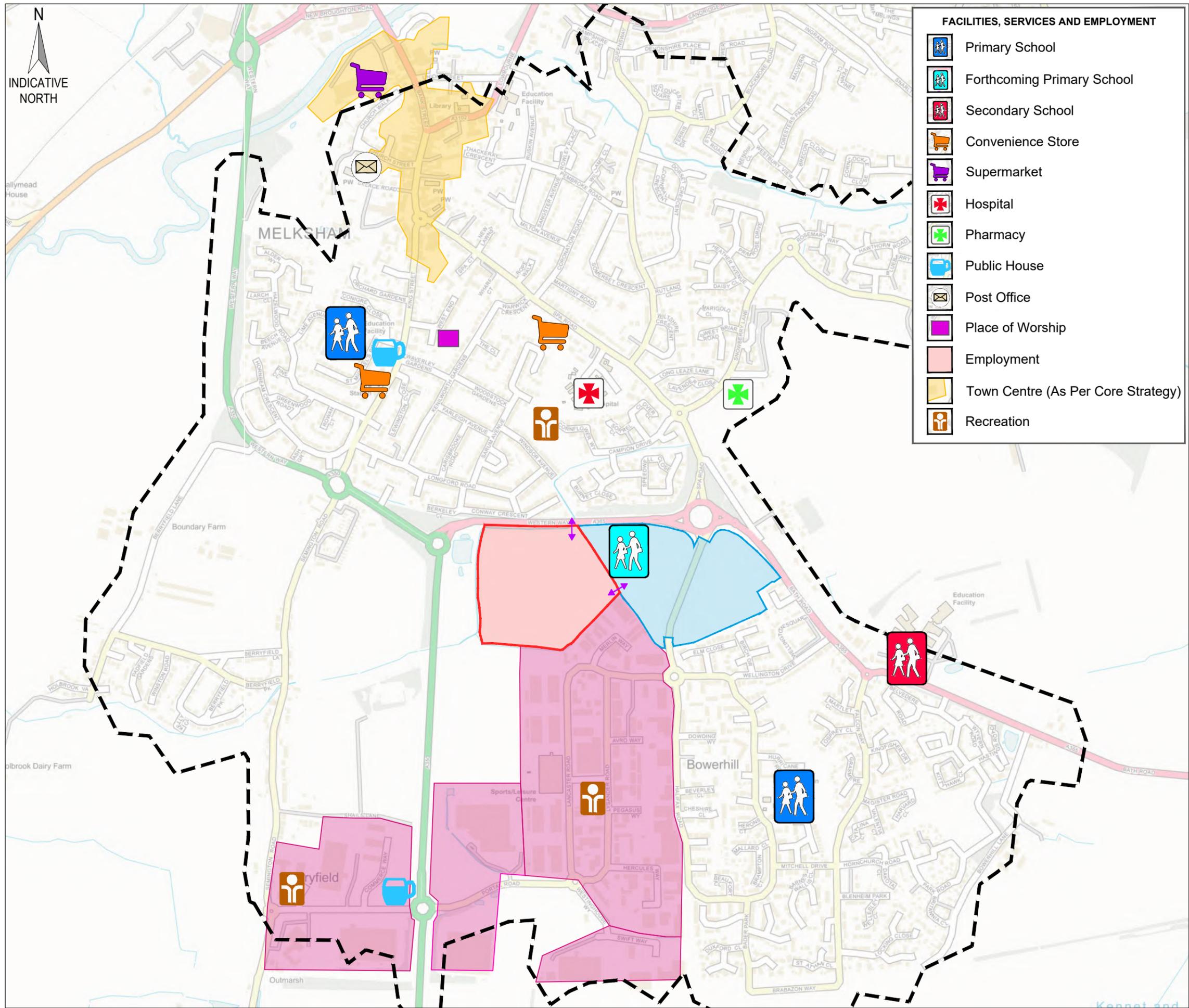
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C

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Appendix 3: Plan of Local Services and Facilities



- FACILITIES, SERVICES AND EMPLOYMENT**
-  Primary School
 -  Forthcoming Primary School
 -  Secondary School
 -  Convenience Store
 -  Supermarket
 -  Hospital
 -  Pharmacy
 -  Public House
 -  Post Office
 -  Place of Worship
 -  Employment
 -  Town Centre (As Per Core Strategy)
 -  Recreation

- KEY**
-  Site Location (Illustrative)
 -  2km Walking Isochrone
 -  Pedestrian Access
 -  'Pathfinder Place' (Illustrative)

P2	09.03.21	Minor Revisions	TB	MG
P1	04.11.20	Preliminary Issue	TB	MG
<i>Rev</i>	<i>Date</i>	<i>Description</i>	<i>By</i>	<i>Apvd</i>

PROJECT:
 LAND SOUTH OF WESTERN WAY
 MELKSHAM

TITLE:
 ACCESSIBILITY TO LOCAL FACILITIES,
 SERVICES AND EMPLOYMENT
 OPPORTUNITIES

CLIENT:
 HALLAM LAND MANAGEMENT

SCALE@A3:
 1:10,000

PROJECT REF:
 16307

DRAWING No:
 017

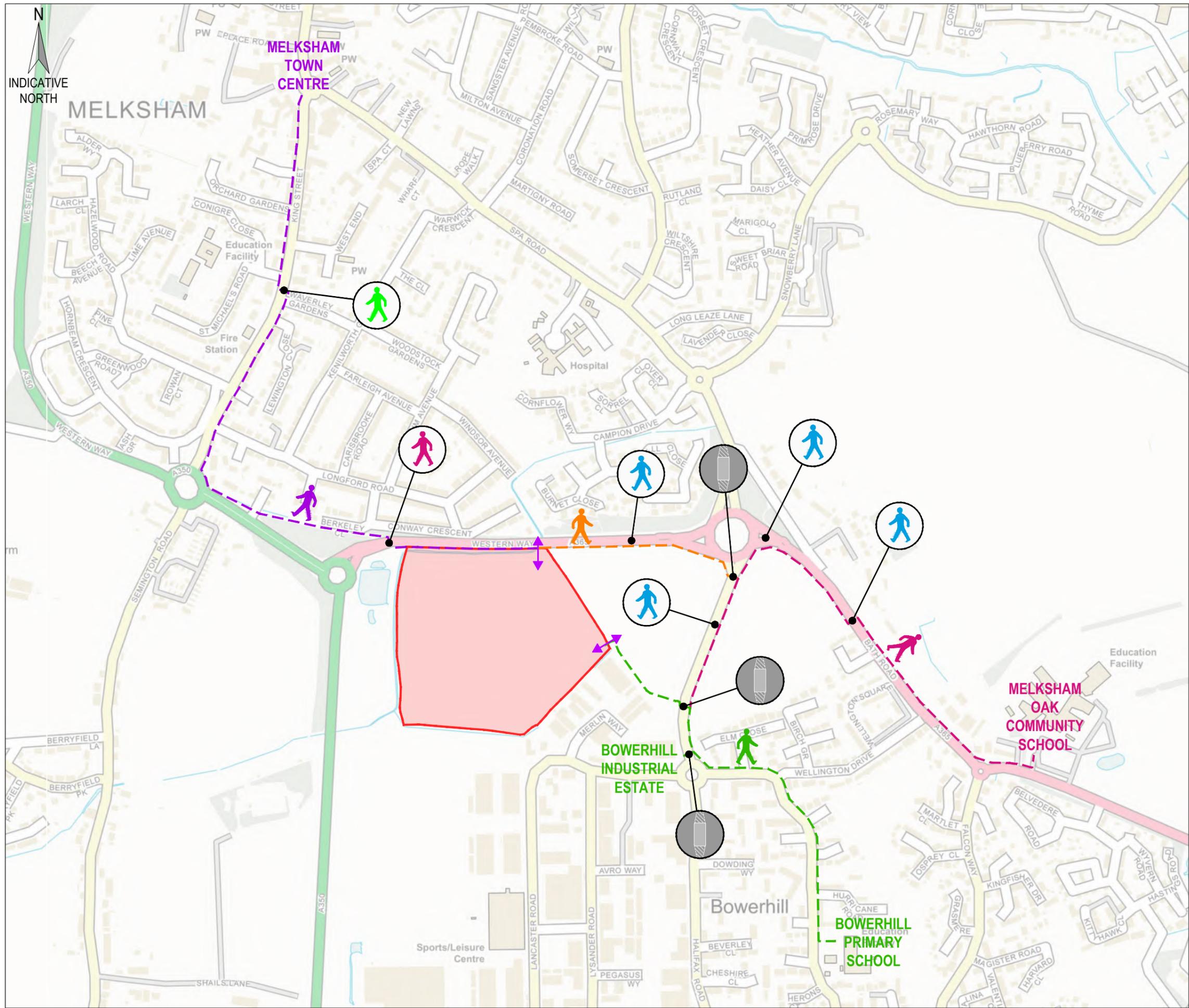
REV:
 P2

Revision Referencing
 P = Preliminary A = Approval T = Tender C = Construction





Appendix 4: Walking Routes



KEY

-  Site Location (Illustrative)
-  Walking Route 1
-  Walking Route 2
-  Walking Route 3
-  Walking Route 4
-  Signal-Controlled Crossing (Existing)
-  Signal-Controlled Crossing (Committed)
-  Signal-Controlled Crossing (Proposed)
-  Refuge Island
-  Pedestrian Access

P2	09.03.21	Minor Revisions	TB	MG
P1	04.11.20	Preliminary Issue	TB	MG

PROJECT:
LAND SOUTH OF WESTERN WAY
MELKSHAM

TITLE:
WALKING ROUTES

CLIENT:
HALLAM LAND MANAGEMENT

SCALE@A3:
NOT TO SCALE

PROJECT REF:
16307
DRAWING No: 018 **REV:** P2

Revision Referencing
P = Preliminary A = Approval T = Tender C = Construction



STRAT317

Wiltshire Local Plan Review Consultation

Response on behalf of Miller Homes



Contents

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1. Executive Summary

1.1. Spatial Strategy

- 1.1.1. The benefits of focusing new development towards the County's main settlements, in terms of making the best use of existing infrastructure, better supporting existing businesses, reducing the need to travel and opportunities for renewable energy are all supported.
- 1.1.2. Based on information provided within the consultation, the approach of dividing the county into four different Housing Market Areas (HMAs) within which the majority of the local population live and work, is supported. The role of the HMAs is to target addressing need where that need arises; which is a logical approach.
- 1.1.3. Page 14 of the Emerging Spatial Strategy sets out a total housing requirement of 20,400 for the Chippenham HMA during the period 2016 to 2036. The basis of this overall total housing requirement is supported, subject to increasing it to reflect a plan period up to at least 2038, assuming the plan is adopted in 2023 in accordance with the most recent Local Development Scheme (LDS) dated July 2020.

1.2. Strategy for Malmesbury

- 1.2.1. High level constraints at Malmesbury and the nearby area, including Milbourne, are illustrated at Figure 4 on page 18 of the Malmesbury site selection report (January 2021). This shows that two rivers run through Malmesbury; the Tetbury Avon to the north and the River Avon to the south, both converging on the eastern side of Malmesbury. Land around both rivers is identified as being in flood zone 2 and 3. Land to the west of Malmesbury is designated as an Area of Outstanding Natural Beauty (AONB). The eastern half of Malmesbury, including the area where the two rivers converge is designated as a Conversation Area, which extends up to the A429.
- 1.2.2. These constraints demonstrate the fairly constrained nature of Malmesbury. However, these constraints need to be balanced with the need for appropriate growth to continue to contribute towards alleviating affordability issues in the area and support the role of Malmesbury as an *'important tourist location in Wiltshire'* (paragraph 5.72 of the Core Strategy). The changing requirements as a result of the pandemic, including an increase in home working permanently, reducing net out commuting to other settlements and boosting local demand for many goods and services are all also recognised, alongside Neighbourhood Plan aspirations.
- 1.2.3. Notwithstanding these stated aims and trends in the emerging spatial strategy, the Local Plan Review (LPR) proposes a reduction in the levels of housing at Malmesbury from 885 from 2006 to 2026 in the Core Strategy to 665 from 2016 to 2036. Whilst the environmental constraints at Malmesbury are noted, there does not appear to be any evidence to justify the quantum of the proposed reduction.

- 1.2.4. The Emerging Strategy must allow for growth around Malmesbury to support both its employment function, meet local housing need and support its role as a tourist destination. Whilst development must be sensitively designed around its constraints, which themselves contribute to the special character of the area, these in themselves should not be a barrier to further development around Malmesbury. Additionally, the Emerging Strategy must demonstrate it appropriately responds to changing and current requirements.
- 1.2.5. Areas close to the centre of Malmesbury, such as at Milbourne should be considered in terms of their ability to fulfil this role. Sensitively designed development, can maintain the separate identify of Milbourne, but are actually located much closer to the centre of Malmesbury than some of the sites put forward for assessment, helping meet the wider objectives of the Council relating to sustainability and addressing climate change for example.
- 1.2.6. The spatial strategy must be flexible enough for sites such as this to properly be considered and address current need and objectives within the Emerging Spatial Strategy.

1.3. The Role of Villages

- 1.3.1. The increased threshold for rural exception schemes of up to 20 dwellings or 5% of the settlement size (compared to the threshold of up to 10 dwellings in the adopted policy) is generally welcomed as this will give greater allowance for the varied needs of rural settlements to be met. However, this threshold remains a somewhat arbitrary limit, particularly given there is a '*substantial need*' for affordable housing in the county, as referred to in the Strategic Housing Market Assessment (SHMA) 2017. Instead, the appropriate scale (and type) of residential development at rural settlements should be informed by local needs and site-specific circumstances.
- 1.3.2. Milbourne, for example, is located less than 1km away from the Market Town of Malmesbury, and whilst being defined as a rural settlement (Small Village), it offers potential to also support the development needs of Malmesbury. The Emerging Spatial Strategy (page 3) identified Malmesbury with '*potential for significant development*' but also recognises it as being a '*more constrained settlement*' in the Chippenham HMA (page 12). In this instance it is therefore not appropriate to restrict development at Milbourne only to rural exception housing subject to the above limits. Instead sites such as Land to the west of Milbourne, Malmesbury offer less constrained land which is capable of helping to meet both Malmesbury's needs and the emerging objectives of the Local Plan Review.
- 1.3.3. Paragraph 32 of the consultation paper indicates that the intention to separate Small Villages from Large Villages / Local Service Centres is because, "*Small Villages may accommodate small-scale development that responds to local needs and they therefore do not have such a wider role.*" However, it is important to recognise that some Small Villages have the potential to perform a necessary wider role owing to their location and proximity to larger settlements. Indeed the National Planning Policy Framework (NPPF) encourages sustainable development in such rural areas. The intention to separate Small Villages and further limit potential development in these locations is therefore not supported.

1.3.4. The LPR should instead take a flexible approach to the settlement hierarchy in order to respond appropriately to development needs. The LPR should also consider the potential for additional development at Small Villages, such as Milbourne, where appropriate to support wider development needs.

1.3.5. Given that the Council is currently unable to deliver a 5-year housing land supply, with only 4.29 years supply in the North and West Wiltshire HMA (Housing Land Supply Statement (2019)), it is even more important that the Council identifies sufficient housing sites. The contribution that suitable and deliverable sites at Smaller Villages, such as Land to the west of Milbourne, can make to housing supply should therefore be considered positively.

1.4. Inclusion of Climate Change considerations and balancing requirements

1.4.1. In February 2019, the Council acknowledged a climate emergency and agreed to seek to make the county of Wiltshire carbon neutral by 2030. Part of the consultation relates to the role of planning policy in contributing to achieving this goal.

1.4.2. A specific policy that encourages a '*proactive approach*' to climate change mitigation and adaptation through design would reflect national guidance (NPPF paragraph 149), as well as reflecting the objectives of the Climate Emergency, and is generally supported. However, the suggestion that all '*new development is rated as zero carbon*' from adoption of the plan in 2023 is considered too onerous and could impact deliverability of housing. Instead, any policy wording should therefore target 1) a stepped approach to reducing carbon and 2) seek to achieve being 'net' carbon neutral by 2030.

1.4.3. This would allow additional flexibility in how the overall target will be achieved, through enabling some emissions to be offset elsewhere if necessary/appropriate, whilst still ensuring that overall the carbon emissions are zero. Viability evidence to consider both this requirement and other requirements cumulatively will be key alongside a flexible approach, to help ensure that housing delivery and other objectives are not compromised.

1.4.4. To support the Climate Emergency, the principle of increasing the level of self-containment within Wiltshire's settlements which should include Milbourne and Malmesbury (as it is considered to offer '*the best solution for tackling unsustainable, carbon-based travel patterns*') is a logical and sound approach.

1.5. Potential sites

1.5.1. The proposed place-shaping principles for Malmesbury currently do not capture all messages and objectives within the various consultation documents. In particular, this includes the way the current pandemic is changing our behaviour and the different long-term roles of settlements, including an increased level of home working and reducing net out commuting to other settlements. This position is emphasised again through the '*Addressing Climate Change and Biodiversity Net Gain*' document, which highlights the need for '*increasing the level of self-containment within Wiltshire's settlements*' as this '*offers the best solution for tackling unsustainable, carbon-based travel patterns*'.

- 1.5.2. The Malmesbury site selection paper notes the importance of historic patterns of growth. It is agreed that this should be considered, however, this must be appropriately considered within the relevant context of Malmesbury and its immediate locality. Understanding the character of an area is important. Given historic/environmental constraints, growth could have been forced in a particular direction. Continuing with this pattern of growth could actually result in new development being located a significant distance from the town centre and services upon which there is an interdependency. An alternative growth strategy could therefore be more appropriate.
- 1.5.3. Through reducing the levels of proposed housing at Malmesbury, despite the evidence, and thereby artificially constraining development in this location, out commuting levels won't be reduced nor self-containment achieved, which are both key elements of the Climate Change agenda.
- 1.5.4. Whilst development must be sensitively designed around its constraints, which themselves contribute to the special character of the area, these should not be an overall barrier to further development around Malmesbury. The Emerging Strategy must allow for such growth around Malmesbury in order for the objectives around sustainability and climate change to be delivered.
- 1.5.5. The spatial strategy must be flexible enough for sites such as 'Land to the west of Milbourne' to properly be considered to enable these wider objectives to be delivered.
- 1.5.6. Areas close to the centre of Malmesbury, such as at Milbourne should be considered in terms of their ability to fulfil the role of accommodating some of the necessary growth around Malmesbury and supporting its role as a tourist destination. Sensitively designed development, can maintain the separate identify of Milbourne, but could actually be located much closer to the centre of Malmesbury than some of the sites put forward for assessment. This would therefore help to meet the wider objectives of the Council associated with tackling unsustainable carbon based travel patterns in particular.
- 1.5.7. Land to the west of Milbourne (see plan at Appendix 1) fulfils all of these criteria. Sensitively designed development focusing on the eastern side of the site, would enable the separate identify of Milbourne to be retained, has no overarching constraints in terms of impact on the historic settlement, the AONB, the conservation area and is located away from the rivers.
- 1.5.8. Further in terms of accessibility, the closest primary school (St Joseph's Catholic Primary School) is located approximately 0.6 miles away, Malmesbury School (a Secondary School) is located only 1.2 miles away, Malmesbury medical partnership is less than a mile away and Malmesbury Town Centre is also less than a three quarters of a mile away, based on streetcheck.co.uk. (Note these distances are all approximate and will depend upon which part of the site they are measured from.) These factors all support the sustainability credentials of 'Land to the west of Milbourne' which could provide a positive contribution to the overall strategy of for Malmesbury and overall objectives of the emerging LPR.

2. Introduction

2.1. Introduction

2.1.1. This report has been prepared on behalf of Miller Homes in relation to Wiltshire Council's (WC) current Local Plan Review (LPR) consultation.

2.1.2. Miller Homes have an interest in land to the west of Milbourne, which is located adjacent to Milbourne and approximately 1km to the east of the centre of Malmesbury. The site measures approximately 5.3ha and is bound by the A429 to the west, Blicks Hill to the south and existing residential dwellings to the north-east. A copy of the site location plan is enclosed at Appendix 1.

2.1.3. The current consultation seeks to inform preparation of the LPR which will provide for future housing and employment need in the county over the period 2016-2036. The consultation is thereby based on a number of documents relating to: the amount and location of development in the county's main settlements (including a 'Planning for Malmesbury' paper), how growth is distributed around the county (the 'Emergency Spatial Strategy' paper), the framework for rural communities to meet housing needs (the 'Empowering Rural Communities' paper), and the approach to policies relating to climate change and biodiversity net gain (the 'Addressing Climate Change and Biodiversity Net Gain' paper).

2.1.4. On this basis, this report is structured as follows based on the details and questions contained within the consultation documents:

- Chapter 2: Emerging Spatial Strategy
- Chapter 3: Empowering Rural Communities
- Chapter 4: Addressing Climate Change and Biodiversity Net Gain
- Chapter 5: Supporting Documents (Interim Sustainability Appraisal, Local Transport Review, Chippenham HMA: Formulating Alternative Development Strategies, Local Housing Needs Assessment, Level 1 Strategic Flood Risk Assessment, Retail and Town Centre Studies and Employment Land Review);
- Chapter 6: Planning for Malmesbury; and
- Chapter 7: Summary.

2.1.5. Our response provides comments regarding the overall approach, development requirements and spatial strategy and explains that the land to the west of Milbourne provides an opportunity to accommodate residential development to contribute towards the aims and objectives of the LPR.

3. Emerging Spatial Strategy

3.1. Introduction

3.1.1. The Emerging Spatial Strategy considers the pattern of development and proposes a distribution of that development and growth around the county. The strategy is split into various chapters which are considered below.

3.2. Growth and climate change

3.2.1. This chapter of the Emerging Spatial Strategy acknowledges the Council's resolution to seek to '*make the county carbon neutral by 2030*' as part of the Climate Emergency, that Wiltshire Council declared in February 2019.

3.2.2. It is right to acknowledge the '*key role*' that the LPR will play in helping achieve this. Support is also given to having a 'sustainable pattern of development' with appropriate distribution of growth.

3.2.3. There is also recognition of the fact that '*A large proportion of Wiltshire residents live in the countryside and smaller rural settlements. On a smaller scale, growth to meet local needs can also facilitate carbon reduction in similar if more modest ways... Affordable homes are needed for local people and planning must help support rural jobs...*' These statements and aspirations are all broadly supported

3.2.4. The benefits of focusing new development within the County's main settlements, in terms of making the best use of existing infrastructure, better supporting existing businesses, reducing the need to travel and opportunities for renewable energy are all supported. We suggest that the main objective of '*focusing new development **within** the County's main settlements*' given this reduces carbon in different ways...' should be amended to refer to '*new development **within or close to** the County's main settlements....*'

3.2.5. This will ensure a slightly greater number of sites are assessed, to ensure the objectives, particularly those emerging objectives focusing on climate change, can be delivered. Looking only at sites '*within*' the main settlements would rule out any sites currently outside those main settlements. Additionally, to have a strategy with greater certainty of achieving the objectives, some flexibility is required to enable sites that could be physically closer to a 'main settlement' and potentially unconstrained by physical constraints (therefore arguably more sustainable than other sites) not to be ruled out.

3.3. Delivering the spatial strategy

3.3.1. This chapter explains the background and context that has informed the 'delivery principles' of the spatial strategy. Responses on specific delivery principles are set out below.

'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. They will be agreed between the Council and the relevant Town and Parish Councils'

3.3.2. In principle this is a logical approach. The background/ supporting text to this section also sets out:

- That the spatial strategy focuses on the different long-term roles of settlements and apportioning growth accordingly.
- Covid-19 is changing the way we look at our surroundings, changing our behaviour and, longer term, how we manage our environment.
- It is likely to increase home working permanently, reducing net out commuting to other settlements and boosting local demand for many goods and services. This may create opportunities to reconsider how we use town centres. A distribution of growth needs to be delivered with these and other factors in mind to ensure each community has an appropriate planning framework.

3.3.3. There appears little/no evidence to explain what the 'long-term role' is envisaged to be for Malmesbury for example and little if any, evidence to demonstrate how this 'long-term role' has influenced the apportioning of the growth. Further, the changes to our behaviour and managing the environment have not been specifically identified in order for these measures to be transparently translated into the longer term strategy. Only if these steps are followed through can the '*distribution of growth needs*' be '*delivered with these and other factors in mind*'.

3.3.4. Therefore, whilst the principle of the 'Place Shaping Priorities' is supported, the background work and evidence base must demonstrate how the proposed strategy fully responds to these objectives to successfully deliver the 'long-term' role.

3.3.5. Emerging strategies must also demonstrate how they have the ability to flexibly adapt to these changing requirements, (including the climate change agenda etc.) and ensure future development can be planned to be sustainable.

'To maximise the use of previously developed land and support urban renewal where needed, each of the main settlements will have a target amount of new homes that will need to be planned for within its urban area.'

3.3.6. The aim of this 'delivery principle' is supported and a 'target' amount of new homes on brownfield land reflects national guidance.

3.3.7. As explained at paragraph 3.8 of the 'Emerging Spatial Strategy', '*the strategy includes a **possible** brownfield target for each settlements; an indicative number of new homes to be built over the period 2021-2031 using previously developed land... [our emphasis]. The brownfield target is derived from a 'windfall' allowance for Wiltshire used in the housing land supply.'*

3.3.8. Paragraph 3.12 then notes that, '*The amount of greenfield land needing to be identified for development will depend upon the brownfield land that can be relied upon, which is land identified in neighbourhood plans or other allocations and planning permissions. **It is not possible to assume each target will be met and just a target amount cannot count toward the land we need to plan for.***' [again our emphasis].

- 3.3.9. It is notable that the Council's Brownfield Land Register (2019) identifies only around 1,000 units on brownfield sites with planning permission in the county (with none appearing to be in Malmesbury), of which a large proportion were granted permission over 3 years ago, further emphasising that this provision cannot be relied upon.
- 3.3.10. This statement about how the 'target' for brownfield land is fully supported but the acknowledgement that *'just a target amount cannot count toward the land we need to plan for'*, also does not appear to have informed the *'Planning for Malmesbury'* consultation document, discussed further below under this section.

3.4. Formulating the spatial strategy

- 3.4.1. Based on information provided within the consultation, the approach of dividing the county into four different Housing Market Areas (HMAs) within which the majority of the local population live and work, is supported. It is a logical approach to propose that addressing need is targeted to where that need is. Land to the west of Milbourne, Malmesbury falls within the proposed new Chippenham HMA.
- 3.4.2. Paragraph 2.17 explains that housing needs has been calculated to produce both a minimum and a higher figure for the period 2016 to 2036. This is a logical approach to test at this stage. The most recent Local Development Scheme (LDS), dated July 2020, envisages adoption of the Local Plan Review in Q2 of 2023. A plan period to 2036 would therefore cover only 13 years and fall short of the NPPF requirement (para 22) 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.'*
- 3.4.3. It is also worthy to note that the MHCLG consultation on proposed updates to the NPPF (closing on 27 March) refers to the timescale for strategic policies being amended with larger-scale developments or new settlements to be considered with a 30-year vision. Reducing the plan period to only 13 years is therefore clearly contrary to the direction of travel. Policies, such as the housing requirements, should be updated to reflect an extended plan period.

3.5. Emerging Spatial Strategy and Chippenham Housing Market Area

- 3.5.1. As above, Land to the west of Milbourne is located just to the east of Malmesbury, which falls within the proposed Chippenham HMA. Page 14 of the Emerging Spatial Strategy sets out a total housing requirement of 20,400 for the Chippenham HMA during the period 2016 to 2036, see Table below.
- 3.5.2. The basis of this overall total housing requirement (rather than specific apportionment) is supported, subject to increasing it to reflect a plan period up to at least 2038, (as explained above), to respond to the most recent LDS where adoption is envisaged in 2023.

Wiltshire Local Plan Review Consultation

Response on behalf of Miller Homes



			Overall Housing Requirement (Dwellings)		Overall Employment Requirement (Hectares)
	Wiltshire Core Strategy 2006-2026	Brownfield target 2021-2031	Emerging Strategy 2016-2036	Residual at 1 April 2019	
Calne	1440	60	1610	360	4
Chippenham	4510	240	9225	5100	5
Corsham	1220	160	815	120	0
Devizes	2010	150	1330	330	0
Malmesbury	885	70	665	95	0
Melksham	2240	130	3950	2585	0
Rest of HMA	1992		2805	1270	0
TOTAL	14297		20400	9860	9

- 3.5.3. The LPR proposes a reduction in the levels of housing at Malmesbury from 885 from 2006 to 2026 in the Core Strategy to 665 from 2016 to 2036.
- 3.5.4. Paragraph 3.33 of the Emerging Spatial Strategy sets out that, *'The results of sustainability appraisal identified 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.'* Whilst the environmental constraints at Malmesbury are noted, there does not appear to be any evidence to justify the quantum of the proposed reduction.
- 3.5.5. Malmesbury itself, located on the opposite side of the A429 is identified as a 'market town'. The Core Strategy sets out that, *'Outside the Principal Settlements, Market Towns are defined as settlements that have the ability to support sustainable patterns of living in Wiltshire through their current levels of facilities, services and employment opportunities. Market Towns have the potential for significant development that will increase the jobs and homes in each town in order to help sustain and where necessary enhance their services and facilities and promote better levels of self containment and viable sustainable communities.'*
- 3.5.6. This role of the market towns and focus of development in these locations, along with the principal settlements is rightly continued in the emerging Local Plan Review. The Table on page 3 confirms that, *'Market towns have 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.'* It is also entirely right that constraints are properly considered in the spatial strategy.
- 3.5.7. The Emerging Strategy must allow for growth around Malmesbury to support both its employment function, meet local housing need and support its role as a tourist destination. Whilst development must be sensitively designed around its constraints, which themselves contribute to the special character of the area, these in themselves should not be a barrier to further development around Malmesbury.

- 3.5.8. High level constraints at Malmesbury and the nearby area, including Milbourne, are illustrated at Figure 4 on page 18 of the Malmesbury site selection report (January 2021). This shows that two rivers run through Malmesbury; the Tetbury Avon to the north and the River Avon to the south, both converging on the eastern side of Malmesbury. Land around both rivers is identified as being in flood zone 2 and 3. Land to the west of Malmesbury is designated as AONB. The eastern half of Malmesbury, including the area where the two rivers converge is designated as a Conversation Area, which extends up to the A429.
- 3.5.9. These constraints demonstrate the fairly constrained nature of Malmesbury and how these constraints will need to be balanced with the need for appropriate growth to continue to contribute towards alleviating affordability issues in the area, support the role of Malmesbury as an 'important tourist location in Wiltshire' (paragraph 5.72 of the Core Strategy) alongside supporting its employment function and meeting housing need.
- 3.5.10. Additionally, the emerging Strategy must demonstrate it appropriately responds to changing requirements as a result of the pandemic. These changing requirements include an increase in home working permanently, reducing net out commuting to other settlements and boosting local demand for many goods and services are all also recognised in the Emerging Strategy as a principle and it must be demonstrated how these changing requirements are appropriately reflected in the emerging apportionment of dwellings.
- 3.5.11. Areas close to the centre of Malmesbury, such as at Milbourne should be considered in terms of their ability to fulfil this role and the wider objectives of the plan. Sensitively designed development, can maintain the separate identity of Milbourne, but are actually located much closer to the centre of Malmesbury than some of the sites put forward for assessment, helping meet the wider objectives of the both the LPA and Council associated for example with sustainability and addressing climate change.
- 3.5.12. The spatial strategy must be flexible enough for sites such as this to properly be considered.

Role of Chippenham

- 3.5.13. It is noted that the largest proportion of dwellings is proposed to be allocated to Chippenham. It is accepted that there is some logic to this given that this settlement is a 'principal settlement' i.e. at the top of the settlement hierarchy. However, the total requirement is proposed to be delivered through three sites; site 1: East Chippenham with 2,975, site 2: South Chippenham with 2,415 and site 3, East of Showell Farm with 196 dwellings. All three sites are located around the south eastern part of Chippenham and appear to be part of one large urban extension.
- 3.5.14. It is recognised that there can be many benefits of large extensions such as this, not least in terms of infrastructure provision. However, it is widely acknowledged that larger sites are more complex to deliver and therefore have much longer build out periods; in the case of Chippenham, potentially extending beyond the plan period. There must therefore be flexibility within the plan to deliver on small sites more quickly to address the need within the Chippenham HMA.

3.6. Summary

- 3.6.1. The key points from this chapter are summarised below:

- The Local Plan Review has a key role in contributing to the delivery of the Climate Change Agenda, particularly in terms of having a 'sustainable pattern of development' with appropriate distribution of growth.
- The approach of dividing the county into four different Housing Market Areas (HMAs) within which the majority of the local population live and work, is supported. It is a logical approach to propose that addressing need is targeted to where that need is.
- The Plan Period should be extended to at least 2038 to ensure it covers a 'minimum 15 year period from adoption' as per the NPPF requirements with associated increases in housing requirements.
- The Local Plan Review proposes a reduction in the levels of housing at Malmesbury from 885 from 2006 to 2026 in the Core Strategy to 665 from 2016 to 2036 in the emerging Local Plan Review. Whilst the environmental constraints at Malmesbury are noted, there does not appear to be any evidence to justify the quantum of the proposed reduction.
- The Emerging Strategy must allow for growth around Malmesbury to support both its employment function, meet local housing need and support its role as a tourist destination. Whilst development must be sensitively designed around its constraints, which themselves contribute to the special character of the area, these in themselves should not be a barrier to further development around Malmesbury.
- Emerging strategies, particularly around Malmesbury and Milbourne must demonstrate how they have the ability to flexibly adapt to the changing requirements, (including the climate change agenda, sustainable development and reducing net out commuting) and these requirements should be reflected in the emerging apportionment of dwellings.
- This flexibility should enable sites that could be physically closer to a 'main settlement' and potentially unconstrained by physical constraints (therefore arguably more sustainable than other sites) not to be ruled out such as at Land to the West of Milbourne.
- There must therefore be flexibility within the plan to deliver on small sites more quickly to address the need within the Chippenham HMA.

4. Empowering Rural Communities

4.1. Introduction

4.1.1. This chapter relates to the Empowering Rural Communities consultation document. Our response below is structured according to the sections and questions contained within the document.

4.2. Empowering Rural Communities

4.2.1. The introductory text of the consultation paper (paragraphs 3-6) indicates a desire to change the emphasis towards considering development in rural areas. Specifically, paragraph 6 of the consultation paper states that, “*The Local Plan Review is looking at ways it can **empower** and not frustrate local initiatives and **facilitate meeting needs** whilst continuing to protect the countryside*” [our emphasis]. This stance reflects the positive approach taken in the NPPF which encourages the promotion of sustainable development in rural areas and states that planning policies should “*identify opportunities for villages to grow and thrive*” (NPPF paragraph 77). The overall intended approach towards considering development in rural areas is therefore supported.

4.2.2. Paragraph 8 of the consultation paper add that rural settlements (with specific reference to Large Villages and Local Service Centres) should continue to accommodate new homes based on their size, importance and ability to meet local needs. Whilst this is a sustainable approach to accommodating new development, it is also important to also allow for new development in Small Villages in order to support the vitality of rural areas and contribute to overall housing needs. Indeed, Small Villages such as Milbourne can play an important role in supporting the development needs of nearby larger settlements such as Malmesbury as noted further below.

Question: Do you agree there should be a target of 40% affordable homes on all new schemes of more than five dwellings in the rural area? What other approaches might there be?

4.2.3. The appropriate proportion of affordable housing provided at new developments in the rural area should be informed by up-to-date evidence of local needs, market requirements and viability. Whilst the overall desire to simplify planning requirements and encourage affordable housing supply (as proposed in paragraphs 15-18 of the consultation paper) is positive, it is important to ensure that this is not at the expense of meeting identified local housing needs in rural areas.

4.2.4. The Core Strategy (paragraph 6.44) set out the need for different affordable housing requirements across the county (a 30% zone and 40% zone) as it was identified that “*there are clear geographical disparities in terms of residential land values*” affecting viability, based on the Wiltshire Local Plan Viability Study 2014. It is noted that the Swindon and Wiltshire Strategic Housing Market Assessment (SHMA) 2017 highlights the ‘substantial need’ for affordable housing in the county. However the proposed approach to set a higher blanket target of 40% affordable provision on sites of more than 5 dwellings must be justified through an up-to-date viability assessment. Without this there is a risk that development, particularly smaller-scale development, will not come forward as envisaged, which will impact on the vitality of rural areas and overall housing supply.

- 4.2.5. It is notable that the Council is currently unable to deliver a 5-year housing land supply (based on the latest Housing Land Supply Statement (2019)), with 4.56 years supply across the county (Table 2a) and 4.29 years supply in the North and West Wiltshire HMA (including Malmesbury and Milbourne) (Table 3a). As a result the Council will not currently be able to meet its housing requirement over the Core Strategy plan period 2006-2026. It is therefore crucial that the LPR does not prohibit overall future housing delivery with overly restrictive affordable housing targets.

Question: Do you think this approach is worth pursuing? What local evidence would be needed to justify applying restrictions like these?

- 4.2.6. It is assumed that this question relates to the proposed approach to control development of large replacement dwellings and house extensions in rural areas, as set out in the preceding paragraphs 23-25 of the consultation paper.
- 4.2.7. The NPPF (paragraphs 61 and 78) encourages the need for a mix of housing to support local needs and the vitality of rural communities, as also acknowledged at paragraph 23 of the consultation paper. It is therefore important to ensure that the LPR contains planning policies which facilitate this.
- 4.2.8. The proposals to prevent replacement dwellings and extensions in rural areas takes a restrictive approach towards new development and appear to place unnecessary restrictions on market demand. This approach therefore appears at odds with the NPPF which is clear that planning policies should be positive (NPPF paragraph 35) and support sustainable development in rural areas (NPPF paragraph 78). Instead the LPR should be focused on facilitating new development to come forward in rural areas which is of an appropriate size and type to meet identified local needs.
- 4.2.9. The Swindon and Wiltshire SHMA 2017 (Figure 77) highlights a need for 3 and 4-bed market housing in the county and therefore it is important to ensure that appropriate provision is made for this in the LPR. Greenfield sites and rural areas in particular offer the opportunity for a greater proportion of larger family units with increased private amenity space to meet this identified need. Indeed Land to the west of Milbourne is well-placed to help meet this need given its location adjacent to Milbourne and close to Malmesbury.

Question: Do you agree with the approach set out in the suggested revised Core Policy 44? If not, why not? How could it be improved?

- 4.2.10. It is important to ensure that in the first instance the LPR fully considers the housing needs of rural settlements through an evidence-based approach. This will help to inform the policy requirements needed to meet these identified needs. The overall intention to include a rural exception policy and help to deliver affordable housing is consistent with paragraph 77 of the NPPF and is supported. However, consideration should be given as to whether such a policy enables identified need to be sufficiently met or whether additional provision for development in rural areas is required. Additional comments on the development needs of rural areas are provided elsewhere in this report.
- 4.2.11. Notwithstanding the above, we have several specific comments regarding the proposed revised Core Policy 44 as noted below.

- 4.2.12. Firstly, the proposed revised policy refers only broadly to 'rural settlements'. It is important for clarity that 'rural settlements' are clearly defined in the LPR to include 'Small Villages', as well as Large Villages and Local Service Centres, as noted at paragraph 20 of the consultation paper and in the current adopted Core Policy 44.
- 4.2.13. The increased threshold for rural exception schemes of up to 20 dwellings or 5% of the settlement size (compared to the threshold of up to 10 dwellings in the adopted policy) is generally welcomed as this will give greater allowance for the varied needs of rural settlements to be met. However, this threshold remains a somewhat arbitrary limit, particularly given there is a 'substantial need' for affordable housing in the county, as referred to in the SHMA 2017. Instead, the appropriate scale (and type) of residential development at rural settlements should be informed by local needs and site-specific circumstances.
- 4.2.14. Similarly, there appears to be no justification for the proposed approach to allow only 'up to 25% open market housing' at rural exception schemes, particularly when compared to the current adopted policy and the NPPF. Whilst rural exception sites are primarily affordable housing-led proposals, the NPPF (paragraph 77) states broadly that 'some' market housing should be considered to help meet local needs. In line with the current adopted Core Policy 44 states only that affordable housing should make up the 'majority' of the development. It is considered that the proposed revised policy should be revised accordingly in line with NPPF paragraph 77, more akin to the current adopted policy, in order to give greater allowance for local needs and site-specific circumstances to be met.
- 4.2.15. Milbourne, for example, is located less than 1km away from the Market Town of Malmesbury, and whilst being defined as a rural settlement (Small Village), it offers potential to also support the development needs of Malmesbury. The Emerging Spatial Strategy (page 3) identified Malmesbury with 'potential for significant development' but also recognises it as being a 'more constrained settlement' in the Chippenham HMA (page 12). In this instance it is therefore not appropriate to restrict development at Milbourne only to rural exception housing subject to the above limits. Instead sites such as Land to the west of Milbourne offer less constrained land which is capable of helping to meet Malmesbury's needs.

4.3. Supporting Rural Business, Services and Facilities

The role of local service centres, large and small villages

- 4.3.1. It is noted that the consultation paper does not propose to change the settlements designated as Small Villages but intends to make more of a distinction between Small Villages and Large Villages / Local Service Centres to inform the location of new development.
- 4.3.2. The general approach to direct development according to the relative sustainability of settlements is logical. However, it is important that this grouping is subject to ongoing monitoring and review to account for any changes in local circumstances and in the provision of local services and facilities, which may lead to changes to the relative sustainability of settlements to accommodate growth. It is notable that the evidence informing the current adopted settlement hierarchy ('Topic paper 3: Settlement strategy', January 2012) is almost 10 years old and therefore it is recommended that a full review is undertaken to accurately inform the LPR.



4.3.3. Paragraph 32 of the consultation paper indicates that the intention to separate Small Villages from Large Villages / Local Service Centres is because, “*Small Villages may accommodate small-scale development that responds to local needs and they therefore do not have such a wider role.*” However, it is important to recognise that some Small Villages have the potential to perform a necessary wider role owing to their location and proximity to larger settlements. Milbourne, for example, is located less than 1km to the east of Malmesbury (a constrained Market Town) and therefore has potential to accommodate additional development in a sustainable location to support the wider area. Indeed the NPPF encourages sustainable development in such rural areas. The intention to separate Small Villages and further limit potential development in these locations is therefore not supported.

4.3.4. The LPR should instead take a flexible approach to the settlement hierarchy in order to respond appropriately to development needs. The LPR should also consider the potential for additional development at Small Villages, such as Milbourne, where appropriate to support wider development needs.

Question: What do you think to the housing requirements for Local Service Centres and Large Villages? Should requirements be higher or lower? If so which ones and why?

4.3.5. In the Chippenham HMA, it is noted that the housing requirement for Local Service Centres is relatively small (100 units at Market Lavington) and that the amount of development ‘elsewhere’ (i.e. including Smaller Villages) is broadly akin to that of ‘Large Villages’ (page 9). This is despite the aim that Local Service Centres will accommodate more growth than Large Villages (paragraph 47) and is markedly different to that of other HMAs. The table at page 9 of the consultation paper also highlights the significant housing requirement at Market Towns (including Malmesbury) in the Chippenham HMA. This further highlights the importance of development in Smaller Villages in the Chippenham HMA, such as at Milbourne, to contribute to the overall development needs of the HMA and the Market Town of Malmesbury.

4.3.6. Tables 2.3 and 2.4 indicate that a large proportion of the housing requirement for Local Service Centres and Large Villages in the Chippenham HMA has been met by completions and commitments. It is however important that ongoing monitoring is undertaken to consider whether these sites remain likely to be delivered in the plan period, as noted at paragraph 53 of the consultation paper. Indeed the NPPF is clear that local authorities should monitor and maintain a deliverable housing supply to meet local needs (paragraph 73).

4.3.7. Given that the Council is currently unable to deliver a 5-year housing land supply, with only 4.29 years supply in the North and West Wiltshire HMA (Housing Land Supply Statement (2019)), it is even more important that the Council identifies sufficient housing sites. The contribution that suitable and deliverable sites at Smaller Villages, such as Land to the west of Milbourne, can make to housing supply should therefore be considered positively.

Neighbourhood planning

- 4.3.8. The consultation paper (paragraph 42) states that, '*elsewhere in the countryside*' (outside of Local Service Centres and Large Villages) local communities will bring forward housing proposals through neighbourhood planning, neighbourhood development orders or planning applications. Paragraph 44 notes that historic delivery of housing in these areas has largely been through small-scale windfall permissions.
- 4.3.9. Whilst the encouragement given towards neighbourhood planning is generally supported, it is important to ensure that sufficient housing is delivered via this means in order to support overall development needs.
- 4.3.10. The Malmesbury Neighbourhood Plan was made in 2015 and states that, alongside the allocation of 2 sites at Malmesbury, housing at Smaller Villages (including Milbourne) should only be on windfall sites and 'the number of dwellings should ideally not exceed single figures' (Policy 3). The Neighbourhood Plan is now 6 years old and will be in need of review to accompany the new LPR.
- 4.3.11. Given the scale of housing provision required 'elsewhere' in rural areas outside the Local Service Centres and Larger Villages in the Chippenham HMA (as referred to above), as well as the current housing land supply shortfall, it will be important to ensure that sufficient housing is provided for in these areas. Accordingly, the LPR itself should be prepared to make adequate provision for housing in Smaller Villages in the event that a review of the Neighbourhood Plan is not undertaken.
- 4.3.12. Whilst including a windfall allowance in the LPR is appropriate, as above given the scale and need of housing provision in smaller rural areas, the LPR should consider allocating smaller rural sites to provide greater certainty of delivery. This should include consideration of Land to the west of Milbourne which is sustainably located and suitable to support overall housing needs.

4.4. Summary

- 4.4.1. The key points from this chapter are summarised below.



- The positive intentions towards considering development in rural areas is supported in line with the NPPF and this must be reflected in LPR policies.
- The general approach to direct development according to the relative sustainability of settlements is logical.
- Consideration must be given to the potential for Small Villages to support the wider local needs of nearby larger settlements particularly where there is under-supply (e.g. the contribution of Milbourne to Malmesbury's needs and housing supply in the HMA)
- The LPR should make specific provision for housing in Small Villages, particularly where new Neighbourhood Plans do not come forward, to help provide certainty of delivery
- The appropriate proportion of affordable housing provided in the rural area should be informed by up-to-date evidence of local needs and should not be at a level that prohibits overall housing delivery in areas of under-supply.
- The LPR should reflect the predominant need for 3 and 4-bed market housing in the county and consider favourably greenfield sites and rural areas which are able to meet this need.
- The proposed revised Core Policy 44 should be amended to enable rural exception schemes of varying scales and with increased levels of market housing to be delivered to meet local needs.

5. Addressing Climate Change and Biodiversity Net Gain

5.1. Introduction

5.1.1. This chapter relates to the Addressing Climate Change and Biodiversity Net Gain consultation document. Our response below is structured according to the sections and questions contained within the document.

5.2. Section 3: The role of land-use plans in tackling climate change

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

5.2.1. A specific policy that encourages a '*proactive approach*' to climate change mitigation and adaptation through design would reflect national guidance (NPPF paragraph 149), as well as reflecting the objectives of the Climate Emergency. This approach is therefore generally supported and should make a contribution towards reducing carbon emissions.

5.2.2. It will however be important that such a policy should incorporate sufficient flexibility without setting prescriptive requirements as to how these aspirations are met. A target reduction in energy consumption over and above building regulations could be established (subject to being supported by evidence) however, the policy should not set out prescriptively how this should be achieved. For example, it should not include a specific proportion of energy consumption to be provided by a certain type of energy.

5.2.3. Prescriptively setting out proportions of energy that should come from a particular source will not enable the flexibility to address site-specific or changing circumstances during the plan period. A prescriptive approach could therefore result in the delivery of housing / other development being compromised and would not be supported.

5.2.4. Further, such a prescriptive policy would not take account of the fact that all policies should be focused on energy reduction in the first instance. The overall target to reduce energy consumption should first be achieved, where possible, through use of energy efficiency measures such as a 'fabric first approach' and remaining energy requirements secured through measures such as on or off-site renewable energy and other low carbon technologies, which could include 'allowable solutions'.

5.2.5. Appropriate account must also be taken of the financial and viability implications of any such policy, and additionally the financial and viability implications when considered cumulatively with other policies, to ensure that the delivery of housing and other objectives is not compromised.

Question A2: What practical and achievable steps should the Local Plan take to significantly reduce carbon emissions by 2030?

5.2.6. As set out above, residential development in particular should be required to reduce energy consumption in the first instance through a fabric-first approach, prior to considering the use of renewable and/or low carbon energy either on or off-site alongside potential offsetting measures.

5.2.7. The policy should also incorporate sufficient flexibility to address site specific or changing circumstances during the plan period and should not prescriptively set out how these requirements are met (for example policies should avoid requiring energy to be provided via a specific method, e.g. solar panels, district heating etc.).

5.2.8. As part of achieving 'net zero carbon', measures such as off-setting and allowable solutions should be considered. As part of the consideration of off-setting and allowable solutions, we would therefore welcome details as to how the cost per tonne of carbon/ other measures associated with allowable solutions will be calculated to ensure that the financial and viability implications of any such policy are fully considered.

Question A3: How should these actions be delivered and measured?

5.2.9. No comment.

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

5.2.10. The measures set out provide a good framework for the consideration of future development. The first line of policy theme 1, '*Development should be planned for with the future in mind*' is particularly important. A flexible approach to site selection should inform how sites are future proofed. This must include carefully considering how the sustainability and climate change criteria can most appropriately be achieved, whilst balancing these requirements with the fact that some development, around, for example Malmesbury, is necessary. Sites adjacent to the existing built form of Malmesbury may actually be less sustainable, for reasons including flood risk than sites not previously considered, such as land to the west of Milbourne.

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

5.2.11. Whilst in principle this approach is positive, any policy should incorporate sufficient flexibility to address site specific or changing circumstances during the plan period and should not prescriptively set out how these requirements are met. The financial and viability implications of such a policy must also be considered both in meeting the individual policy requirements and cumulatively with other policy requirements to ensure the delivery of housing and other objectives is not compromised.

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

5.2.12. The measures set out provide a broad framework for moving towards a net zero carbon future. It is noted that the policy theme 3 includes the following, '*This effectively means that the zero carbon 'rating' of all new development should be achieved on-site through the fabric of the buildings (energy efficiency), plot orientation, plus the incorporation of renewable energy generation.*'

5.2.13. It is not considered realistic to require all new development to be 'zero carbon' from adoption of the plan. To ensure the net zero carbon target is achievable by 2030, without compromising the delivery of housing

and other objectives in the plan, it would seem more realistic and viable to implement a 'stepped approach' towards this target.

- 5.2.14. Further, a requirement to achieve 'zero carbon' (not 'net zero carbon'), means there appears to be no flexibility in how the policy is achieved, for example through off-setting or allowable solutions.
- 5.2.15. Having a target of 'zero carbon' within a policy would go beyond both the national target (which relates to 'net zero carbon' and Wiltshire's own target, of being a 'net carbon neutral' by 2030'.)
- 5.2.16. Carbon neutral means that while some emissions are still being generated by a building/process these emissions are being offset somewhere else making the overall net emissions zero. Wiltshire's target of being 'net carbon neutral by 2030', appears to be ahead but in accordance with the national target.
- 5.2.17. Any policy wording should therefore target 1) a stepped approach to carbon reduction and 2) seek to achieve being 'net' carbon neutral by 2030. This would allow additional flexibility in how the overall target will be achieved, through enabling some emissions to be offset elsewhere if necessary/ appropriate, whilst still ensuring that overall the carbon emissions are zero. A flexible approach will help ensure that housing delivery and other objectives are not compromised.

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

- 5.2.18. As set out in B3 above, it is not considered realistic to require all new development to be 'zero carbon' from adoption of the plan. To ensure the net zero carbon target is achievable by 2030, without compromising the delivery of housing and other objectives in the plan, it would seem more realistic and viable to implement a 'stepped approach' towards this target.
- 5.2.19. Further, a requirement to achieve 'zero carbon' (not 'net zero carbon'), means there appears to be no flexibility in how the policy is achieved, for example through off-setting or allowable solutions.
- 5.2.20. Having a target of 'zero carbon' within a policy would go beyond both the national target (which relates to 'net zero carbon' and Wiltshire's own target, of being a 'net carbon neutral' by 2030'.)
- 5.2.21. Carbon neutral means that while some emissions are still being generated by a building/process these emissions are being offset somewhere else making the overall net emissions zero. Wiltshire's target of being 'net carbon neutral by 2030', appears to be ahead but in accordance with the national target.
- 5.2.22. Any policy wording should therefore target 1) a stepped approach to carbon reduction and 2) seek to achieve being 'net' carbon neutral by 2030. This would allow additional flexibility in how the overall target will be achieved, through enabling some emissions to be offset elsewhere if necessary/ appropriate, whilst still ensuring that overall the carbon emissions are zero. A flexible approach will help ensure that housing delivery and other objectives are not compromised.

Question B5: Would a move to support the delivery of zero carbon new development materially affect scheme viability?

5.2.23. As above, a requirement to achieve 'zero carbon' (not 'net zero carbon'), means there appears to be no flexibility in how the policy is achieved, for example through off-setting or allowable solutions.

5.2.24. Again, as above, any policy wording should therefore target 1) a stepped approach to carbon reduction and 2) seek to achieve being 'net' carbon neutral by 2030. This would allow additional flexibility in how the overall target will be achieved, through enabling some emissions to be offset elsewhere if necessary/appropriate, whilst still ensuring that overall the carbon emissions are zero. Viability evidence to consider both this requirement and other requirements cumulatively will be key alongside the flexible approach as outlined above, to help ensure that housing delivery and other objectives are not compromised.

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

5.2.25. No comment.

Question B7: How should the Council support the retrofitting and modernisation of existing buildings to achieve higher performance and reduce carbon emissions?

5.2.26. No comment.

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

5.2.27. As above, any policy wording should therefore target 1) a stepped approach to carbon reduction and 2) seek to achieve being 'net' carbon neutral by 2030. This would allow additional flexibility in how the overall target will be achieved, through enabling some emissions to be offset elsewhere if necessary/appropriate, whilst still ensuring that overall the carbon emissions are zero.

5.2.28. It is important that the policy wording does not restrict potential opportunities for the supply of energy from renewable energy sources, such as those from nearby off-site renewable sources. These policy alterations should ensure such opportunities are not ruled out.

5.2.29. Furthermore, a more flexible approach will help ensure that housing delivery and other objectives are not compromised.

Question B9: Should the Council set out policies that favour particular technologies, or should it encourage all technologies to provide green energy in Wiltshire?

5.2.30. It is understood that the purpose of the policy is to reduce carbon emissions to contribute to Wiltshire's target of being a 'net carbon neutral district by 2030'. If the overall target is to reduce carbon emissions, (rather than increasing renewable energy use) then the policy should not be prescriptive as to how the carbon reductions will be achieved. The targets should be referenced and refer to the fact that these 'could', for example, be achieved by including certain on or off-site types of renewable energy.

Question B10: Should the Local Plan set targets for the production and use of renewable energy? If so, what might they be and how would they be measured?

5.2.31. As above, it is understood that the purpose of the policy is to reduce carbon emissions to contribute to Wiltshire's target of being a 'net carbon neutral district by 2030'. If the overall target is to reduce carbon emissions, (rather than increasing renewable energy use) then the policy should not be prescriptive as to how the carbon reductions will be achieved and should not set targets for the production and use of renewable energy.

5.2.32. Furthermore, assuming the primary aim of any policy is about achieving a reduction in energy use and in particular carbon reduction, the policy should firstly promote a reduction in the actual energy use, through a 'fabric first' (or energy efficiency in the design of buildings) approach. Any policy which focuses on targets for the production and use of renewable energy could conflict with the overall aim of energy reduction, by placing more weight on achieving a target around the production and use of energy rather than an actual reduction in energy consumption.

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

5.2.33. No comment.

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

5.2.34. The principle of increasing the level of self-containment within Wiltshire's settlements as it is considered to offer 'the best solution for tackling unsustainable, carbon-based travel patterns' is a logical and sound approach.

5.2.35. Whilst development must be sensitively designed around its constraints, which themselves contribute to the special character of the area, these in themselves should not be a barrier to further development around Main Settlements such as Malmesbury. The Emerging Strategy must allow for such growth around Malmesbury in order for the objectives around sustainability and climate change to be delivered.

5.2.36. Areas close to the centre of Malmesbury, such as at Milbourne should be considered in terms of their ability to fulfil the role of accommodating some of the necessary growth around Malmesbury. Sensitively designed development, can maintain the separate identity of Milbourne, but could actually be located much closer to the centre of Malmesbury than some of the sites put forward for assessment. This would therefore help to meet the wider objectives of the Council associated in particular with tackling unsustainable carbon based travel patterns.

5.2.37. The spatial strategy must be flexible enough for sites such as this to properly be considered to enable these wider objectives to be delivered.

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

5.2.38. As above, a practical step is ensuring the spatial strategy is flexible enough to allow for the necessary

growth around 'Main Settlements' such as Malmesbury to accommodate growth on sites unconstrained by flooding or other key constraints and located physically close to Malmesbury, such as at Milbourne.

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

5.2.39. No comment.

Question B15: If all new development is to be future proof promote zero carbon living in energy production and consumption terms, what impact would this have on the design and viability of schemes?

5.2.40. As above, any policy wording should target 1) a stepped approach towards being 'net carbon neutral' by 2030 and 2) ensure any planning policy also has a target of being 'net carbon neutral' (not zero carbon) by 2030. This would allow additional flexibility in how the overall target will be achieved, through enabling some emissions to be offset elsewhere if necessary/ appropriate, whilst still ensuring that overall the carbon emissions are zero.

5.2.41. It is important that the policy wording does not restrict potential opportunities for the supply of energy from renewable energy sources, such as those from nearby off-site renewable sources. These policy alterations should ensure such opportunities are not ruled out.

5.2.42. Furthermore, a more flexible approach will help ensure that the energy reduction requirements do not negatively impact on the design and viability of schemes to the same extent. However, further evidence is required to enable the energy requirements to be considered cumulatively with other requirements to ensure housing delivery and other objectives are not compromised.

5.3. Summary

5.3.1. The key points from this chapter are summarised below.

- The proposed pro-active approach to climate change mitigation and adaptation is generally supported and should make a contribution towards reducing carbon emissions.
- Prescriptively setting out proportions of energy that should come from a particular source will not enable the flexibility to address site-specific or changing circumstances during the plan period. A prescriptive approach could therefore result in the delivery of housing / other development being compromised and would not be supported.
- The overall target to reduce energy consumption should first be achieved, where possible, through use of energy efficiency measures such as a 'fabric first approach' and remaining energy requirements secured through measures such as on or off-site renewable energy and other low carbon technologies, which could include 'off-setting' and 'allowable solutions'.
- In considering off-setting and allowable solutions, details of the cost per tonne of carbon/ other measures associated with how allowable solutions will be calculated would be welcomed.
- It is not considered realistic to require all new development to be 'zero carbon' from adoption of the plan. Further, a requirement to achieve 'zero carbon' (not 'net zero carbon'), means there appears to be no flexibility in how the policy is achieved, for example through off-setting or allowable solutions.
- Any policy wording should target 1) a stepped approach to carbon reduction up to 2030 and 2) seek to achieve being 'net' carbon neutral by 2030.
- If the overall target is to reduce carbon emissions, (rather than increasing renewable energy use) then the policy should not be prescriptive as to how the carbon reductions will be achieved.
- Appropriate account must also be taken of the financial and viability implications of any such policy/ies, to ensure that the delivery of housing and other objectives is not compromised.
- The principle of increasing the level of self-containment within Wiltshire's settlements as it is considered to offer 'the best solution for tackling unsustainable, carbon-based travel patterns' is a logical and sound approach.
- A flexible approach to site selection should inform how sites are future proofed. For example, sites adjacent to the existing built form of Malmesbury may actually be less sustainable, for reasons including flood risk than sites not previously considered, such as land to the west of Milbourne.

6. Supporting Documents

6.1. Introduction

6.1.1. This chapter relates to the supporting consultation documents (Interim Sustainability Appraisal, Local Transport Review, Chippenham HMA: Formulating Alternative Development Strategies, Local Housing Needs Assessment, Retail and Town Centre Study, Employment Land Review and the Level 1 Strategic Flood Risk Assessment). Our response below is structured according to the relevant sections contained within these documents.

6.2. Interim Sustainability Appraisal

6.2.1. The Interim Sustainability Appraisal (SA) (paragraph 4.2.1) highlights the overall increase in housing and employment requirements in the Chippenham HMA compared to the Core Strategy. In considering three potential strategies to accommodate these needs, it is noted that the Interim SA rejects Strategy CH-A (rolling forward the equivalent distribution of the Core Strategy) and instead recommends an additional/amended approach more akin to Strategies CH-B (Chippenham Expanded Community) and CH-C (Melksham Focus) which reduces the proposed development levels at settlements which are considered to be more environmentally constrained such as Malmesbury.

6.2.2. It is important to note however that Malmesbury has a more positive score against the SA objectives in Strategy CH-A than the average score for other settlements in Strategy CH-A. This indicates that the rejection of Strategy CH-A relates more to the potential for greater adverse potential impacts at other settlements in the HMA than at Malmesbury.

6.2.3. Malmesbury scores particularly highly against the SA objectives 8 (housing), 9 (health) and 11 (economy). Indeed the assessment against SA objective 8 in fact highlights that the level of growth planned by Strategy CH-A may not be sufficient – *“Given the high affordability ratio and relatively low growth proposed, it is uncertain whether the scale of growth under this strategy would be sufficient to address the current imbalance”* (Interim SA Appendix I, page 27). It is noted that the SA gives the same ‘minor positive’ score for Malmesbury under SA objective 8 for Strategy CH-B and CH-C, despite each of these approaches proposing a lower level of growth and thereby contributing less to the identified affordability issues. Similarly, it is noted that the SA gives the same ‘minor positive’ score for Malmesbury under SA objective 11 (economy) for each of the three Strategies, despite the potential for additional housing under Strategy CH-A to further support the local economy.

6.2.4. It is noted that Malmesbury is assessed more negatively in relation to environmental SA objectives, such as objectives 3 (water) and 6 (heritage), where the scores are lower against Strategy CH-A compared to Strategies CH-B and CH-C. The assessment is however focused predominantly in relation to the level of growth and does not fully consider the location of growth or appropriate mitigation that can be delivered. Whilst it is acknowledged that Malmesbury town itself is subject to heritage constraints, it is important to consider the potential for development around Malmesbury which is less constrained. Land to the west of Milbourne, for instance, is less constrained but is sustainably located close to Malmesbury and is therefore able to help meet local development needs.

6.2.5. Within consideration of potential development strategies, it is important that the SA takes a positive approach to considering the needs and opportunities of individual settlements.

6.3. Local Transport Review

6.3.1. The Local Transport Review predominantly considers the impact of strategic growth at the Principal Settlements of Chippenham, Salisbury and Trowbridge. In particular, the Review (section 4.2.3) highlights the “significant pressures” forecast on the A350 corridor which require mitigation around and to the south of Chippenham.

6.3.2. The acknowledgement at section 4.4 of the Review that further assessment is required to analyse the impact of development at Market Towns (i.e. including Malmesbury located to the north of Chippenham) is noted. It is important that this assessment is undertaken as soon as possible to inform the selection of development sites in the LPR.

6.3.3. In this regard, Land to the west of Milbourne is located adjacent to the A429 between Malmesbury and Milbourne, with pedestrian/cycle connections along Blinks Hill to the town centre. As such the site is well placed and sustainably located to accommodate new development.

6.4. Chippenham HMA: Formulating Alternative Development Strategies

6.4.1. The Alternative Development Strategies (ADS) report considers whether it is appropriate to roll-forward the Core Strategy or whether alternative development strategies are required for the Chippenham HMA.

6.4.2. Tables 1 and 2 set out that rolling forward the current strategy would result in a housing requirement for Malmesbury of 1,260 homes over the period 2016-2036 (the lowest of the Principal Settlements and Market Towns in the HMA) and an employment requirement for Malmesbury of 7.2ha based on the Employment Land Review (an increase to the current Core Strategy requirement compared to a decrease at other settlements). However despite this, Tables 10 and 11 conclude that a lower level of growth should be sought at Malmesbury due primarily to environmental constraints and land availability.

6.4.3. It is notable that the assessment of potential environmental impacts is based on a ‘high level environmental assessment’ and ‘broad judgement’ set out on two pages of the report (pages 12-13). Whilst it is acknowledged that Malmesbury is subject to environmental constraints, it is not clear how exactly the assessment has been made and which land has been considered. The conclusions made are therefore not fully evidence-based and justified, as required by NPPF paragraph 35, and full assessment is required in order to fully inform the development strategy. In undertaking a full assessment, consideration should be given to the wider area around Malmesbury (such as at Milbourne) which is less-constrained and sustainably located to support Malmesbury’s needs.

6.4.4. It is also considered that a number of the conclusions in Table 10 relating to Malmesbury do not fully reflect the local circumstances and assessment set out in the preceding text. For example:

- Employment – Table 10 concludes that a lower scale of employment growth is required compared with rolling forward the Core Strategy. However, whilst there is some deliverable supply due to outstanding commitments to meet Core Strategy requirements (Figure 6), the Employment Land Review (2018, referred to below) highlights the forecast under-supply in the area moving forward and recommends (at section 7.2.1) *“further allocations here [at Malmesbury] would be helpful for accommodating future growth.”* The ADS report itself (paragraph 96) continues that *“Both Corsham and Malmesbury show stronger prospects for job growth that also suggest higher rates of housing development than rolling forward the current strategy.”* The supporting evidence therefore outlines a different picture relating to this indicator compared to the ADS report conclusions.
 - Population – Table 10 concludes that ‘neither higher or lower’ growth is required in relation to population based on the Core Strategy. However, Figure 9 shows a projected 9% increase in population distribution in Malmesbury, as well as a 150% increase in rural areas. It is therefore clear that a level of higher growth is required at Malmesbury and surrounding rural areas (such as Milbourne) based on this indicator, in contrast to the ADS report conclusions.
 - Affordability – Table 10 also concludes that ‘neither higher or lower’ growth is required in relation to affordability based on the Core Strategy. However, whilst Figure 10 suggests there is not a need for affordable housing in Malmesbury, this is marginal (at -5%), and notably this directly contrasts with the Interim SA. Paragraph 4.2.7 of the Interim SA highlights that *“the ratio of house price to earnings in Malmesbury continues to be one of the highest in Wiltshire at 14.13 and delivery of affordable homes should be prioritised.”* On this basis there appears to be a clear need for additional growth to improve affordability in Malmesbury, in contrast again to the ADS report conclusions.
 - Land availability – Table 10 concludes that land availability indicates a need for a lower scale of growth at Malmesbury. This is based on Figure 4 which indicates that there is 42% of land available in Malmesbury to accommodate the needs of rolling forward the Core Strategy. However, importantly this does not account for land to the west of Milbourne which also provides suitable and available land to accommodate development to support meeting Malmesbury’s needs. It is vital that the LPR considers all potential land around Malmesbury, such as land to the west of Milbourne, in order to meet identified local development needs (as referred to above).
- 6.4.5. These inaccuracies skew the conclusions and recommendations set out in Table 11 and incorrectly suggest that a lower level of growth should be proposed at Malmesbury in contrast to the evidence base. Instead it is clear that, as a minimum, the distribution of homes and jobs for Malmesbury should be rolled-forward from the Core Strategy, as opposed to the alternative development strategies CH-B and CH-C. A positive approach should be taken to considering the potential development opportunities at and around Malmesbury, in line with the NPPF, including consideration of potential development of land to the west of Milbourne.

6.5. Local Housing Needs Assessment (2019)

- 6.5.1. It is noted that the Local Housing Needs Assessment (LHNA) (2019) identifies Malmesbury within the new Chippenham HMA given the importance of Malmesbury to Chippenham’s workforce.

- 6.5.2. Importantly, the LHNA (Figure 14) highlights a shortfall of between 3,800 and 4,200 workers in the Chippenham HMA to support the projected increase in jobs. As such, Figure 15 of the LHNA recommends an additional 2,979 homes above the minimum Local Housing Need in the HMA (increasing the total requirement to 20,400 homes) in order to fulfil the forecast jobs growth. It is noted and welcomed that this total requirement of 20,400 homes is carried forward in the Emerging Spatial Strategy.
- 6.5.3. It will be important to ensure that this requirement of 20,400 homes is subsequently met as a minimum in order to support local jobs as well as local housing needs. Sufficient housing sites should therefore be allocated in the LPR to meet this requirement including at sustainable locations such as Malmesbury. This is particularly important given the specific identified employment needs of Malmesbury (referred to below) and given the current housing land supply shortfall referred to above.

6.6. Retail and Town Centre Study (2020)

- 6.6.1. It is notable that the preparation of the Retail and Town Centres Study (2020) commenced at the start of 2020 with evidence base data collected in October 2020 during the onset of the Covid-19 pandemic. As outlined throughout the study, the pandemic has and is continuing to lead to significant change in retail and town centre uses (in addition to ongoing changes in retail habits prior to the pandemic) and therefore it is important that the Council monitors and considers updates to the assessment to ensure the LPR is informed by up-to-date and accurate evidence.
- 6.6.2. In any case, it is clear that *“changes in retailer requirements and market demand will continue to have a significant impact on the UK’s town centres and high streets”* (paragraph 3.49) and therefore LPR policies will need to be sufficiently flexible to respond to these changes, particularly given that the LPR covers the plan period up to 2036.
- 6.6.3. With regards to Malmesbury, Table 4.9 of the Study shows that there has been a drop in the number of retail/service uses in the town centre since 2012, below the UK average (Table 4.9). Despite current trends however, the Study (paragraph 8.17) states that overall *“Malmesbury is considered to be a healthy town centre which benefits from a small but strong localised catchment, assisted by the attractiveness of the centre for visitors from outside of the local area.”* This thereby further emphasises the suitability and sustainability of Malmesbury to accommodate new development which can benefit from and further support local services and facilities. As set out previously, Land to the west of Milbourne is located in a sustainable location less than 1km from the centre of Malmesbury and therefore has the potential to accommodate development which can help to support local town centre uses.

6.7. Employment Land Review (2018)

- 6.7.1. The Employment Land Review highlights the importance of the Council allocating and supporting the delivery of employment sites across the county. In particular, section 7.2.1 of the Review emphasises the *“immediate need”* for new allocations in the Wiltshire part of the M4/Swindon (Wiltshire) FEMA (including Malmesbury) due to the forecast under-supply of around 4ha of employment land in the next 5 years. The Review (section 7.2.1) continues that, *“There is only one site available in Malmesbury, giving little choice for new development, including interest from Dyson suppliers, so further allocations here would be helpful for accommodating future growth.”*

6.7.2. The NPPF (paragraph 104) highlights the need for an appropriate mix of uses across an area in order to minimise journeys and support sustainable development. In light of the need for additional employment land in Malmesbury, it follows that the LPR should also allow for additional housing provision at Malmesbury in order to support sustainable development.

6.8. Level 1 Strategic Flood Risk Assessment (2019)

6.8.1. The Level 1 Strategic Flood Risk Assessment highlights the areas of the county that are subject to flood risk including Malmesbury, which has previously experienced flooding on a number of occasions, including most recently in 2012 (Appendix Q: Recorded flood history).

6.8.2. It is noted that a number of the appendices are missing from the SFRA published for consultation including the maps showing Flood Zones 2 and 3 (Appendices B-D). However, the Flood Map for Planning (at Gov.uk) clearly illustrates the flood risk constraints around the south, south-east and north-west of Malmesbury in particular.

6.8.3. The NPPF (paragraph 158) is clear that development should be directed to areas with the lowest risk of flooding. In this regard, land to the west of Milbourne, to the east of Malmesbury, is located in Flood Zone 1 and is therefore unconstrained and well-placed in this respect to accommodate development to support Malmesbury's needs.

6.9. Summary

6.9.1. The key points from this chapter are summarised below.

- The Interim SA should consider the needs and opportunities of individual settlements when considering potential development strategies. Strategy CH-A should not be rejected for Malmesbury as it scores more positively than other settlements and the SA indicates that additional growth at Malmesbury is required beyond that proposed by Strategy CH-A (and even more so compared to alternative strategies)
- The evidence base has been incorrectly applied to inform the conclusions regarding Alternative Development Strategies. It is clear that, as a minimum, the level of growth for Malmesbury should be rolled-forward from the Core Strategy.
- It is welcomed that the total housing requirement for the Chippenham HMA takes account of forecast job growth, as noted in the Local Housing Needs Assessment.
- The Local Transport Review should assess the impact of development at Market Towns to inform the amount and location of sites around these settlements.
- It is welcomed that Malmesbury is recognized as a healthy and sustainable town centre in the Retail and Town Centre Study, and therefore the area should accommodate new development to benefit from and support this.
- Sufficient housing is also required in Malmesbury to support the need for additional employment supply in Malmesbury, as identified by the Employment Land Review.

7. Planning for Malmesbury

7.1. Introduction

7.1.1. This chapter relates to the Planning for Malmesbury consultation document. Our response below is structured according to the sections and questions contained within the document.

7.2. Scale of growth

Question MM1. What do you think to this scale of growth? Should there be a brownfield target? Should it be higher or lower?

7.2.1. In 2019, Wiltshire Council committed to becoming 'net carbon neutral by 2030' and is seeking to make the County carbon neutral by 2030. To achieve this aspiration, the 'Addressing Climate Change and Biodiversity Net Gain' document highlights the need for 'increasing the level of self-containment within Wiltshire's settlements' which 'offers the best solution for tackling unsustainable, carbon-based travel patterns'. Alongside the design of new development, the location of new development is therefore critical in contributing to meet this aspiration.

7.2.2. As set out above, it is noted that the Local Housing Needs Assessment (LHNA) (2019) identifies Malmesbury within the new Chippenham HMA given the importance of Malmesbury to Chippenham's workforce.

7.2.3. Importantly, the LHNA (Figure 14) highlights a shortfall of between 3,800 and 4,200 workers in the Chippenham HMA to support the projected increase in jobs. As such, Figure 15 of the LHNA recommends an additional 2,979 homes above the minimum Local Housing Need in the HMA (increasing the total requirement to 20,400 homes) in order to fulfil the forecast jobs growth.

7.2.4. It will be important to ensure that this requirement of 20,400 homes is subsequently met as a minimum in order to support local jobs as well as local housing needs and further that opportunities to meet this need as close to where it arises are taken. Sufficient housing sites should therefore be allocated in the LPR to meet this requirement including at sustainable locations such as around Malmesbury. This is particularly important given the specific identified employment needs of Malmesbury, the current housing land supply shortfall referred to above and ensuring all development is sustainably located in response to the climate emergency.

7.2.5. As explained above, at paragraph 3.8 of the 'Emerging Spatial Strategy', *'the strategy includes a possible brownfield target for each settlements; an indicative number of new homes to be built over the period 2021-2031 using previously developed land... [our emphasis]. The brownfield target is derived from a 'windfall' allowance for Wiltshire used in the housing land supply.'*

7.2.6. Paragraph 3.12 notes that, *'The amount of greenfield land needing to be identified for development will depend upon the brownfield land that can be relied upon, which is land identified in neighbourhood plans or other allocations and planning permissions. It is not possible to assume each target will be met and just a target amount cannot count toward the land we need to plan for.'*

7.2.7. In accordance with national guidance, it is entirely reasonable to include a target for delivery of houses on brownfield sites. As recognised in the Spatial Strategy, it is not possible to assume the target will be met and it cannot count towards the land being planned for. On this basis, there should be specific sites identified to meet the identified need (not a constrained version of the need) and any windfall development on brownfield sites should be in addition to the allocated sites.

7.3. Place shaping priorities

Question MM2. Are these the right priorities? What priorities may be missing? How might these place shaping priorities be achieved?

7.3.1. The three place shaping principles (delivering a range of housing to meet local needs with supporting infrastructure, recognising environmental constraints, support good prospects for economic growth and developing a town centre strategy) are all credible. However, these place shaping principles alone do not capture other messages within the various consultation documents such as the way the current pandemic is changing our behaviour and the different long-term roles of settlements, including an increased level of home working and reducing net out commuting to other settlements. This position is emphasised again through the *'Addressing Climate Change and Biodiversity Net Gain'* document, which highlights the need for *'increasing the level of self-containment within Wiltshire's settlements'* as this *'offers the best solution for tackling unsustainable, carbon-based travel patterns'*.

7.3.2. These over-arching messages must actually come through in the individual documents, such as *'Looking to the Future, Planning for Malmesbury'*. By artificially constraining development in this location, out commuting levels won't be reduced nor self-containment achieved.

7.3.3. The Malmesbury site selection paper notes the importance of historic patterns of growth. It is agreed that this should be considered, however, this must be appropriately considered within the relevant context. Understanding the character of an area is important. However, if growth has been forced along a particular direction given the constraints in a location, and continuing with this pattern actually results in new development being located a significant distance from the town centre and services upon which there is an interdependency, an alternative growth strategy could be more appropriate.

7.3.4. Therefore, the Place Shaping Principles should specifically include 1) meeting the need where that need arises, and 2) promoting self-containment, reducing out commuting to help contribute to meeting the aspirations of the Climate Emergency. To facilitate this, in the case of Malmesbury, an alternative approach should include consideration of sites in for example Milbourne, which could meet these objectives, whilst ensuring the separate identity of Milbourne is retained.

7.4. Potential Development Sites

Question MM3. Is this the right pool of potential development sites? Are there any other sites we should be considering?

7.4.1. Yes, there are other sites that should be considered.

- 7.4.2. As above, the proposed place shaping principles for Malmesbury currently do not capture all messages and objectives within the various consultation documents. In particular, this includes the way the current pandemic is changing our behaviour and the different long-term roles of settlements, including an increased level of home working and reducing net out commuting to other settlements. This position is emphasised again through the *'Addressing Climate Change and Biodiversity Net Gain'* document, which highlights the need for *'increasing the level of self-containment within Wiltshire's settlements'* as this *'offers the best solution for tackling unsustainable, carbon-based travel patterns'*.
- 7.4.3. By artificially constraining development in this location, out commuting levels won't be reduced nor self-containment achieved.
- 7.4.4. The Emerging Strategy must allow for growth around Malmesbury where that need arises to support both its employment function, meet local housing need and support its role as a tourist destination. Whilst development must be sensitively designed around its constraints, which themselves contribute to the special character of the area, these in themselves should not be a barrier to further development around Malmesbury.
- 7.4.5. Areas close to the centre of Malmesbury, such as at Milbourne should be considered in terms of their ability to fulfil this role. Sensitively designed development, can maintain the separate identify of Milbourne, but are actually located much closer to the centre of Malmesbury than some of the sites put forward for assessment, helping meet the wider objectives of the Council associated for example with sustainability and addressing climate change.
- 7.4.6. Land to the west of Milbourne (see plan at Appendix 1) fulfils all of these criteria. Sensitively designed development focusing on the eastern side of the site, would enable the separate identify of Milbourne to be retained, has no overarching constraints in terms of impact on the historic settlement, the AONB, the conservation area and is located away from the rivers.
- 7.4.7. Further in terms of accessibility, the closest primary school (St Joseph's Catholic Primary School) is located approximately 0.6 miles away, Malmesbury School (a Secondary School) is located only 1.2 miles away, Malmesbury medical partnership is less than a mile away and Malmesbury Town Centre is also less than a three quarters of a mile away, based on streetcheck.co.uk. (Note these distances are all approximate and will depend upon which part of the site they are measured from.) However, these factors all support the sustainability credentials of this location.

Question 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?

- 7.4.8. As above, in identifying land most 'appropriate to build' on, relates to the key priorities in an area. From reading all of the consultation material and adopted Core Strategy, for Malmesbury this appears to be:
- Supporting both the employment function of Malmesbury, meeting local housing need and supporting its role as a tourist destination;
 - Ensuring development is sensitively located around the environmental constraints in Malmesbury and an understanding of its special character;

- Contributing to meeting the aspiration to achieve net zero carbon by 2030, including measures such as the promotion of self-containment (which Wiltshire consider to be the best solution for tackling unsustainable, carbon-based travel patterns);
- Responding to new behaviours as a result of the pandemic including a reduced level of out commuting and increased home working.

7.4.9. To achieve all of these aspirations and ensure development is 'future proofed' the identified housing need should be met where that need arises and if new objectives are successfully to be achieved, previous growth patterns should not automatically be continued.

7.4.10. As above, areas close to the centre of Malmesbury, such as at Milbourne should be considered in terms of their ability to fulfil this role. Sensitively designed development, can maintain the separate identify of Milbourne, but are actually located much closer to the centre of Malmesbury than some of the sites put forward for assessment, helping meet the wider objectives of the both the LPA and Council associated for example with sustainability and addressing climate change.

Question 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?

7.4.11. As above, the site selection approach for Malmesbury currently does not capture all messages and objectives within the various consultation documents. In particular, this includes the way the current pandemic is changing our behaviour and the different long-term roles of settlements, including an increased level of home working and reducing net out commuting to other settlements. This position is emphasised again through the '*Addressing Climate Change and Biodiversity Net Gain*' document, which highlights the need for '*increasing the level of self-containment within Wiltshire's settlements*' as this '*offers the best solution for tackling unsustainable, carbon-based travel patterns*'.

7.4.12. By artificially constraining development in this location, out commuting levels won't be reduced nor self-containment achieved.

7.4.13. For the reasons set out above, sites such as 'Land to the west of Milbourne' provides the opportunity to successfully help meet housing need where that need arises and meet the objectives of the existing Core Strategy regarding supporting the economy of Malmesbury but additionally has the ability to contribute to meeting the new objectives that are clearly a key focus at Wiltshire as a result of declaring the Climate Emergency.

7.5. Summary

7.5.1. The key points from this chapter are summarised below.

- The proposed place shaping principles for Malmesbury does not capture all objectives within the various consultation documents. In particular, this includes the way the current pandemic is changing our behaviour and the different long-term roles of settlements, including an increased level of home working and reducing net out commuting to other settlements.
- Alongside the design of new development, the location of new development is critical in 'increasing the level of self-containment within Wiltshire's settlements' which 'offers the best solution for tackling unsustainable, carbon-based travel patterns'.
- By artificially constraining development in this location, out commuting levels won't be reduced nor self-containment achieved.
- The requirement of 20,400 homes should be met as a minimum in order to support local jobs as well as local housing needs in addition to wider objectives of the LPR and further that opportunities to meet this need as close to where it arises are taken.
- Sufficient housing sites should therefore be allocated in the LPR to meet this requirement including at sustainable locations such as around Malmesbury.
- The Emerging Strategy must allow for growth around Malmesbury where that need arises to support both its employment function, meet local housing need and support its role as a tourist destination. Whilst development must be sensitively designed around its constraints, which themselves contribute to the special character of the area, these in themselves should not be a barrier to further development around Malmesbury.
- Areas close to the centre of Malmesbury should be considered in terms of their ability to fulfil this role. Land to the west of Milbourne (see plan at Appendix 1) fulfils all of the identified criteria and has no over-arching constraints.
- Here, sensitively designed development, can maintain the separate identify of Milbourne, but is actually located much closer to the centre of Malmesbury than some of the sites put forward for assessment, helping meet the wider objectives of the Council associated with sustainability, addressing climate change and being located with easy access to services and facilities for example.

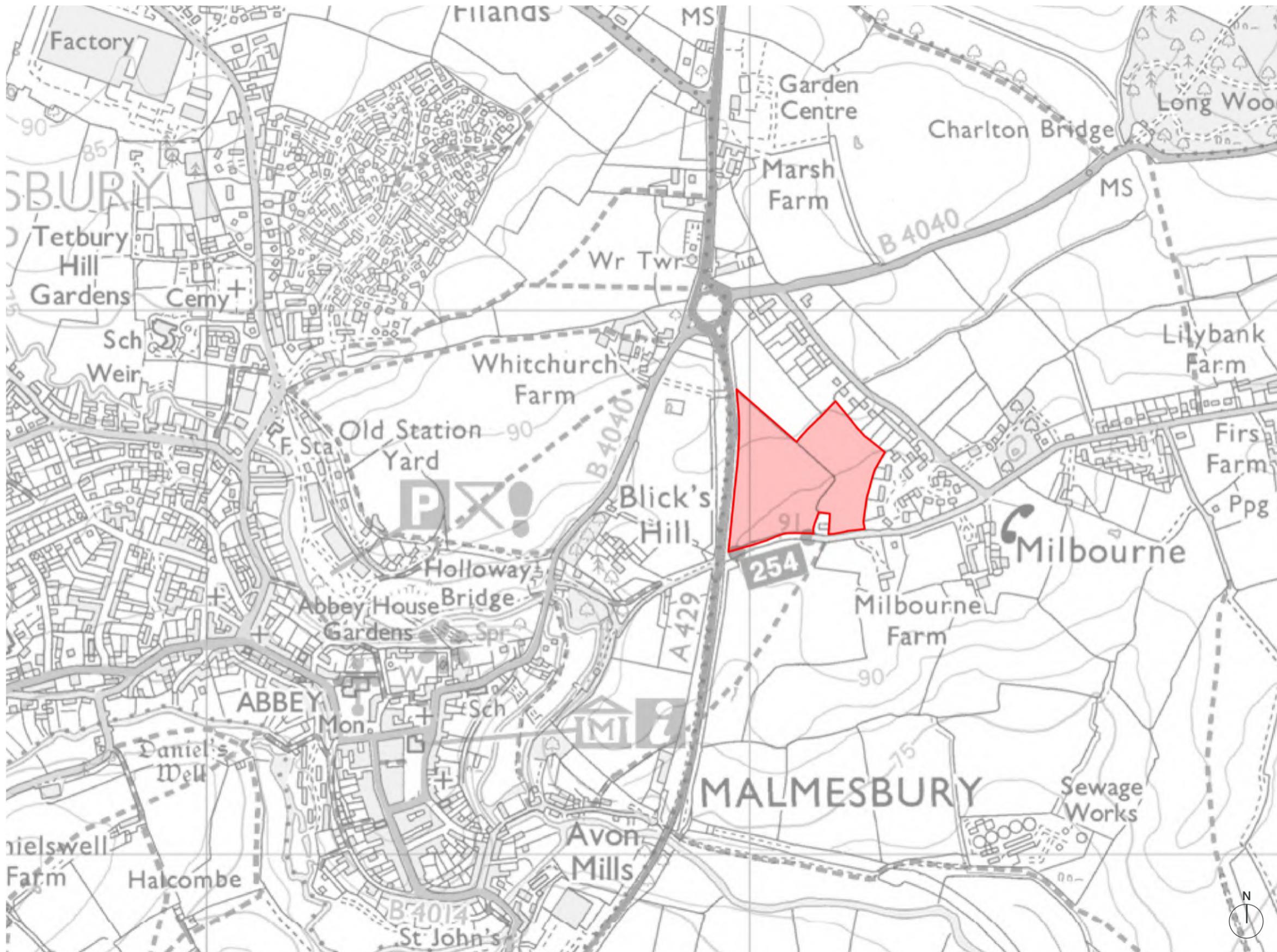
8. Conclusion

8.1. Summary

- 8.1.1. These representations have been prepared on behalf of Miller Homes in relation to the current LPR consultation. Miller Homes have an interest in land to the west of Milbourne and therefore wish to inform the preparation of the LPR.
- 8.1.2. Comments have been provided based on the details and questions within the consultation documents relating to: the Emerging Spatial Strategy, Empowering Rural Communities, Addressing Climate Change and Biodiversity Net Gain, Planning for Malmesbury and supporting consultation documents.
- 8.1.3. Our response supports the overall spatial strategy, changes to HMAs and the overall housing requirement for the Chippenham HMA. However, concerns are raised regarding the approach and amount of housing proposed at and around Malmesbury. Concerns are also raised that place-shaping principles and changing behaviours have not been taken into account.
- 8.1.4. Whilst it is acknowledged that Malmesbury itself is constrained, our response explains this should not be a barrier and the LPR must allow for sufficient growth in areas around the town (such as at Milbourne) in order to support its local housing needs, employment function and its role as a tourist destination. The emerging strategy must also allow for such growth around Malmesbury in order for the objectives around sustainability and climate change to be delivered. Indeed the supporting evidence base documents highlight the level of growth required and do not justify any reduction in development at Malmesbury compared to the Core Strategy. Land to the west of Milbourne is located less than 1km away from local services and facilities in Malmesbury and is therefore sustainably-located and relatively unconstrained to support the identified needs of Malmesbury.
- 8.1.5. The LPR should therefore fully review the level of growth proposed at and around Malmesbury and consideration should be given to the potential development at Land to the west of Milbourne to supporting Malmesbury's needs.



Appendix 1



Site Boundary

Land to the West of Milbourne, Malmesbury

on behalf of Miller Homes

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drawing no.	RL03	drawing	Site Location Plan - Wider Capture
revision	-	scale	1:25,000 @ A3
drawn by	CJM	checked by	AR
date	March 2021	job no.	-

Urban
Design
Studio





- Site Boundary
- ➔ Potential Vehicular Access from A429
(location to be determined)
- ww No development within green gap to
retain separate identity of Milbourne
- - - - - Pedestrian / Cycle Route

Land to the West of Milbourne, Malmesbury

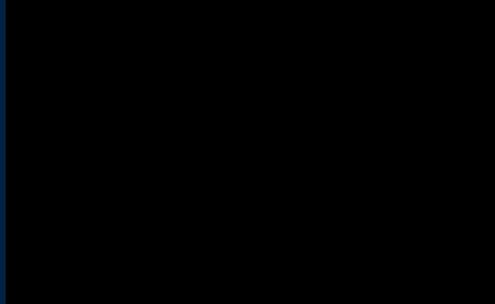
on behalf of Miller Homes

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drawing no.	RL02	drawing	Site Location Plan - Aerial
revision	A	scale	1:1,000 @ A3
drawn by	CJM	checked by	AR
date	March 2021	job no.	-

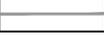
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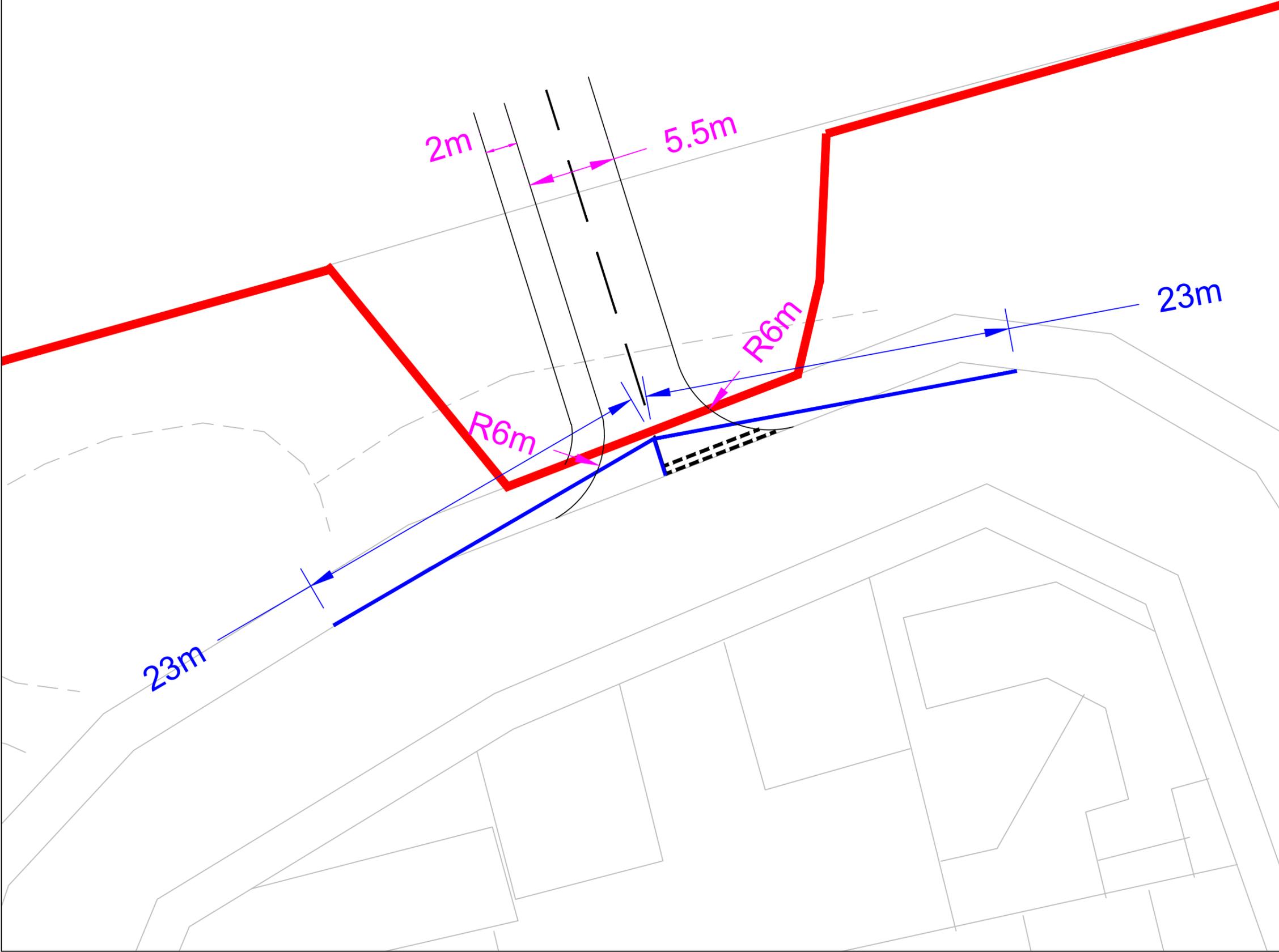




STRAT318



- Key
-  Site boundary
 -  Proposed
 -  Existing
 -  Carriageway Dimensions
 -  Visibility Splay - Based on Manual for Streets 20mph Stopping Sight Distance (2.4m x 23m)



H:\Projects\38696 Elcot Lane, Marlborough\5 Design\Drawings\Acad\ss\38696-Lea24 6m.dwg Originator: CHRIS.PRICE2



Elcot Lane
Marlborough

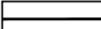
Site Access - Visibility Splays
Page 1 of 3

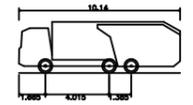


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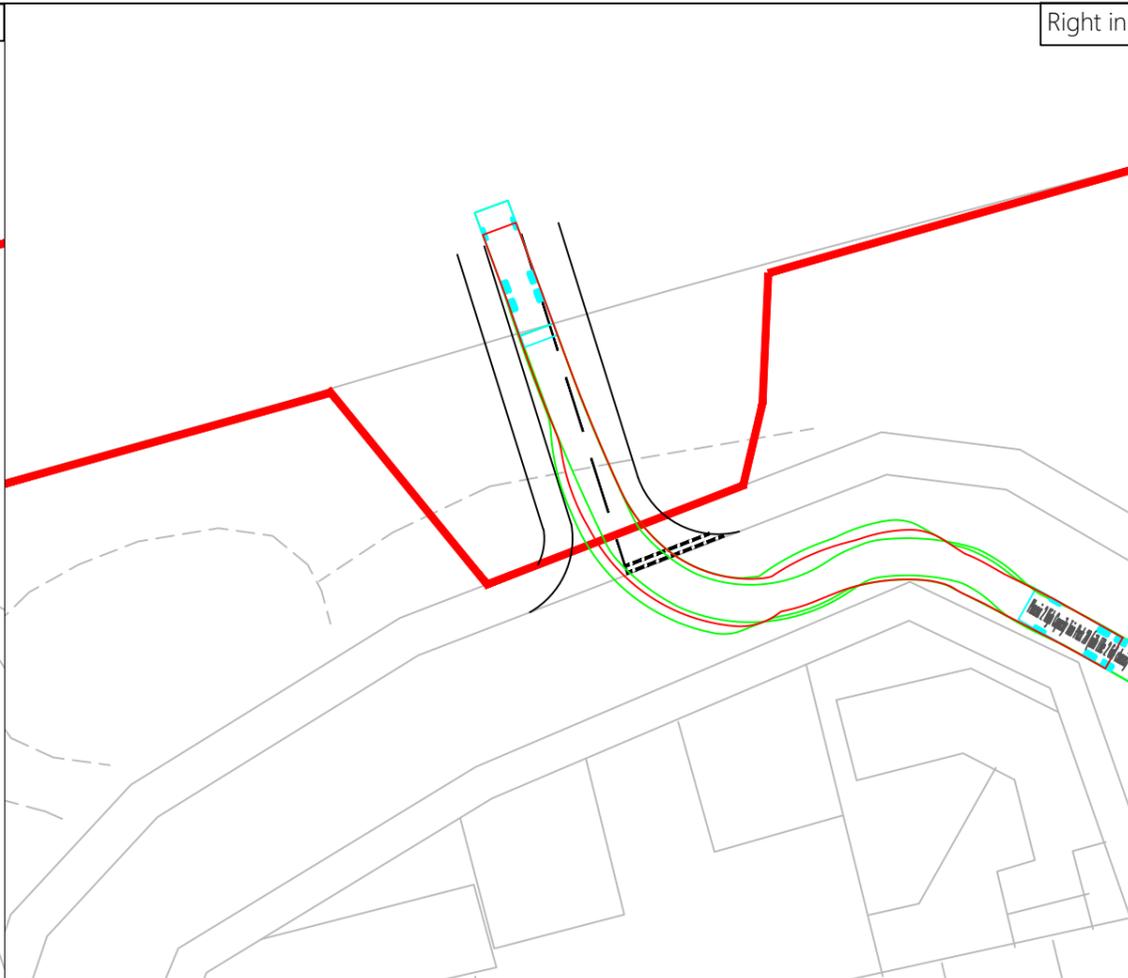
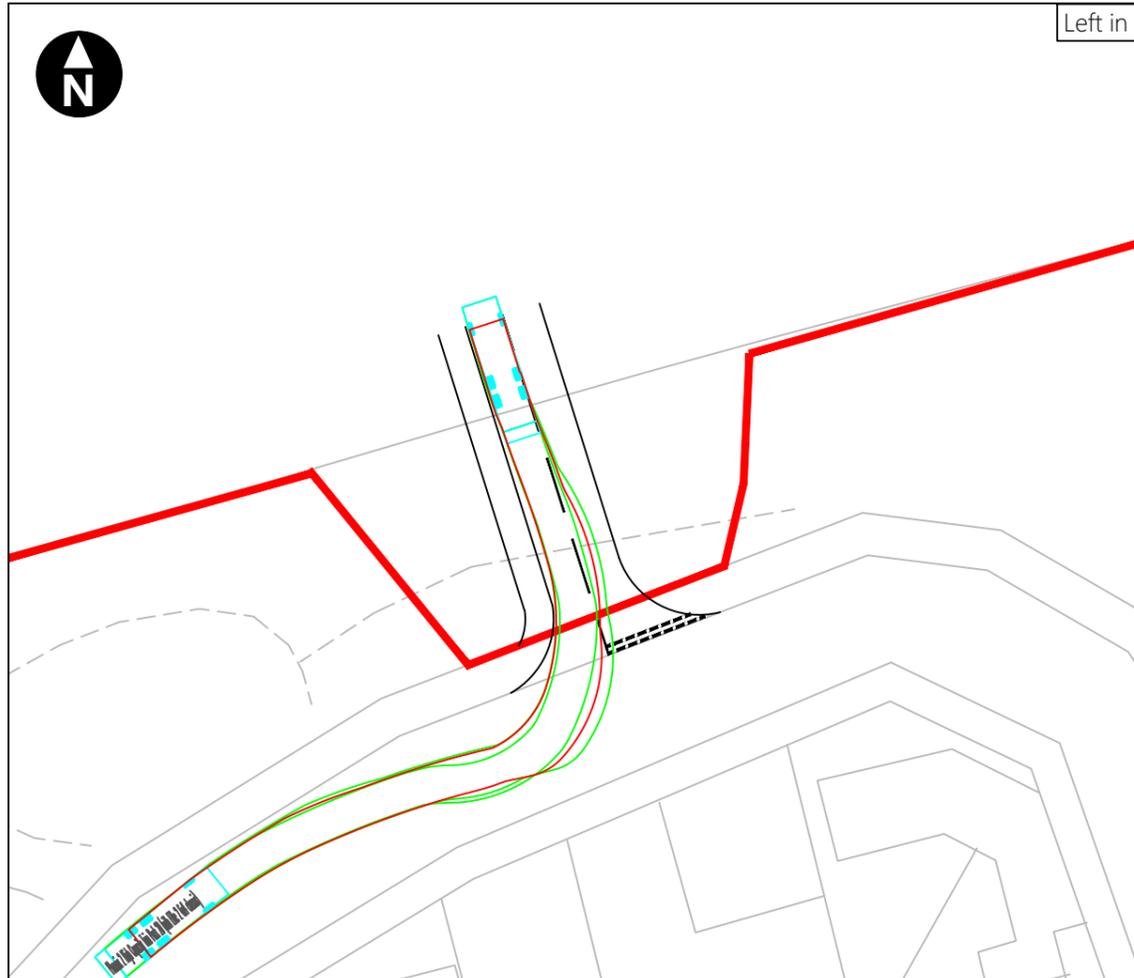
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Key

-  Site boundary
-  Proposed
-  Existing

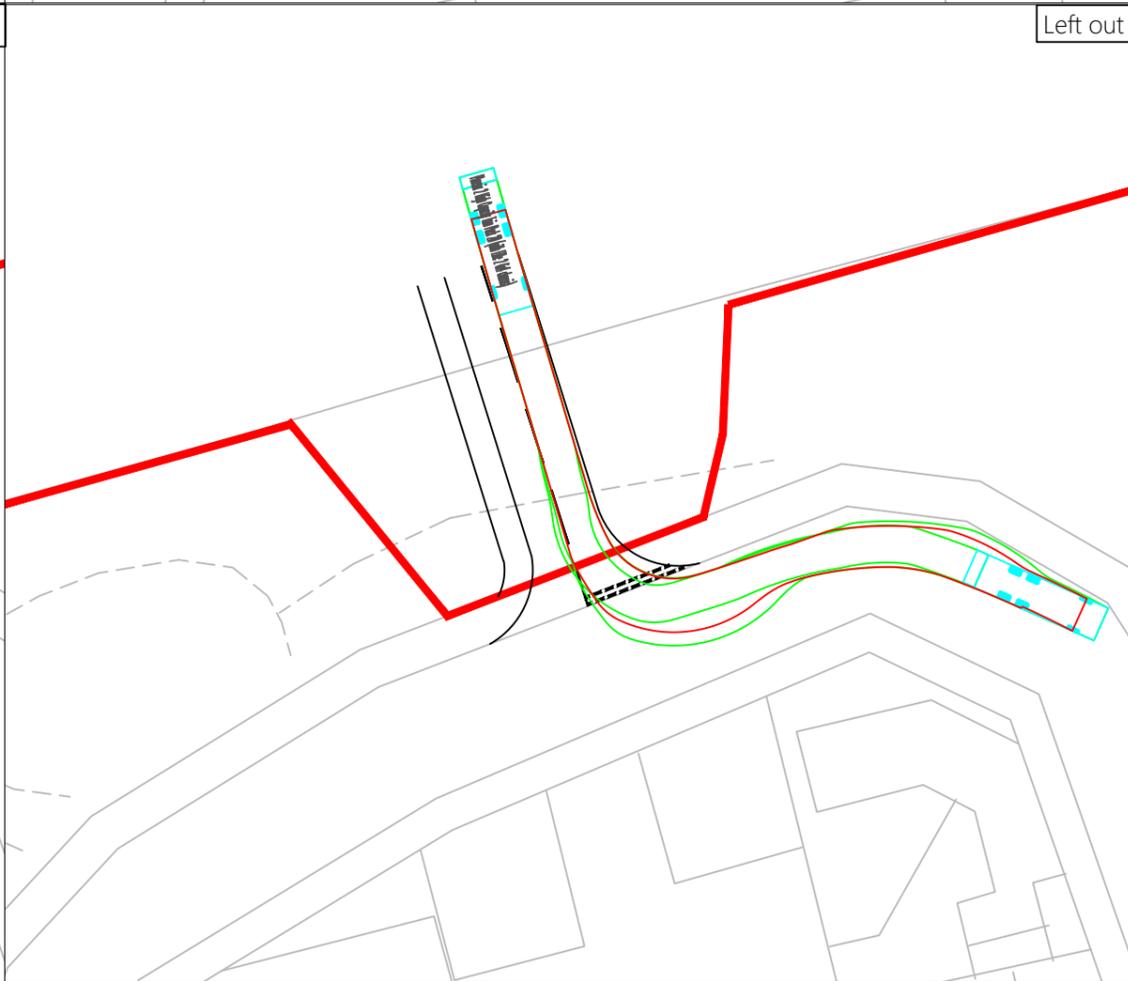
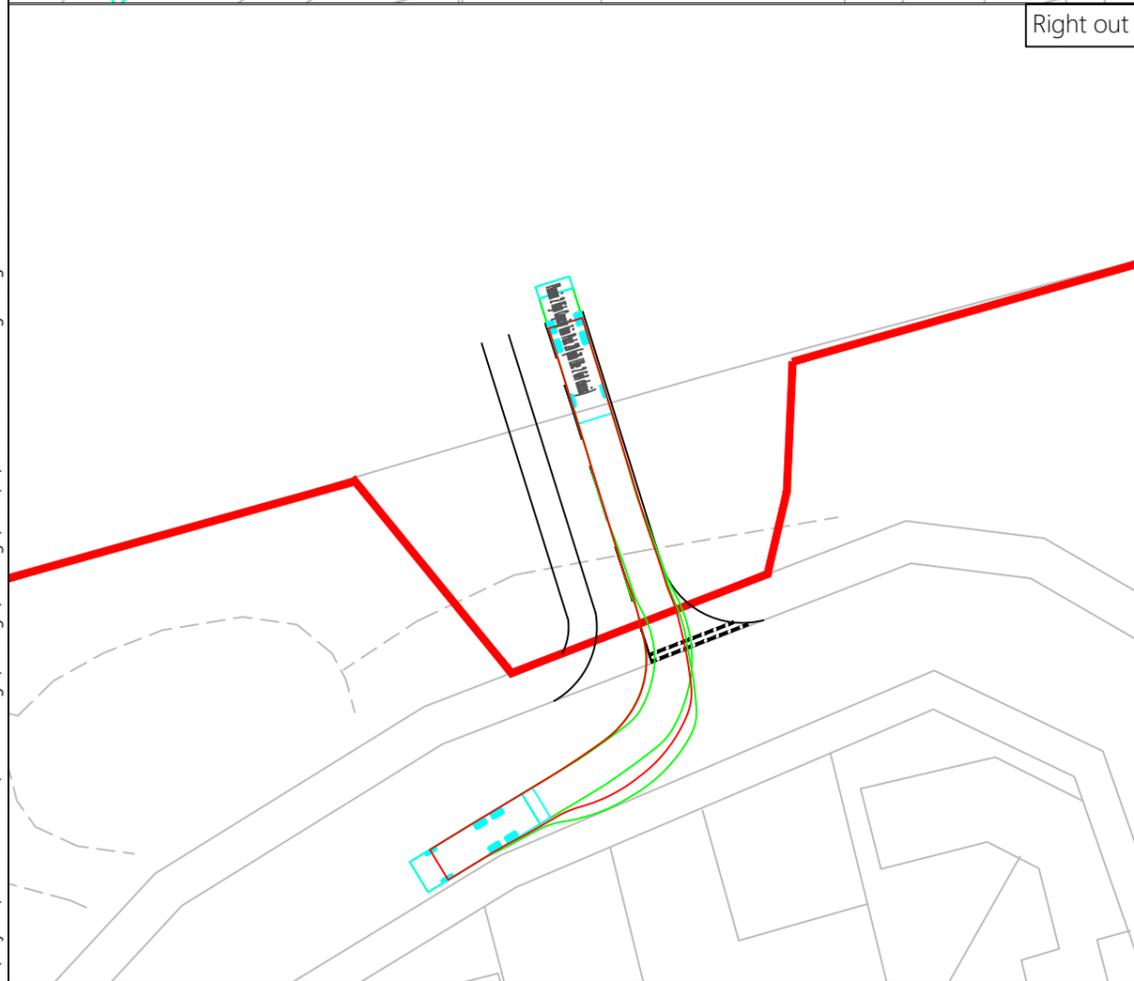


Phoenix 2 High Capacity Twin Pack 20 (with Elite 2 6x4 chassis)
 Overall Length 10.140m
 Overall Width 4.205m
 Overall Body Height 4.205m
 Min Body Ground Clearance 0.410m
 Track Width 2.500m
 Lock-to-lock time 4.00s
 Curb to Curb Turning Radius 9.100m



Right out

Left out



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Client



Elcot Lane
Marlborough

Site Access - Vehicle Tracking RCV
Page 2 of 3

July 2020



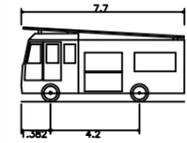


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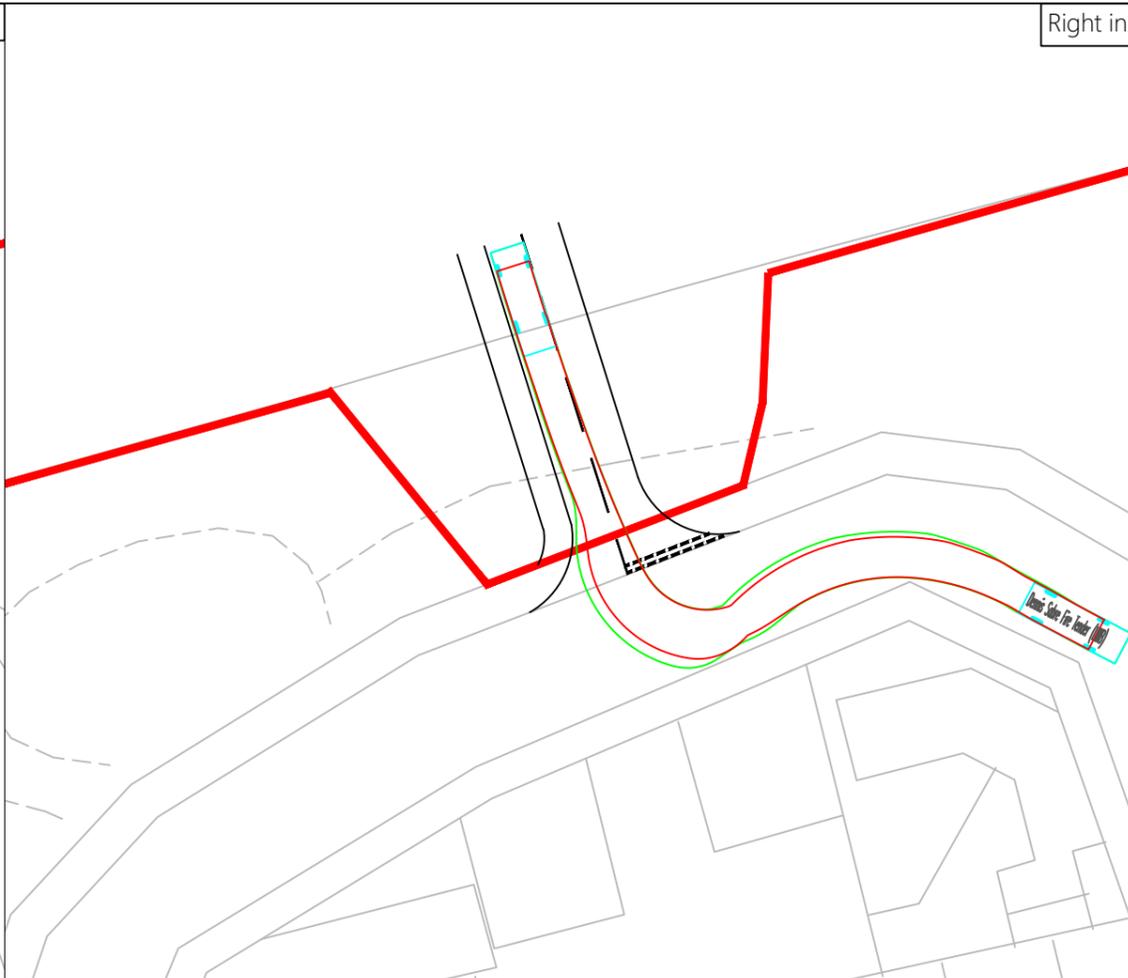
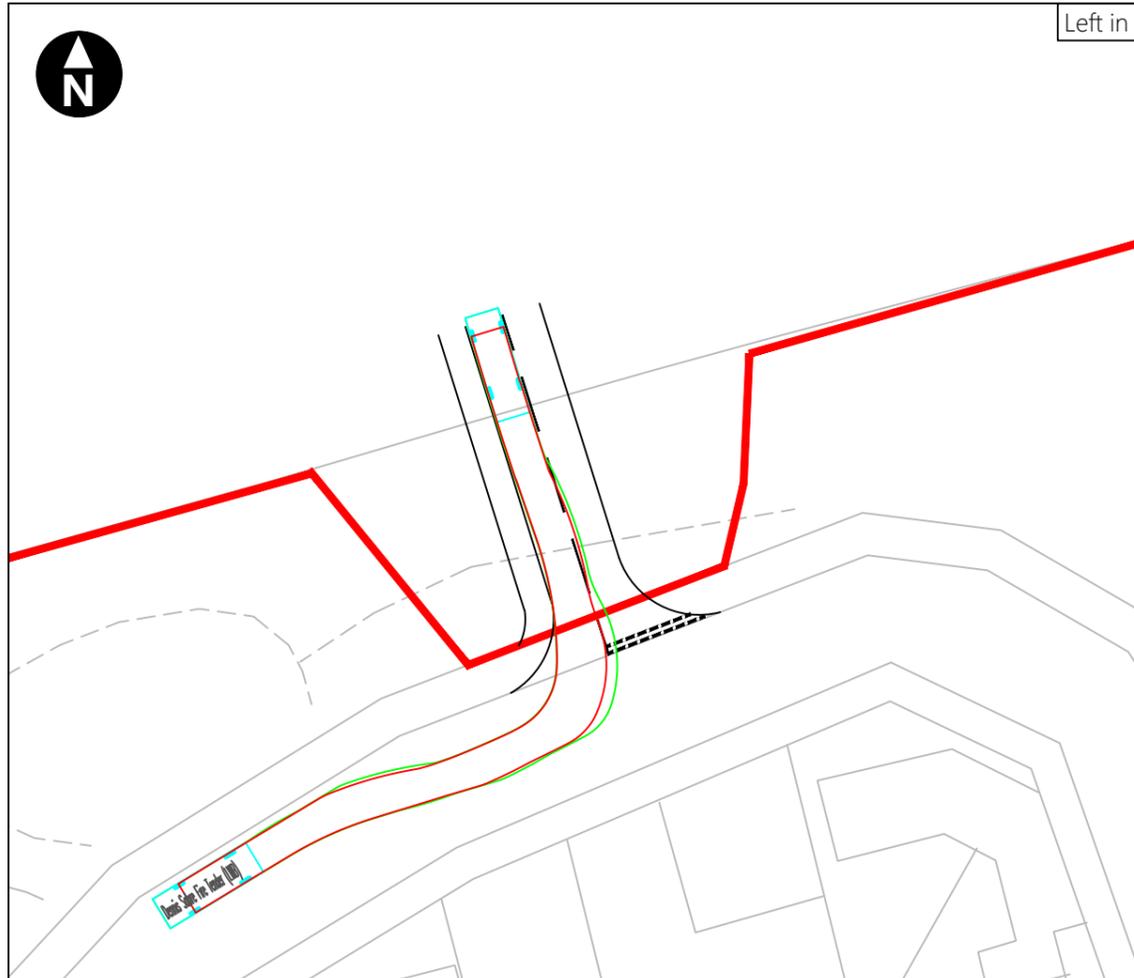
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Key

-  Site boundary
-  Proposed
-  Existing

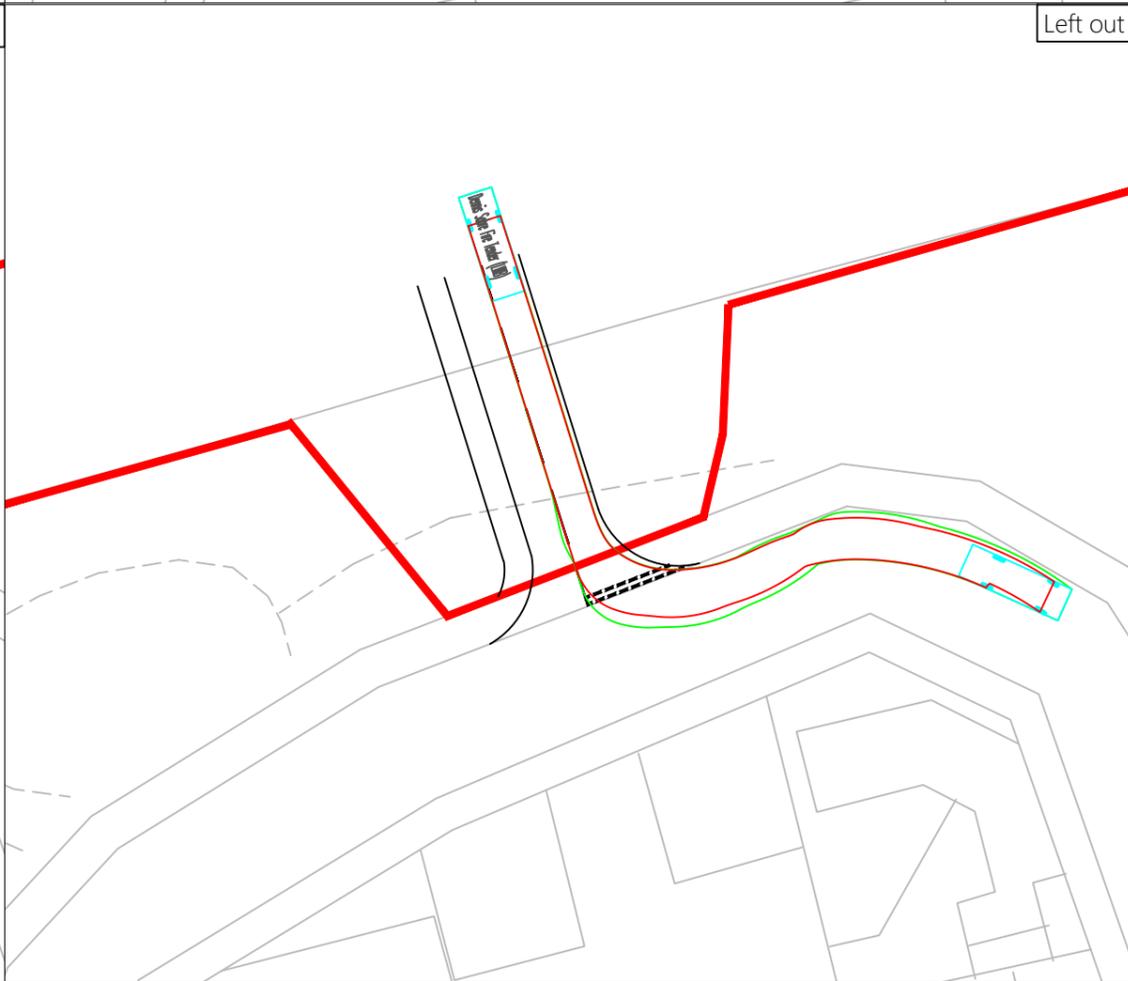
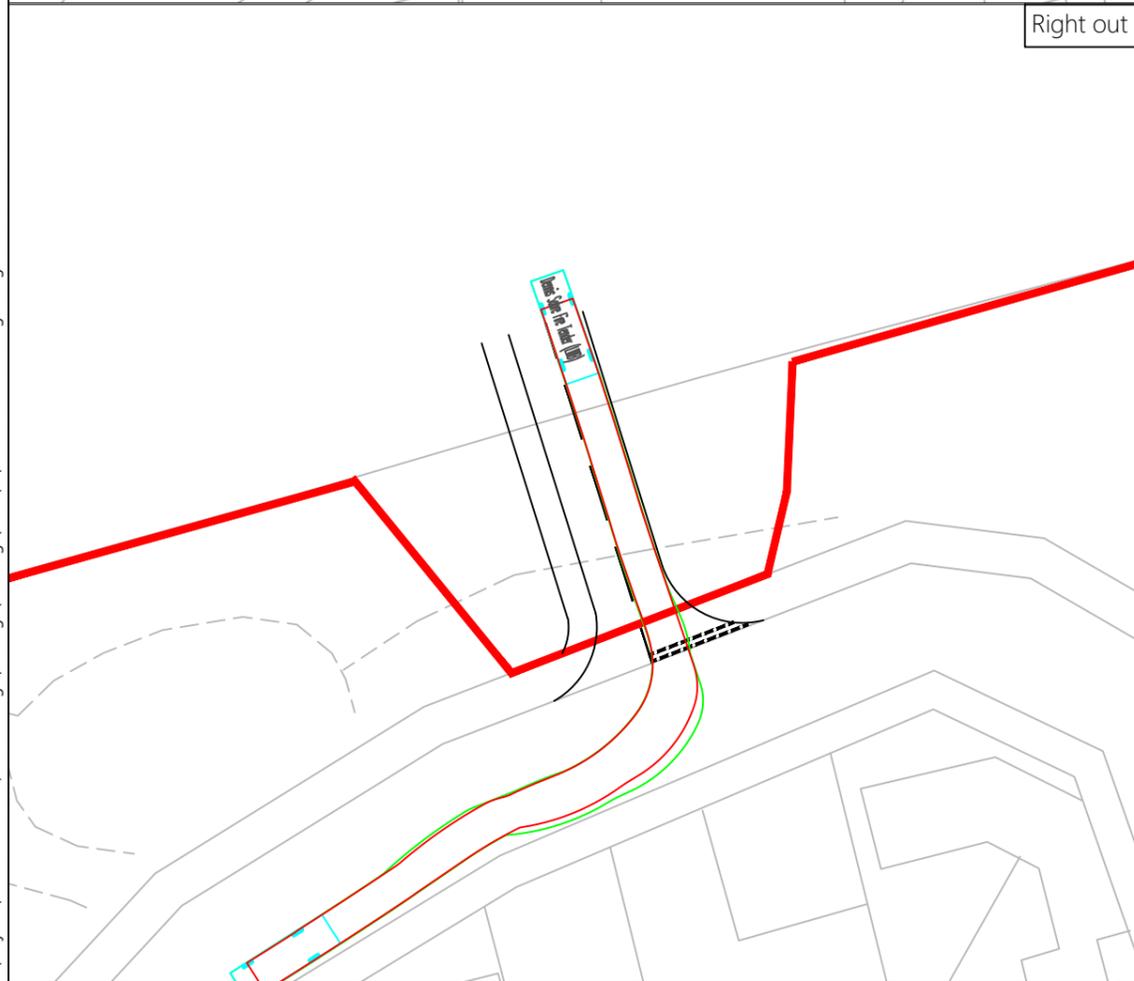


Dennis Sabre Fire Tender (LWB)	7.700m
Overall Length	2.430m
Overall Width	3.512m
Overall Body Height	0.397m
Min Body Ground Clearance	2.380m
Track Width	5.00s
Lock-to-lock time	7.400m
Curb-to-curb Turning Radius	



Right out

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Client



Elcot Lane
Marlborough

Site Access - Vehicle Tracking Fire Tender
Page 3 of 3

July 2020



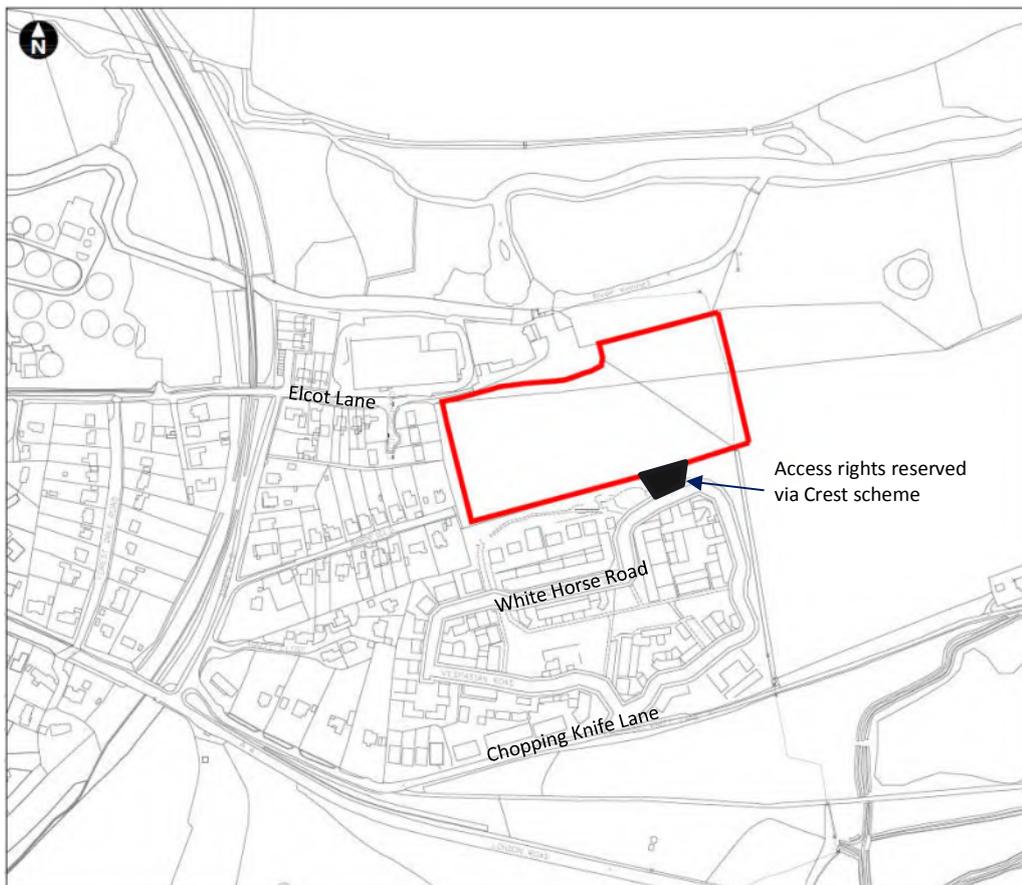
Technical note:

Land off Elcot Lane, Marlborough – Access Appraisal (July 2020)

1. Introduction

Wood Environment and Infrastructure Solutions UK Limited ('Wood') has been commissioned by The Crown Estate to produce a high-level access appraisal of the Elcot Lane site in Marlborough (hereafter referred to as 'the Site'). The Site is to the north of the St Johns Park residential development, as shown in Figure 1.1. The Crown Estate has an agreement with Crest Nicholson, the developers of St Johns Park, which safeguards a section of land between White Horse Road and the Site boundary to provide a vehicular access (shaded black on Figure 1.1).

Figure 1.1 Location Plan



The opportunity to allocate the site for residential development was tested by Marlborough Town Council in July/August 2019 as part of the early stages of preparing the Marlborough Area Neighbourhood Plan (MANP). Marlborough Town Council received a consultation response from Wiltshire Council Highways, who recognised that the road network via White Horse Road is able to accommodate an increase in movements, albeit not a 'significant' increase in vehicles, and mentions an existing issue with on-street parking.

This note addresses Wiltshire Council Highways' comments, explaining that any additional movements are unlikely to be significant (or severe in the context of NPPF paragraph 109) and responds to the point regarding on-street parking. In addition, Wiltshire Council Highways highlight the site's connectivity for pedestrians and cyclists, which we have factored into our wider sustainable access strategy.

This note has been based on the following:

- Review of the baseline situation;
- Review of design guidance;
- Site access and connectivity proposals; and
- Consideration of traffic generation and impact.

A site visit was undertaken on Wednesday 24th June between 16.30 and 18.15 hours to observe the local transport network, including on-street parking, vehicular flows and speeds and pedestrian connectivity and amenity. The site observations have enabled an understanding of the extent of on-street parking and how this affects vehicle movements and road safety. Due to the Covid-19 lockdown situation, traffic counts of vehicle movements into and out of the St Johns Park development have not been undertaken as these would not be representative of 'normal' travel pattern conditions. However, it was noted during the site visit that that parking within the development was likely to reflect a 'worst case' due to the number of households being at home.

2. Review of baseline

2.1 Local Road Network

A4 London Road

The A4 London Road forms the major arm of the A4/Chopping Knife Lane simple priority junction and has a 30mph speed limit in the vicinity of the junction. A footway is present along the northern side, providing access into Marlborough to the west. Bus stops for services 20, 620, X20 and X22 are located on both sides of the carriageway.

Chopping Knife Lane

Chopping Knife Lane connects to the A4 London Road as the minor road of a simple priority junction and then takes a right-angled bend. Its western extent is 30mph with a general carriageway width of 5.5m and a footway provided on the southern side and provides direct vehicular access to residential properties located on the north side. At approximately 200m and the commencement of the St Johns Park development, the speed limit reduces to 20mph and a footway is provided on the north side of the 5.5m carriageway. There are speed cushions to support the speed limit. There are no parking restrictions along the road and during the site visit, it was observed that there is parking in front of the houses along on side of this section of road. Chopping Knife Lane becomes White Horse Road which runs through the St Johns Park development.

Chopping Knife Lane has been realigned and continues as a single-track road for 1.5 miles, connecting to Kings Drive to the north east.

White Horse Road/Vespasian Road

White Horse Road which becomes Vespasian Road is a 5.5m wide single carriageway with street lighting which was designed as a 20mph loop road arrangement through the St Johns Park residential development. There are 2m footways on both sides along most sections of the road.

The development is on the former St John's School site and was granted planning permissions in 2007 and 2009 and comprises a residential development of 169 dwellings. The loop road arrangement was designed in accordance with the relevant Wiltshire Council design guidance at the time – the 1993 *Residential Road Design Guide* and was approved by Wiltshire Council. The alignment of the road, which includes right angled bends, ensures that vehicle speeds are kept at 20mph or less.

There are no parking restrictions along the road and during the site visit it was observed that there is some parking along sections of the loop road in front of houses. The on-street parking reduces the effective width of the road to one-way flow and does result in traffic speeds that are lower than the design speeds. Dangerous or obstructive parking was not observed, although there were two instances where a vehicle travelling in an opposing direction to another needed to stop and wait for the other vehicle to pass as there was not sufficient width for two-way traffic.

Elcot Lane

Elcot Lane is an adopted no through road which provides access to residential dwellings, Elcot Mill and Marlborough Tiles and is lightly trafficked. Its carriageway width varies from 6.6m at its western end to a minimum width of 2.8m along short sections.

2.2 Pedestrian and cycle connectivity

In addition to the 2m footways either side of the roads, there are pedestrian routes within St Johns Park which provide good permeability throughout the development. A 3m pedestrian/cycle route runs from the St Johns Park development to Elcot Lane along the western boundary of the Site.

Public Rights of Way (PRoW) run east to west along the northern boundary and north to south along the eastern boundary.

Speeds throughout St Johns Park are low, 20mph or less, due to the alignment of White Horse Road and cul-de-sacs leading off it. Low vehicle speeds like this create a safer environment which benefits cyclists.

Elcot Lane is a lightly trafficked route with low speeds and is conducive to a safe cycling environment.

2.3 Road safety

A review of the CrashMap website (www.crashmap.co.uk) which contains information on personal injury accident (PIA) for all road users, including pedestrians and cyclists, shows that there has never been a recorded road accident on White Horse Road and Vespasian Road within St Johns Park.

There are no recorded accidents on Chopping Knife Lane or Elcot Lane in the past five years. The only recorded PIA in the vicinity of the Site is a 'slight' accident at the London Road/Chopping Knife Lane junction in August 2017.

3. Review of existing guidance

The following guidance documents were reviewed to establish the design standards for the suitability of using White Horse Road for access.

- *Manual for Streets*, Department for Transport (DfT), 2007;
- *Wiltshire Council Residential Road Guidance*, Wiltshire Council, 1993; and
- *Sustrans Design Manual*, 2014.

Manual for Streets (MfS)

MfS replaced *Design Bulletin 32*, first published in 1977, and its companion guide *Places, Streets and Movement*. It is used for the design, construction, adoption and maintenance of new residential streets and shows how the design of existing residential streets can be enhanced, providing a common reference point for all those involved in road design.

MfS provides guidance on street geometry to provide a safe environment for all users, with which the design of White Horse Road/Vespasian Road complies. This includes a 5.5m wide road and a maximum speed limit of 20mph, limiting straight and uninterrupted links to 70m, providing changes in priority, reduced forward visibility (as per MfS guidelines) and changes in street features and surfacing.

MfS identifies design standards for visibility splays at junctions as 2.4m 'X' distance and 23m 'Y' distance for 20mph roads.

Wiltshire Residential Road Design Guide

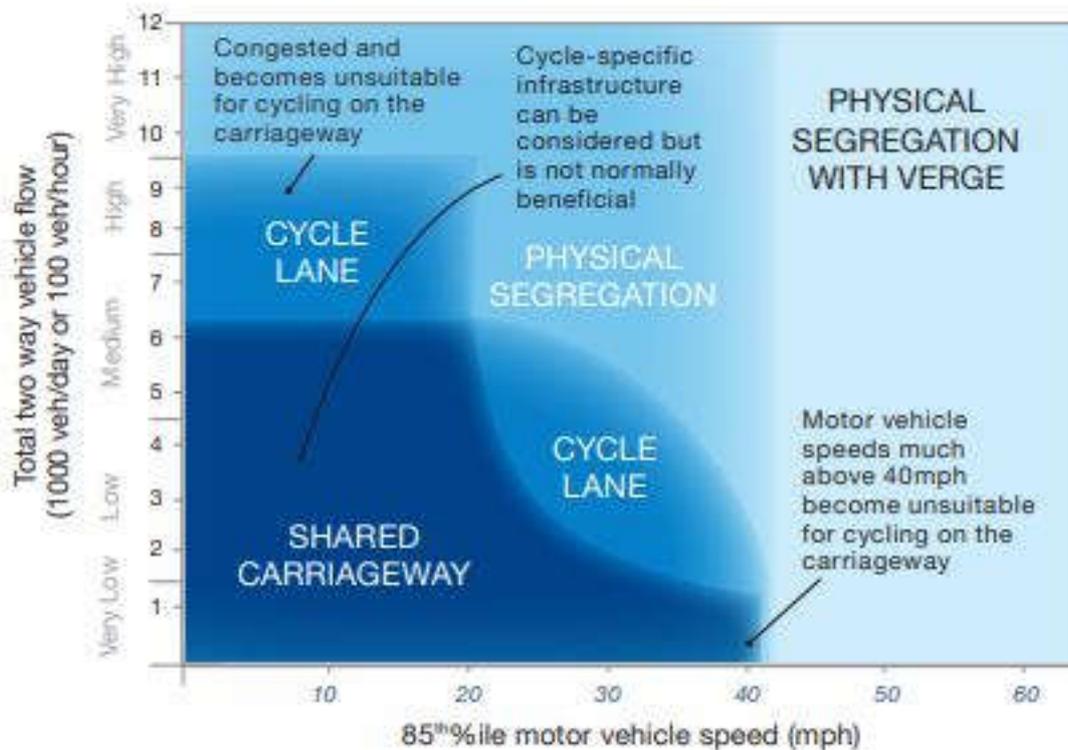
The design guide, which was applicable at the time of the approval of White Horse Road, defined road type hierarchy and design criteria for these. Table 3.1 summarises the design guide criteria for the road types.

Table 3.1 Wiltshire Residential Road Design Guide criteria

Criteria	Major access road	Minor access road	Access way
Carriageway width (maximum)	5.5m	5.5m	5.5m
Footway width	2.0m (both sides)	2.0m (both sides)	N/A
Forward visibility (minimum)	60.0m	45.0m	33.0m
Junction visibility ('Y' distance)	60.0m	45.0m	33.0m
Junction visibility ('X' distance)	4.5m	4.5m 2.4m (< 50 dwellings)	2.4m
Entry radius	6.0m	6.0m 4.5m	4.5m
Design speed	< 30mph	< 25mph	< 20mph
Suitable for approximate number of dwellings	Up to 300	Up to 150 with secondary access; 100 in cul-de-sac with emergency access 50 in cul-de-sac	Up to 50 with secondary access; 25 in cul-de-sac

Sustrans Design Manual

The Sustrans *Handbook for cycle-friendly design*, April 2014, provides guidance for the provision for cyclists. At the beginning of the manual the following figure is included which illustrates how restraint of traffic speeds and volumes can create satisfactory conditions for cyclists.



Source: *Sustrans Design Manual – Handbook for cycle friendly design*, April 2014

In relation to the St Johns Park development and traffic along White Horse Road, the Transport Assessment (TA) that accompanied the 2007 application which was for 174 dwellings identified the trip rates that are shown in Table 3.2, which also shows the traffic generation for 169 dwellings. It is noted that these trip rates are very high when compared to current survey sites in the TRICS database.

Table 3.2 St Johns Park Predicted Vehicular Trip Rates (2004 TA)

	AM Peak (08:00-09:00)			PM Peak (17:00 – 18:00)		
	In	Out	Two-way	Out	In	Two-way
Trip rate per dwelling	0.19	0.61	0.80	0.44	0.26	0.70
Traffic generation (169 dwellings)	32	103	135	74	44	118

Source: TA for Proposed Development of St John's Lower School, Savernake Campus, Marlborough, CEC, November 2004

Based on the estimated traffic generation, the traffic flows are very low, which combined with the 20mph design speed, demonstrates that White Horse Road is conducive for shared carriageway cycling.

4. Site access and connectivity proposals

An illustrative masterplan has been developed, as shown in Figure 4.1. The scheme can provide up to 50 homes with access via the Crest Nicholson scheme to south onto White Horse Road. The access complies with MfS design standards, with 23m visibility splays achievable (details enclosed at Appendix A).

Figure 4.1 Illustrative Masterplan



The design of the internal road network will be to achieve a 20mph speed limit along the main spine road.

A 2m footway will be provided on the south side of the spine road. Pedestrian and cycle connectivity to the external network will be onto White Horse Road and Elcot Road to the south.

5. Access appraisal

5.1 Traffic generation

In order to understand the implications of vehicular movement from the development, the potential traffic generation has been calculated based on trip rates for a comparable size and location of development from the TRICS database, based on the following criteria:

- Survey sites in England only excluding Greater London
- Category A – houses privately owned (worst case scenario)
- Range of dwelling size – 23 to 160 units
- Upper limit of population within 1 mile – 15,000
- Upper limit of population within 5 miles – 25,000
- Edge of town, suburban area, neighbourhood centre
- No Public Transport Accessibility Level (PTAL) present

The resultant trip rates and traffic generation figures are shown in Table 5.1. The TRICS output is provided in Appendix A.

Table 5.1 Potential traffic generation

	AM Peak (08:00-09:00)		PM Peak (17:00 – 18:00)		Daily (07:00 – 19:00)	
	In	Out	In	Out	In	Out
Trip rate per dwelling	0.090	0.257	0.257	0.132	1.829	1.883
Traffic generation (50 dwellings)	5	13	13	7	91	94

As shown in Table 5.1, the development would potentially result in an additional 18 two-way trips in the morning peak hour (an average of 1 trip every 3 minutes and 20 seconds), 20 trips in the evening peak hour (an average of 1 trip every 3 minutes) and 185 trips over 12 hours. As a consequence, there will be no significant increase in movements as a result of the scheme.

It is noted that the trip rates are considerably lower than those quoted in the 2004 TA in support of the Crest Nicholson development, which is reflective of changing trends in travel behaviour such as increased working from home, reduced travel and travel outside of normal peak hours. The recent Covid-19 lockdown period is likely to result in further long-term changes as many businesses with home working capabilities will continue with this pattern of working to reduce costs.

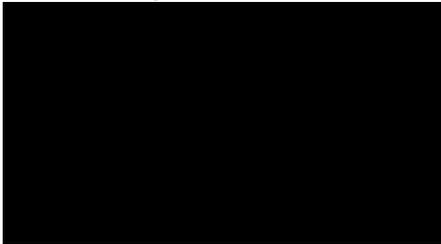
5.2 Access appraisal

No severe impacts are likely in the context of paragraph 109 of the NPPF for the following reasons.

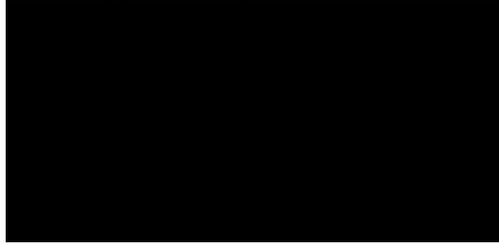
- The amount of traffic that would be generated by the Site is not significant (just 20 trips at most in the PM peak) and overall traffic flows on White Horse Road would continue to be conducive for cyclists to share the carriageway with vehicles.

- An access junction onto White Horse Road can be accommodated and designed to MfS standards.
- White Horse Road/Vespasian Road has been designed to maintain 20mph speeds. The presence of on-street parking further reinforces slow speeds. Dangerous or obstructive parking on White Hill Road/Vespasian Road was not observed during the site visit. If Wiltshire Council Highways has concerns regarding the on-street parking, consideration could be given to identifying areas of restricted parking along White Horse Road and Vespasian Road.
- As recognised by Wiltshire Council Highways, the Site does lend itself to non-vehicular connectivity as cyclists can utilise Elcot Lane to access the town centre as well as the permeable network through the St Johns Park development to Chopping Knife Lane and the bus stops on the A4 London Road.

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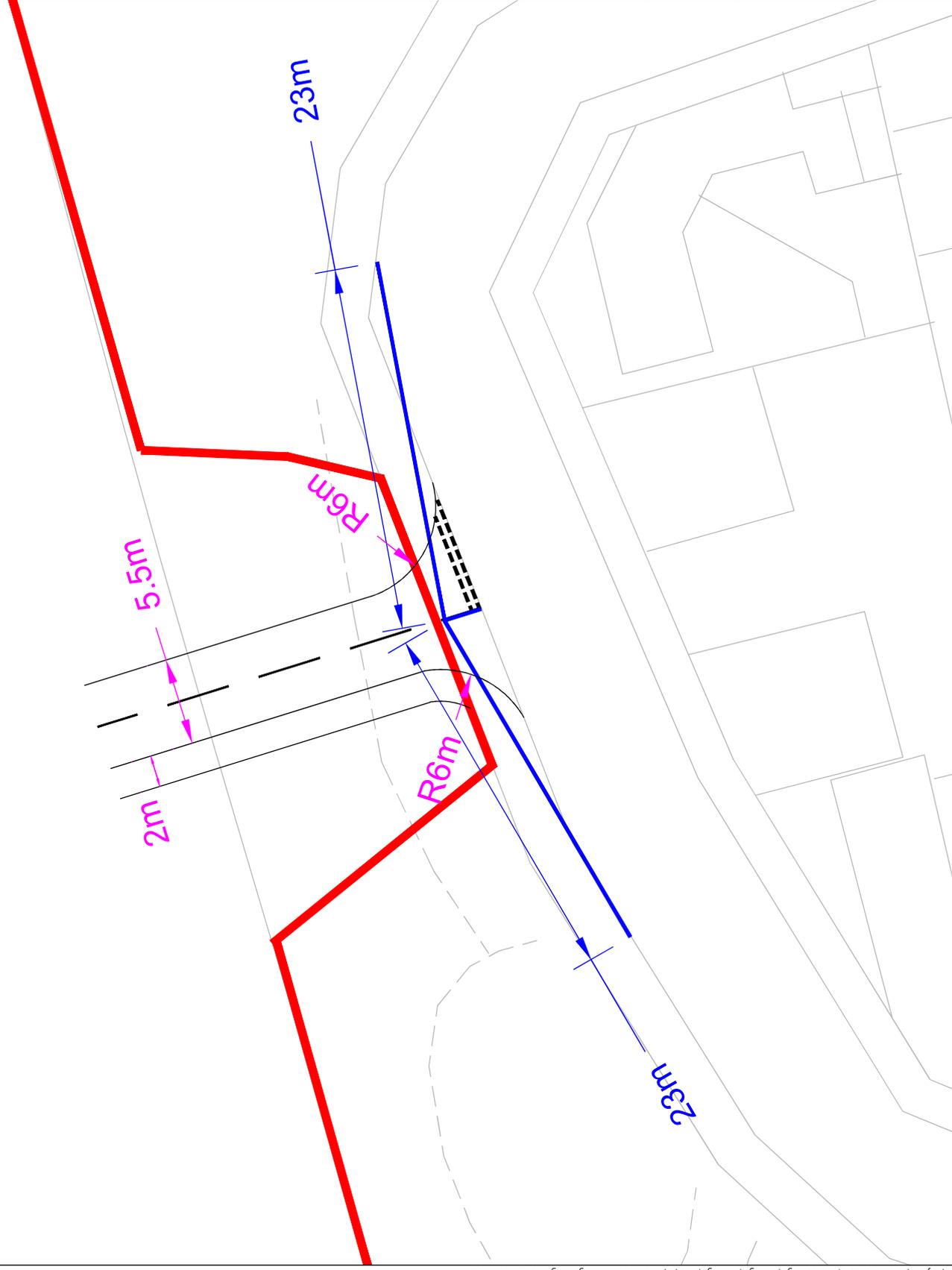
Appendix A Preliminary access design and supporting information





Key

-  Site boundary
-  Proposed
-  Existing
-  Carriageway Dimensions
-  Visibility Splay - Based on Manual for Streets 20mph Stopping Sight Distance (2.4m x 2.3m)



0 m  15 m
 Scale: 1:250 @ A3
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Client:



Elcot Lane
Marlborough

Site Access - Visibility Splays
Page 1 of 3

July 2020 





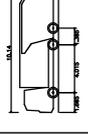
Left in

Right in

Right out

Left out

- Key
-  Site boundary
 -  Proposed
 -  Existing



Phoenix 2 High Capacity Twin Peak 20 (with Elite 2 6x4 chassis)
 Overall length 3800mm
 Wheelbase 1800mm
 Max. height 2700mm
 Max. width 2400mm
 Max. ground clearance 220mm
 Lock-to-lock time 2.00s
 Cab to curb turning radius 8.100m



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Client



Elcot Lane
Marlborough

Site Access - Vehicle Tracking RCV
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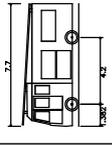
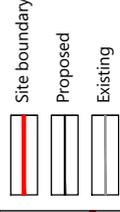


Left in

Right in

Right out

Left out



Dennis Sabre Fire Tender (LWB)

- Overall Length 12,000mm
- Overall Body Height 4,200mm
- Overall Body Width 3,700mm
- Min. Body Ground Clearance 930mm
- Lock-to-lock time 5.08m
- Curb to Curb Turning Radius 7,400mm



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Client



Elcot Lane
Marlborough

Site Access - Vehicle Tracking Fire Tender
Page 3 of 3

July 2020



Technical note:

Elcot Lane Marlborough: Historic Environment (July 2020)

1. Introduction

- 1.1.1 Wood Environment and Infrastructure Solutions Limited (“Wood”) was commissioned by The Crown Estate to undertake a review of heritage assets in proximity to its landholding east of Elcot Lane / north of White Horse Road, Marlborough (hereafter referred to as ‘the Site’). The Site is located to the south side of Elcot Lane, and to the north of the recent housing development around White Horse Road. The site is presently in agricultural use as an arable field.
- 1.1.2 This note sets out that whilst there are no heritage assets on the Site itself, the impact of any development on the Site on the setting of three designated assets needs to be considered explain, explaining how this has been factored into the illustrative masterplan and our accompanying landscape and visual assessment to minimise impacts and deliver wider enhancement as far as possible.

2. Heritage Assets

- 2.1.1 There are no designated heritage assets located within the Site.

2.2 Listed Buildings

- 2.2.1 The site is located to the immediate south of two listed buildings (refer Figure 2.2):
- Elcot Mill House grade II (list entry 1243209); and
 - Stables at Elcot Mill grade II (list entry 1243101).
- 2.2.2 Both Elcot Mill House and the listed stables have particularly short list entries due to the lack of revisions since their listing in 1974. The mill house is described as 18th or early 19th century in date and is constructed of chequered brick with a gambrel or Dutch roof of two pitches. It is of two stories with attic dormers and is arranged broadly east to west, with the primary façade facing south towards the hedgerow which defines the northern extent of the proposed allocation site. The listed stable block is located north and west of the house and is broadly oriented north to south. Tree planting within the garden to the south of the listed stable increases its separation from the proposed allocation site.

2.3 Conservation Areas

- 2.3.1 The proposed allocation site is located 450m south-west of Mildenhall Conservation Area. According to Wiltshire Council's web site there is no adopted conservation area assessment or management plan for this conservation area.

2.4 Scheduled Monuments

- 2.4.1 The extensive scheduled monument of Camp on Forest Hill (list entry 1004697) is located between Chopping Knife Lane and the A4 London Road. This is an extensive settlement site which is currently included on the Heritage at Risk Register by Historic England as a result of ongoing damage by ploughing. This is located south of the proposed allocation site, with the housing estate based around White Horse Road within the intervening land (Figure 2.2).

2.5 World Heritage Sites

- 2.5.1 The World Heritage Site of Stonehenge, Avebury and Associated Sites is located to the west of Marlborough and is 5.6km west of the proposed allocation site, to the far side of Marlborough (Figure 2.1).

Figure 2.1 Designated heritage assets – wider area

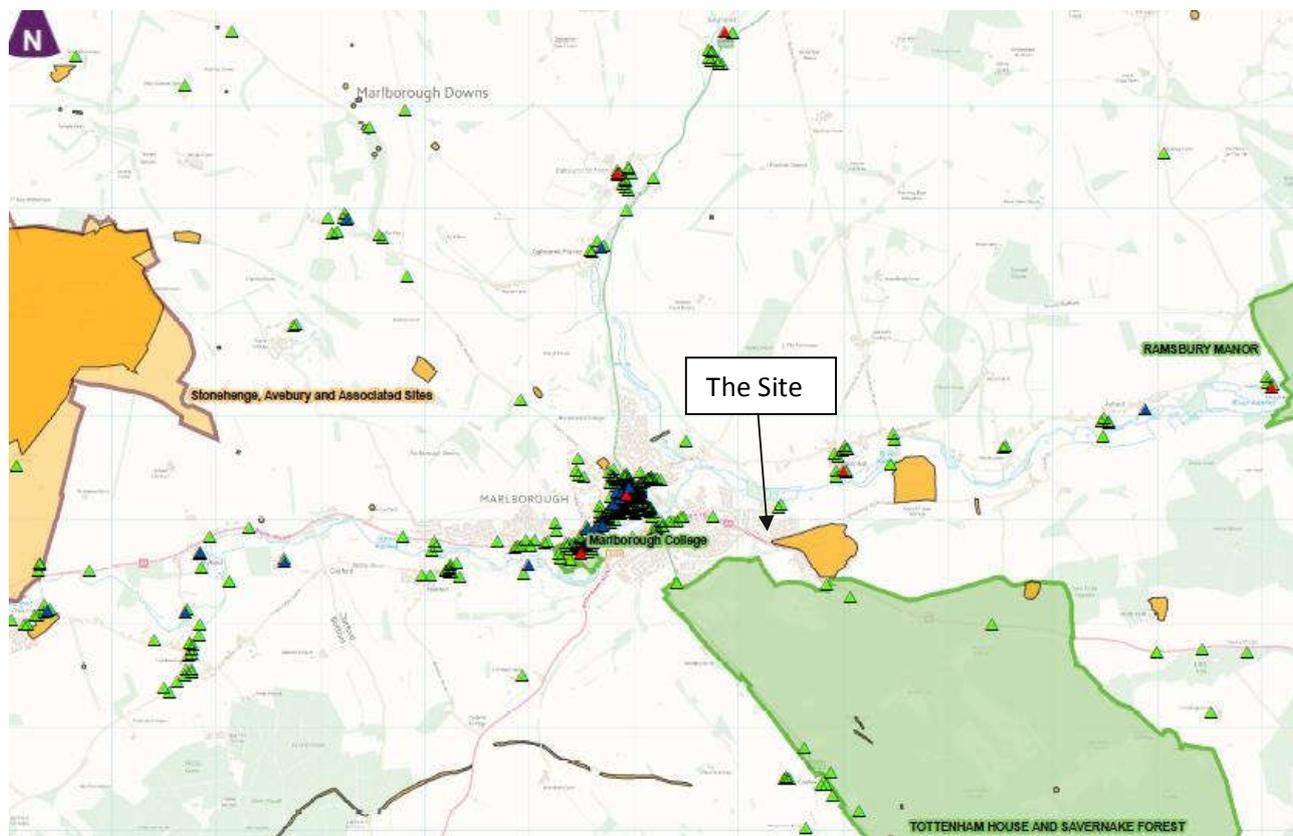
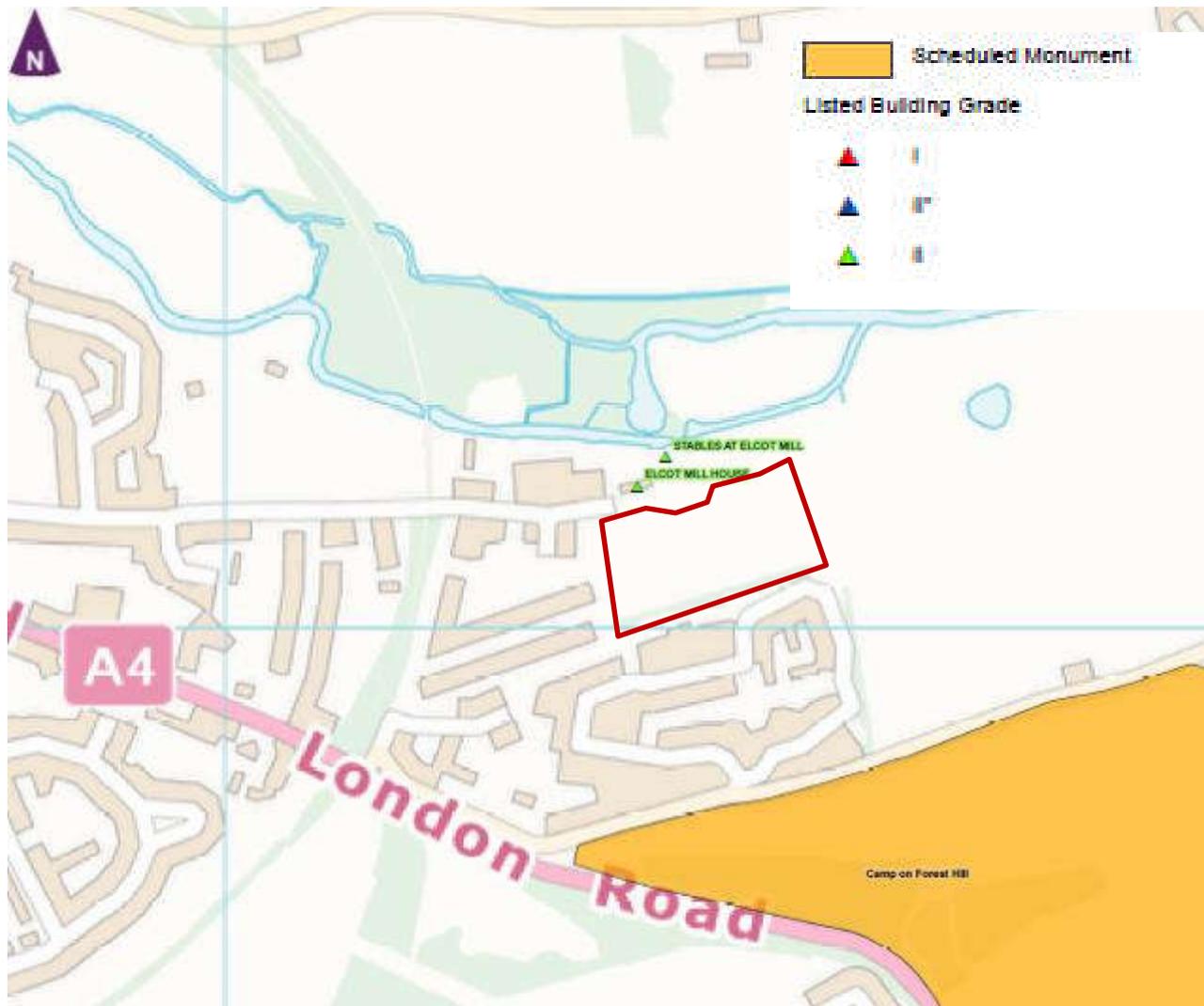


Figure 2.2 Designated heritage assets – near the Site



3. Analysis of Setting

3.1 Overview of approach

3.1.1 Historic England (2015) The Historic Environment and Site Allocations in Local Plans (Historic England Advice Note 3) provides a staged methodology to assess the potential impacts of a site allocation. The staged process is as follows:

- Step one – identify which heritage assets are affected by the potential allocation.
- Step two – understand what contribution the site (in its current form) makes to the significances of the heritage asset(s).
- Step three – identify what impact the allocation might have on that significance.
- Step four – consider maximising enhancements and avoiding harm.

- Step five – determine whether the proposed site allocation is appropriate in light of the NPPF's tests of soundness in paragraph 182.

3.2 Step one

3.2.1 Of the identified heritage assets it is only the two grade II listed buildings and one scheduled monument that are considered to be potentially affected to any extent by development on the Site. These are:

- Elcot Mill House grade II listed building (list entry 1243209);
- Stables at Elcot Mill grade II listed building (list entry 1243101); and
- Camp on Forest Hill (list entry 1004697).

3.2.2 Mildenhall Conservation Area is separated from the site by the river valley of the River Kennett and planting between the proposed allocation site and the conservation area. The scheduled monument of Camp on Forest Hill is separated from the Site by the housing estate based around White Horse Road. The World Heritage site of Stonehenge, Avebury and Associated Sites is significantly distant from the proposal site and well to the west side of Marlborough.

3.3 Step two

3.3.1 The site presently offers an outlook of agricultural land to the south of the well-defined boundary of the curtilage of the two listed buildings. The southern boundary of the property is demarcated by a well-managed coniferous hedge with occasional standard trees. The height of the hedge and the gaps between the trees mean that the grade II listed house is visible from within the proposed allocation site and there will be corresponding views from the upper floors of the house over the allocation site. The proposed allocation site rises to the south so will be visible from the house and especially at first floor level.

3.3.2 Elcot Mill House and the associated stables related to a, now lost, mill building that was located to the north-east of the stables adjacent to the River Kennett. A review of readily available historic maps shows that the mill complex was accessed by Elcot Lane and also suggests that the mill building may survive, in part, as archaeological remains. The land to the west of the house has been examined using aerial photographs, historic maps and what was visible from public footpath during a site visit. It is clear that the land to the north of the house was formerly parts of the brailed channel of the River Kennett and was exploited as part of a sequence of mill sites west of Marlborough. A former mill leat is visible in aerial photographs, located between the house and stable and running to the south of the stable. The mill race ran to the north of the leat and, again, is visible in aerial photographs. The site of the mill, to the north-east of the listed stable block, is visible in aerial photographs as hard standing adjacent to the former mill race.

3.3.3 To the rear, north, of the mill house and stables the modern landscape preserves the pattern of rivers, mill leats and basins which are visible on historic mapping. The landscape north of the mill house and stable has changed with greater planting and a lack of management of the water courses.

3.3.4 West of the mill house, the tile factory is a post-war addition to the area and has significantly changed the character of the area in the immediate vicinity of the mill house and stable. Tree planting to the north of the factory has reduced the impact of this structure within the river valley, but it is a considerable change to the setting of Elcot Mill House and stable as it has contributed to an erosion of the former managed agricultural landscape. In the post war period housing started

to be constructed to the south-west of the mill, south of Elcot Lane and east of Barnfield. This housing is of multiple phases in the post-war period and is laid out with generous gardens and planting. East of Barnfield the former line of the Midland and South Western Railway survives.

- 3.3.5 The two listed buildings stand in a complex developing landscape that has changed significantly in the post war period. Historic maps indicate that Elcot Mill was built and operated as one of a series of corn mills arranged along the course of the River Kennet. During this period, it was located within a wholly agricultural context, with a functional relationship to the surrounding agricultural fields. This context has been altered by the eastward expansion of the town of Marlborough which has brought residential development to the immediate south-west, and to the south, as well as by the establishment of the tile works to the immediate west. Despite this, important elements of their historic context, in the form of water management features, the river, mill races and open land to the north and the former site of the mill all survive. These features provide a meaningful setting for the house and stable and contribute to its significance and understanding in their relationship to the now lost mill.
- 3.3.6 The Camp on Forest Hill scheduled monument comprises a north facing slope overlooking the River Kennet valley, as well as more level land to the south. As shown on Figure 1.4 in the accompanying landscape technical note the site is partially visible from the slope comprising the northern part of the monument (Viewpoint 2), though it is largely screened by recent residential development. The site therefore forms part of the setting of the monument as it is located within the Kennet valley. However, the contribution of the site to the heritage significance of the monument is very limited as it is seen very much in the context of twentieth century residential development on the eastern edge of Marlborough.

3.4 Step three

- 3.4.1 The allocation and development of the proposal site will alter the setting of the listed Mill House as a result of a change of use from agricultural land to housing. Residential development within the proposed allocation will only affect views to and from the south-facing frontage of the mill house. However, there is existing screening south of the listed buildings and depending upon the layout of any new housing, and its relationship to the listed building, visual effects can be limited. Much of the significance of the mill house and stable relate to their historic relationship to the surviving water management features, which are located to the north, as well as the site of the now lost mill and its archaeological remains. These elements contribute to the significance of the house through their direct associations as heritage assets related to the former use of the site, and this association would not be affected by development within the proposed allocation site.
- 3.4.2 Due to its location in the context of existing housing, residential development has only limited potential to alter the setting of the Camp on Forest Hill scheduled monument.

3.5 Step four

- 3.5.1 Proposals for the site allocation should include for a limit to two storey houses at a low density, and provision for landscaping and planting to the north of the site to ensure the mill house and stables are buffered from new development. This landscaping could include the informal footpath that is now running along the south face of the hedgerow boundary with the mill house. The careful placement of standard trees would enable the existing planting with the garden south of the house to be complemented with new planting within the site and a suitable buffer established.
- 3.5.2 It is recommended that traffic access to the site should be from White Horse Road rather than from Elcot Lane. However existing footpaths should be maintained and upgraded to ensure access to

the wider landscape is maintained. The provision of any main landscaping buffer to the south of footpaths along the north of the allocation site should enable views to be maintained over the river and channels.

- 3.5.3 Any housing layout should ensure there is a softer edge towards the mill house, and planting should be included within gardens and boundaries to break up the visibility of any housing allocation. The design of any scheme should include provision for views of the mill house, and from the mill house, to be incorporated into any housing layout.
- 3.5.4 The eastern boundary of the site will comprise a newly planted hedgerow with a landscape buffer. This will follow a historic parish boundary and will re-establish the line of a hedgerow shown on the Tithe Map of 1843 and continuing the hedgerow line on the eastern edge of the housing estate based around White Horse Road.
- 3.5.5 The boundary treatment on the eastern edge of the site will contribute to limiting the extent of any change in the setting of Camp on Forest Hill scheduled monument, as it will help to screen the development and will continue the line of an existing hedgerow. Figure 1.11 in the accompanying landscape and visual note illustrates the limited effects of development on views from this monument.

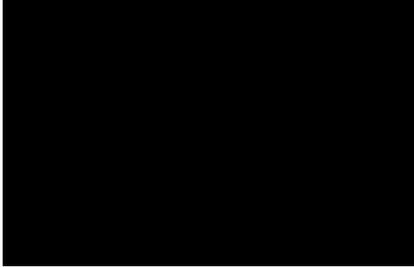
3.6 Step five

- 3.6.1 Paragraph 182 of the NPPF requires local plans to be demonstrated as sound by meeting the following test:
- The plan should be positively prepared;
 - Justified;
 - Effective; and
 - Consistent with national policy.
- 3.6.2 The allocation and use of the proposal site for housing will impact upon the setting of the grade II listed Elcot Mill House and stables, and subsequently will affect the significance of the designated asset. This affect can be characterised as less than substantial, according to paragraph 134 of the NPPF (lower end of the spectrum). The suggestions for Step Four will mitigate the harm from any proposed development ensuring compliance with the NPPF.

3.7 Conclusions

- 3.7.1 Development has the potential to affect the settings of the grade II listed Elcot Mill House though this can be limited by a number of design measures to include:
- Access to be taken from White House Road and not Elcot Lane;
 - Limit to two storeys with a low density of development; and
 - Provision for landscaping and planting, with a site layout providing a softer edge to the north of the site.
- 3.7.2 The planting of a hedgerow on the eastern edge of the site would re-establish a planted boundary on the line of a historic parish boundary and this would contribute to limiting any harm to the historic environment. It is anticipated that these measures would ensure that there would be no harm to the heritage significance of the Camp on Forest Hill scheduled monument.

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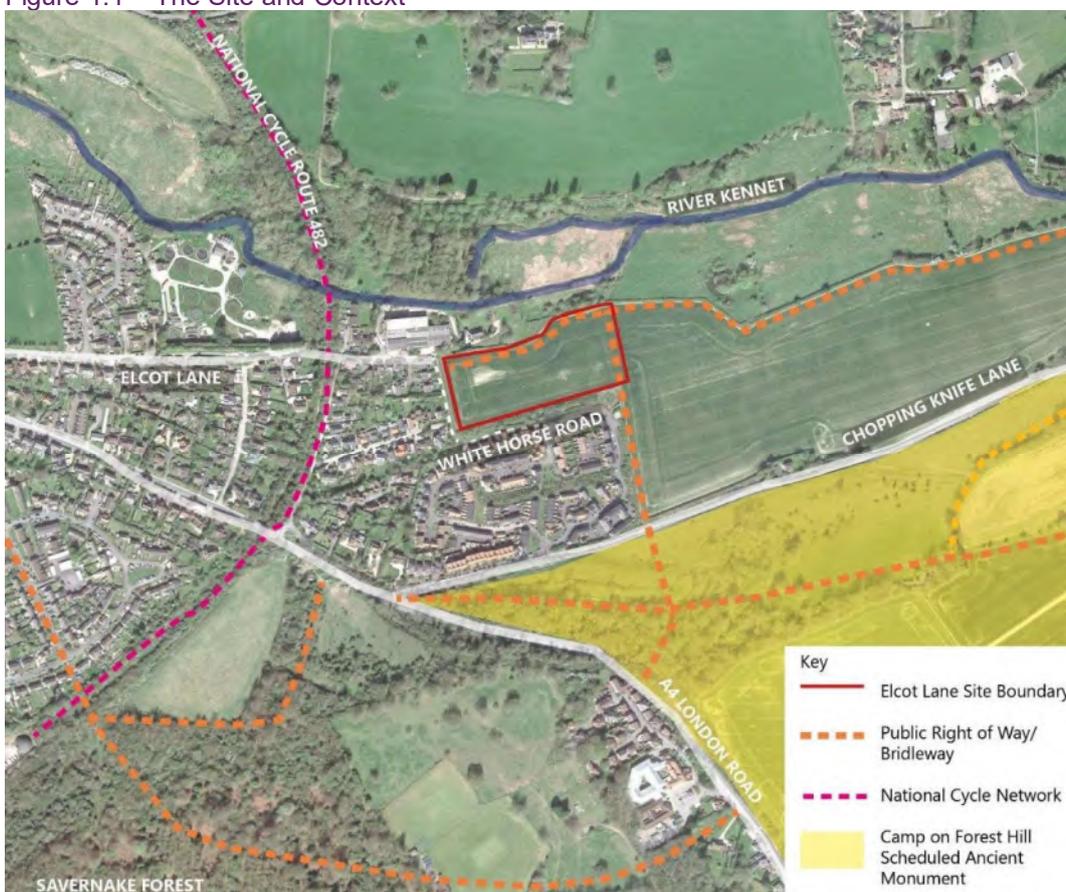
Elcot Lane: Landscape and Visual Considerations (July 2020)

1. Introduction

Wood Environment and Infrastructure Solutions Limited ("Wood") was commissioned by The Crown Estate to produce a high level review of the landscape and visual context for its landholding east of Elcot Lane / north of White Horse Road, Marlborough (hereafter referred to as 'the Site'). The intention of the study is to identify any landscape and visual issues or opportunities related to delivering new homes on the Site. The findings of this study will inform consideration of the appropriateness of allocating the Site and also further masterplan development. The location of the Site in the context of its surroundings is shown on Figure 1.1.

Work was undertaken through desktop review of local planning policy and designations, published character assessments, Defra UK MAGIC website, Ordnance Survey mapping, Google Earth Pro and a site visit undertaken in June 2020.

Figure 1.1 – The Site and Context



1.1 Site Context

Photographs of the key features of the Site and surrounding area are shown on Figure 1.2 and 1.3 and will be referred to in the description below (Appendix A).

The Site is located immediately to the east of the existing settlement boundary of Marlborough and is wholly located within the *North Wessex Downs* Area of Outstanding Natural Beauty (AONB) (as is the whole of Marlborough town). An aerial photograph showing the Site and its indicative boundary is provided in Figure 1.1. The Site is approximately 2.2 hectares (ha) in area and principally comprised of arable farmland with associated field margins of treelines or hedges on or adjacent to the boundary. The existing arable field use and boundary planting can be seen on photographs on Figure 1.2.

Surrounding land uses comprise a recent housing development to the south (along White Horse Road and Vespasian Road, immediately north of Chopping Knife Lane), arable land to the north and east; and more established residential development and light industrial uses to the northwest and west. Photographs of the relationship between the Site and the development on White Horse Road can be seen in photographs on Figures 1.2 and 1.3

The River Kennet is located approximately 30 metres north of the northern boundary (along with Elcot Mill House and Stables both of which are Grade II Listed Buildings, see photo 2 on Figure 1.2). The River Kennet and the Public Rights of Way that are located along its banks, are an important element of the green infrastructure network of Marlborough. One of the PRoW that follows the route of the River Kennet runs along the northern boundary of the Site before continuing in an eastwards direction, alongside the River towards the village of Mildenhall and beyond.

1.2 Site Description

The topography of the Site and its surroundings is such that the Site forms part of the River Kennet valley floor. It is low lying and very gently sloping (ranging between approximately 137m AOD in the north and 135 metres AOD in the south). Landform then rises to the south, fairly gently at first and then more steeply up to Forest Hill, the site of a Scheduled Ancient Monument (Camp on Forest Hill).

There is a man-made but marked change in topography along the southern Site boundary, where a vegetated embankment approximately 2-3 metres tall, marks the transition between the Site and the adjacent housing development. This vegetated embankment can be seen in photograph 1 of Figure 1.2, and also in photograph 3 of Figure 1.3. The vegetation and bank look to have been installed relatively recently but have established well and form a strong southern edge. A play area associated with the new housing development along White Horse Lane, is located partially within and immediately to the south of this block of planting, as is a footpath which runs along the northern edge of the housing development. Both the path and the play area can be seen in photos 1 and 4 of Figure 1.2.

The Site is part of the arable landscape to the east of Marlborough, albeit that development to the south means that it is a fairly narrow strip of arable land, slightly isolated from the more expansive area of arable fields further to the east. There is however no field boundary along the eastern edge of the Site, and there is one continuous crop growing across the Site which forms part of the field that extends to the east (see photo 3, Figure 1.3).

There are very few landscape features within the Site; it is an arable field, and the only tree or hedgerow planting is located around the boundaries. The PRoW that runs east-west along the northern boundary is an important feature of the Site and the wider green infrastructure network of Marlborough, connecting the Site to Mildenhall, to the east, and to the National Cycle Network route 482, along the route of the former Chiseldon to Marlborough railway line, to the west.

The northern boundary between the Site and Elcot Mill House and the River Kennet is a well-established, vegetated edge; a combination of coniferous species hedgerow along the boundary with Elcot Mill House and trees and native hedgerow. Further to the north east of the Site, the vegetation becomes less ornamental and then dominated by native trees and hedgerow planting, tying into the arable field boundary that continues eastwards.

To the west of the Site, the boundary is a hedgerow which separates the arable fields from a path that connects the White Horse Road development with Elcot Lane. It is a paved, fairly narrow path that is approximately 3 metres wide. To the west of the path are residential properties that overlook the Site, on *Elcot Orchard* and *Barnfield*. The path and adjacent hedgerow can be seen on photo 1 of Figure 1.3.

1.3 Landscape Policy

This section provides a summary of the planning policy context regarding landscape and visual matters relevant to the Site.

National Policy

National Planning Policy Framework (NPPF)

At the heart of the NPPF is the achievement of sustainable development – this includes protecting and enhancing the natural and built environment and securing a high-quality built environment (para 7).

Paragraph 57 emphasises the importance of achieving high quality design for all development, including individual buildings, public and private spaces and wider area development schemes. Paragraph 58 confirms that development should seek to optimise the potential of sites and respond to local character while not discouraging appropriate innovation.

Paragraph 170 states that planning policies and decisions should contribute to and enhance the natural and local environment by (amongst other criteria);

- a) protecting and enhancing valued landscapes in a manner commensurate with their statutory status or identified quality in the development plan.
- b) recognising the intrinsic character and beauty of the countryside, and the wider benefits from natural capital and ecosystem services – including the economic and other benefits of the best and most versatile agricultural land, and of trees and woodland.

Paragraph 172 sets out the ‘exceptional circumstances’ tests for allowing development in the AONB and where it can be demonstrated that the development is in the public interest (e.g. need for market and affordable homes). Further details on this are provided in the planning and delivery summary accompanying this landscape appraisal.

Local Policy

The Site is located within Wiltshire Council’s administrative boundaries, with the Wiltshire Core Strategy the principal consideration as key part of the adopted development plan. Wiltshire Council is reviewing the Wiltshire Core Strategy (adopted in January 2015) and this is to be recast as the Wiltshire Local Plan. Certain policies from the former Kennet District Local Plan (2011) have been saved until new policy is written. Policy HC34 *Recreation provision on large housing sites* is a saved policy, relevant to development of this Site. Details of the relevant policies from both documents are provided below.

Wiltshire Core Strategy

CP51 (Landscape).

It is noted that a new Landscape Strategy for Wiltshire is currently being developed. However, until that study is completed, there are 10 existing Landscape Character Assessments which are applicable to Wiltshire in general (of which 2 are relevant to the Site).

This policy seeks to protect, conserve and where possible enhance the existing landscape character. It states that any development must seek to have no harmful impact upon landscape character and must mitigate any adverse effects through sensitive design and landscape measures. It notes the importance of reviewing the existing local landscape character, and ensuring that this is considered in the masterplan process, including consideration of the

- Local distinctive landscape patterns;
- Local distinctive character of settlements and their landscape setting;
- The nature of the urban fringe;
- Important views; and
- Tranquillity

The policy also notes that any development proposals within the *North Wessex Downs* AONBs must demonstrate that they have taken account of the objectives, policies and actions set out in the North Wessex Downs AONB Management Plan.

CP52: Green Infrastructure

This policy notes that the Green Infrastructure Strategy for Wiltshire is still being developed. However, it stresses the importance placed on developing and enhancing green infrastructure networks and identifies river corridors and the existing PRow network as being two of the key priorities in enhancement of the strategic green infrastructure network.

The policy notes that developers will be expected to audit the current provision in and around the development site and prepare a statement demonstrating how this will be retained and enhanced as a result of the development process. A standardised green infrastructure audit template will be developed to assist developers in assessing existing and required provision.

CP57: Ensuring High Quality Design and Place Shaping

Wiltshire Council will expect a high standard of design in all new development. It will be expected that new development will contribute to a strong sense of place which draws on the local context. Of particular note, it is expected that the development will:

- Enhance local distinctiveness by responding to the existing natural and historic environment;
- Retain existing important landscape features and enhance biodiversity and recreational corridors
- Respond positively to the existing townscape features in terms of layout, built form, height, mass, scale, elevation design, materials, streetscape and roofline.

Other Material Considerations

North Wessex Downs AONB Management Plan 2019-2024

The Site is located wholly within the North Wessex Downs AONB. The North Wessex Downs AONB Management Plan presents objectives and policies that partners can apply to help conserve and enhance this nationally important landscape. The Plan also contains priorities that the North Wessex Downs team intends to lead or carry out with others.

The Plan sets out the Vision for the North Wessex Downs AONB which is supported by thematic chapters which describe and explain the special qualities that make the landscape unique: Landscape, Rural Land Management, Biodiversity, Natural Resources, Historic Environment, Development, Communities, and Tourism, Leisure and Access.

It is noted that one of the key issues for the AONB landscape is, *“Intense pressure for development which threatens the character and quality of its landscape and risks merging of small settlements, encroachment by larger settlements and changes to the scale and nature of development boundaries.”* To manage this risk, AONB policy LA06 has been developed.

LA06

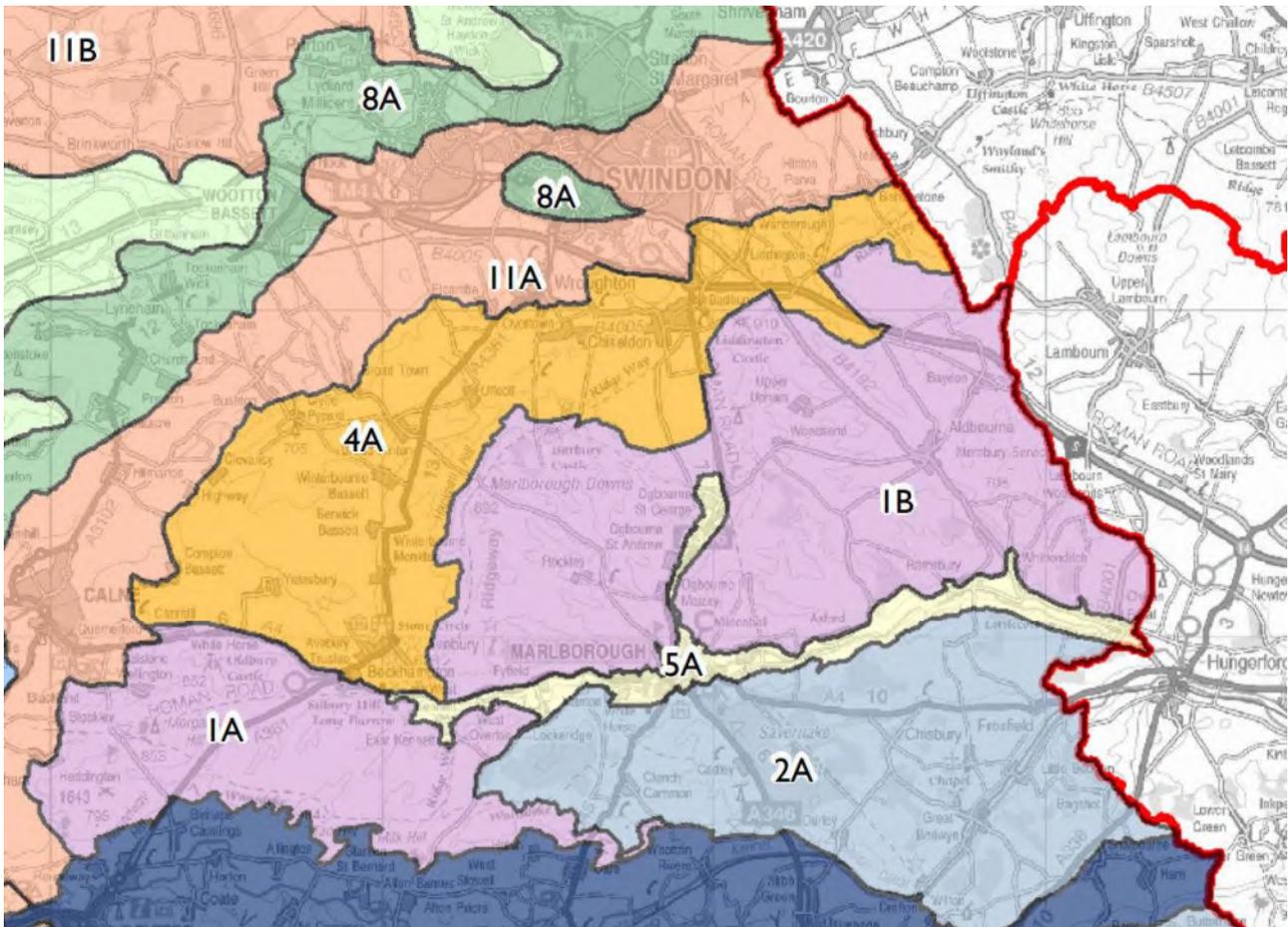
‘Ensure that all development in or affecting the setting of the AONB conserves and enhances the character, qualities and heritage of the North Wessex Downs landscape.’

1.4 Landscape Character

The Site is covered by the Wiltshire Landscape Character Assessment (2005) and the Kennet Landscape Character Assessment (1999).

Wiltshire Landscape Character Assessment (2005)

Figure 1.7 – Extract from Wiltshire Landscape Character Areas Map



As defined by this Landscape Character Assessment, the Site falls within Landscape Character Area (LCA) 5A: Kennet Chalk River Valley

Key characteristics of the LCA include:

- Relatively steep sides and a narrow valley floor, providing a strong sense of enclosure.
- A varied and attractive landscape with tracts of lush floodplain pasture, marsh and reedbeds, lines of willow pollards and poplars plus hedgerows enclosing the fields and stands of regenerating alder, birch and oak along the river banks.
- Well wooded, with sinuous belts of woodland lining the valley sides and some larger broadleaved woodland blocks on the valley floor particularly in the east.
- The rich biodiversity of the floodplain is reflected in its status (with the floodplain of the River Lambourn) as a SAC.
- Minor roads follow the lower valley sides.

- Settlements, from manor houses and hamlets to the market town of Marlborough include those of Saxon and Medieval origins. Building materials generally reflect the local geology, with brick/flint and clay tile dominating east of Marlborough, and sarsen stone and brick dominating to the west.
- Mills and churches are distinctive built features within the valley. In the upper reaches of the river, archaeological monuments associated with Avebury World Heritage Site (WHS), including The Sanctuary stone circle, are a prominent feature.

The LCA is assessed to be in **good condition** with a **strong character**. Inherent landscape sensitivities are summarised as being:

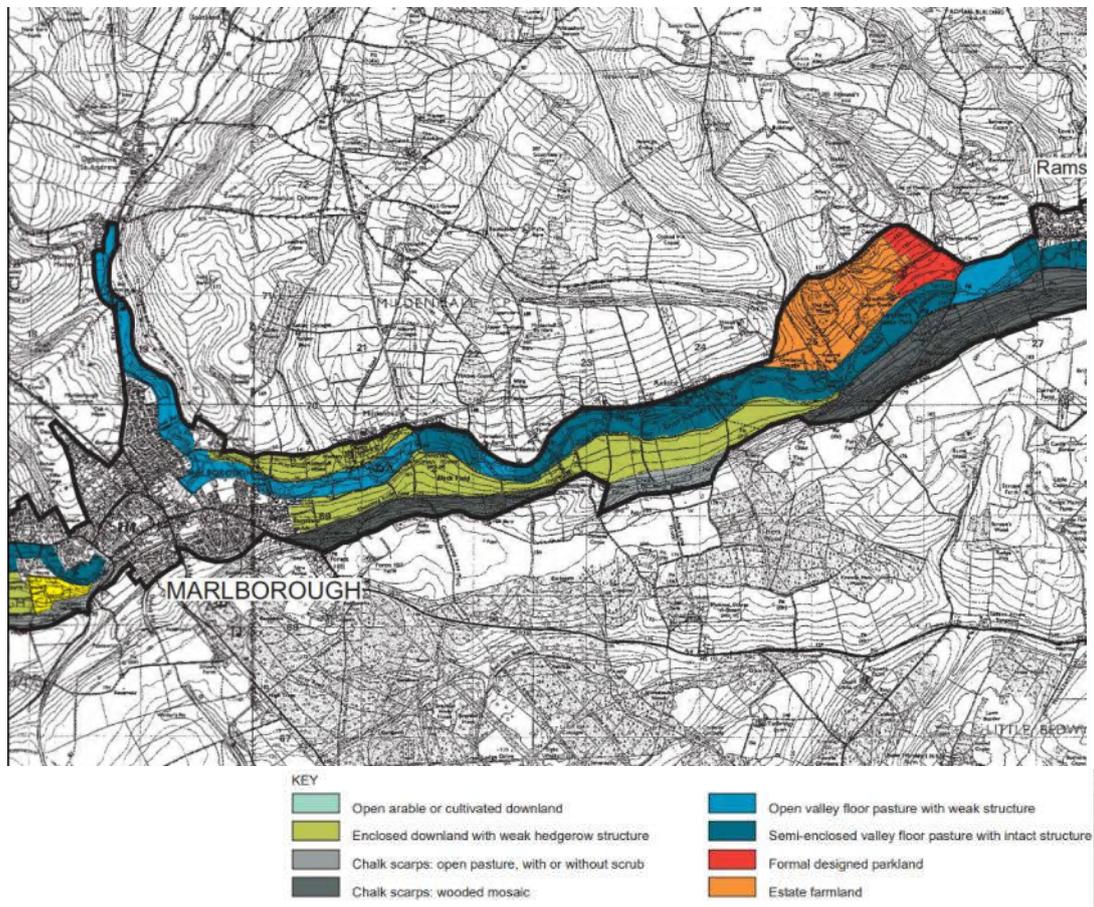
- Small scale enclosed landscape.
- High water quality and outstanding ecological richness of the chalk rivers.
- Remnants of water meadows including a few in active management plus other historic floodplain feature such as mills and leats and watercress beds.
- Rich floodplain landscape of small scale grazed pastures, riparian vegetation and damp woodlands.
- Small distinctive villages and manors built of a rich variety of local materials.
- Peaceful rural landscape away from the major roadways.
- Valley crests are visually sensitive.

The strategy for this character area is to conserve the tranquil, intimate and rural character of the landscape. This will include maintenance of key features including permanent pasture, wet grassland and riparian woodlands and historic features associated with the mills and water meadows, historic parklands and vernacular villages. There are opportunities for restoration of waterside pastures, replanting and management of hedgerows and limited native tree planting/regeneration. The broad management objectives are:

- Consider opportunities for re-planting hedgerows and hedgerow trees where these have been lost. In particular, the comparatively dense structure of willows, poplars and other moisture loving trees should be retained along field boundaries and the course of the river.
- Identify, conserve and restore remnant water meadow systems that are an important historic landscape feature - and consider opportunities for reinstatement of traditional management techniques. Wiltshire Landscape Character Assessment 87 Land Use Consultants Final Report December 2005
- Identify, conserve and consider opportunities for reconnecting and recreating wetland habitats such as wet woodland, fen, marsh and swamp.
- Resist excessive signage associated with new development along the trunk roads and maintain a sense of landscape scale when planning new road junctions - junctions that are too large will disrupt visual unity along the valleys.
- Monitor road engineering to safeguard the rural character of the lanes. • Conserve the pattern of tight knit villages, maintaining the physical and visual gap between them.
- Consider developing guidance for built development to ensure both future construction and changes to existing buildings are designed to integrate with the existing character and structure of settlements.

Kennet Landscape Character Assessment (1999)

Figure 1.8 – Extract from Kennet Landscape Character Assessment – Figure 14.1 Area 7 Kennet Valley



The Site falls within *LCA7 Kennet Valley*. The extent of this LCA in the landscape surrounding the Site is shown in Figure 1.8. The character area is split down into several sub areas, with the Site sitting within the 'Enclosed downland with weak hedgerow structure.' sub area. No description of this particular sub area is given with the character assessment. The sub area descriptions that are written into the character assessment of LCA7, are summarised below.

Valley floor pasture.

- occupying the river floodplain; underlain by alluvium and generally under permanent pasture;
- characterised by willows and alders in hedges and along watercourses;
- attractive, pastoral character;
- open valley floor pasture with weak structure is characterised by poor hedgerow structure and relatively few mature trees along watercourses; open character;
- Semi-enclosed valley floor pasture with intact structure, comprises a generally strong hedgerow structure, and in particular a richness in mature riparian trees such as willows and alder.

Formal parkland and designed landscapes

- areas of formal C18 and C19 designed parkland with a distinctively pastoral and mature character;
- characteristic features such as parkland trees set in pasture, avenues, rides, copses

and blocks of woodland, lakes, formal gardens, estate boundaries (walls or railings), ornamental features, estate buildings etc.

Estate farmland

- traces of a former parkland character or land which displays typical estate characteristics;
- fields enclosed by blocks of woodland and belts of trees;
- regular single-species hedgerow trees, avenues;
- estate fencing (railings and post and rail);
- game coverts.

Key Landmarks and Landscape Features

- Silbury Hill;
- Ramsbury Manor Park;
- the River Kennet itself.

Landscape Quality and Key Issues

The study notes that the LCA lies within the North Wessex Downs AONB which confirms its outstanding quality and national significance. It states that *'Overall the Kennet Valley is a very attractive blend of riparian and pastoral landscapes. There are a small number of areas, however, where strategies for management and enhancement may be appropriate. Different strategies for management and enhancement are shown in Figure 14.2'*¹

¹ Kennet Landscape Character Assessment (1999) pg 72.

Figure 1.9 – Extract from Kennet Landscape Character Assessment – Figure 14.2

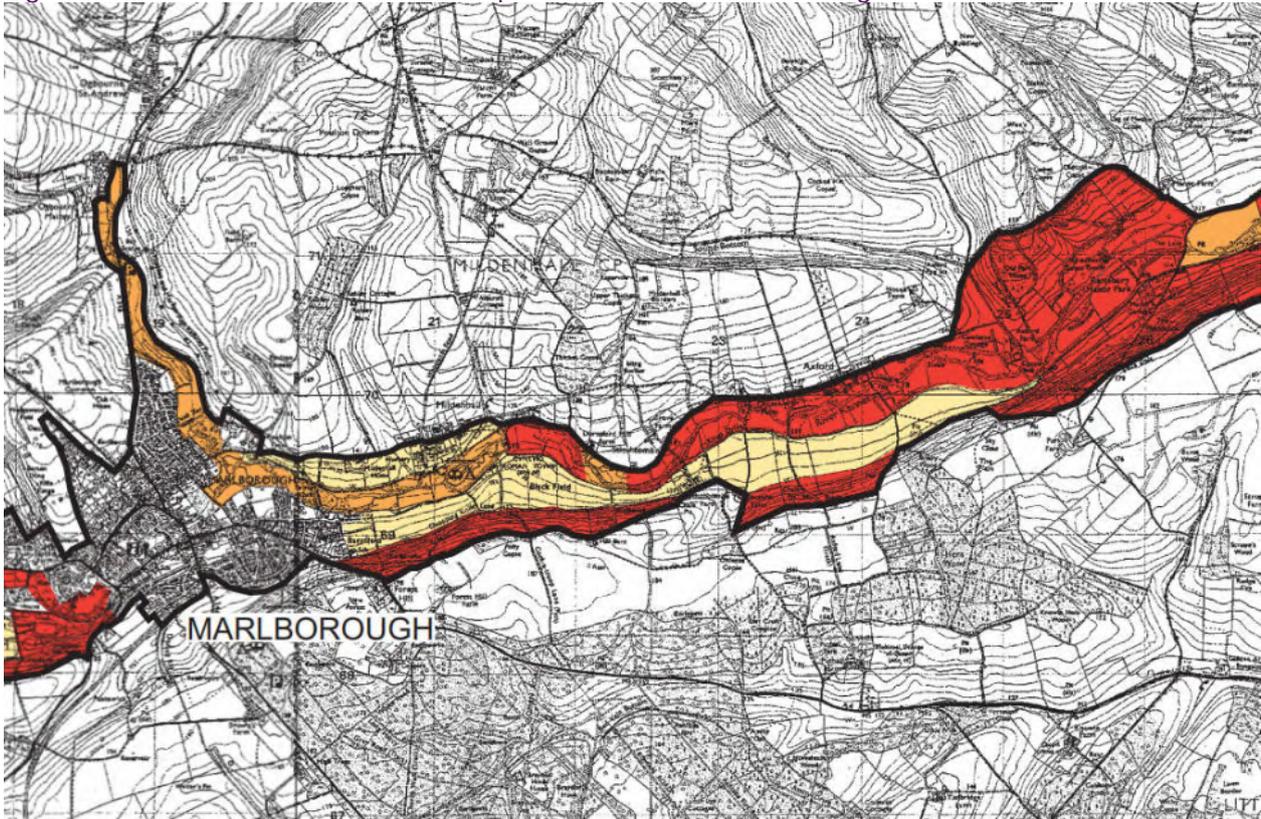


Figure 14.2 from the study identifies the Site as falling within an area of 'Repair'. The character assessment methodology describes areas in need of repair as follows:

'...areas where the structure of the landscape has been more substantially weakened by intensive farming practice or Dutch Elm Disease, or where its character and quality has been affected by non-agricultural land uses which have a detrimental influence on the landscape, e.g. airfields, built development, roads, power lines etc. They require more significant intervention to repair landscape structure and features that have been weakened by intensive farming practice or to mitigate the influence of detracting land uses or features.'

The character assessment identifies the following area-specific 'Enhancement Priorities' and 'Development Sensitivities'.

Enhancement priorities

- retain and manage areas of valley floor permanent pasture, wet grassland and meadows, including riparian vegetation, and discourage further ploughing and field enlargement;
- encourage traditional practices of willow pollarding and ditch management;
- in more open floodplain areas, introduce new tree planting along watercourses and in lines and groups within the valley floor, using typical riparian species such as willow and alder;
- retain the tranquil, intimate and unspoilt qualities of the river corridor and improve landscape structure and land management on the fringes of settlements and along main roads, to mitigate adverse impacts on river corridor landscapes;
- encourage repair, replanting and extension of hedgerow network and development of hedgerow trees in areas where a remnant structure remains, using native species typical of the locality, and discourage further hedgerow removal and replacement by fencing;

- seek to reverse damaging effects of low flows and poor water quality;
- encourage management of existing woodlands within the river corridor to maximise landscape and wildlife value, including the reintroduction of traditional coppice management and diversification of uniform plantations to favour native broadleaved species;
- plant large blocks and belts of native broadleaved woodland on arable or cultivated land on valley sides, to link with existing woodlands and to restore or reinforce a mosaic of woodland and farmland;
- maintain and, where necessary, restore parkland landscapes, including distinctive elements such as parkland trees, avenues, woods, copses, boundary walls and structures;
- encourage less intensive farming practices on arable land/improved grasslands along the valley sides and encourage the introduction of 'natural' vegetation cover in field headlands and margins.

Development sensitivities

- the whole area has an essentially tranquil, intimate and pastoral character within which only small-scale, sensitively-designed development, associated with existing built form, could be successfully accommodated without adverse landscape impacts;
- valley floor pastures and meadows along the River Kennet corridor represent a scarce landscape and ecological resource, making them particularly unsuitable for development;
- the open arable landscapes with a weak hedgerow structure along the valley sides are visually exposed and built development is likely to intrude upon the river corridor landscape;
- areas of woodland or enclosed farmland with an intact hedgerow structure along the valley sides are visually contained. In landscape and visual terms small-scale essential development which must be located in the countryside potentially could be accommodated in such areas, where they did not adversely affect the attractive, rural and unspoilt character of the river corridor;
- areas of parkland or estate landscape have particularly distinctive and attractive qualities and are sensitive to development.

Landscape Character Observations Made in 2020

During the Site visit undertaken in June 2020, the key characteristics of the Kennet landscape character area identified in the Wiltshire Landscape Character Assessment (as the most recent landscape character assessment undertaken) were checked against the Site and its immediate surroundings.

Table 1.1 Key Characteristics of Area 5A Kennet Chalk River Valley (as identified by the Wiltshire LCA)

Characteristic	Identified in 2020 Assessment
Relatively steep sides and a narrow valley floor, providing a strong sense of enclosure.	Although the Site itself is fairly flat, views out to the steeply sloping sides of the 'Camp on Forest Hill' Scheduled Ancient Monument are a prominent characteristic of the Site.
A varied and attractive landscape with tracts of lush floodplain pasture, marsh and reedbeds, lines of willow	The Site visit indicated that the Site forms part of the Kennet Valley floor. Although there is no woodland within the Site itself, views of the lush floodplain vegetation, willows and poplars form a background feature of views out of the Site.

Characteristic	Identified in 2020 Assessment
pollards and poplars plus hedgerows enclosing the fields and stands of regenerating alder, birch and oak along the river banks.	
Well wooded, with sinuous belts of woodland lining the valley sides and some larger broadleaved woodland blocks on the valley floor particularly in the east.	Although there is no woodland within the Site itself, views of the lush floodplain vegetation, willows and poplars form a background feature of views out of the Site.
The rich biodiversity of the floodplain is reflected in its status (with the floodplain of the River Lambourn) as a SAC.	The Site doesn't form part of the SAC
Minor roads follow the lower valley sides.	Chopping Knife Lane, south of the Site is a minor road that follows the lower valley sides.
Settlements, from manor houses and hamlets to the market town of Marlborough include those of Saxon and Medieval origins. Building materials generally reflect the local geology, with brick/flint and clay tile dominating east of Marlborough, and sarsen stone and brick dominating to the west.	<p>The most prominent built form as viewed from the Site and its immediate surroundings, is the recent development along White Horse Road. The three story apartment block in the south of the development, just off Chopping Knife Lane (see viewpoints 1 and 2), is a particularly prominent and intrusive feature of the development. It is visible from a number of locations within the landscape to the east of the Site, and in terms of height, scale and building materials, is not sympathetic to the existing character. A combination of the building height, and its location at the highest point of the Site mean that it is a prominent and detracting addition to the Kennet Valley LCA.</p> <p>In contrast, the north facing, two story properties on the northern edge of the development make a fairly positive contribution to the urban edge and are not a very intrusive or detracting feature as viewed from the valley floor or the wider landscape character area. The varied building materials, and staggered building orientation, alongside the belt of tree and hedgerow planting, creates a soft and characterful edge.</p>
Mills and churches are distinctive built features within the valley. In the upper reaches of the river, archaeological monuments associated with Avebury World Heritage Site (WHS), including The Sanctuary stone circle, are a prominent feature.	Elcot House Mill is an example of the former mills that are found along the River Kennet.

A review of the key characteristics of *LCA 5A Kennet Chalk River Valley* against the features of the Site and its immediate surrounding indicate that the Site is clearly a part of the valley floor landscape. Views out to the lush vegetation along the banks of the River Kennet are a characteristic feature of the Site, as are the views to the steeply sloping valley sides of Forest Hill, which create a fairly enclosed landscape. The arable land use is not a particularly characteristic feature, with land use more typically being pasture, and there is evidence that there has been loss of hedgerow, with the eastern Site boundary having no hedgerow.

2. Visual Context

A Site visit undertaken in June 2020 demonstrated that, while there are exceptions as discussed below, the Site is typically well screened from the views of local visual receptors. In particular, the dense tree cover along the River Kennet, established roadside planting along Chopping Knife Lane, Cock-a-Troop Lane and along Poulton Hill and a belt of planting along the northern edge of the White Horse development, all contribute to a high level of visual containment to views experienced by receptors to the north and east, particularly during Summer months when there are leaves on the trees.

Existing built form to the immediate south and west of the site again mean that close range views over the Site are largely restricted with the exception of those residents immediately overlooking the Site e.g. some residents on White Horse Road to the south where there are gaps in the planted edge along the northern boundary and 'Elcot Orchard' and 'Barnfield' to the west.

The eastern boundary of the Site has no hedgerow and an open aspect. The open aspect allows views into the Site from selected parts of the PRow network between the Site and Mildenhall Viewpoints 1, 3,4,5 and 6 (shown on Figures 1.4, 1.5 and 1.6 are typical of the occasional and glimpsed views into the Site from the adjacent network of PRow. With the exception of occasional views through the trees, views towards the Site from the east are screened by the multiple layers of intervening vegetation. The riverine planting along the River Kennet, provides the majority of the visual screening, but the tall hedgerow field boundaries and mature roadside planting all contribute to the network of mature planting that provides filtering and screening of views of the Site.

The Camp at Forest Hill SAM provides panoramic views northwards, across the Kennet Valley in general. Viewpoint 2 demonstrates the view experienced from a PRow within the SAM. The Site is partially visible from the PRow, although existing development along White Horse Lane partially restricts views. It is clear however, that any development on the Site will need to give careful consideration to how it impacts upon views experienced from the SAM, and this will be particularly important to the design of the eastern edge of the development. Photographs on Figure 1.11 show the existing view experienced from the SAM (the same view as viewpoint 2) and possible future view, should housing be developed on the Site.

The site visit indicated that the following visual receptors have the potential to experience views of the Site, and the impact on their views will need to be considered as part of the masterplan, and a means of mitigation considered. The views experienced by these visual receptors are demonstrated by stitched together photographs included on Figures 1.4 to 1.6, as referenced below, and individual site photos shown on Figures 1.2 and 1.3.

- Residential receptors in selected properties to the immediate south on White Horse Road where gaps in the planting allow for views of the Site (see Site photos 1 and 2 of Figure 1.2)
- Users of the playground/path on the northern edge of the White Horse Road Development, where gaps in the planting allow (see Site photos 1 and 2 of Figure 1.2)
- Residential receptors in properties to the west on Barnfield and Elcot Orchard
- Residential receptors in Nutwood, the property on Chopping Knife Lane
- Users of PRow network within the Site/immediately along the boundary (see photo 2 and 3 on Figure 1.3)
- Users of PRow network to the east and north of the Site (See Viewpoint 1, Figure 1.4, viewpoint 3 (Figure 1.5) and Viewpoints 5 and 6 (Figure 1.6)
- Users of the PRow on the northern edge of the Scheduled Ancient Monument (Camp on Forest Hill). (see Viewpoint 2, Figure 1.4)

3. Summary

The Site - and whole of Marlborough - is located in a highly sensitive and protected landscape (North Wessex Downs AONB). While both the Wiltshire Landscape Character Assessment and Kennet Landscape Character Assessment note the strength of character of the landscape, there is some contradiction as to its condition, with the Wiltshire Landscape Character Assessment stating that *LCA 5A: Kennet Chalk River Valley* is in **good condition** with a **strong character** and the Kennet Landscape Character Assessment stating that *LCA7 Kennet Valley* is in need of repair.

Both Landscape Character Assessments are now over 15 years old the Wiltshire assessment having been undertaken in 2005 and the Kennet District assessment having been completed in 1999. The Site visit undertaken in June 2020 indicated that to the east of the Site, the character of the Kennet valley landscape is in good condition, with many of the key characteristics identified in both landscape character assessments being present. One of the factors identified in the Kennet Landscape Character Assessment for an area in need of repair is *'where its character and quality has been affected by non-agricultural land uses which have a detrimental influence on the landscape, e.g. airfields, **built development**, roads, power lines etc.'*

As discussed in this note, the housing development immediately to the south of the Site is visible from parts of the River Kennet Valley to the east. The three story apartment block on the higher part of the White Horse Road Site, is a particularly prominent feature, visible from part of the Kennet Valley landscape including from well used PRow that are used by recreational receptors, enjoying the AONB landscape. .

However, the White Horse Road development demonstrates that where the built form is on lower lying land, and only two storeys, the visual impact on the surrounding visual receptors is much less. The north facing, two story properties on the northern edge of the development make a fairly positive contribution to the urban edge. The varied building materials, and staggered building orientation, alongside the belt of tree and hedgerow planting, creates a soft and characterful edge which is only very occasionally visible except for in the immediate vicinity of the Site. .

Given that the Site is on lower lying ground, and experiences a high level of screening from surrounding built form and vegetation, it is judged that there is potential for the Elcot Lane Site to be a well-integrated and positive addition to the urban edge of Marlborough, assuming that careful consideration is given to the location, scale, orientation and building materials of the housing and location of species composition of the planting.

3.1 Design Considerations

Key landscape related design considerations going forward (subject to further assessment and technical studies) are outlined below:

- Consider opportunities for re-planting hedgerows and hedgerow trees as part of the scheme, in particular along the eastern boundary.
- Identify opportunities for reconnecting and recreating wetland habitats such as small areas of wet woodland and marshy areas, particularly along the lower lying north eastern boundary of the Site, where the Site is closest to the River Kennet.
- Resist excessive signage and maintain a sense of landscape scale when planning new road junctions. Carefully consider the most appropriate location for the access road from the south, off White Horse Road. There is a fairly steep drop in elevation between White Horse Road and the Site, and the access road may need fairly substantial retaining edges. Consideration must

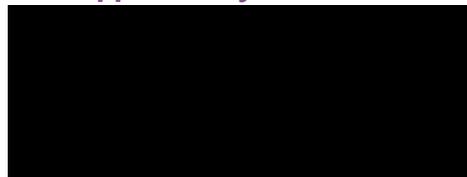
be given to how this structure can best be screened, and it is likely that appropriate species of trees and hedgerow should be planted as part of the mitigation strategy.

- Should an access to the Site be required from Elcot Lane this would require the removal of mature trees and a section of hedgerow. Further masterplanning work must be based upon the findings of a Tree Survey (in accordance with BS5837:2012), and the road design/means of constructing the road, must aim to minimise tree loss.
- Ensure that built form and road design is sufficiently offset from the northern boundary to ensure the planting along the northern Site boundary can be retained (protect the setting of Elcot Mill House)
- In line with local planning policy and published design guidance, development should be in keeping with local vernacular (where possible) and be of a height and mass that relates to key views and the wider context.
- Heights of the proposed development should be restricted to 2 storeys (below the tree canopy line and skyline from wider views) across the majority of the site.
- As per Local Planning Policy CP52: Green Infrastructure, the development should form part of a wider green infrastructure network of multi-functional green space/ green and blue corridors, which seeks to maintain, enhance and create connectivity with off-site green infrastructure. It will be particularly important to retain access along the PRoW along the northern Site boundary, which is an important section of route, connecting the PRoW along the River Kennet to National Cycle Network route 482
- Open space, including sustainable drainage, can be located on the north and eastern boundary and would be helpful to provide further landscaping enhancements.
- Future work should be progressed and tested through an iterative process of design and assessment and should be undertaken through additional desk and field work in accordance with the Third Edition of the Guidelines for Landscape and Visual Impact Assessment (GLVIA3).

Issued by



Approved by



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Appendix A – Drawings



Originator: Holly Colson
\\war-fs-1.global.amec.com\shared\Projects\38696 Elcot Lane, Marlborough\5 Design\Drawings\INDY\38696-LEA17- Figure 1.2.indd



Photo 1: View from the footpath on the northern edge of the adjacent development, overlooking the Site. Although the belt of planting along much of the boundary between the adjacent development and the Site restricts views southwards, where there are gaps in the planting, clear views into the Site are possible, and in fact designed to be taken advantage of e.g. benches overlooking the view.



Photo 2: View from the footpath on the northern edge of the adjacent development, looking northwards from the approximate point of the bench visible in the photograph above.



Photo 3: View westwards along White Horse Road showing the screening provided by the belt of planting to the north.



Photo 4: Playground on the northern edge of the adjacent development

Elcot Lane

Figure 1.2

Photographs of the Site and Surroundings

July 2020



wood.

\\war-fs1.global.amec.com\shared\Projects\38696-LEA18 Figure 1.3.indd Originator: Holly Colson



Photo 1: View from the end of Elcot Lane looking eastwards

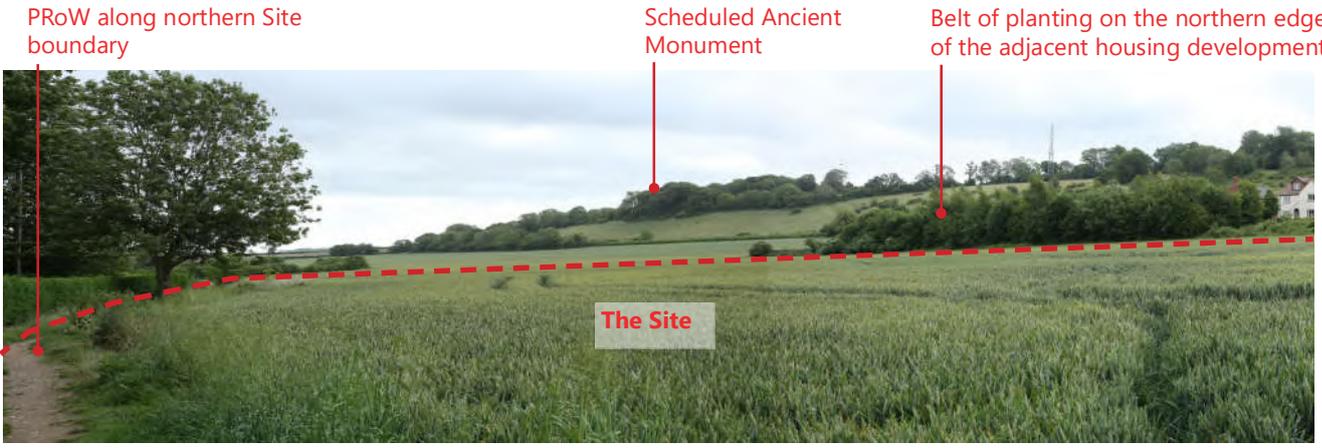


Photo 2: View from the north west corner of the Site, looking eastwards and north eastwards, across the Site towards the Scheduled Ancient Monument (Camp on Forest Hill).



Photo 3: View from the north east corner of the Site looking west and south west

Elcot Lane

Figure 1.3

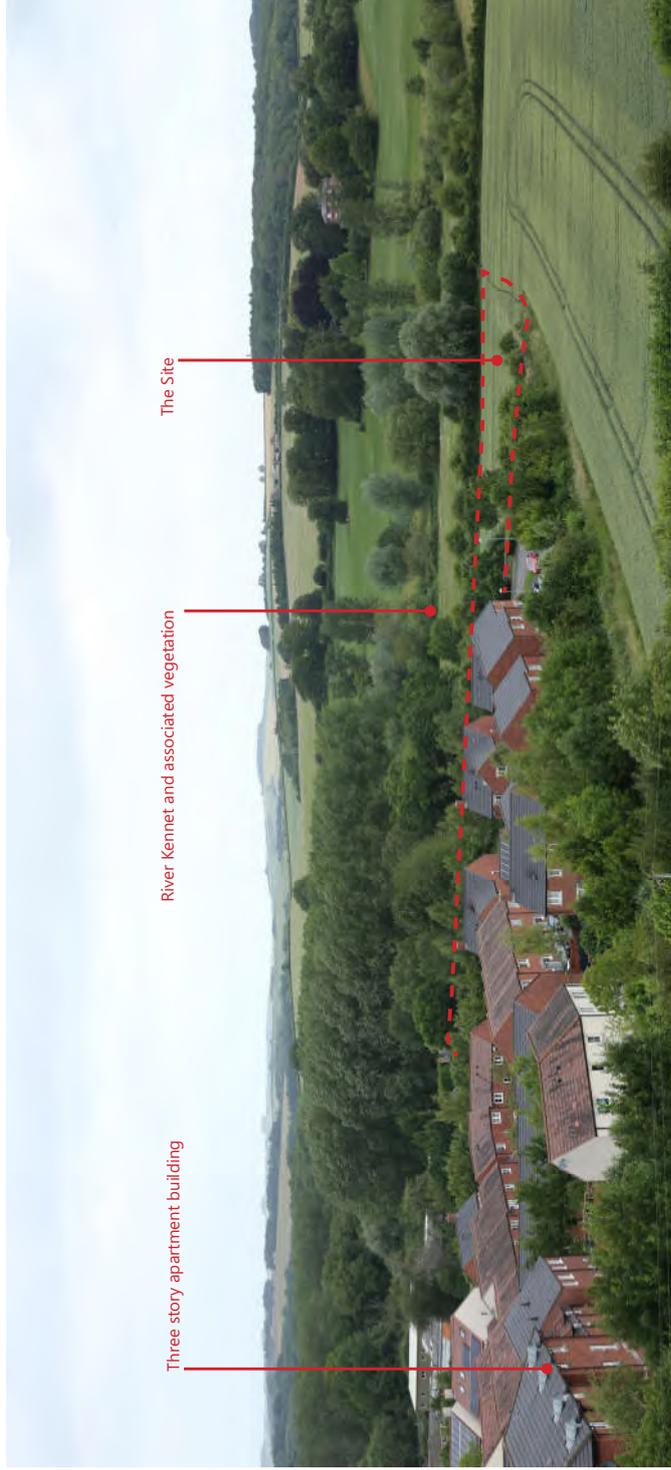
Photographs of the Site and Surroundings

July 2020



Viewpoint 1

Originator: Holly Colson



Viewpoint 2

Viewpoint Location Plan



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Elcot Lane

Figure 1.4

Viewpoints 1 & 2

July 2020



wood.



The roofline of existing properties to the north of Chopping Knife Lane are partially visible above the layers of intervening vegetation. During winter months, the Site may be partially visible in the context of existing built form.

Viewpoint 5

Originator: Holly Colson



The roofline of existing properties to the north of Chopping Knife Lane are partially visible as a distant feature, visible above the layers of intervening vegetation. During winter months, the Site may be partially visible in the context of existing built form.

Viewpoint 6

Viewpoint Location Plan



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Elcot Lane

Figure 1.6
Viewpoints 5 & 6

July 2020





Existing view from Camp at Forest Hill Scheduled Ancient Monument



Possible future view from Camp at Forest Hill Scheduled Ancient Monument

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Elcot Lane

Figure 1.11

**Existing and Possible Future Views
from the Camp at Forest Hill
Scheduled Ancient Woodland**

July 2020



wood.



Key

- Site boundary
- Vehicle access
- Pedestrian/ Green links
- Potential future development
- Open space



Green space and stand-off to listed buildings with attractive frontage

Potential Riverside Park

Emergency access via Elcot Lane

Main vehicle access via Crest scheme

Secondary / emergency access

Strong landscaped boundary along the site's eastern edge

Chopping Knife Lane

Not To Scale A3
© 2018 Google

Client

Marlborough Neighbourhood Plan

Option B - Land east of Elcot Lane / north of Chopping Knife Lane
Illustrative masterplan

August 2019



STRAT319



RIDGE

**RESPONSE TO WILTSHIRE'S
LOCAL PLAN REVIEW
CONSULTATION**

FOR BADMINTON ESTATE

March 2021

RESPONSE TO WILTSHIRE'S LOCAL PLAN REVIEW CONSULTATION

March 2021

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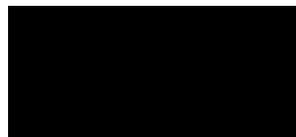
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1. INTRODUCTION

Statement Background

- 1.1. This representation has been produced on behalf of Badminton Estate and responds to the Council's latest consultation which seeks views on options for the future employment and housing development requirements over the plan period of 2016 to 2036 and includes the distribution of growth within specific Housing Market Areas ("HMA"), and a rethought strategy for empowering rural communities. The Wiltshire Local Plan review consultation runs from Wednesday 13th January to Tuesday 9th March 2021.
- 1.2. The review provides the Council with a means of proactively addressing the economic challenges we currently face. The purpose of a review is to take account of changing circumstances affecting the area, or any relevant changes in national policy. The Council needs to comply with Regulations and ensure its Local Plan is up-to-date and in conformity with the revisions to the National Planning Policy Framework, 2019 (NPPF).
- 1.3. The review presents the opportunity to respond to the Council's declaration of the Climate Change Emergency and meet the housing and employment needs whilst addressing the changing role of communities to help places become more economically, socially and environmentally resilient.
- 1.4. We have reviewed the key documentation and supporting information in detail and overall are cautious towards the Council's proposed development strategy to help meet the District's future housing and employment requirements by placing limited emphasis on the growth within rural areas. Whilst we recognise that the framework for growth in the rural areas has been rethought, we are of the view that more emphasis is required to avoid further stagnation of settlements in the rural area including Smaller Villages.
- 1.5. It is of particular note that alternative strategies were considered as part of the Sustainability Appraisal for the Chippenham Housing Market Area, including "the Strategy CH – C (Focus on the Rest of the HMA)" which was considered within the Sustainability Appraisal. This strategy would provide the most growth towards the rural area and would provide greater opportunities for settlements in the rural area to build resilience and become more sustainable.
- 1.6. The current adopted development plan (Wiltshire Core Strategy adopted January 2015) concentrates a significant amount of development towards Principal Settlements, Market Towns and Community Areas, whilst limiting the extent of growth in "Smaller Villages" to infill within the existing built area. This has caused inequalities across the district, impacting upon the sustainability of rural areas and increasing the level of deprivation. Notwithstanding this, speculative development has come forward over the years within rural areas. It is our view that focus should be placed on addressing the deprivation and inequalities that are in place following the continuation of focussing development at the aforementioned locations.

Statement Structure

- 1.7. The purpose of this representation is to respond to the Wiltshire Local Plan Review Consultation and the content within the following documentation; the Emerging Spatial Strategy, Empowering Rural Communities and Addressing Climate Change and Biodiversity Net Gain.
- 1.8. In the first instance the following provides a narrative of the Badminton Estate's future ambition to achieve sustainable growth within rural areas.

2. THE BADMINTON ESTATE

- 2.1 The Badminton Estate contains a well-established legacy, having been in the ownership of the Somerset Family since the early 1600s. Since that time, successive generations of the family have built many historic buildings and created today's landscape by planting numerous trees and woodlands, contributing to the character and appearance of the District's landscape. Whilst Badminton House and Park lie just outside the county of Wiltshire, the Park immediately adjoins the county boundary. The Estate seeks to maintain Badminton House, and to support all of the communities of the Estate (including both the central village communities of Badminton and Little Badminton and the communities across the wider Estate, as well as the wider farming community of the Estate farms).
- 2.2 The Estate offers a wide range of benefits to the local community including the provision of let residential property and rural employment opportunities through agriculture and forestry. Whilst continuing these services, the Estate is also keen to develop and diversify their offering to the community with the development of suitable new enterprises, which in turn will help maintain and retain their legacy as well as securing their future vitality and creating new employment opportunities which will assist with the revitalisation and diversification of the rural economy. In addition, the Estate seek to provide new residential units and community services through the offering of their land for future, sustainable development. Providing such uses within rural areas will support existing services and facilities and improve community uses, enhancing the sustainability credentials for rural villages and enabling the empowerment of their communities. The Estate are seeking to submit a representation shortly to the Council's Call for Sites which reflects these principles, promoting the development of a site within the village of Luckington for a mix of residential use, live/work units and community facilities.
- 2.3 In support of this the Estate seek to achieve the following objectives:
- Maintain Badminton House, its surrounding gardens and parkland.
 - Maintain all listed and non-listed buildings on the Estate, re-using any redundant buildings and securing viable new uses for them.
 - To reduce the carbon footprint of the Estate and work towards a carbon neutral future, and work with other local businesses to offer carbon off-setting and biodiversification opportunities on the Estate.
 - Continue the current programme of investment in improving and renovating residential property.
 - Continue to offer a range of accommodation in let residential property to retain a balanced community.

- Continue to diversify the Estate's historical dependence on income from agriculture and forestry.
- To maintain and expand rural employment opportunities both on the Estate and in the wider community to enhance vitality within the local community.

2.4 The ambition of the Estate should be seen as a driver toward directing proportionate and sustainable growth toward the rural areas of the Wiltshire District. The following section provides commentary on the Council's emerging spatial strategy with proposed suggestions in how it can seek to deliver such growth.

3. EMERGING SPATIAL STRATEGY

- 3.1. Forecasts predict Wiltshire will need to deliver between 40,840 and 45,630 new homes over the plan period of 2016 to 2036. A hierarchy is presented within the Emerging Spatial Strategy which categorises settlements based on the amount of development they can deliver sustainably. The primary focus for development is directed toward Principal Settlements and Market Towns, with Smaller Villages considered as 'non-strategic' and generally limited to providing infill development. It is noted that the hierarchy that is presented within the Core Strategy is not subject to change as part of this review.
- 3.2. Ridge and Partners LLP consider that development within the rural area can contribute towards the sustainability of Smaller Villages and in turn address issues related to climate change and the need to travel. It is our view that the rural area plays an important role in ensuring that sustainability can be achieved for the wider administrative area. We also agree that a primary focus for development within Principal Settlements does offer a sustainable location for development but believe that the role of rural villages should be recognised particularly with the increasing need for places to be more self-sufficient and resilient. By providing proportionate growth opportunities in Smaller Villages the Council will be actively addressing the issues of stagnation and growth inequality.
- 3.3. In delivering the spatial strategy we note that particular focus has been placed on the different long-term roles of settlements and apports growth accordingly. This is to help implicate growth so that the loss of countryside can be avoided as settlements expand. However, the restrictions across Smaller Villages (and those not included within the spatial hierarchy) are left to wilt and become stagnant whilst a large proportion of the growth is maintained within the existing main settlements.
- 3.4. It is our view that strategies need a degree of flexibility particularly towards rural villages given the recent implications of Covid-19 and the effect this has had on the way in which people wish to work or live. The Council recognise this in the Emerging Spatial Strategy at paragraph 2.8:
- "The impact of COVID-19 is also likely to increase home working permanently, reducing net out commuting to other settlements and boosting local demand for many goods and services."*
- 3.5. Embedding a degree of flexibility can help improve the sustainability of the wider area and bring communities together. It is noted that within the "Emerging Strategy" consultation, recognition has been given to the effects of Covid-19 and how it has changed the way we look at our surroundings, our behaviour and how we manage our environment. However, it is our view that this has not been translated into the emerging spatial strategy by not looking to allocate development within rural communities other than those opportunities that are guided by Neighbourhood Development Plans.
- 3.6. Whilst we are encouraged to see that there is greater support placed on the production of neighbourhood plans and allows relevant parishes or groups to reclassify their status or add new development within villages depending upon the evidence of local circumstance. We feel that more is needed to address the issues of stagnation and growth inequality within rural communities.

- 3.7. The assumption that a lack of services means rural villages are unsustainable for new housing has been challenged by The Taylor Review, The Affordable Rural Housing Commission and academics due to the negative impact this process has on house price affordability, social cohesion and economic performance. It is our concern that this strategy will effectively fossilise villages instead of seeking to address the reasons behind why services are being lost, which in turn creates a cycle of decline.
- 3.8. Having reviewed the services assessed to develop the settlement hierarchy, we conclude that settlements are being ranked using criteria more reflective of the way people lived in the past and pre-Covid. Without proactively planning for the future now, rural communities will miss out on the advantages development can bring and the technological change it will inevitably bring too. Particularly during a time that has seen unprecedented change following the Covid-19 outbreak.
- 3.9. One facet of sustainability that has not been given due consideration is the access to broadband and the substantial benefits it brings. It reduces isolation and opens access to services like banking, shopping, education, healthcare, communication, employment and entertainment services. All of which reduce the need to travel.

Emerging Strategy, Neighbourhood Planning and Community Led Housing

- 3.10. Moreover, whilst we agree that Neighbourhood Development Plans can be a useful tool in achieving a level of community buy-in to the planning process and provides the opportunity to make local choices about how their neighbourhood changes and what residents see as important. However, it is our view that, as a mechanism for boosting planned development, very few Neighbourhood Plans genuinely pursue additional housing growth and can take some time before they are formally made and form part of the development plan. This has been exacerbated within the last year due to COVID-19 where referendums for Neighbourhood Plans cannot be undertaken until May 2021.
- 3.11. Even when Neighbourhood Plans are put in place, there is no statutory requirement for them to conduct a Housing Needs Assessment. If neighbourhood planners opt to conduct one, the NPPF advises groups against collecting their own primary data from residents, stating it is disproportionate to collect this data when other sources are available. It advocates using data from the Local Plan to inform what housing an area needs. It is our view that this data is given at a strategic level and may therefore not reflect local need.
- 3.12. Outside the main settlements, the increased level of housing need is translated directly into an increase in housing requirements at rural settlements. The result is a scale of growth equivalent to past rates of housing development which has been restricted by previous strategies. Therefore, whilst we support community-led development and the benefits it can bring, it is our view that the Council should be bolder in its approach by supporting the growth of rural settlements and allowing for a proportionate and sustainable amount of development to be delivered at Smaller Villages outside the remit of Neighbourhood Planning and community-led initiatives.

- 3.13. With regards to community led housing schemes, which are otherwise supported by the development of rural exception sites, our principal concern is that these types of developments are intentionally restrictive and by its very nature hinders the likelihood of development coming into fruition. Therefore, as a mechanism for building resilience and allowing proportionate growth in rural areas, it is our view that relying on the delivery of community led housing schemes would continue to restrict their growth, thereafter impacting upon their sustainability.
- 3.14. Rural exception sites providing affordable housing for local people can be difficult to deliver within rural areas due to the unavailability and high 'hope' values of suitable land. However, well planned and appropriate development could increase housing choice, provide different types and tenures of housing, including affordable housing and shared ownership homes, as well as increase support for key local services and facilities. One of the strategic aims at Paragraph 1.8 within the Core Strategy is to achieve 91% coverage of superfast broadband. It is unclear whether this objective has been met, but nevertheless it is clear that an aim for the District has been to increase the connectivity of the area. It is our view that the Local Plan Review can utilise the benefits of widespread connectivity by factoring in the services that are now available to settlement within the rural area.
- 3.15. Overall, notwithstanding the steady decline in growth of rural areas currently being received, should Neighbourhood Plans not deliver the need for housing in rural communities, it is clear that the sustainability of rural villages is likely to worsen over the next 15 years. It is common that villages have a tendency to have older people, a growing affordability gap between local incomes and house prices and can lack certain housing types/ tenures especially smaller market and affordable homes. These issues can be addressed by the emerging Local Plan and addressing the difficulties younger people who wish to remain in or move to an area.

Emerging Strategy and Five-year Housing Land Supply

- 3.16. Furthermore, it is our view that limiting growth in rural settlements will impact upon the Council's ability to maintain a 5YHLS. The latest supply statement details that the Council can only demonstrate 4.53 years of housing land supply, a result from the development of current allocations within the Core Strategy being delayed which would otherwise have resulted in a large amount of growth for the District. It is our concern that a continued reliance of developing larger settlements will weaken the Council's ability to demonstrate five years of housing land supply.

4. CREATING SUSTAINABLE RURAL VILLAGES AND SETTLEMENTS

- 4.1. As a principle, it is encouraging to see the Council have dedicated a detailed document to “Empowering Rural Communities” and a focus of the Local Plan Review is to set an appropriate scale of housing growth for Large Villages and Local Service Centres over the plan period (2016-2036). Although we are discouraged to see that the planning controls that are imposed by the existing development plan on Smaller Villages are proposed to continue.
- 4.2. Whilst we agree with the aim to prevent sporadic development and manage widespread speculative pressures for new buildings, we disagree with the blanket presumption against granting planning permissions outside of designated settlements i.e., Smaller Villages, in all but a limited range of circumstances which revolve around meeting local needs; such as to provide affordable homes and for local jobs and services. Rather, the Council should be encouraging incremental and proportionate growth to these settlements to ensure their sustainability is conserved and enhanced.
- 4.3. Ridge and Partners LLP are of the view that the effect of strict controls, and constraining development opportunities to lower landowner expectations of their land’s value for the means of leveraging land for community facilities that might not otherwise be considered viable, is an approach that will create lost opportunity within the emerging Local Plan. Rather the local plan should encourage the development of new community facilities that would allow for self-containment and resilience to be built within rural villages. It is our view that planning policy should support the role of these settlements and that they grow in ways that sustain them.
- 4.4. The role of the rural area is recognised at Paragraph 7 of the Empowering Rural Communities Document, in particular the role of Larger Villages and Local Service Centres. It states that most services upon which communities rely are found in Larger Villages and Local Service Centres and are designated as rural settlements in the current plan that contain services and facilities that also serve a much wider local catchment. They are recognised to be supportive of jobs and businesses as well as often providing local goods and services to a wider catchment. However, our concern is that there is no allowance for incremental and proportionate growth in Smaller Villages which otherwise could become more self-sufficient settlements that would seek to further support the facilities and services found within Larger Villages and Local Service Centres, according with the aim of Paragraph 78 of the NPPF which encourages opportunities for growth in villages where it will support local services. Further, no consideration is given to proposals for community facilities that would otherwise enhance the sustainability credentials of Smaller Villages, allowing them to become more self-sufficient whilst supporting other rural settlements within the District.
- 4.5. Moreover, as above, we are of the view that the initiative to set a framework that supports neighbourhood planning and community led housing is positive, but only for those communities with the ambition to produce and engage with the planning system by making a Neighbourhood Plan or comply with the stringent tests in achieving a community led affordable housing scheme. We

therefore consider that the approaches contained within the 'Empowering Rural Communities' document are only positive for a limited number of communities and will not truly reflect the need for new housing or community facilities.

5. CLIMATE CHANGE THROUGH THE LOCAL PLAN

- 5.1. It is encouraging to see the Council have dedicated a detailed document to "*Addressing Climate Change and biodiversity net gain through the local plan*". It is our view that the Local Plan, in connection with other plans, for example the Local Transport Plan and the emerging Climate Strategy, can support sustainable development and greatly influence the way places change and grow.
- 5.2. It is of note that the UK Met Office predicts hotter, drier summers and milder, wetter winters in Wiltshire along with an increase in the magnitude and frequency of extreme weather events such as heatwaves, floods and droughts. This could have far reaching social, environmental and economic impacts and will require appropriate adaption and mitigation measures.
- 5.3. In particular, it is our view that plan making's role in addressing climate change can help influence the way we live, work and travel. The local plan has the opportunity to shape places to help secure radical cuts in greenhouse gas emissions (for example through efficient building design and changes to the way we travel). The NPPF states that "*Plans should take a proactive approach to mitigating and adapting to climate change, taking into account the long-term implications for flood risk, coastal change, water supply, biodiversity and landscapes, and the risk of overheating from rising temperatures*".
- 5.4. In responding to "*Consultation Question A2: What practical and achievable steps should the Local Plan take to significantly reduce carbon emissions by 2030?*", it is our view that there is a need to ensure the distribution of new development delivers greater levels of self-containment and reduces the need for unsustainable travel pattern with a particular emphasis in increasing the sustainability of settlements within the rural area. Ensuring proportionate and incremental growth is directed to these areas will reduce the need for those to travel within the District and beyond such as toward Swindon, Bath and Bristol to access services, facilities and employment opportunities. The Council recognises the high amount of out-commuting travel within the District as set out within their adopted Core Strategy and the emerging Local Plan.
- 5.5. Further, through the implications of Covid-19, as mentioned above, it is recognised that people will be changing the way in which they work, live and play, with high intentions for those who are working from home to continue to do so. With this comes a reliance for more sustainable growth to be directed toward Smaller Villages to reduce the reliance of out commuting that is otherwise having a negative impact upon climate change through rate of carbon emissions. The emerging Local Plan has an important role to play in responding to the current and future trends of society, that would subsequently help the Council fight the impacts of climate change, by allowing for a proportionate and sustainable amount of growth to be directed toward Smaller Villages within the District.
- 5.6. We therefore respectfully request for the above to be looked upon favourably by the Council as their emerging local plan gathers momentum.

6. CONCLUSION

- 6.1. Overall, the Estate would welcome a revised approach by the Council in meeting their development growth targets across the District by placing greater emphasis in delivering proportionate and sustainable growth within the rural area. Having reviewed the key issues identified within the emerging Local Plan, it is clear the Council are aware that there is a lack of growth in rural areas, however the apparatus that is proposed is, in our view, insufficient to address the affordability issues and continued neglect of these areas.
- 6.2. It is our view that persistent and continued focus upon growth in larger settlements has caused the rural area to become less sustainable, as well as it is having an impact upon meeting the Council's growth targets, as reflected in their lack of five-year housing land supply. Further, it is also our view that the Council's approach does not wholly acknowledge the impacts of the recent pandemic by not seeking to promote development that reflects the changing needs of those who live and work in the District.
- 6.3. It is encouraging to see that the Council is focussing on addressing the issues of climate change in a pragmatic manner. The view is shared that the Local Plan has an important part to play in the Council's response to climate change, and in doing so we believe that greater focus should be placed on rural growth in locations that are not completely dependent on private car use and have access to key services and facilities, whether that be within the village itself or within surrounding areas. The Local Plan should maximise the opportunities for development in locations that not only have good walking, cycling or public transport and digital connections to access key services and facilities, but to those that could support development in another village or develop new services and facilities that would promote the sustainability of those settlements. In adopting a more considerate approach towards the role of rural settlements, the Local Plan will play a long-standing role towards addressing the issues of climate change helping to achieve a carbon neutral and resilient future for the whole District.

Recommendations

- 6.4. It is understood that the Local Plan Review is still in its infancy and that the proposed development strategy will be worked on as it progresses. However, as set out in this statement, it is respectfully requested that the Council considers an approach that regards settlements within the rural area as realistic prospects for growth and directs the largest proportion of housing to the remainder of the rural area similar to "the Strategy CH – C (Focus on the Rest of the HMA)" which was considered within the Sustainability Appraisal.
- 6.5. It is clear when looking at the adopted Cotswold Local Plan that a suitable local plan policy can be drafted which allows for small to medium sized growth in rural areas so long as it is in proportion to the size of the settlement and does not adversely impact upon the character of those settings, including any environmental constraints that may be contained within those settlements as well ensuring that no adverse cumulative impacts are caused. We would therefore like to take the

opportunity to help influence the wording of the local planning policy to ensure that sustainable growth that is proportionate to rural settlements can be achieved. In doing so, I refer to an adopted local plan policy (Policy DS3) contained within the Cotswold Local Plan (adopted 2018). This policy allows for 'small-scale' residential development in what Cotswold District Council define as 'non-principal settlements' subject to a criterion. The exact wording of that policy is as follows:

"Small-scale residential development in non-Principal Settlements

1. *In non-Principal Settlements, small-scale residential development will be permitted provided it:*
 - a) *Demonstrably supports or enhances the vitality of the local community and the continued availability of services and facilities locally;*
 - b) *Is of a proportionate scale and maintains and enhances sustainable patterns of development;*
 - c) *Complements the form and character of the settlement; and*
 - d) *Does not have an adverse cumulative impact on the settlement having regard to other developments permitted during the Local Plan period.*
2. *Applicants proposing two or more residential units on sites in non-Principal Settlements should complete a rural housing pro-forma and submit this with the planning application."*

6.6. Cotswold District Council do not have a defined list of those settlements that are 'non-Principal', but instead provide a flexible policy approach which allows rural settlements with greater sustainability credentials, such as having access to everyday services such as shops, post offices, schools and good public transport links to neighbouring towns, to grow incrementally. Further, Cotswold District Council recognise that rural settlements that have fewer services and facilities can still be defined as 'non-Principal Settlements' where they have "*reasonable access*" to neighbouring rural settlements that contain a larger range. Paragraph 6.3.4 of the Cotswold Local Plan states "*distance, quality of route, topography and pedestrian safety are important issues when considering the accessibility of services and facilities.*"

6.7. The criteria attached to Policy DS3 provides a 'safety net' to ensure development in rural areas respects, conserves and enhances the rural character and appearance of the landscape as well as any other environmental constraints, having regard to flood risk zones and areas containing heritage assets. As such, the policy requires development to be designed to reflect the local character of settlements ensuring the scale of development is proportionate to the size of the settlement. Further, the policy requires the decision-maker to take into account any other recent development of the village to ensure no adverse cumulative impacts are caused from the new development. The rural housing pro-forma required to be completed for any proposals containing two or more dwellings ensures the applicant provides the level of detail required to ensure the policy requirements of Policy DS3 are met within a planning application.

- 6.8. Overall, we consider a similar policy could be contained within the emerging Local Plan to help the Council create sustainable rural villages and settlements without causing any adverse impacts upon the character and form of those villages, nor impacting upon the environmental designations likely to be contained within those areas. To that end, we would like to invite officers at the Council to discuss the opportunity of implementing such a policy within the emerging Local Plan.
- 6.9. Clearly there is a way forward where rural settlements can accommodate a proportionate level of growth, which supports the requirements of Paragraphs 78 and 103 of the NPPF. Incorporating such a policy within the Local Plan Review will ensure the plan is being prepared in a positive manner to help achieve sustainable development, complying with Paragraph 16 of the NPPF.
- 6.10. Planning for a proportionate amount of growth such as new homes, employment and key services and facilities in smaller rural villages and settlements can play an important role in making sure that the long-term vitality, vibrancy and overall sustainability of our rural communities is maintained by:
- increasing opportunities for home ownership and renting for younger people, families and an increasingly ageing population that want to stay in, or move back to, their communities;
 - increasing access to education and employment opportunities in easy reach of where people live;
 - supporting the long-term sustainability and success of education facilities, particularly those rural primary schools that have seen a decline in class sizes in recent years; and
 - supporting existing and/or enhanced key services and facilities in rural communities, such as local shops, community centres, public houses, broadband connectivity, local employment opportunities, and the viability of public transport connections to towns and urban areas.
- 6.11. In turn, this approach could help stimulate new sources of growth for smaller, local builders, private individuals or through proposals for 'self-build', or those who are unable or unwilling to develop larger sites. This will also support the local economy, by providing and safeguarding jobs in the construction industry, to support the post COVID-19 economic and social recovery.
- 6.12. To that end, the Badminton Estate would be delighted to engage with the Council as the emerging Local Plan gathers momentum to ensure planning policies are in place to help direct proportionate and sustainable amounts of growth toward Smaller Villages which will in turn provide significant social, economic and environmental benefits for the District.

RIDGE



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STRAT320

Wiltshire Local Plan Review 2016-2036: Emerging Strategy

Prepared by Savills
on behalf of Hallam Land Management

1. Introduction

- 1.1 This Representation is made in response to the consultation on the Wiltshire Council (WC) Local Plan Review (LPR) 2016-2036: Emerging Strategy. The representation is submitted by Savills on behalf of Hallam Land Management (HLM) who has an interest in land to the south of Western Way, Melksham. A copy of the Site Location Plan is attached at **Appendix 1**.
- 1.2 By way of context, HLM controls an area of land comprising approximately 10.5 hectares adjacent to the southern edge of Melksham. Prior to the LPR, through the 2017 Strategic Housing and Employment Land Availability Assessment (SHELAA), the site has been identified as suitable, available, achievable, deliverable and developable in the short-term (Reference: 1025).
- 1.3 The site is currently subject to a pending planning application up to 240 dwellings, a 70-bed care home, open space including parkland, community orchard and informal recreation, alongside appropriate supporting infrastructure (App Ref: 20/08400/OUT). We discuss the application in further detail later in the representations.
- 1.4 Our comments on the consultation and supporting evidence base are set out below and are made in accordance with paragraph 35 of the NPPF, to assist in ensuring that the LPR is found sound when examined in the future. We note that there is an ongoing consultation in regard to the changes to the NPPF, and that it is likely, given the published timelines for the LPR, that these will be made prior to the LPR reaching a sufficiently advanced stage, and thus it will be this revised Framework upon which the LPR will be examined.

2. Emerging Spatial Strategy

Plan Period

- 2.1 The proposed timelines for the LPR, with adoption planned for Q2 2023, would mean that it fails to accord with the NPPF's requirement for a "*minimum 15 year plan period from adoption*" (paragraph 22). This must be rectified before proceeding to the next stage of the Local Plan Review. In setting the future end date, we would suggest sufficient flexibility is included to allow for any potential slippages in the plan making process.
- 2.2 In addition, it is not appropriate to retain the base date of 2016. This is already 5 years out of date, and on adoption, the plan would be seven years post-base date. The published evidence base needs a full update, with reliance on reports from the defunct Swindon and Wiltshire Spatial Framework Plan dated 2016/17 not forming a robust evidence base upon which to consider the soundness of the emerging LPR. As such, the plan should be rebased to 2019; with the associated updated evidence base.

Housing Need

- 2.3 We note that WC have not chosen to update the Local Housing Needs (LHN) Assessment (2019) published as part of the informal consultation in August 2019, and recognise that at the point of drafting this consultation document, that the outcome of the national consultation on the standard method was unknown. Subsequently, the Government have published their response, and as such, a comprehensive update of the evidence supporting the proposed housing target is required.
- 2.4 In accordance with the NPPF and PPG, the standard method should be used to identify the 'minimum annual housing need figure'; and then consideration given to whether there is a need for the housing requirement to be higher to account for local circumstances; such as economic projections, previous rates of delivery and the need to deliver affordable housing to meet demonstrable local needs (see PPG 2a-010-20201216 and 2a-024-20190220).
- 2.5 The current 2020 standard method figure for Wiltshire is 2,006 dwellings per annum. As per the PPG, in moving towards the Examination of the LPR, the housing need figure must be "kept under review and revised where appropriate" (PPG: 2a-008-20190220). The updated affordability ratios are due for publication on the 25 March 2021; and thus a 2021 based LHN figure can be calculated prior to the next stage of the LPR. It is noted that the outcome of the 2019 LHN suggest an annualised requirement of 2,285 was required.
- 2.6 In this regard, we note that the LHN cannot be used retrospectively; with the annual affordability ratio responding to any 'oversupply' earlier in the plan period. Thus, the minimum housing requirement for Wiltshire is 2,006 homes per annum from 2020 (32,096 over the current 16 year remaining plan period) – with this to be updated shortly to a 2021 base date; and there is no ability to reduce this due to housing delivery between 2016-2020.

2.7 The implications on the housing requirement for Wiltshire (based on 2020) would therefore be:

Plan Period	Housing Delivered	LHN
2016-2019	7,817 ¹	
2019-2020	2,020 ²	
2020-2036		32,096 ³
Housing Requirement	41,933	

2.8 The PPG questions the appropriateness of a housing target which is lower than previous levels of delivery (PPG: 2a-010-20201216); which is the case for Wiltshire, where housing delivery has been above the LHN figure in seven of the last ten years. A housing target which seeks a reduction in housing delivery cannot be considered to be “significantly boosting” the supply of homes; contrary to the Government’s objective set out in paragraph 60, NPPF.

2.9 In addition to ensuring that the housing requirement is reflecting the national objective of significantly boosting the supply of homes, it is also necessary to consider economic growth projections and strategies: including, but not limited to: “situations where increases in housing need are likely to exceed past trends because of:

- *growth strategies for the area that are likely to be deliverable, for example where funding is in place to promote and facilitate additional growth (e.g. Housing Deals);*
- *strategic infrastructure improvements that are likely to drive an increase in the homes needed locally; or*
- *an authority agreeing to take on unmet need from neighbouring authorities, as set out in a statement of common ground.”*

2.10 The LHN Assessment (2019) recognised this, and considered a number of adjustments to LHN, including anticipated employment growth, and longer term migration trends. In updating this evidence base, it will be necessary to review the economic evidence, including the Economic and Development Needs Assessment (EDNA) (2017) which itself utilised forecasts provided in January 2016 (Oxford Economics) and November 2015 (Cambridge Econometrics); but also to reflect the growth aspirations of the Swindon and Wiltshire Strategic Economic Plan, and the strategies coming forward to support the economic recovery.

2.11 Finally, the PPG affirms that a further adjustment to the housing requirement may be required in response to the need for, and delivery of, affordable housing. We note that at this time, no evidence has been provided on the affordable housing needs of Wiltshire – which should be informing both the overall housing requirement, but also the spatial strategy. This evidence must be published as part of the next consultation stage on the LPR.

¹ Wiltshire AMR

² MHCLG Table 253a Housing Completions by LPA

³ 16 x 2,006

Housing Delivery

- 2.12 It is not immediately clear within the consultation document the strategy for housing delivery outside of the three Principal Settlements, with references made to both Neighbourhood Plans and a future review of the Wiltshire Housing Site Allocations Plan (WHSAP).
- 2.13 Paragraph 3.4 of the Emerging Spatial Strategy consultation document stats that:
- “At Market Towns, preferred sites have not been selected. Instead, their Planning for Settlement Statements present sites considered to be the reasonable alternatives at each place. Views are invited on the most appropriate to allocate. Generally, only a small number of sites will need to be allocated. They may be selected by local communities if they are progressing or reviewing a neighbourhood plan. In other places, it will be the role of the Local Plan Review”.*
- 2.14 It is concerning to see such a suggestion included within the consultation document, and in our view it is entirely inappropriate to suggest that market towns should only deliver growth as part of a Neighbourhood Plan (if being prepared). Given the plan period proposed and the wider housing need, the LPR must look to allocate sites at the market towns as well as the principal settlements in order to ensure a balanced spread of housing delivery.
- 2.15 We therefore consider that more emphasis should be placed within the LPR on the need to deliver housing and allocate appropriate sites at the market towns.
- 2.16 With a plan period of less than 15 years, and a significant existing issue in regard to five year housing land supply, there is a clear need to allocate housing sites which will deliver in the short/medium term. This is emphasised by the requirement for the LPR to be able to demonstrate a five year housing land supply at adoption (paragraph 73, NPPF).
- 2.17 This will not be accomplished with the singular large scale strategic sites proposed in the Principal Settlements, or indeed any single large scale allocations at any of the Market Towns; which will take years to come forward (particularly if they are tied to the delivery of substantive infrastructure items such as bypasses which are reliant on external funding). This has been illustrated in the Core Strategy strategic sites, where, whilst adopted in January 2015, there are a significant number of strategic sites which have yet to deliver a single unit: including West of Warminster, Ashton Park and Ludgershill – which combined account for nearly 4,000 units; and none will deliver until 2024 at the earliest.
- 2.18 Housing delivery is best accomplished through a suitable mix of housing sites – indeed this is a requirement of the NPPF (paragraph 67). This should reflect both location and site size to ensure a robust supply of housing land, and a varied housing market; ensuring there is no over-reliance on the delivery of a handful of larger, difficult to deliver sites.

2.19 In this regard, we note that the Market Towns need to identify an additional 7,330 dwellings: 1,240 via brownfield sites, and 6,090 dwellings on greenfield sites. This is substantial, and a significantly higher quantum of development than any Neighbourhood Plans have delivered to date. It forms a significant element of the spatial strategy; thus it must be demonstrated that it is deliverable through the allocation of a suitable range of housing sites.

3. Addressing Climate Change and Biodiversity Net Gain

Land Use Policies

- 3.1 The most appropriate mechanism to address climate change through the local plan process is the distribution of development – directing development to those locations where there are opportunities for employment, and/or are well served by the public transport network

Flood Risk and Sustainable Drainage

- 3.2 Flood risk policy must reflect national policy and guidance. The Environment Agency set the level of greenfield runoff rates, including the appropriate plus climate change scenario. This will change over the course of the plan-making process, and then again over the plan period. As such, we suggest no explicit standard is provided. We assume this pertains to the reference to a 20% betterment – with the delivery of the plus climate change scenario creating a betterment against existing rates of runoff. This should be clarified, and if a separate measure is being proposed locally this must be clearly set out – in terms of precisely what the requirement is and what it is measured against, the additional costings must factor into the LPR Viability Assessment, and the additional land-take identified for the Preferred Sites.

Natural Capital

- 3.3 The introduction of the concept of Natural Capital is unhelpful – this reflects a specific policy approach which differs from the national approach.
- 3.4 The Authorities response to the Green and Blue Infrastructure Network should be captured through the national requirement to draft Local Nature Recovery Strategies, and the forthcoming legislative requirement to deliver net biodiversity gain.
- 3.5 We note that Figures from the GBI Plan have been published within the Topic Papers, but not the strategy in full. This should have informed part of the consultation evidence base, and would have otherwise informed respondent's answers to this question.
- 3.6 We support the intention to implement biodiversity net gain in accordance with the forthcoming regulations, and suggest that it is not necessary to repeat these in detail in the LPR.

Zero Carbon Homes

- 3.7 The Government is progressing with national changes to building regulations associated with zero carbon ready homes through the Future Homes Standard; and we note that an update has been published since the drafting of the consultation document.

- 3.8 The Future Homes Standard is a two-stage approach to reach 'carbon ready homes' by 2025. This is expressly referenced as a staged approach to changing the Building Regulations to reflect the need to develop supply chains, skills and construction practices. The role of developers is to achieve a 75-80% reduction in carbon emissions – with the residual reduction a society wide move towards decarbonised energy sources.
- 3.9 Whilst we generally support the Council's ambition to ensure that new developments mitigate and adapt to the impacts of climate change, we would have very significant concerns if local policies set the bar higher than the Future Homes Standard, and to do so earlier than the proposed timelines set out by the Government.
- 3.10 The NPPF paragraphs 16b), 34 and 57 all relate to the need for Local Plans to be deliverable (at the point of adoption) and have regard to viability and the PPG section in relation to 'climate change' advises that:

"The National Planning Policy Framework expects local planning authorities when setting any local requirement for a building's sustainability to do so in a way consistent with the government's zero carbon buildings policy and adopt nationally described standards. Local requirements should form part of a Local Plan following engagement with appropriate partners, and will need to be based on robust and credible evidence and pay careful attention to viability". [Paragraph Reference ID: 6-009-20150327]

- 3.11 Any standards set above the national Building Regulations, will need to be demonstrated as feasible, viable and achievable in practice, and will need to be balanced against wider aspirations in the LPR, such as the delivery of affordable housing.

Decarbonising Energy

- 3.12 Decarbonising energy through new development is integrated into the Future Homes Standard – there is therefore no explicit requirement for a separate policy. Traditionally, local plan policies have set an explicit standard for the delivery of renewable/low carbon energy on site; however, this will no longer be required with the Future Homes Standard.
- 3.13 Every site and scheme will differ – and the most appropriate technology will need to respond to this. We therefore suggest that the policy should remain flexible, and no particular technologies should be favoured.
- 3.14 In line with the wider societal move to decarbonising our energy supply, and recognising that this pertains to existing housing/development, WC should enact a permissive policy to the delivery of standalone low carbon/renewable energy schemes.

Air Quality

- 3.15 The Department for Transport undertook a consultation in 2019 which considered potential regulations for the installation of smart charging. This included indicative costs, which must be factored into the viability

assessment, but it also recognised that there will be circumstances whereby the costs of charging provision will escalate due to the need for electrical capacity reinforcements; and that in these circumstances, there would be an exemption to the requirement to provide charging points. We suggest that any policy should specifically recognise such circumstances to avoid situations where development may be rendered unviable due to grid capacity constraints.

- 3.16 We recognise that WC have committed to undertaking proactive discussions with the energy providers in this regard, and this is supported. The cost of any upgrades to the energy network to support any draft policy requirement will need to be factored into the Viability Assessment, and also the Infrastructure Delivery Plan.
- 3.17 There will need to be a balance between passive and active charging facilities, and we suggest that this balance needs to be informed by an evidence base on 1) current demand (i.e. ownership), and 2) immediate future ownership (i.e. within the first 5 years of the plan period). Any development plan must be reviewed every five years, and thus the policy will be able to respond to the rapidly evolving technology at its next review.

4. Planning for Melksham

- 4.1 Melksham represents a sustainable location for development – scoring equal to Chippenham in terms of accessibility (Table 6), it has delivered the most employment development out of all the towns in the HMA over the 2006-2018 period (Figure 5) and is projected the largest employment increase, at 128% in WC's economic growth scenarios (Figure 8).
- 4.2 The delivery of the town's residual need, at 2,585 dwellings by 2036, will require a proactive and positive approach to development, and an appropriate delivery mechanism to ensure that proposals can come forward in a timely manner.
- 4.3 This must be through site allocations within the LPR – given the importance of the town, the need for a coordinated approach, and the scale of housing required. There is clearly a role for the local community and Town Council to engage with this process; however it would be entirely inappropriate to allow a Neighbourhood Plan to take the lead in delivering this scale of development.
- 4.4 Whilst this is the case for Neighbourhood Development Plans (NDP) across the UK, in particular regard to Melksham, we note that the Neighbourhood Plan Area was designated on the 14 July 2014, and a draft NDP was published for consultation in February 2021. It has taken 7 years to progress to a draft NDP, with additional time still required before it is made (should it proceed through Examination). The NDP proposes makes a single allocation for 18 units for a settlement of over 24,000 people. This is despite the Town Council being made aware in 2017 that their housing requirement would increase, and with the figures affirmed in 2018. The NDP has sought to resist this emerging housing need.
- 4.5 We would have significant concerns with a strategy which sought to deliver the strategic housing needs of Wiltshire through reliance on a future NDP – and do not consider that this strategy would be effective or justified in accordance with paragraph 35, NPPF. The LPR must allocate the required strategic sites in Melksham; and in accordance with our comments above on housing delivery, must do this through the allocation of a range of housing sites.

Place Shaping Priorities

- 4.6 We support the Place Shaping Priorities identified for the town, and have the following comments to make:
- Out-commuting – we support the objective of improving the employment offer to reduce out-commuting. As set out elsewhere in our representation, this reflects the historical and projected future employment growth of the town.
 - A350 Bypass – whilst we appreciate the objective of delivering a bypass, the case needs to be more clearly evidenced that this is a place shaping priority, or that the cost of delivering the bypass could not be better used on other infrastructure or initiatives

Land to the south of Western Way, Melksham (Site 9/1025)

4.7 The Land South of Western Way, Melksham, is currently subject to a pending planning application (ref 20/08400/OUT) submitted in September 2020. A copy of the latest outline masterplan is enclosed at **Appendix 2.**

4.8 During its determination a number of technical matters have been resolved, and we provide a summary of these below. It is important that this is reflected in the evidence base for the LPR as it progresses.

4.9 We note that the Site Selection Report scores the site 'green' in regard to Accessibility, Flood Risk and Heritage, and this is supported by the planning application submitted (discussed further below). In terms of the two categories which scored red (Landscape) and amber (traffic), we have the following points to make:

Landscape - Red

4.10 The single landscape point raised pertains to the potential of the development to cause coalescence of Bowerhill Industrial Estate and Melksham; however, the Site Selection Reports then concludes that the site is large enough that a degree of separation could be maintained (p14); thus it is unclear why it still scores red.

4.11 The site is surrounded by development – to the north is Western Way (A365), beyond which is housing. Adjacent to the south is the employment area of Bowerhill, which is a designated Principal Employment Area. To the east of the site, there is a planning consent for up to 235 dwellings, primary school with early years nursery and open space provision. This scheme, Pathfinder Place, is under construction, with the site anticipated to be complete by 2025. To the west of the site is the A350 and the A350/A365 roundabout. New residential development is also under construction on land to the west; Land East of Semington Road, Melksham (16/00497/OUT) which was consented in May 2017 for up to 150 dwellings. This site is also under construction, with first completions in 2019/20, with the site due for completion in 2022/23.

4.12 The consented site to the east appropriately dealt with the matter of coalescence and there is no evidence to indicate that this could not be achieved for this site. Indeed, we note that the draft NDP specifically identifies the extent of land required to remain 'open' to maintain the separation between these two areas (as a 'Important Green Gap' draft Policy 17); and our pending planning application appropriately reflects this.

4.13 Therefore, the analysis underpinning the site assessment from a landscape perspective is flawed, and must be revised in accordance with WC's own analysis.

Traffic – Amber

4.14 It is unclear why the site scored amber from a traffic perspective. We note that it references that "direct access onto Western Way may be possible"; but this does not indicate a ground for a negative score.

- 4.15 The outline planning application has been revised, with amended plans submitted in February 2021 to show vehicular access into the site via Pathfinder Place to the east. To support the changes, a Transport Assessment Addendum – Technical Note has also been prepared and submitted alongside the wider pack of information.
- 4.16 The amended plans have been informed by extensive discussions with WC’s Highways Officer in relation to the access options for the site, resulting in the amended proposal for a single vehicular access via Pathfinder Place.
- 4.17 In terms of traffic the planning application documentation, particularly the junction capacity modelling presented in the TA, has demonstrated that the four assessed junctions are forecast to operate within capacity with the addition of the traffic generated by the proposed development. The TA concludes that the proposed development is not anticipated to result in a severe residual cumulative impact and as such no mitigation works are required to the junctions assessed.
- 4.18 We therefore recommend that the traffic analysis supporting the site assessment should be reviewed further, taking into account the technical information provided as part of the pending planning application.

Accessibility – Green

- 4.19 The site scores green for accessibility and this is agreed. The planning application supporting documentation confirms that the site is very well connected to local services and facilities in Melksham and that there are opportunities for sustainable travel by foot, bicycle and bus.
- 4.20 Indeed, the site is located close to many of the services and facilities available in Melksham. Listed below are the distances from the site to a number of the key facilities within the local area.
- Pathfinder Place Primary School (not yet built):- 380 metres walking distance (5 minutes);
 - Aloeric Primary School:- 1,310 metres walking distance (16 minutes);
 - Bowerhill Primary School:- 1,410 metres walking distance (17 minutes);
 - Melksham Oak Community School (Secondary):- 1,320 metres walking distance (16 minutes);
 - Bowerhill Industrial Estate:- 965 metres walking distance (11 minutes);
 - Hampton Business Park:- 1,125 metres walking distance (13 minutes);
 - Melksham Community Hospital:- 1,130 metres walking distance (13 minutes);
 - Spa Medical Centre:- 945 metres walking distance (11 minutes);
 - St Anthony of Padua Church:- 1,360 metres walking distance (16 minutes);

- Playing Fields at Burnet Close:- 930 metres walking distance (11 minutes);
- Morrisons Daily:- 1,105 metres walking distance (13 minutes);
- Sainsbury's Supermarket:- 2,215 metres walking distance (26 minutes);
- Melksham Post Office:- 1,840 metres walking distance (22 minutes);
- Melksham town centre:- 1,600 metres walking distance (20 minutes)

4.21 This demonstrates that development of the site would offer future residents with school aged children safe access to the two closest primary schools, Aloeric Primary School and Bowerhill Primary School, whilst also at an easy walking distance of 16 and 17 minutes respectively. This does not currently account for the new primary school planned to be delivered on the Pathfinder Place site, adjacent to the site. Once delivered this would provide excellent access for primary school children living on the site. For secondary school children, Melksham Oak Community School is also a 16 minute walk from the site (or 6 minute cycle).

4.22 To facilitate walking and cycling, the application proposals include new pedestrian footpaths and cycle ways along Western Way.

4.23 To assist in explaining the proximity of the site to local services and facilities, we have appended a plan at **Appendix 3**. This not only shows how well the site can easily integrate with the existing urban form on the edge of Melksham, but also how the site is located at the centre of an even spread of local services and facilities. In addition, the plans attached at **Appendix 4** shows the walking routes available, split into three key routes, to the town centre to the north, Melksham Oak Community School to the east and both Bowerhill Industrial Estate and Primary School to the south. Figure 4.5 also shows the existing, committed and proposed signalled crossings along these walking routes, including Western Way to the north of the site.

4.24 Overall, given its location, the range of services and facilities available within walking and cycling distance, and the opportunities for public transport, the application site is considered to represent an extremely suitable and sustainable location for residential development.

Flood Risk – Green

4.25 The site scores green for flood risk and this is agreed.

4.26 A Flood Risk Assessment and Drainage Strategy was submitted in support of the outline planning application for the site and this demonstrates that the site falls within flood zone 1 and is therefore in a preferable location for residential development in the context of the sequential test in the Framework. The technical assessment also concludes that the land has a low probability of flooding from overland flow, ground water and sewer flooding.

4.27 The proposed drainage strategy for the development will be to introduce a detention basin in the north west corner of the site. This will manage the surface water runoff from the proposed development. Careful

integration of this feature into the site will create potential habitats for wildlife and promote biodiversity, providing valuable open space and amenity value.

Heritage – Green

- 4.28 We agree with the conclusion that the site scores green for heritage.
- 4.29 The likely harm to heritage assets has already been assessed by a qualified heritage specialist on behalf of HLM as part of the outline planning application. Indeed, the supporting Heritage Assessment, confirms that the site is located beyond the setting of all designated heritage assets within the study area and therefore, there will be no effects on the significance of these heritage assets.
- 4.30 During the determination of the planning application the County Archaeologist sought further information on potential underground remains, and a geophysical survey was subsequently provided. This resulted in the County Archaeologist agreeing that, considering the results of the geophysical survey, it is unlikely that any archaeology surviving within the proposed footprint would prove an overriding constraint to development

Ecology

- 4.31 The site assessment references the site's location within a wider area which supports a meta-population of great crested newts.
- 4.32 The application is supported by an Ecological Appraisal which confirms that, in general terms, other than the boundary features and the arable fields, other habitats are scarce with most grassland field margins restricted in nature with the exception of that on the northern boundary adjacent to the A365 Western Way where the wide band of scrub accommodates a highway drainage ditch and mosaic of scattered native scrub, semi improved grassland and areas of more contiguous scrub. Although arable fields would be lost, the proposed landscaping scheme will buffer and enhance the existing semi-natural habitats and provide larger areas of higher quality habitat post-development. This has been evidenced using the Defra v2 metric demonstrating clearly that the proposed development can achieve a measurable net gain in biodiversity.
- 4.33 The survey work undertaken on site has confirmed via eDNA survey from waterbodies in land adjacent west of the site and given that most habitat on site is suboptimal terrestrial habitat for the species and the proposed development neither involves the loss of any waterbodies nor substantial amounts of suitable terrestrial habitat the District Level Licensing route is considered the most appropriate form of mitigating any potential adverse impacts of the proposed development.
- 4.34 All other protected species (including badger, hazel dormouse and riparian mammals) are not considered likely to constrain the development proposals, and as such precautionary mitigation measures and/or enhancement measures alone have been recommended.
- 4.35 Habitat enhancements have also been recommended, including inclusion of native, wildlife friendly and where possible fruit bearing species in the proposed planting schedule, creation of species rich grassland

wildflower meadows, the inclusion of bat and bird boxes on retained trees and proposed buildings and consideration of a 'hedgehog highway' scheme.

Deliverability

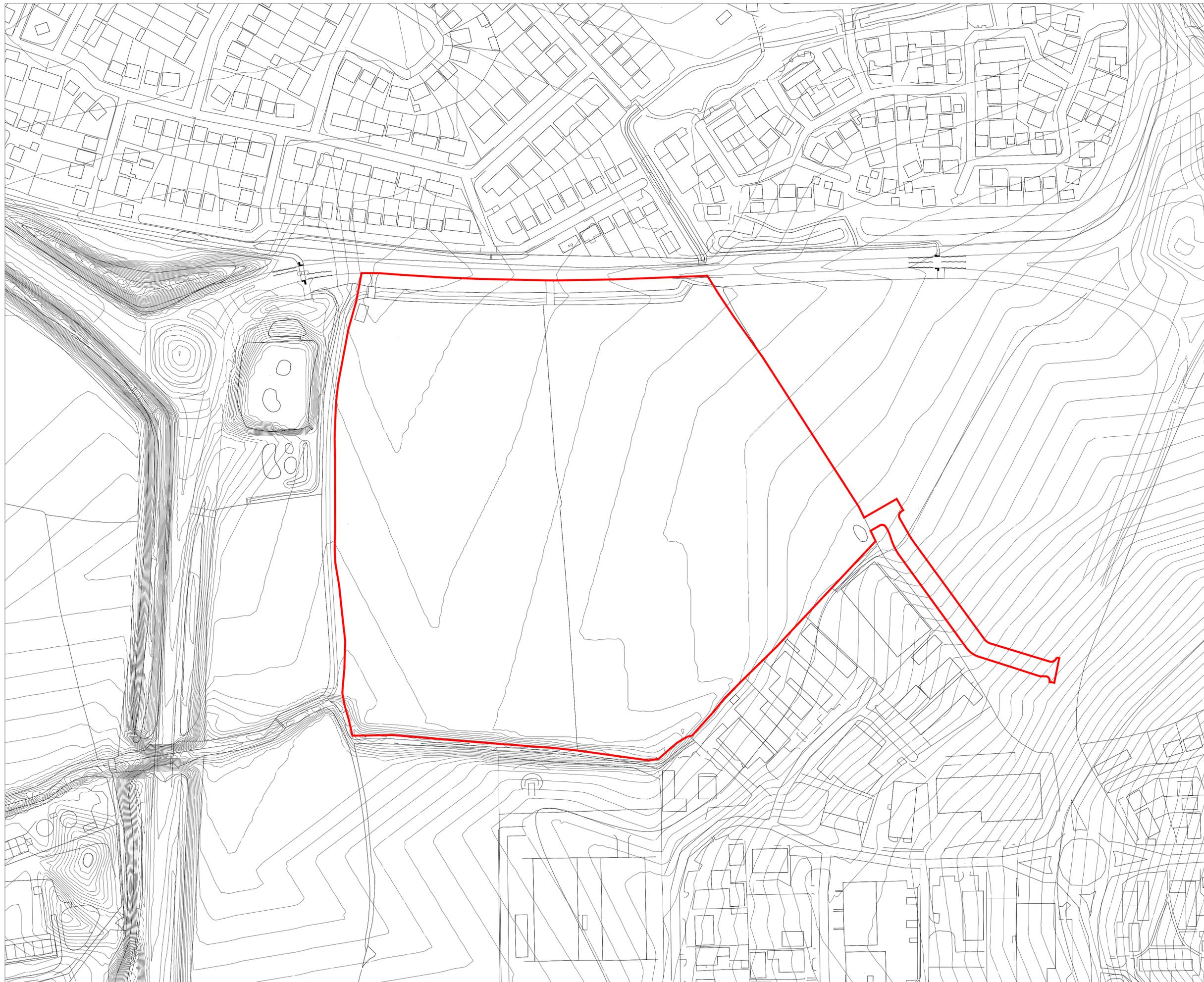
- 4.36 The site is subject to a planning application for up to 240 dwellings and a 70-bed care home. Following the grant of planning consent, the site would progress quickly through the reserved matters process, and we would anticipate construction commencing within a 18/24month period. First completions would then be expected in late year 3/early year 4; ensuring that the site is delivering housing to aid WC in meeting its five year housing land supply requirement.

5. Summary and Conclusions

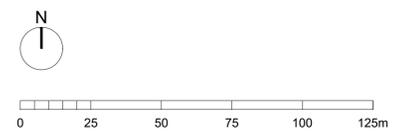
- 5.1 Overall, we currently have concerns over WC's approach to housing need and the plan period within the consultation documentation.
- 5.2 We note that the evidence base is dated and will require a refresh prior to progressing the LPR, and also that prior to progressing any further, a detailed assessment of affordable housing need should also be undertaken.
- 5.3 Melksham is identified as a sustainable location for further growth reflecting the market town's wide range of services and facilities as well as employment opportunities. The town is also strategically located between Wiltshire's principal settlements of Chippenham and Trowbridge, and is also well placed to provide access to neighbouring settlements and locations further afield, via sustainable transport modes. Directing additional development to the town is therefore supported.
- 5.4 The Land South of Western Way, Melksham (Site 9/1025) is suitably located to the south of the town, and will soon be surrounded by built development on all four sides. The site has been acknowledged by WC as a suitable, available, achievable, deliverable and developable site and was considered as a reasonable option in the 2015 assessment work accompanying the site allocations plan. Furthermore, the fact that there is a pending outline planning application for the site demonstrates that there is a strong intention to deliver the site.
- 5.5 The site represents a logical solution to addressing the identified housing needs of both the town and the Chippenham HMA and we strongly support the inclusion of the site as a draft allocation in the next version of the LPR.



Appendix 1: Site Location Plan



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KEY
 Application Site Boundary 10.9 ha

PLANNING				
D	21.01.2021	Site boundary amendment.	SJD	KEF
C	18.08.2020	Northern boundary landowner amendment.	JUB	KEF
B	17.08.2020	Northern boundary landowner amendment.	JUB	KEF
-	23.07.2020	First issue.	JUB	KEF
rev	date	description	dm	chkd

fpcr

- masterplanning
- environmental assessment
- landscape design
- urban design
- ecology
- architecture
- arboriculture

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client
Hallam Land Management Ltd

project
**Land off Western Way,
 Melksham**

drawing title
SITE LOCATION PLAN

scale
 1:1250 @ A1

drawn / checked
 JUB / KEF

revision date
 21 January 2021

drawing number
7611-L-06

rev
D

CAD file: J:\7600\7611\LANDS\Plans\7611-L-06 D - Location Plan.dwg



Appendix 2: Illustrative Masterplan

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0 25 50 75 100 125m

-  Site Boundary 10.9ha
-  Proposed Residential Development [main streets]
-  Proposed Residential Development [secondary streets & green lanes]
-  Proposed Care Home
-  Equipped Play Space
1.MUGA
2.LEAP
-  Proposed SuDS Basin
-  Indicative Swales
-  Proposed Vehicular Access
-  Proposed Pedestrian, Cycle & Emergency Access
-  Proposed Pedestrian Access
-  Indicative Pedestrian / Cycle Routes
-  Orchard Tree Planting
-  Proposed Structural Tree Planting
-  Allotments

rev	date	description	dm / chkd
C	03/02/2021	Updates based on LPA comments	SJD / KEF
B	21/01/2021	New site boundary line added	LAN
-	16.09.20	First Issue	JUB/KEF

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client
Hallam Land Management Ltd

project
Land off Western Way Melksham

drawing title
ILLUSTRATIVE MASTERPLAN

scale
1:1250@ A1

drawn / checked
JUB/KEF

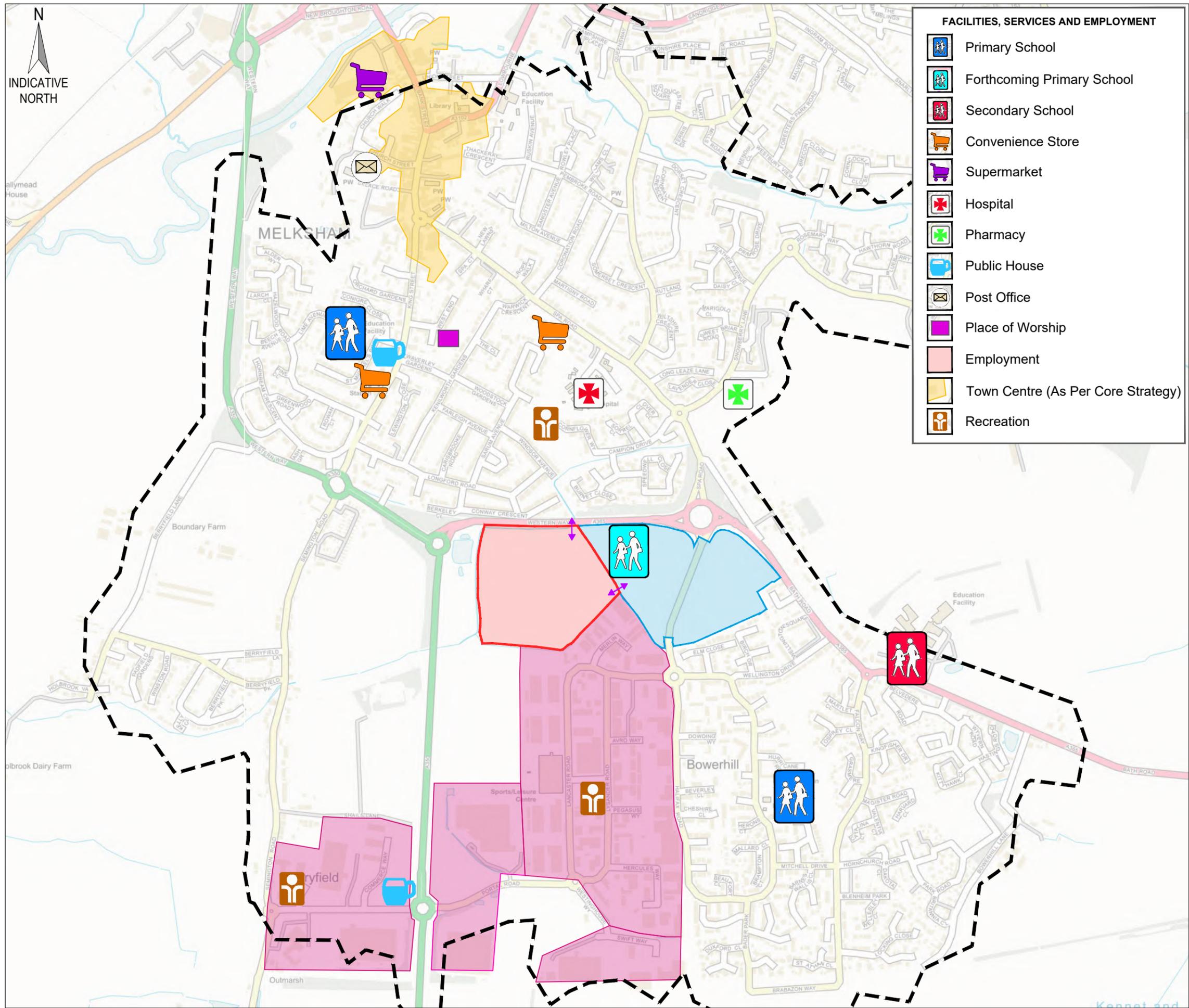
revision date
02.02.21

7611-L-07 **C**

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Appendix 3: Plan of Local Services and Facilities



- FACILITIES, SERVICES AND EMPLOYMENT**
-  Primary School
 -  Forthcoming Primary School
 -  Secondary School
 -  Convenience Store
 -  Supermarket
 -  Hospital
 -  Pharmacy
 -  Public House
 -  Post Office
 -  Place of Worship
 -  Employment
 -  Town Centre (As Per Core Strategy)
 -  Recreation

- KEY**
-  Site Location (Illustrative)
 -  2km Walking Isochrone
 -  Pedestrian Access
 -  'Pathfinder Place' (Illustrative)

P2	09.03.21	Minor Revisions	TB	MG
P1	04.11.20	Preliminary Issue	TB	MG
<i>Rev</i>	<i>Date</i>	<i>Description</i>	<i>By</i>	<i>Apvd</i>

PROJECT:
LAND SOUTH OF WESTERN WAY
MELKSHAM

TITLE:
ACCESSIBILITY TO LOCAL FACILITIES,
SERVICES AND EMPLOYMENT
OPPORTUNITIES

CLIENT:
HALLAM LAND MANAGEMENT

SCALE@A3:
1:10,000

PROJECT REF:
16307

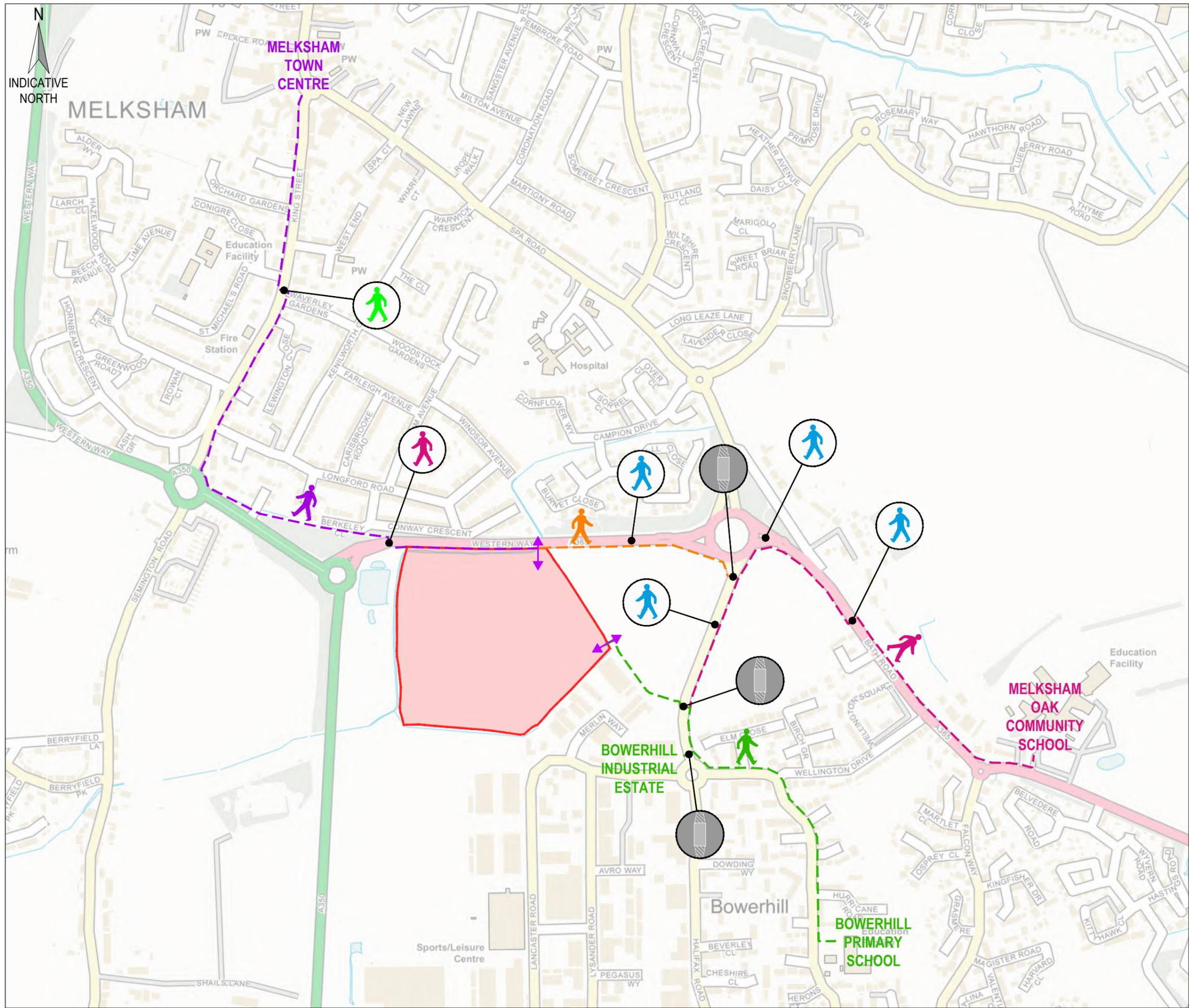
DRAWING No: 017 **REV:**
P2

Revision Referencing
P = Preliminary A = Approval T = Tender C = Construction





Appendix 4: Walking Routes



KEY

-  Site Location (Illustrative)
-  Walking Route 1
-  Walking Route 2
-  Walking Route 3
-  Walking Route 4
-  Signal-Controlled Crossing (Existing)
-  Signal-Controlled Crossing (Committed)
-  Signal-Controlled Crossing (Proposed)
-  Refuge Island
-  Pedestrian Access

P2	09.03.21	Minor Revisions	TB	MG
P1	04.11.20	Preliminary Issue	TB	MG
<i>Rev</i>	<i>Date</i>	<i>Description</i>	<i>By</i>	<i>Apvd</i>

PROJECT:
LAND SOUTH OF WESTERN WAY
MELKSHAM

TITLE:
WALKING ROUTES

CLIENT:
HALLAM LAND MANAGEMENT

SCALE@A3:
NOT TO SCALE

PROJECT REF:
16307
DRAWING No: 018 **REV:** P2

Revision Referencing
P = Preliminary A = Approval T = Tender C = Construction



STRAT321

The Emerging Spatial Strategy Wiltshire LP Part 2 obo Retirement Housing Consortium

When selecting sites for elderly persons' accommodation careful consideration is given to locational criteria including: Topography, Environment (including safety and security), Mobility, Services and Community Facilities. As such, suitable sites for specialist accommodation for the elderly are difficult to find and tend to be located within, or adjacent to town or local centres. It is therefore highly unlikely that the majority of development sites will be suitable for specialist accommodation for the elderly, particularly on urban extension sites where access to goods and services may be limited. Having said that, when new local centres are being created these may also provide an appropriate location for retirement housing developments.

Specialist accommodation for the elderly also usually provides an element of care and communal facilities at an additional cost to the developer. This requires a critical mass of residents

in order to be feasible and small scale developments of specialist housing for the elderly could not be realistically asked to provide or maintain such facilities. It is therefore unlikely to expect the provision of specialist accommodation for the elderly to be met piecemeal in general needs housing developments.

We would like to highlight the advice provided in the Housing in Later Life: Planning Ahead for Specialist Housing for Older People toolkit. This toolkit was developed by a consortium of private and public organisations with an interest in housing for the elderly and encourages a joined up approach to planning, housing and social care policy both in the collection of evidence and the development of specialist accommodation for the elderly. A copy of this document has been appended for your convenience. Whilst we appreciate that no one planning approach will be appropriate for all areas, an example policy is provided that, we hope, will provide a useful reference for the Council:

"The Council will encourage the provision of specialist housing for older people across all tenures in sustainable locations.

The Council aims to ensure that older people are able to secure and sustain independence in a home appropriate to their circumstances and to actively encourage developers to build new homes to the 'Lifetime Homes' standard so that they can be readily adapted to meet the needs of those with disabilities and the elderly as well as assisting independent living at home. The Council will, through the identification of sites, allowing for windfall developments, and / or granting of planning consents in sustainable locations, provide for the development of retirement accommodation, residential care homes, close care, Extra Care and assisted care housing and Continuing Care Retirement Communities."

Well located and designed specialist housing for older homeowners is a highly sustainable form of housing. Given the critical need for older persons accommodation in Wiltshire there should be a presumption in favour of sustainable housing and in particular specialist housing which is being proposed on suitable sites. It is recommended that greater weight is attached to this approach alongside the desire to release residential land within strategic allocations or indeed a separate policy within the document to cover the housing need for the ageing population. This accommodation will come from a number of sources both public and private and with varying levels of care and shelter provision enabling individual people to remain in their own home with

independence and security. In effect there should be more of a positive policy supporting older people's accommodation in the same way that affordable housing is given a high priority.

Most forms of Extra Care Accommodation fall within Use Class C2 and Appeal precedent has confirmed that self-containment of accommodation is not the determining factor as to Use Class. Where Extra Care accommodation falls under use class C2 it should not be liable for affordable housing. Attached is a paper that discusses the McCarthy & Stone Extra Care model and its relationship with the Use Classes Order. This establishes, principally by citing relevant appeal precedent for other similar developments that whereas some forms of Extra care housing will not be, the McCarthy and Stone model does fall within Class C2.

Delivering beneficial Sheltered Housing and Extra Care Accommodation should be prioritised in Wiltshire to meet its identified housing needs and not unnecessarily confused or complicated by erroneous and misleading statements.

It is well established that it is inappropriate to mix specialist housing for the elderly with other (family/younger persons) housing in a single flatted block. Given the nature of the County, that is where most, if not all the new stock will come from.

We have attached a report entitled "Healthier and Happier" which is an analysis of the fiscal and wellbeing benefits of building more homes for later living which issued in 2019 which has been developed by WPI Strategy and Homes for Later Living as well as a former Government Economist.

The report has the following findings:

- Each person living in housing specifically designed for later life enjoys a reduced risk of health challenges, contributing to fiscal savings to the NHS and social care services of c.£3,500 per year
- Those in specialist housing are half as likely to have falls with resulting fractures, injuries and costly inpatient bed stays
- Building 30,000 more retirement housing dwellings every year for the next 10 years, which is the estimated demand, would generate fiscal savings across the NHS and social services of £2.1 billion annually
- Based on a selection of established national well-being criteria such as happiness and life satisfaction, an average person aged 80 feels as good as someone 10 years younger after moving from mainstream housing to housing specially designed for later living

The report demonstrates that there are savings of circa £3,500 per unit per year. These savings to the NHS each year are substantial. McCarthy Stone's data nationally which shows that 45% of homeowners entering a McCarthy Stone development move from within a five-mile radius (the average is 5.2 miles), thereby releasing much-needed family homes back into the local market. It is therefore clear that most of the future residents of these types of schemes will already be using facilities provided by the local NHS trust.

We have attached a very recent report entitled "Silver saviours for the high street" which is an analysis of the fiscal and wellbeing benefits of building more homes for later living which has been developed by WPI Strategy and Homes for Later Living as well as a former Government Economist. The report has the following findings:

- Retirement and extra care housing creates more local economic value and more local jobs than any other type of residential development

- People living in each retirement development generate £550,000 of spending per year, £347,000 of which is spent on the local high street. Some £225,000 of this is new spending in the local authority, directly contributing to keeping local shops open
- For just one retirement or extra care development of roughly 45 units, a local authority could expect to see benefits of 85 construction jobs for the duration of the build, as well as six permanent jobs and £13m in GVA over the lifetime of the development, as opposed to not developing a site

Healthier and Happier

An analysis of the fiscal and
wellbeing benefits of building
more homes for later living

A report by



STRATEGY for

Homes for Later Living 

September 2019





What are homes for later living?

Homes for later living means specially designed housing suitable for older people who want to maintain the independence and privacy that comes with having a home of their own but may want access to varying degrees of support and care, plus an in-built social community.

Typically built for people who no longer want or need a family-sized house, and often taking the form of apartments or bungalows, homes for later living are designed to help people remain independent, safe, secure and sociable for as long as possible.

One of the key differences between new-build housing for older people and new-build mainstream housing is the provision of extensive communal areas where neighbours can socialise, host visitors and be part of a friendly, like-minded community.

Another key difference is the presence of an on-site manager or team, someone whose role is to look out for people's welfare, be a point of call if help is needed, make sure the communal areas are well-maintained and to be a reassuring, friendly presence.

Homes for later living typically come in two types:

- Housing with support, or Retirement Living – age restricted housing, typically for those aged 60 and above, with communal lounges and other facilities such as a shared laundry and a guest room. Importantly, support is provided by an on-site manager who is dedicated to the running of the development. Schemes are typically between 30 to 60 units in size.
- Housing with care, or Extra Care housing – age restricted accommodation, typically for those aged 70 and above. As above but with an increased range of on-site services including care in a style that can respond flexibly to increasing need whilst fostering independence as far as is possible in older age. Developments are typically between 40 to 70 units in size.

Facilities common to both types can include a communal lounge, restaurant with on-site kitchen, function room, laundry, guest suite, well-being centres, hairdressers, and staff rooms.



About the author

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Homes for Later Living

Homes for Later Living has been set up to promote greater choice, availability and quality of housing specifically for older people. It is comprised of Churchill Retirement Living, McCarthy & Stone and PegasusLife Group (made up of PegasusLife and Renaissance Retirement) and operates alongside the Retirement Home Builders Group within the Home Builders Federation (HBF).

Homes for Later Living exists to promote all types of housing which are specifically designed, built or adapted for people over the age of 60. These properties are operated in the long-term interest of residents, so that as people grow older and their needs change they can choose to live in a property that works for them.



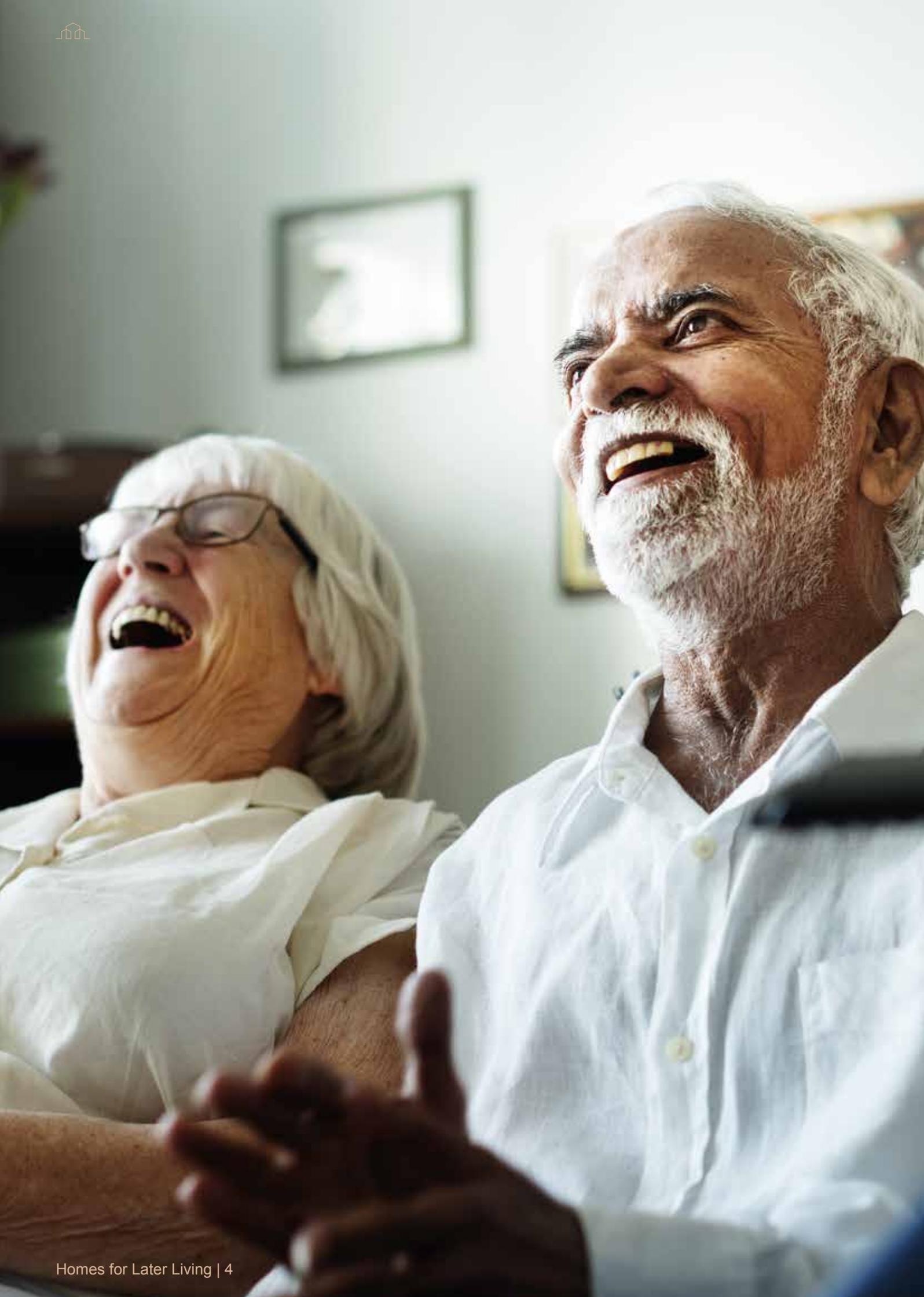
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Foreword

One hundred years ago, the average life expectancy for men and women was 55 and 59 respectively. Thanks to advances in medicine, technology, diet and lifestyle, things look very different today. As a result, the number of older people in England is growing significantly and this rate of growth is projected to speed up over the next 20 years.

This is good news for all of us but it creates a challenge for the NHS and local authorities – long term conditions can kick in as we get older, meaning that we need more health and social care support. According to latest government forecasts, the number of people aged over 80 is set to rise from around 3.2 million today to 5 million in 2032. Meanwhile, the number of people aged 100 or over has increased by 85% over the last 15 years, with 14,430 centenarians living in the UK at the last count.

As the population increases and ages, it is vital that the link between housing and health and social care is recognised. The right kind of housing can help people stay healthy and support them to live independently. As this important report from Homes for Later Living highlights, there is currently a severe shortage of suitable housing for the growing numbers of people entering retirement. The result is that many older people are often living alone in unsafe, unsuitable and unhealthy accommodation, where they are most likely to suffer from falls, loneliness and dementia.

This report shows that moving into specialist retirement housing is proven to reduce incidence of falls and reduce delays in discharge from hospital. Building more homes across all tenures for later living every year would give people more choice and flexibility on how they live their lives. Encouraging this shift in accommodation could save the NHS and local authorities huge sums every year.

And while these fiscal savings are important, what this research shows is that the kind of services and amenities available to people living in specialist retirement living can give older people a new lease of life. When it comes to wellbeing, retirement housing can help people turning 60, 70 or 80 to feel considerably more positive about life. Residents benefit from a safer, more secure place to live, which allows support at varying levels to maximise independence. Communal areas hosting social events and exercise classes help tackle social isolation which often manifests amongst those in later life.

The other benefit of building more homes for later living is the positive impact on younger generations looking to buy a property of their own or to upsize. By giving an ageing population a real choice over where to downsize to, more family homes could be freed up for younger families looking for suitable housing to raise their children.

People shouldn't fear getting older. Turning 80 should be seen as just the next stage in life. Downsizing is not simply the end of an era but an opportunity to shed the cumbersome upkeep of a large property and explore a new way of living in later life.



Rachael Maskell MP

Chair of the All-Party Parliamentary Group for Ageing and Older People

September 2019



Executive summary

As a result of ongoing advances in technology, better healthcare and improved lifestyles, we are living longer and are often healthier. By 2032 there will be five million people over eighty living in the UK.

But as the number of older people in the UK goes up, we are experiencing a shortage of homes specifically designed for later living. This does not just mean that millions of older people are stuck in housing that may no longer suit their needs, but that the shortage of specifically designed housing for older people is unnecessarily drawing resources from elsewhere in the NHS and local authorities.

The answer to this escalating problem is a radical increase in the supply and mix of specialist housing schemes for later living, funded by using existing equity in housing stock.

In this report, we have explored the significant savings that Government and individuals could expect to make if more older people in the UK could access this type of housing. Our research also looks at how - by maximising independence and increasing social interaction - homes for later living can significantly improve the wellbeing of older people. The analysis shows that:

- **Each person living in a home for later living enjoys a reduced risk of health challenges, contributing to fiscal savings to the NHS and social care services of approximately £3,500 per year.**
- **Building 30,000 more retirement housing dwellings every year for the next 10 years would generate fiscal savings across the NHS and social services of £2.1bn per year.**
- **On a selection of national well-being criteria such as happiness and life satisfaction, an average person aged 80 feels as good as someone 10 years younger after moving from mainstream housing to housing specially designed for later living.**

Our analysis comes amid mounting evidence that poor housing is closely linked to poor health, increasing the strain on the social care system and the NHS.

As things stand, many older people find themselves with little option but to stay put in properties that are remote from shops and services, ill-equipped for changing mobility needs, hard to maintain and potentially hazardous to grow old in. The lack of opportunities to access suitable housing in retirement means that, when it finally comes, their next move is to a care or residential home.

In contrast, Homes for Later Living offers varying levels of support and social interaction for those who want to remain independent for as long as possible by living in a safe and sociable environment in later life. All schemes offer residents the opportunity to live independently in their own apartment or bungalow while 'extra care housing' includes many shared services and 24 hour on-site care.

Various social activities combined with the abundance of communal spaces means that, compared to older people in other housing types, Homes for Later Living residents are around half as likely to feel lonely.

“Many older people are living in unsafe, unsuitable and unhealthy accommodation, with little hope of being able to move somewhere better or improve their homes.”

APPG on Ageing and Older People. 2019 inquiry into decent and accessible homes for older people

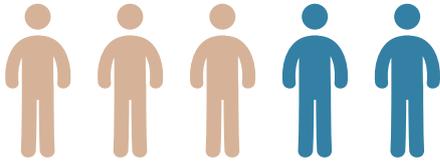
This report is the first of three explorations of the case for building more homes for later living. In future studies, we will investigate the positive impact that more homes for later living would have on the wider housing market and we will assess the significant benefits that local communities receive from building more homes for later living.

We will also be exploring a number of mechanisms to encourage more homes of this nature to be built, and to ensure that those in later life are aware of the options available to them.

It is our contention that all older people should have better access to homes for later living, which offer varying levels of support and social interaction for those who want to stay safe and keep their independence in later life. The personal well-being improvements associated with moving to a home for later living should not be understated – and on a human level are by far the most important.

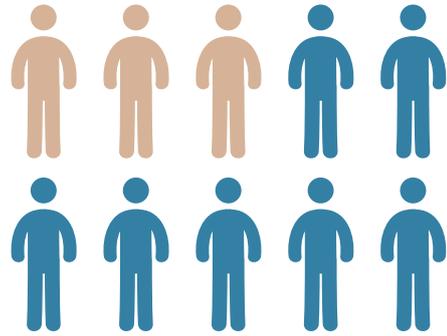
However, it is the significant potential fiscal savings that should make all politicians sit up and take note. Any policy-maker looking to mitigate increasing costs to the state associated with an ageing population cannot afford to ignore these findings.

By 2032, there will be almost 2m more over 80s in the UK



Key: = 1 million over 80s

This will increase to 10m by the end of the century



Each person in a home for later living saves c. **£3,500** to the NHS and social services per year

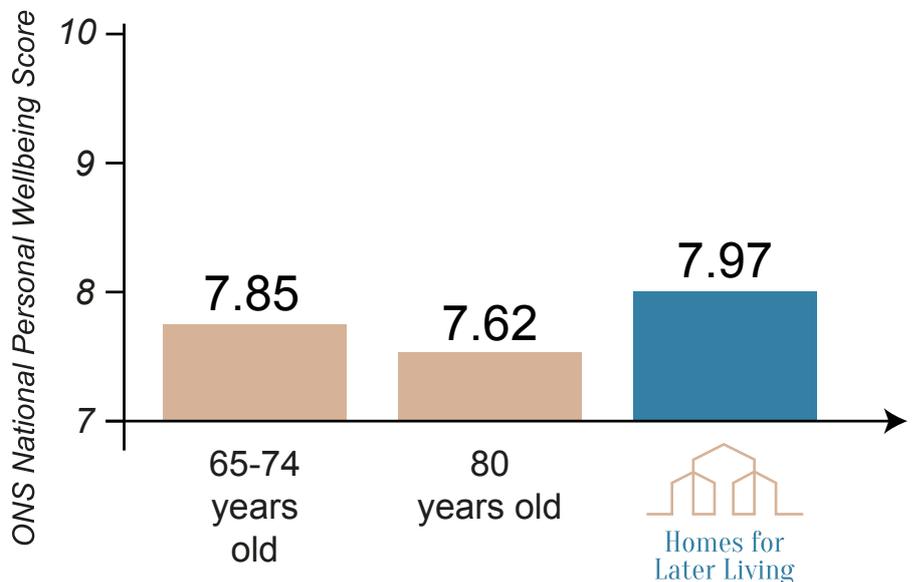
Building more homes for later living could

save up to

£2.1bn

to the NHS and social services per year

The average 80-year-old living in a homes for later living property can feel as good as someone 10 years younger





Introduction

A perfect storm has created the conditions whereby many older people have little choice but to remain in a house that may no longer meet their changing needs as they get older. For these people, their housing may be denying them considerably better health and social outcomes later in life.

Not only do more people live in the UK than ever before, it is a well-known fact that we also have an ageing population. Although improvements in life expectancy have recently stalled, people are generally still living longer than they used to and, by 2032, the number of people in the UK aged over 80 is set to rise to five million from 3.2 million today.¹

As the population has been growing and ageing, a housing crisis has been brewing. Politicians have repeatedly insisted that housing is rising to the top of the political agenda and promised to take bold action, but this has mainly targeted helping people onto the housing ladder rather than making sure people are able to move back down the ladder as they get older.

Politicians widely accept there is a significant problem. Time and again we have heard about the 'broken housing market' which can only be fixed by building more homes. Government targets are set at delivering 300,000 homes a year by the middle of the next decade. Yet while house building has risen since the lows reached during the financial crisis of a decade ago, a further significant increase is still needed to achieve this goal.

The toll that the ongoing housing crisis has taken on young people has been well-documented. Nearly a million more 20-34 year olds live at home with mum and dad than 20 years ago, despite no rise in their population.² Homes have become unaffordable for millennials and rents have continued to rise steeply. Over the last ten years, the average age of first-time buyers has risen from 31 to 33 with many people now relying on help from the 'Bank of Mum and Dad'.³ According to the last available figures, 39% of first-time buyers had help from family or friends, while 10% used an inheritance.⁴ As things stand, the plight of many young people struggling to get on the property ladder is only exacerbated by the lack of family-sized homes coming back onto the market.

But it is not just the under 30s affected by the housing crisis. While much of the media focus has been on first time buyers and the plight of young renters, a housing shortfall has been steadily developing at the older end of the housing market. As people in the UK get older, there is a severe shortage of housing being built specifically for people in later life. The result is that many older people are living in accommodation that becomes potentially unsafe, unsuitable and unhealthy for them given their changing needs, with limited options as to how they can either adapt their homes or move somewhere specially designed for their needs.





A housing headache – old homes versus care homes

Just like any other age group, older people are highly diverse. They may be rich, poor, or somewhere in between. Their health needs and their housing situations vary, greatly dependent upon their tenure, geographical location, income and equity. Their personal situations — links with family, friends and neighbours, their interests, lifestyles and aspirations — are also diverse.

For those who do not have pressing care needs and are keen to remain independent, it may not seem necessary or frankly appealing to leave the family home. But the result of this is that many older people remain in a house which is not able to sustain their changing needs as they get older.

The UK has the oldest housing stock in the EU with 38% of our homes dating from before 1946 and 21% from before 1919.⁵ Older homes are often in a poorer state of repair and have more dangers, including cold, damp, fire risk and general fall hazards. They also tend to be lacking basic adaptations such as handrails in the shower and on the stairs, as well as more substantial elements such as wider internal doors, stair lifts and walk-in showers. For less mobile older people, these adaptations mean that everyday essential tasks like getting out of bed, going to the bathroom or getting dressed are safer and more manageable, helping to support their independence.

Even for those not struggling with day-to-day tasks, a downside to staying at home in old age is the lack of companionship and increased risk of loneliness. Some 3.8 million individuals over the age of 65 live alone in the UK, 58% of whom are over 75.⁶ Half of the over-80s live alone. While their physical health may be holding up, older people who remain in the family home may suffer from having no close friends or relatives nearby. Their house might also have poor public transport links and not be within easy reach of local services and amenities. If this is the case then even the most active and outgoing older people can find themselves at risk of social isolation, with an increasing sense of loneliness and vulnerability.

For many people, the eventual move often occurs at a situation very late in life when options are limited and the change in residential needs can be drastic. When older people require high levels of care, a care home is often seen as the natural next step in their housing journey. Around 421,000 older people in the UK are thought to be in this type of accommodation,⁷ where a number of older people live, usually in single rooms with access to on-site care services. But there is a high level of reluctance



around taking this step. Previous polling commissioned by the Alzheimer's Society found that seven in ten Britons are scared of going into a care home.⁸

Despite the variable quality, care homes can eat up public and private funds at an alarming rate. For the 41% of care home residents who pay privately, costs can range from £27,000 to £39,000 per year. If nursing is required, the cost can be as high as £55,000 per year.⁹

Within local authorities, over a third of budgets are now spent on adult social care, which also includes the huge sums spent on council-funded home care.¹⁰ The cost is such that almost half of councils have seen the closure of domestic home care providers in their area in the past year and a third have seen residential care homes close, collectively affecting more than 8,000 clients and residents.¹¹

The former deputy prime minister Damian Green MP is one of a number of politicians to have raised the alarm over the social care crisis and the impact on care homes. In July 2019, Green suggested that local authorities are increasingly reluctant to allow care homes and retirement homes to be built in their areas because they can't afford the social care costs associated with that demographic. "We need to face up to these unpalatable truths," he said. "The current system isn't sustainable financially or politically... Local authorities don't want to become attractive places for retired people."

Caroline Caunter MBE

Current Homes for Later Living resident

After being diagnosed with a brain tumour, Caroline was forced to move out of her three-bedroom house and into a nursing home for six months. Whilst she needed a higher level of care, Caroline explained how she came to find a happy balance between independence and care:

“I'm very independent and lived on my own for 30 years since my husband died, so I felt too well to be spending my time sitting in a care home, but wanted the security of being somewhere surrounded by people and with an emergency care system.”



Since moving to her homes for later living property, Caroline now has a 24-hour Careline system in case of emergency which ensures a quicker response to limit any medical difficulties which can impact on elderly people living alone. She has support with daily tasks such as maintaining her garden, and an apartment built with frailer residents in mind to prevent the majority of accidents which could occur.



Health problems in old age

While many column inches have been dedicated to the problems faced by young people struggling to get on the housing ladder, the plight of the many older people stuck in unsuitable housing has received significantly less media attention. And yet the evidence that poor housing can lead to health problems in old age is already well-established, with enormous resultant costs to the NHS and social care.

A lack of suitable accommodation amongst elderly patients is often the cause of delayed discharge from NHS hospitals at an enormous cost of £500 a minute and furthermore risks comprising a full recovery.¹³ It stands to reason that if more elderly people lived in homes which were properly designed and equipped for their needs the rate of delayed discharge would be considerably reduced.

Falls

While anyone can have a fall, older people are especially vulnerable. Public Health England statistics show that in 2017/18 falls accounted for 335,000 hospital admissions in England of people aged 65 and over. Around one in three adults over 65 who live at home will have at least one fall a year,¹⁴ and around half of people aged 80 and over fall at least once a year.¹⁵

A fall can be caused by poor vision, balance problems, muscle weakness or other long-term health conditions. It is most likely to happen as a result of poor housing conditions. These could include dim lighting, rugs or carpets not properly secured and storage areas that are difficult to access.

Falls can result in a range of injuries including head injuries and hip fractures. The human cost of a fall can include distress, pain, injury, loss of confidence, loss of independence and mortality. For health services, they are both high volume and costly. The NHS itself has described falls and fractures in older people as “a costly and often preventable health issue.”¹⁶

Cold and keeping warm

Millions of older people in the UK are living in homes that are too cold. According to one expert, by remaining in a larger house which is difficult and costly to keep consistently warm over a long period of time, some “asset-rich but cash-poor” older people face a choice of “heat or eat.”¹⁷

A cold home can cause chronic and acute illnesses and lead to reduced mobility, falls and depression. In 2018, the House of Commons Housing, Communities and

Local Government Committee heard that there was a well-evidenced link between cold homes and chronic diseases, such as respiratory and cardiovascular diseases and rheumatoid arthritis, and poor mental health. The committee also heard that cold homes were connected to acute cases, namely heart attacks, strokes and falls.¹⁸

Social isolation

Many older people live far away from relatives in homes that are not within easy reach of local services, amenities and public transport links. These factors all contribute towards social isolation, which can lead to loneliness and depression.



Around 1.5 million people aged 50 and over are always or often lonely, researchers have calculated.¹⁹ Projections from Age UK suggest that this could rise to two million people within the next 10 years.²⁰ Loneliness makes it harder for people to regulate behaviours such as drinking, smoking, and over-eating, which in turn have their own significant negative outcomes.

Research has suggested that the impact of loneliness and isolation on mortality is equivalent to smoking 15 cigarettes a day.²¹ There are also much wider negative results to note, including that older people who are lonely are more than three times more likely to suffer depression,²² and 1.9 times more likely to develop dementia in the following 15 years.²³

Studies have also shown that social isolation increases the risk of being diagnosed with chronic illnesses. Indeed, there is a vast amount of research on social isolation and health suggesting that people who participate in social activities have been found to have a lower risk of suffering from multiple chronic diseases.



Benefits of homes for later living

These days, many people in later life are as active as ever.²⁴ Indeed, amongst the over 80s there are some 53,000 people who are still in employment. Others are increasingly enjoying action-packed retirements.

For the increasing number of active older people, care provision is not the only consideration in play when it comes to choosing where to live in their later years. Companionship and a sense of control are also important, as is access to a variety of support services.

In short, retirees of today expect far more choice and greater quality. Specialist housing schemes for later living respond to this by offering varying levels of support and social interaction for those who want to stay safe and keep their independence in later life. All schemes offer residents the opportunity to live independently in their own space, usually a one or two-bedroomed apartment or bungalow.

Schemes often classified as 'retirement living' provide a dedicated manager and communal spaces for regular social events, which can range from bridge nights to wine tasting events. While all accommodation will be equipped with emergency alarm systems, 'extra care housing' means domestic and personal care tailored to the level of support needed by the residents - from maintaining their apartment to daily care visits.

Significant shared services will also be provided, such as a residents' lounge, restaurant with on-site kitchen, function room, laundry, guest suite, well-being centres, hairdressers and staff rooms.

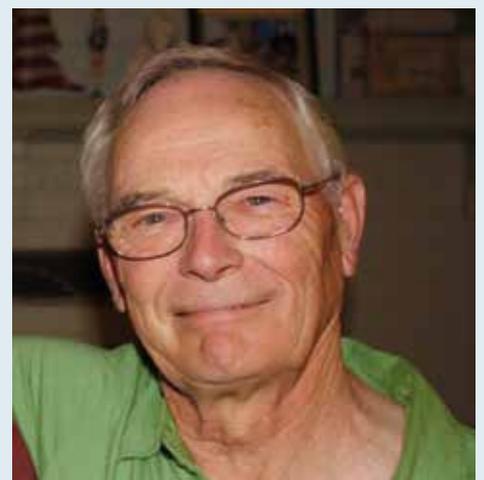
By maximising independence and increasing social interaction, all of these housing environments can improve the well-being and health of older people and so enhance their overall quality of life.

Given the majority of developments for later living are located on or close to a high street, there are also significant community benefits. Businesses situated nearby can expect to feel the effects of the 'grey pound' as residents of homes for later living regularly use shops and local facilities. At the same time, organisations which rely on volunteers such as libraries, charity shops and community centres also benefit from having more people with free time to get involved living close to the high street.

Indeed, research by McCarthy & Stone in 2014 found that more than three-quarters (78%) of their residents used local shops at least once a week; and around 90% used local shops and/or supermarkets more than once a month.²⁵ Other local services were also used regularly by owners, with around a quarter using services such as local taxis, hairdressers, pubs, cafes and restaurants more than once a week.

Geoff Oxlee in Seaford Current Homes for Later Living resident

“Many of the owners have lost their partners, and the friendship and care shown by the hosts plus the companionship shared both in the lounge and the gardens helps alleviate loneliness. This is of course fundamental to the concept of a caring and comfortable retirement living. I feel we are part of a good community and living here is indeed a pleasure. We are seen as and quite properly called “owners” not just residents.”

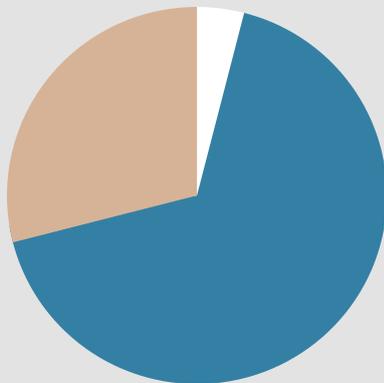


A survey of Homes for Later Living residents

Residents of schemes run by Churchill Retirement Living, McCarthy & Stone and Pegasus Life Group were surveyed in 2019.

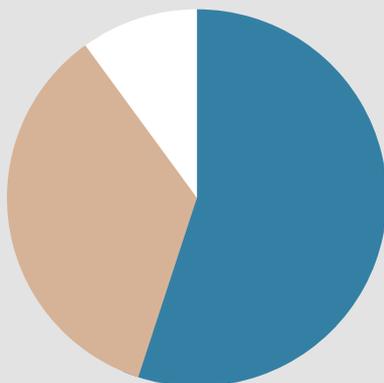
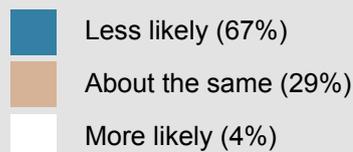
Questions were answered by more than 1,400 residents and the survey results showed that:

- Two thirds (67%) of residents feel they are less likely to move into a residential care home since moving into their current home.
- Over half (55%) of residents have a greater sense of community since moving into a Homes for Later Living property.
- Three quarters (76%) of residents feel communal areas are important for well-being and ability to socialise.

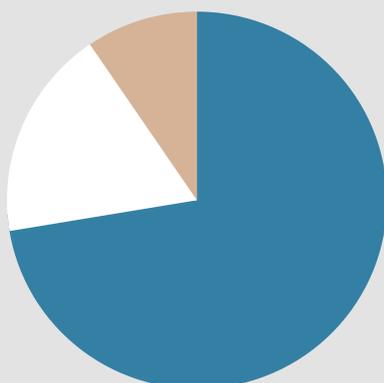
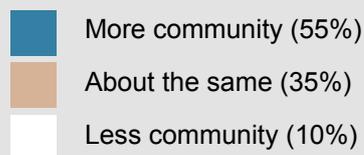


Breakdown of questions and responses:

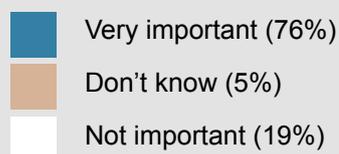
Do you feel your new home means you're more likely, or less likely, to move into a residential care home?



Since you moved into your retirement property do you feel more, or less, of a sense of community where you live?



How important are the communal areas in your development to your general well-being and ability to socialise?





Oomph! exercise classes

Oomph! is partly funded by Sport England and is the UK's leading wellbeing business for older adults. It partnered with McCarthy & Stone earlier this year, training staff members to deliver specifically tailored exercise classes for Homes for Later Living residents. The regular classes provide the opportunity to exercise for all levels of physical ability and are a fun way of socialising with other homeowners.

Residents have said Oomph! makes them happy, makes them laugh and creates stronger muscles. "It's the best thing I have ever done coming to this class each week. I am 92 and it keeps me going," says Joyce, who attends classes in Plymouth.



Dedicated on-site help and support

A dedicated on-site manager is the point of call for all residents, responsible for the effective and smooth running of developments. Also known as hosts or concierges, they oversee all communal areas and activities, offering support for residents where necessary and providing a sense of stability and security.

Ann Clare, lodge manager at De Clare Lodge in Cowbridge, Wales, says that getting to know a range of people is the most gratifying part of the role.

"I'm a real people person so that's the aspect of the job I love," she says. "I've enjoyed getting to know all my new owners, supporting them with their move and helping to sort out any little problems that they might have. Looking out for the health and wellbeing of my owners will be a key part of making sure they enjoy their new lifestyle here and make the most of it."

The lack of good quality homes for later living

As previously suggested by the think tank Demos, over half of over-60s – around eight million people currently living in seven million homes – are interested in moving and one third specifically wanting to down-size.²⁶ More recently, Legal & General found that of all the households with homeowners aged 55 and over with at least two unoccupied rooms, more than half would consider downsizing.²⁷ The 2017/18 English Housing Survey found that 67% of home owners aged 65 or over live in an under-occupied property, equivalent to 3.6 million households in England.²⁸



Freeing up this stock could make a huge contribution to easing the housing crisis, releasing many more family homes close to schools onto the market. But in the absence of enough local choice and incentive to consider moving home, many older people stay put in properties that are unsuitable and even unsafe to grow old in.

“Quite simply, older people who would like to move will be deterred from doing so if they cannot find a property that they would like to live in.”

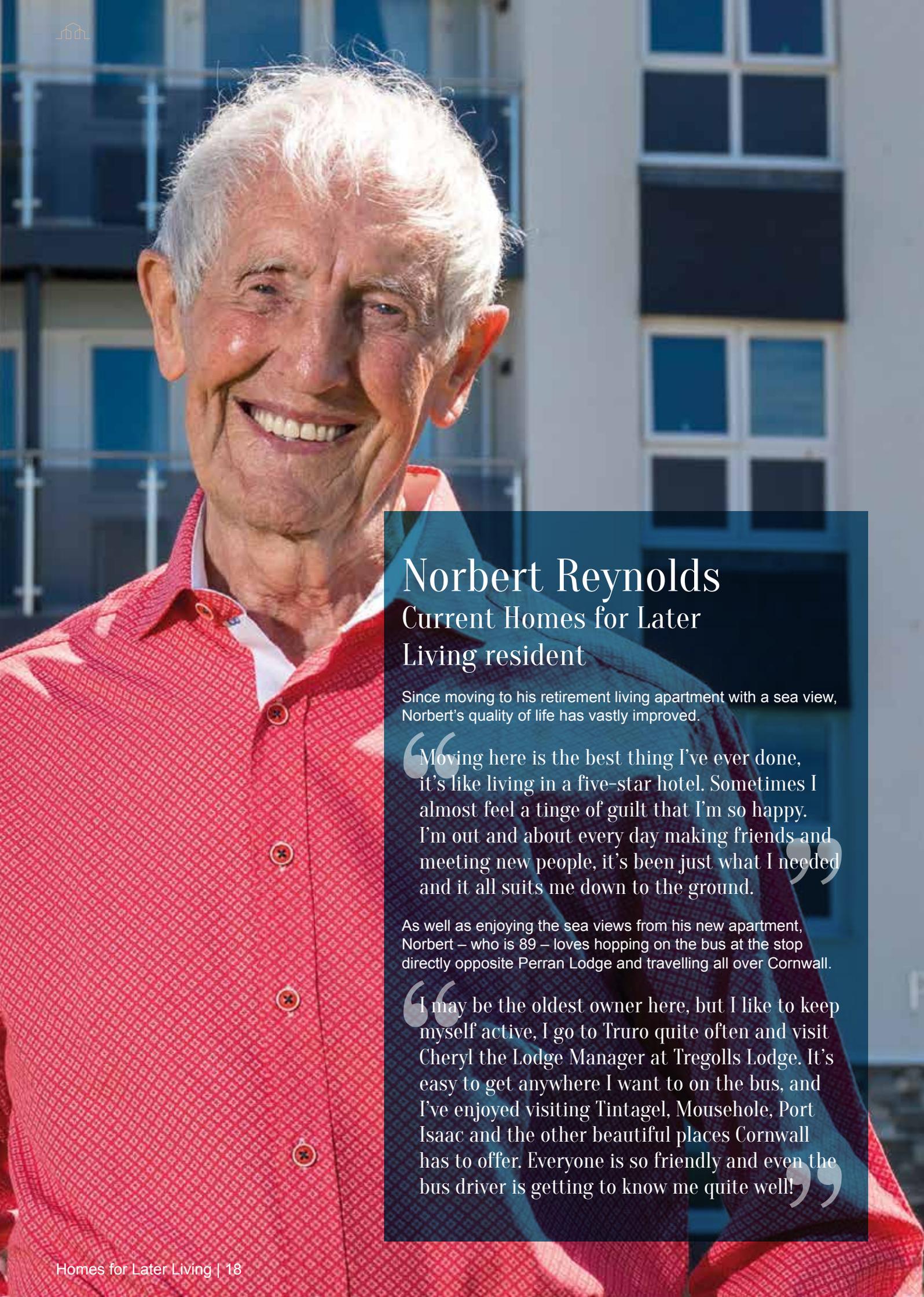
Housing, Communities and Local Government Committee, 2018

Of course, the practical and emotional upheaval of moving from the family home cannot be overlooked, but it is only part of the picture. Rather, most experts point to the massive shortage of housing that can keep older people healthy and support them to live independently.

In its report on the issue, Legal & General found that only 13% of all homeowners aged 55 and over had gone ahead with downsizing, adding that “the lack of good quality later living housing is the fundamental barrier to Last Time Buyers making the decision to move.”²⁹

Parliamentarians have reached the same conclusion, with the House of Commons Housing, Communities and Local Government Committee highlighting a lack of suitable accommodation for older people to move to. “Quite simply, older people who would like to move will be deterred from doing so if they cannot find a property that they would like to live in. This is particularly so given the practical, financial and emotional implications of moving,” stated the Committee’s 2018 report.³⁰

In 2019, the House of Lords Committee on Intergenerational Fairness and Provision also heard a similar story. “The generation born between 1946 and 1965 is substantially larger than subsequent or preceding ones,” they stated. “We have heard that there is an inadequate supply of housing that is adaptable or specialised to meet the needs of this larger cohort as their care needs increase.”³¹



Norbert Reynolds Current Homes for Later Living resident

Since moving to his retirement living apartment with a sea view, Norbert's quality of life has vastly improved.

“Moving here is the best thing I've ever done, it's like living in a five-star hotel. Sometimes I almost feel a tinge of guilt that I'm so happy. I'm out and about every day making friends and meeting new people, it's been just what I needed and it all suits me down to the ground.”

As well as enjoying the sea views from his new apartment, Norbert – who is 89 – loves hopping on the bus at the stop directly opposite Perran Lodge and travelling all over Cornwall.

“I may be the oldest owner here, but I like to keep myself active, I go to Truro quite often and visit Cheryl the Lodge Manager at Tregolls Lodge. It's easy to get anywhere I want to on the bus, and I've enjoyed visiting Tintagel, Mousehole, Port Isaac and the other beautiful places Cornwall has to offer. Everyone is so friendly and even the bus driver is getting to know me quite well!”



Fiscal impact: key findings

A programme of private investment in specialist housing, funded by existing equity, would do more than remove the biggest barrier stopping thousands of people from downsizing. We have calculated that the average person living in specialist housing for older people saves the NHS and social services £3,490 per year. Assuming average household sizes of around 1.33 in homes for later living, building 30,000 homes for later living every year could therefore generate fiscal savings to central government and local authorities of at least £1.4bn a year within a decade.³²

This comes on top of the fiscal savings already being delivered by the existing homes for later living market, thought to be at least £750 million a year. In total, £2.1bn a year in fiscal savings could be delivered if we had these additional properties built over the coming decade.

Each person living in a Homes for Later Living property enjoys a reduced risk of health challenges, contributing to fiscal savings to the NHS and social care services of almost £3,500 per year.

To put it in context, the three leading retirement living developers and operators built a combined 3,300 dwellings - around 20% of which were extra care housing - in 2019. Their ambition for the sector as a whole is to deliver the extra 30,000 properties per year by 2032.

The average resident in a homes for later living property is in their early 80s,³³ and the average age of first purchase is around 79.³⁴ There are currently 3.2 million over 80s in the UK with this figure set to rise to five million by 2032 and ten million by the end of the century.³⁵ Assuming there are 1.33 people per homes for later living household, building the extra accommodation would mean around 400,000 people housed more appropriately, rather than struggling to get by in the family home or going into long-term residential care. It would amount to 600,000 out of five million over 80s - one in eight - living in specialist housing by 2032.

This would generate the additional fiscal savings across the NHS and social services of £2.1bn a year. But these are only the fiscal savings we have been able to quantify and apply in our modelling, with others unaccounted for. For example it is unlikely to capture the full scale of NHS savings and does not capture savings beyond health and social care services, for example, those linked to reduced crime as a result of living in a more secure environment.

Furthermore, this kind of intervention in the housing market would prevent thousands of over 80s going into expensive long-term residential care. A number of studies have estimated that around 10 to 12% of those currently living in retirement living (or 'sheltered housing') would be in expensive residential care were these specialist homes not available.³⁶ It is also believed that around a third of the 421,000 elderly people currently in residential care today could be housed and cared for more effectively in specialist housing.³⁷ This would improve the quality of life of tens of thousands of people and save money both for private individuals and their families as well as for local authorities picking up the tab for social care. The over-use of institutional care for the over 80s manifests a vast fiscal inefficiency and we estimate around £1,800 saved per person to the public purse for every homes for later living resident through reduced use of institutionalisation alone.

Homes for later living properties are designed to keep residents safe and secure and to minimise risk. Building homes for retirement living requires the best available design and accessibility standards. For example, communal spaces are shared to avoid the potentially isolating effects of retirement and loneliness - which has been linked to an increased risk of dementia. This explains why specialist homes are proven to prevent or reduce an array of adverse health outcomes that cost the NHS and social care services billions of pounds a year.

By 2032 there will be five million people over eighty living in the UK - if one in eight were housed in a homes for later living this could generate total fiscal savings across the NHS and social services of £2.1bn per year.

Health spending on the average 80-year-old is £6,200 a year and long-term care at £1,000 a year, rising almost exponentially with age (it is 'just' £2,700 and £300 for the average 65 years old).³⁸ The most costly hospital admissions for older people tend to result from falls and fractures, dementia, and strokes.

What are the improved outcomes?

Most of those living in a homes for later living property are in their 80s. Half of over 80s in the general population live alone.³⁹ Yet those in homes for later living could be around half as likely to have falls,⁴⁰ with resulting fractures, injuries and costly inpatient bed stays. Considering that the number of over 80s will rise from around 3.2m today to around 5m in 2032, and around a half of the 80s will fall in any given year - the implied number of over 80s falling will rise from 1.6m today to around 2.5m in 2032, a rise of 900,000 should fall rates remain the same. If we built 30,000 specialist homes per year, housing roughly 400,000 over 80s, it could mean 100,000 fewer fallers. In addition, residents of homes for later living are around half as likely to



be lonely,⁴¹ making them significantly less likely to develop dementia.⁴² Reduced isolation also means that stroke sufferers get the urgent medical attention that is so crucial to surviving a stroke and making a full or near-full recovery, the key message of the award-winning Act FAST TV campaign.⁴³ What follows is a reduced dependency on long term care and the toll that takes on local authority social care budgets

Table below: The fiscal impacts of mainstream vs homes for later living housing, by outcome and efficiency

	Mainstream housing, pp >80yrs	Homes for Later Living housing, pp >80yrs	Difference
Adverse health outcomes / cause:	Cost (£)	Cost (£)	Saving (£)
Fracture or serious injury / falls	811	300	(510)
Dementia / loneliness	2,119	1,874	(244)
Stroke incapacitation / delayed action	477	343	(134)
Pneumonia, heart attacks, arthritis / cold homes*	205	nil	(205)
Visits to GP and A&E attendance / (various)	267	195	(72)
Subtotal (prevention)	3,878	2712	(1,166)
Efficiencies:			
Utilisation of public-funded institutional care**	1812	nil	(1,812)
Use of public-funded home care services	984	820	(164)
Use of disabled facilities grant money***	349	nil	(349)
Subtotal (efficiencies)	3,144	820	(2,324)
Total	7,022	3,512	(3,490)

assumes no HFLL homes are cold. **includes only those in HFLL homes that would otherwise be in institutional care, if HFLL didn't exist. *assumes zero use of disabled facilities grant in HFLL homes as these ones are already adapted. A more detailed methodology can be found in the annex.*

The numbers for the three fiscal big hitters are stark. Falls and fragility fractures cost the NHS at least £2bn a year and social services £1.1bn.⁴⁴ Dementia costs the NHS £4.3bn a year and social services over £4.5bn.⁴⁵ For strokes it is £3bn and £2.5bn respectively.⁴⁶ That is £17.5bn a year just for the big three, even without capturing everything across health and social services.

All in all, we identify fiscal savings across NHS and social care services of almost £3,500 a year for the average person living in a home for later living.



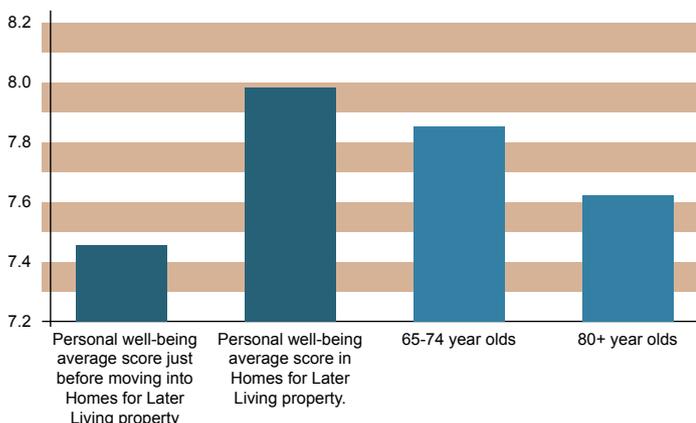
Well-being impact: key findings

Of course, huge savings for local authorities and the NHS are only part of the picture. Our evidence also points to dramatic improvements in the personal well-being of a typical person aged 80 moving from mainstream housing to Homes for Later Living properties. We have found that Homes for Later Living residents score as highly as someone 10 years younger on the nationally recognised general well-being criteria. In particular, those over 80 living in specialist housing are much less likely to have feelings of anxiety compared to the over 80s living in mainstream housing.

We estimate that the monetary value of this improved feeling of personal wellbeing could be as high as £1,530 per person per year, or around £10,000 (discounted) over the average eight-year period a resident lives in a Homes for Later Living property. This is when valued on the same basis as the Quality Adjusted Life year (QALY), the means of evaluating whether to conduct a medical intervention which values one year of quality life as high as between £20,000 and £30,000 per year. If the ambition to build 30,00 homes for later living properties per year was met, the value of personal well-being improvements could be as high as £600m a year.

To assess how moving into specialist housing from mainstream housing is associated with significant improvements in personal wellbeing, we surveyed over 1,400 Homes for Later Living residents. Our research found that moving to the current property was associated with a marked improvement in residents' average personal well-being scores. Overall, the average scores went up from 7.46 out of 10 to 7.97 out of 10. This is an improvement of 0.51 percentage points or, equivalently, 7%. Much of this improvement came through a greater sense of life satisfaction and reduced levels of anxiety.

Chart below: Average personal well-being scores for Homes for Later Living residents compared with national population



Amongst the general population, feelings of personal wellbeing over a person's lifetime (as reported by the ONS' National personal well-being data) appear to peak

with the onset of retirement at the age of 65. But then they decline from about the age of 75. Average national personal wellbeing scores plateau for those aged 65-74 at 7.85 out of 10, then fall to 7.72 for those aged 75-79. For those aged between 85 and 89 average scores fall even further to 7.59.⁴⁷ These declines may be the result of life event factors which adversely affect personal well-being, including the loss of a partner, and increased loneliness, or failing health, impaired mobility and reduced independence.

The average age of those in Homes for Later Living properties is a little over 80. The average personal well-being score for those surveyed who currently live in these properties was 7.97. The survey results show that the well-being scores of those over 80s who have moved into a Homes for Later Living property actually increases and is higher than personal well-being reported by the over-80s nationally.

Lifetime events occurring just before or at the time of moving can of course impact on wellbeing scores in either direction. For example, just over a quarter of respondents cited the loss of a partner as a reason that best describes why they moved into their retirement property. Across all the providers, 14% of survey respondents reported feeling lonely often or some of the time in their current retirement property. 18% of respondents reported they felt lonely often or some of the time just before they moved to their current retirement property.

The increased personal well-being scores from moving into a Homes for Later Living property restore to over-80s living in these properties a sense of personal well-being that would otherwise have peaked when they were 65-74 years old (the mid-point being 70). In other words, matching personal well-being levels of those at least ten years younger.

Table below: Survey of personal well-being indicators for Homes for Later Living residents

	Personal well-being average score just before moving into their current home	Personal well-being average score in current home
Life satisfaction	7.31	7.95
Life worthwhile	7.72	8.06
Happy yesterday	7.32	7.75
Not anxious yesterday	7.51	8.12
Blended average	7.46	7.97



Marjorie Carter Current Homes for Later Living resident

Former Olympian Marjorie Carter, who lives in a Homes for Later Living property, defies gravity – and conventional wisdom – by continuing to perform gymnastics routines at the age of 84.

Marjorie started gymnastics at the age of 10, going on to compete in both the 1952 Olympic Games in Finland and the 1960 Games in Rome. 74 years later, she can still stand on her head, perform the splits and cartwheel.

“You need to keep moving. It’s so important when you get older to maintain that independence and mobility. As they say, ‘use it or you lose it.’

Living at Jowett Court with a range of people of a similar age is a good lift for the mind, as well as making friends and spending quality time with people, which is as important as regular exercise for maintaining a healthy lifestyle.”

Conclusion

Retirees of today expect far more choice and greater quality than previous generations. A few housing providers are responding to this, and in many cases older people are benefiting from residing in homes for later living that are tailored to meet their evolving needs. But much more can be done.

This report has examined the significant benefits of homes for later living, which encompasses retirement living properties with and without care services. Our research has shown that people living in all forms of housing for older people have significantly greater well-being than those living in other types of accommodation. The potential fiscal savings to the NHS and local authorities are significant. However, savings of over £2bn a year will only become apparent if we can build 30,000 homes for later living properties per year over ten years, ideally by 2032 to keep pace with demand.

The huge savings are possible because the design of homes for later living is specially tailored to older people, meaning that residents are around half as likely to have falls with resulting fractures, injuries and costly inpatient bed stays. As well as having their own living space, typically an apartment, abundance of communal spaces also means they are around half as likely to feel lonely. The quality of these homes has to be unparalleled across the market to meet high quality requirements, ensuring the safety of residents in later life.

In order to deliver savings of £2.1bn to the NHS and social services, we need to keep pace with demand by building 30,000 homes for later living properties per year.

Despite the benefits, it is widely accepted that currently there is inadequate provision of homes for later living. While the range of choice for those in later life has considerably increased over the last 20 years, the current planning system makes it difficult for existing retirement house builders to meet growing demand. At the same time, the system works against other mainstream house builders looking to enter this part of the market.



The need for homes for later living to be treated differently from conventional, mainstream housing has been accepted by the likes of the Law Commission and the Housing, Communities and Local Government Committee. This was seen in the distinction the Law Commission made with regard to the case for exit or event fees, the distinction the Government made with regard to the need for an economically sustainable ground rent and the distinction the Housing, Communities and Local Government Committee made with regard to planning obstacles and the case for a new use class. Going further, local planning authorities proactively planning for the provision of more homes for later living and adopting a presumption in favour of proposals for this type of housing (including special considerations around planning applications) should help meet the increasing demand for homes for later living.

In addition to the fiscal savings and personal improvement in quality of life for older people, building more suitable homes for a rapidly ageing population will also have knock-on benefits for the wider housing market. We will be exploring these wider benefits and further mechanisms to encourage more homes for later living to be built in subsequent reports.

This report comes as policy makers continue to search for an answer to the housing crisis and the multiple challenges associated with an ageing population and provision of long term social care. It sets out the benefits the Government can expect to see on both fronts if it invests in homes for later living. Now the onus is on policy makers to take action.



Annex

Fiscal Savings

There are two streams of fiscal savings:

1. Adverse health outcomes reduced by being in specialist housing as opposed to mainstream housing, including: falls and fractures, dementia onset through loneliness, and stroke inaction.
2. Efficiencies through residential and nursing care avoided by people moving from mainstream to specialist homes rather than directly into institutional care, as well as reduced need for home adaptations (i.e. homes for later living properties are already adapted) and better collective home care provision (i.e. those needed care all in one place).

Adverse health outcomes

With at least 162,000 market specialist homes currently existent, and an ambition for the sector to build 300,000 more, and assumed average household sizes of around 1.33, the implied annual fiscal savings would be: $(162,000 + 300,000) \times 1.33 \times \text{£}3,490 = \text{£}2.1\text{bn p.a.}$

Falls & fractures

Outcomes

- We assume fallers are halved in specialist housing vs living in mainstream (MS) housing, from 50% to 25% in Retirement Living (RL), and 60% to 30% for those in Extra Care (EC).
- 14.5% of RL falls (and 17.4% of EC falls) lead to a hospital admission.
- This implies that out of an over 80s population of 3.2m, 1.6m fall each year and 224,000 are admitted to hospital - typically with a fracture.
- Hospital bed days per person are reduced from 12.5 to 6.25 in RL (and 12.5 to 1.5 EC).

Costs to public

- Falls cost the NHS £2bn a year o/w £0.9bn treatment and £1.1bn hospital bed.
- With 335,000 fallers overall that implies £5,970 per patient and around £2,420 for the hospital treatment and £3,550 cost of hospital bed.
- We assume bed stays are longer for the over 80s – £4,325 bed (also 12.5 days at £346 per day), plus the £2,420 treatment cost, or £6,745 per over-80 patient
- In addition, falls cost state-funded social care £1.1bn, or an implied £3,284 per person, though we

don't assume it is any higher for the over 80s.

For the average over-80 person in each accommodation type then the costs of falls are as follows:

RL: 25% fall x 14.5% hosp admission x {£2,420 treat + (6 day x £346 bed) + £3,284 sc} = £285
MS(vRL): 50% fall x 14.5% hosp admission x {£2,420 treat + (12 day x £346 bed) + £3,284 sc} = £727
EC: 30% fall x 0.168 hosp admission x {£2,420 treat + (1.5 day x £346 bed) + £3,612 sc} = £325
MS(vEC): 60% fall x 0.168 hosp admission x {£2,420 treat + (12.5 day x £346 bed) + £3,612 sc} = £1,047
RL therefore produces a £442 saving against its counterfactual (£727 – £285) and EC £722. £442 and £722 are uprated by inflation over one year to bring them to 2019 money, £453 RL and £740 EC.

Loneliness & dementia

Outcomes

- We assume loneliness is halved in specialist housing vs mainstream housing (particularly given that a large proportion of the over 80s also live alone), from 30% to 15% in all specialist housing types.
- 1 in 6 of the over 80s (17%) have dementia. We assume those who are lonely are twice as likely to develop it.
- These assumptions imply dementia amongst the over 80s who are lonely is 26%, dementia amongst those not lonely is 13% i.e. $(30\% \text{ lonely} \times 26\% \text{ dementia}) + (70\% \text{ not lonely} \times 13\% \text{ dementia}) = 17\% \text{ average dementia}$
- We further assume the rates of dementia in EC are 50% higher – 39% for the 'lonely' and 19.5% for the 'not lonely'.

Costs to public

- Dementia costs the NHS £4.3bn a year across 850,000 sufferers, an implied average cost of £5,060 per person, though we don't assume it is any higher for the over 80s.
- In addition, dementia costs state-funded social care £5.2bn a year, an implied average cost of £6,060 per person, though, again, we don't assume it is any higher for the over 80s.

For the average person over 80 in each accommodation type then the cost of dementia is:

RL: (15% x 26%) x (£5,060 treat + £6,060 sc) + (85% x 13%) x (£5,060 treat + £6,060 sc) = £1,662
MS: (30% x 26%) x (£5,050 treat + £6,060 sc) + (70% x 13%) x (£5,060 treat + £6,060 sc) = £1,879
EC: (15% x 39%) x (£5,060 treat + £6,060 sc) + (85% x 0.195) x (£5,060 treat + £6,060 sc) = £2,494
MS: (30% x 39%) x (£5,060 treat + £6,060 sc) + (70% x 0.195) x (£5,060 treat + £6,060 sc) = £2,819
RL therefore produces a £217 saving against its counterfactual and EC £325. £217 and £325 are uprated by inflation over one year to bring them to 2019 money, £222 RL and £333 EC.

Stroke inaction

Outcomes

- Stroke victims are found and treated quicker in specialist housing, particularly because many otherwise live alone or have irregular interaction with others.
- We assume this quicker reaction delivers reduced treatment costs, better outcomes amongst survivors and thus reduced long term social care costs, of 25%
- Around 1.5% of the 80s have a stroke each year.

Costs to public

- Strokes cost the NHS £3bn a year across 115,000 sufferers, an implied average of £26,500 per sufferer, though we do not assume it is higher for the over 80s.
- In addition, strokes cost state-funded social care £2bn a year across 1 million stroke sufferers, or £2,000 per stroke survivor. Over 3 years this is £6,000.

For the average over 80 person in each accommodation type then the cost of strokes occurring each year is:

*RL or EC: 1.5% x (£26,100 treat + £6,000 sc) x 75%
FAST = £334*

*MS (vRL or vEC): 1.5% x (£26,100 treat £6,000 sc) =
£465*

RL or EC therefore produce a £131 saving against their counterfactuals, uprating by inflation over one year brings it to **£134 RL or EC**.

Miscellaneous

Outcomes

- Annual GP visits per person are reduced from 6 to 4.5 in RL and from 6 to 3 in EC
- Annual A&E visits per person are reduced from 0.5 to 0.4 in RL and EC

Costs to public

- The cost of a GP visit is £30 and of an A&E visit is £160.

For the average over 80 person in each accommodation type then the cost of GPs & A&E is:

RL: 4.5 x £30 GP + 0.4 x £160 A&E = £199

MS: 6 x £30 GP + 0.5 x £160 A&E = £260

EC: 3 x £30 GP + 0.4 x £160 A&E = £154

MS: 6 x £30 GP + 0.5 x £160 A&E = £260

RL produces a £61 saving against its counterfactual and EC £106 combining GP and A&E elements. £61 and £106 are uprated by inflation over one year to bring them to 2019 money, £62 and £108.

Furthermore, cold homes inflict health costs on the NHS of £200 per annum for the average over 80 in mainstream housing. It is believed that cold homes cost the NHS £1.36bn a year, or around £100 for every over 65-year old in the UK. We assume it is double for the average 80-year old, uprating by inflation over one year brings it to **£205 RL or EC**.

Residential & nursing care

Outcomes

- We assume 12% of the over 80s living in RL would otherwise be in long term residential care if RL wasn't available, i.e. in the counterfactual.
- We assume 20% of the over 80s living in EC would otherwise be in long term residential care and 30% would otherwise be in long term nursing care if EC wasn't available, i.e. in the counterfactual.
- However, unlike the vast majority in RL, those in EC receive significant home care which - despite initially higher personal savings - local authorities are eventually likely to contribute to because of the higher level of care needed. We assume LAs save £3,000 a year on average in home care where the EC counterfactual is residential care and £6,000 where it is nursing care.
- 80 % of market RL / EC is owner-occupied and 20% is private rented.
- We assume residential / nursing care lasting 5 years if RL and EC were not available.

Costs

- Residential care is assumed to cost £36,000 p.a. (including 'hotel' costs) and Nursing care £45,000 p.a.
- 50% of owner occupiers in RL/EC live alone, and would therefore have been required to sell their previous home to pay for residential care in the counterfactual.
- 50% of owner occupiers in RL/EC live with a partner and would not therefore have been required to sell their previous home to pay for residential care in the counterfactual.
- This produces an average household size of 1.33 (50 adults occupy 25 homes and 50 adults occupy 50 homes or, combined, 100 adults occupy 75 homes. $100 / 75 = 1.33$).
- 100% of renters regardless of status have no home to sell.
- The average specialist owner occupied home can be sold for £250,000.
- Average savings per person are £35,000, £11,750 above the £23,250 capital threshold for local authority support (ignoring the taper to the lower threshold for simplicity).
- The average pension and attendance allowance income is that self-funders would pay towards residential / nursing care (costing £36,000 or £45,000 p.a.) out of their income is £17,750 p.a:

State pension +£8,500

Private pension +£6,000



Attendance allowance +£4,500
 Disregarded -£1,250
 Total £17,750

In the counterfactual of being in residential /nursing care, single owner occupiers are likely to foot the whole bill and government none, as they are forced to use savings and sell their home to cover any shortfall in residential or nursing care cost against their income.

Couple owner occupiers are not required to sell their home while one partner remains living there. So only the individual's savings can be used to plug any shortfall, government (LA) picking up the rest. The same is true for single and couple renters:

Cost of residential care over 5 years = £36,000 x 5 = -£180,000
 Private contribution (income) = £17,750 x 5 = +£88,750
 Private contribution (savings) = £40,000 - £23,250 = +£11,750
 Shortfall = government (LA) contribution = +£79,500 (44% of total)

Residential (Res) and nursing care (Nur) savings for the average over 80 in RL and EC are therefore:

RL v Res: {50% owner couple x 80% owner occ + 20% renter} x £36,000 cost x 44% public x 12% in res counterfactual = £1,149
 EC v Res: {50% owner couple x 80% owner occ + 20% rented} x £36,000 cost x 44% public x 20% in res counterfactual = £1,915*...
 EC v Nur: (50% owner couple x 80% owner occ + 20% rented} x £48,000 cost x 58% public x 30% in nur counterfactual = £4,725**...

Home care adjustments are needed for EC v Res and EC v Nur. For the average person in EC, local authorities are assumed to contribute £3,000 x 20% = £600 in home care where the counterfactual is residential care and contribute £6,000 x 30% £1,800 in home care where the counterfactual is nursing care. The LA will no longer have to pay these if the person goes into residential / nursing care and have to sell their homes. The burden on the state is therefore adjusted down to:

EC v Residential care = £1,915* - £600 = £1,315
 EC v Nursing care = £4,725** - £1,800 = £2,925

£1,149, £1,315 and £2,925 are uprated by inflation over one year to bring them to 2019 money: **£1,178 RL, £1,348 EC and £2,998 EC.**

Home support efficiencies

Government and local authorities support independent living at home through various channels including home care and the disabled facilities grant (DFG).

Outcomes

- Those in specialist housing already have adaptations

do not need new disabled facilities.

- We assume homecare needs are reduced in specialist housing compared to mainstream housing by around 20%.

Costs

- DFG is means-tested, apart from the first £1,000. Over an 8-year average period spent in specialist housing this implies a fiscal saving of £125 a year.
- However, a means-tested DFG of up to £30,000 is available for those eligible and in need. Taking this into account, we assume that the average person in RL would otherwise get DFG of £300 a year if in mainstream housing and the average person in EC would otherwise get DFG of £500 a year. Particularly, if they are also self-funding some or all of their home care, their savings will deplete quicker and so they would become eligible for local authority support.
- Public-funded home care is assumed at £4,000 per person, (paying for 5 hours of care a week) in EC regardless of whether they receive it or not. This is versus £4,800 (paying for 6 hours of care a week) in the mainstream housing counterfactual, an average saving of £800 for those in EC.

Thus being in a homes for later living property would save the government and local authorities £300 and £500 in disabled facilities grant a year, as well as £800 in home care. These figures are uprated by inflation over one year to bring them to 2019 money: **£308, £513 and £820.**

Overall fiscal savings

- Each year of current output generates fiscal savings of £15.3 million
- Building 300,000 new homes plus the 162,000 existing would deliver fiscal savings of £2.1 billion (£1,390 million plus £750 million)

Table below: Fiscal savings at a national level.

	Retirement housebuilding by Homes for Later Living providers in their latest reporting year	People per home	Fiscal saving Per home	Fiscal saving on aggregate
Retirement housebuilding by Homes for Later Living providers in their latest reporting year	3,304	1.33	£4,642	3,304 x £4,642 = £15,337,168
Building 300,000 new homes	300,000	1.33	£4,642	300,000 x £4,642 = £1,392,600,000
Existing 162,000 homes	162,000	1.33	£4,642	162,000 x £4,642 = £725,004,000

Table below: Overall fiscal savings 'scorecard' per person over 80 in specialist housing, p.a.

Adverse health outcomes:	Retirement Living (RL)	Extra Care (EC)	Combined 80:20
Falls & fractures	-£453	-£740	-£510
Loneliness & dementia	-£222	-£333	-£244
Strokes	-£134	-£134	-£134
Conditions related to cold homes	-£205	-£205	-£205
Miscellaneous o/w			
GP visits	-£46	-£92	-£55
A&E visits	-£16	-£16	-£16
Subtotal (A)	-£1077	-£1521	-£1166
Efficiencies:	RL	EC	Combined
Residential care	-£1178	-£1348	-£1212
Nursing care	0	-£2998	-£600
Subtotal (B)	-£1178	-£4346	-£1812
Disabled Facilities Grant	-£308	-£513	-£349
Home care (LA funded)	0	-£820	-£164
Subtotal (C)	-£308	-£1333	-£513
TOTAL (A+B+C) 2019/20 prices	-£2563	-£7200	-£3490



Endnotes

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Silver saviours for the high street

How new retirement properties create more local economic value
and more local jobs than any other type of residential housing

A report by  STRATEGY for

Homes for Later Living

February 2021



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About Homes for Later Living

Homes for Later Living has been set up to promote greater choice, availability and quality of housing specifically for older people. It comprises Churchill Retirement Living, McCarthy Stone and Lifestory Group (made up of Pegasus and Renaissance) and operates alongside the Retirement Home Builders Group within the Home Builders Federation (HBF).

Homes for Later Living exists to promote all types of housing which are specifically designed, built or adapted for people over the age of 60. These properties are operated in the long-term interest of residents, so that as people grow older and their needs change, they can choose to live in a property that works for them.

Homes for Later Living or retirement properties mean specially designed housing suitable for older people who want to maintain the independence and privacy that comes with having a home of their own, but may want access to varying degrees of support and care, plus an in-built social community.

Typically built for people who no longer want or need a family-sized house, and often taking the form of apartments or bungalows, our developments are designed to help people remain independent, safe, secure and sociable for as long as possible.

One of the key differences between new-build housing for older people and new-build mainstream housing is the provision of extensive communal areas where neighbours can socialise, host visitors and be part of a friendly, like-minded community.

Another key difference is the presence of an on-site manager or team, someone whose role is to look out for people's welfare, be a point of call if help is needed, make sure the communal areas are well-maintained and to be a reassuring, friendly presence.



About the author

Chris Walker

Chris Walker is an associate at WPI Strategy and a former government economist, who spent over 12 years as a civil servant in the Treasury, Department for Work and Pensions, and the Department for Communities and Local Government where he was a senior economic adviser. He now works as a research and economic consultant on housing, planning and local economic growth.

Foreword

As we begin to emerge from the shadow of Covid-19, breathing new life into our high streets will be critical to the future economic prospects and the social fabric of local villages, towns and cities right across the UK.

The pandemic has had a devastating impact on the high street, with local businesses unable to open at various points in time. Yet faced with such unimaginable challenges, Britain's entrepreneurs have innovated like never before, moving to different ways of offering their services and products to customers.

There is little doubt that as we return to some semblance of normality this year, that the look and feel of our town centres will need to continue to evolve. Part of this evolution will involve striking the right balance between commercial and residential properties on or near the high street.

In 2018, retail expert Bill Grimsey recommended that high streets and town centres "need to be repopulated and re-fashioned as community hubs, including housing, health and leisure, entertainment, education, arts, business/office space and some shops". Three years later, that argument looks stronger than ever. Getting that mix right will be critical to local economic recovery efforts and fostering a renewed sense of community.

This report seeks to contribute to the debate over the look and feel of our high streets and town centres. Our findings focus specifically on the role that specialist retirement housing can play in driving local economic growth.

The analysis is stark. Specialist retirement properties create more local economic value and more local jobs than any other type of residential housing. People living in these properties are happier, healthier and more likely to spend money locally than people of the same age living elsewhere. And just as importantly, polling commissioned as part of this report indicates that the vast majority of local people would approve of retirement housing being built near them.

Specialist retirement housing does not have to come at the expense of housing for families and young professionals. Rather our previous research has shown that building more specialist retirement housing can stimulate transactions throughout the entire housing market, for families looking to move into bigger homes and for first time buyers looking to take their first step on the property ladder.

We know there are 3 million people across the UK over the age of 65 who would like to move home but don't feel they can. Quite simply we should be building tens of thousands of good quality specialist retirement properties to help meet this demand.

With retirement developments of this sort located in or near to our struggling high streets, the benefits of building these properties are clear. Doing so will help stimulate local economic activity and help communities recover as quickly as possible from the devastating effects of the pandemic.

Executive summary

Local authorities across the UK face pressing challenges in the coming years. Most urgently, councils need to rescue their finances from the ravages of the pandemic which has eroded high streets and cost many jobs. Alongside this, local authorities must manage the escalating costs of social care at the same time as keeping an ageing society healthy, happy and safe, and they need to find the best way of meeting local housing targets.

With the Prime Minister having promised to 'build back better', retirement properties can help local authorities to meet such challenges by creating the conditions for local and sustainable economic growth in communities across the country, without eroding the green belt or urban green spaces.

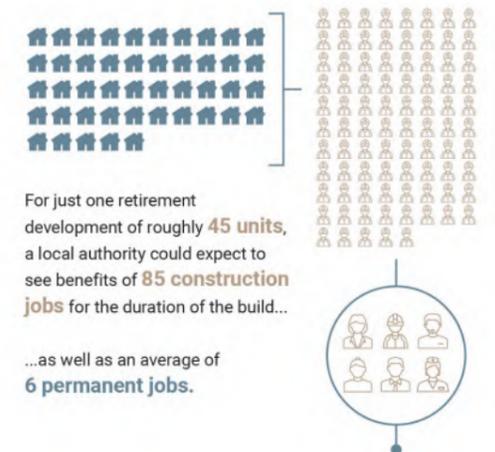
Our previous reports have set out firstly the extent to which retirement housing creates fiscal savings through reduced health and social care costs, and secondly the impact on the wider housing market of releasing second-hand properties back onto the market.

Here, in our third report, we look at the final challenge – that of restoring and creating jobs, supporting shops and services in the local economy, and making new housing environmentally sustainable. Crucially, we show how retirement properties create more local economic value and more local jobs than any other type of residential development.

“Retirement properties create more local economic value and more local jobs than any other type of residential development.”

The benefits for local authorities can be seen both in terms of jobs created and in terms of Gross Value Added (GVA) - in other words the sector-specific economic value it adds. Further benefits are derived from the location of retirement properties amongst existing shops, services and transport connections which focuses the spending power of the 'grey pound' to revitalise local high streets.

- For just one retirement development of roughly 45 units, a local authority could expect to see benefits of 85 construction jobs for the duration of the build, as well as six permanent jobs and £13m in GVA over the lifetime of the development, as opposed to not developing a site.¹
- These benefits mean that retirement properties create more local economic value and more local jobs than any other type of residential development.
- People living in each retirement development generate £550,000 of spending per year, £347,000 of which is spent on the local high street. Some £225,000 of this is new spending in the local authority, directly contributing to keeping local shops open.
- From these figures, we estimate that a typical retirement housing development has the potential to support more than three local retail jobs. Over the lifetime of the development, a typical development would contribute £2.25m of GVA to the high street.



Our findings come as UK-wide polling for this paper shows that retirement housing is among the most popular type of housing. We can see that 68% of people would approve of such housing being built near them, compared to the 45% approval rating given to a conventional block of flats. Meanwhile the generation of local jobs is the most important factor in people's support for new developments.

Despite this public sentiment and the clear benefits that retirement developments bring to local communities, we are still not building enough suitable properties to cater for our ageing population. Currently in the UK, we build around 8,000 retirement properties a year. This is distinctly below the level of demand and need.

Looking at the national picture, our analysis shows what would happen were the UK to build 30,000 retirement properties every year, consistent with the level of supply that is needed.² Building 30,000 retirement properties a year would be just 10% of the national house building target and the estimated level of demand, and, compared to not developing the sites involved, would mean:

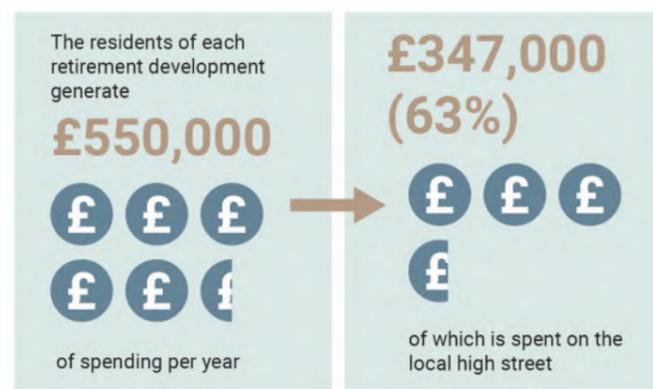
- £2bn of additional economic activity every year would be created across the country. This is £20bn over 10 years, roughly equivalent to 1% of current UK GDP over 10 years, focussed where it is most needed, on our high streets.
- 15,000 additional construction jobs would be created nationally and sustained over the period of construction. A further 700 jobs a year would come from management and renovation of properties freed up.
- Greenfield land across the UK could be preserved as the vast majority of these developments are on brownfield sites, effectively and sustainably regenerating previously developed land.



A single retirement development of 45 units, would add £13m in additional local economic value (GVA) to its area. A 10-year building programme of 30,000 retirement properties per year could be worth roughly the equivalent of an additional 1% of GDP to the economy.

In this report, we therefore provide the evidence that creating the right policy conditions to encourage the construction of more retirement properties is not only in the interests of those people in later life. It will also have a major impact on the wider housing market while stimulating local economic growth in every community across the country.

With all of this in mind, **our key national policy recommendation is for a 10 year programme of building 30,000 retirement properties every year.** If such a programme was introduced then we could have much-needed new housing for older people supplementing new housing for families and young professionals to ensure that we finally have the diverse housing stock we need in the UK.



Introduction

People and businesses across the UK have faced unprecedented personal and economic disruption since the Covid-19 pandemic took hold in March 2020. For local communities, the public health and economic effects have created a perfect financial storm.

Of course, local council finances being squeezed is not a new development. Back in 2012, Barnet Council encapsulated the problem in the Barnet Graph of Doom - a PowerPoint slide showing that within 20 years, unless things were to change dramatically, the north London council would be unable to provide any services except adult social care and children's services.

But since the outbreak of the pandemic, the situation has become even more critical. Councils have been increasing spending while incomes have been falling. There have been new responsibilities to help with the testing, tracing and control of Covid-19 while social distancing requirements and personal protective equipment (PPE) have meant increased expenditure on adult social care and other services. At the same time, a number of long-established routes of income, such as through car parking, have been significantly reduced. On top of all of this, many households and businesses have found themselves struggling to pay their bills.

It is against this backdrop that local authorities throughout the UK will face three very pressing and difficult challenges in the coming years.

First, councils will need to salvage their financial position and that of the local economies on which they rely. This means generating income from a strong local economy populated with businesses, employees and customers all of whom can play their part in generating the revenue needed to pay town hall bills.

Second, councils will need to find ways of mitigating health and social care costs but at the same time keeping an ageing society healthier, happier and safer for as long as possible. Before the pandemic children's and adult social care costs already accounted for a rising proportion of the annual budget. Covid-19 has only exacerbated this situation and with financial restrictions likely to be tighter than ever in 2021, local authorities must reconcile the escalating costs of social care with perilous finances

Third, councils will need to identify where and how they can meet the housing targets required of them without erasing the green belt, over-burdening the road infrastructure or burning up local support. For the vast majority of local authorities, brownfield sites can be the best way to achieve this. Such sites offer new ways of absorbing local targets without fundamentally changing the character of an area or redrawing its perceived boundaries. Furthermore it is urban brownfield sites where retirement housing is best placed to access existing public transport connections and can accommodate a new resident population willing and able to support struggling shops and services

In this report we show that all three of these crucial local authority challenges can be met more effectively through the delivery of much-needed retirement housing, alongside existing conventional housing developments.

With the economic benefits it brings, retirement housing can also be a key driver of the Government's post-pandemic agenda in local authorities across the UK. Setting out his vision for an economic recovery, the Prime Minister promised to "build back better". In his speech on the economy in June 2020, Boris Johnson lamented the failure of the state over many years to build enough new homes and asserted that "we will build fantastic new homes on brownfield sites". Furthermore, the Government has recommitted to its target of delivering an average of 300,000 new build homes a year by the mid-2020s.

The role of brownfield sites in this has been emphasised in the change to the housing formula put forward in the Government's Planning for the Future White Paper. To this end, it is critical to get the most value possible out of developments on these sites.

Retirement housing is likely to be welcomed by the majority of residents. Our UK-wide polling found that it was among the three developments with the highest net approval ratings, alongside care homes and developments of family homes. The polling also found that local job creation is the number one most important aspect for a new development in the eyes of local people.

In the following chapters, we set out the unique social and economic contribution that retirement properties can play in boosting local economic output and creating local jobs, revitalising the high street and greening local communities. These are economic benefits that stem from factors unique in these developments including their specific building designs, central location and residents' spending habits. And they are benefits that are unlikely to come from other types of properties, as can be seen in the annex.

In our modelling, we have shown the "absolute benefits" of retirement properties, in other words those benefits compared to allowing brownfield sites to lay undeveloped. We have also compared those benefits to those yielded by other types of residential developments, namely housing and blocks of flats. In these tables, all the benefits are stated in full time equivalent jobs and in Gross Value Added for easy comparison. In the report itself, however, where it makes more intuitive sense, other metrics are used.

Through our modelling we can therefore see how building specialist retirement properties makes sense for all types of local authorities who need to accommodate new housing and want to see brownfield sites prioritised to achieve this in a way that delivers maximum economic benefit locally and benefits the local community most effectively.

This report is the third in a series of reports looking at the socio-economic benefits of retirement housing, with previous reports having shown how helping more people to access specialist retirement housing would improve older peoples' wellbeing, save money for the NHS and stimulate both ends of the housing market.

Our first report revealed how moving from existing mainstream housing to specialist retirement properties can improve the mental and physical health of our ageing population, with an average Homes for Later Living resident aged 80 feeling as good as someone 10 years younger, when measured on a selection of national wellbeing criteria. The resulting reduced health challenges could bring about significant savings for the NHS and social care budgets. Most notably, we found that each Homes for Later Living resident contributes to fiscal savings to the NHS and social care services of approximately £3,500 per year.

Our second report looked at how building more Homes for Later Living developments would help to unblock the housing market. It revealed that a quarter of people over 65 want to downsize and it showed how helping to make this happen would be beneficial to younger generations. For example, in this report we also showed that, through the chain effect, roughly two in every three retirement properties built releases a home suitable for a first-time buyer further down the chain.

In the third and final report of this series, we build on our previous findings to show that Homes for Later Living developments can be key to building back better in local communities. On top of the benefits outlined in previous reports, we can see that building more specialist retirement properties would do more than any other type of residential development to drive up the numbers of local jobs, boost local economic activity, and bring vibrancy to our local high streets.

Previous research

This report is the last in a series of three pieces of research, each highlighting different benefits brought about by Homes for Later Living developments.

Our first report, Happier and Healthier, explored how specialist retirement housing can improve residents' wellbeing and generate savings for Government. It showed that:

- On a selection of national well-being criteria such as happiness and life satisfaction, an average person aged 80 feels as good as someone 10 years younger after moving from mainstream housing to housing specially designed for later living.
- Each person living in a Homes for Later Living property enjoys fewer health risks, contributing to fiscal savings to the NHS and social care services of approximately £3,500 per year.

Our second report, Chain Reaction, demonstrated how helping more people who wish to downsize would be beneficial to the wider housing market, freeing up thousands of family-sized homes as well as those for first-time buyers. It showed that:

- Approximately 3 million people in the UK over the age of 65 (or 25%) want to downsize.
- Every Homes for Later Living property sold is estimated to generate at least two moves further down the housing chain, freeing up homes at differing stages of the housing ladder for different demographics.
- Roughly two in every three retirement properties built releases a home suitable for a first-time buyer down the housing chain. A typical Homes for Later Living development therefore results in at least 27 first time buyer properties being released onto the market.

Sarum Lodge, Salisbury



Public attitudes towards retirement housing

Homes for Later Living developments may bring numerous economic benefits to local areas but how welcome are they in the eyes of local residents?

Our UK-wide polling indicates that the vast majority of people would approve of retirement housing being built near them. Indeed, when people were asked whether they would approve or disapprove of certain developments being built within a mile of their home, retirement housing was among the three developments with the highest net approval ratings. The other two highest scorers were care homes and developments of family homes.

Across the UK, retirement housing scored a net 68% approval rating - rising to 70% in London and south west. This was slightly higher than the rating given to a development of first time buyer homes (67%) and significantly higher than the rating given to a conventional block of flats (45%) and a development of student accommodation (42%).

The approval rating given to retirement housing was also significantly higher than was given to commercial developments of all kinds. For example, a commercial development (retail) got a 47% net approval score and a commercial development (offices) scored 41%.

More generally, our polling established that more people than not want to see some kind of new housing built near where they live. A third of people think it is important that homes are built in their local area, compared to a quarter who do not.

Finally, our polling asked people what, if anything, they thought was particularly important in any new building development in their local area. The highest scoring answer here was "creating jobs" with 50% of respondents opting for this. Also scoring highly on 42% was "leads to more money being spent in local shops and businesses".

Savanta ComRes polled 2178 adults across the UK from 27-29 November 2020.

Summary of benefits

The figures presented in this report are net additional figures, which show the benefits of retirement developments versus a counterfactual. The below table highlights the benefits of Homes for Later Living developments versus letting a site remain undeveloped. This is in line with best economic practice. N.B. these figures are not the same as direct employment figures. Averages for direct employment can be found in the annex.

	45 apartments – i.e. the benefits of a typical Homes for Later Living development	30,000 apartments – i.e. one year of national building, 10% of the new homes target and the current level of demand	300,000 apartments – i.e. 10 years of national building
Construction	<ul style="list-style-type: none"> • 85 construction jobs for the duration of the build • £7.6m in gross value added in the local area 	<ul style="list-style-type: none"> • 14,820 construction jobs for the duration of the build • £1.4bn in gross value added nationally 	<ul style="list-style-type: none"> • 14,820 jobs sustained for 10 years • £14bn in gross value added nationally
Repairs and Renovations	<ul style="list-style-type: none"> • 1 permanent jobs • £1.6m in gross value added in the local area 	<ul style="list-style-type: none"> • 174 permanent jobs • £285m in gross value added nationally 	<ul style="list-style-type: none"> • 1,740 permanent jobs • £2.85bn in gross value added nationally
Management and Care	<ul style="list-style-type: none"> • 2.3 permanent jobs • £1.6m in gross value added in the local area 	<ul style="list-style-type: none"> • 523 permanent jobs • £366m in gross value added nationally 	<ul style="list-style-type: none"> • 5,230 permanent jobs • £3.66bn in gross value added nationally
High Street Spend ^a	<ul style="list-style-type: none"> • 3.2 permanent jobs on the high street • £2.25m of gross value added to the high street 	Displacement would mean benefits would net off nationally.	Displacement would mean benefits would net off nationally.
Total	<ul style="list-style-type: none"> • 85 construction jobs for the duration of the build • 6.4 permanent jobs • £13m in gross value added in the local area 	<ul style="list-style-type: none"> • 14,820 construction jobs for the duration of the build • 700 permanent jobs • Nearly £2bn in gross value added nationally 	<ul style="list-style-type: none"> • 14,820 construction jobs sustained for 10 years • 7,000 permanent jobs • Nearly £20bn in gross value added nationally, equivalent to 1% of GDP



Boosting local economies through jobs and growth

- A typical retirement development of 45 units could generate over £13m of additional economic activity in a local area, compared to letting a brownfield site lay undeveloped.
- Building 30,000 retirement properties could generate £2bn of economic activity across the country every year, compared to leaving sites undeveloped.
- A typical retirement housing development could also generate 85 additional construction jobs.
- There would also be permanent jobs created in management and maintenance of retirement developments as well as the renovation works and investment that follow moves further down the housing chain.

There has never been a more urgent time for stimulating local economic growth and revitalising our communities. Construction is central to this mission and the Prime Minister has called for an “infrastructure revolution” to “repair and refurbish the fabric of our country”.

The Planning White Paper is intended to help deliver this revolution through modernisation of the planning system and will help to drive up the number of new homes being delivered. The great hope is that a burst of construction will generate the kind of economic growth that this country needs to get back on track from the pandemic. The changes made to the planning algorithm have further evidenced the need to make the most of our brownfield sites.

For local authorities who need to accommodate challenging housebuilding targets but are seeking to protect greenfield sites there is a strong case for factoring specialist retirement properties into these plans.

We already know that this type of housing is largely focused on brownfield land. In fact, c. 97% of Homes for Later Living properties are on brownfield land. We know that it meets a critical need to enable older people to stay in their own homes for longer, thereby reducing health risks and generating significant health and social care savings. And we know that it stimulates both ends of the local housing market, ultimately releasing more for first time buyers.

Now we can also see how retirement housing can boost local economic growth and create jobs. These benefits stem from construction activity, repairs, renovations and onsite management and care jobs including property managers, gardeners, window cleaners among others.

That said, there is no suggestion that specialist retirement housing should come at the expense of new conventional housing in any area. Rather, specialist retirement housing should be built in addition to conventional housing to ensure that we have the diverse housing stock we need, offering choice to potential purchasers and tenants. This will mean that the many benefits brought by specialist retirement housing do not come at the expense of existing housing aimed at families and young people.

The importance of building

Construction of any kind is critically important to economic growth. A site laying undeveloped carries a major opportunity lost. In order to grasp the full extent of this cost, we have modelled out the economic comparison of building Homes for Later Living developments on brownfield sites versus allowing those sites to lay undeveloped.

Our estimates show how construction activity and other factors combine to bring substantial economic benefits. We found that building 30,000 retirement properties a year would add £2bn a year to the UK economy through additional economic activity, partly owing to the specific construction requirements of our properties. It would add 15,000 total construction jobs for the duration of the construction, as well as 700 permanent jobs in the management, renovation, and care work associated with retirement properties and the downstream renovation of properties in the existing housing stock.

Research undertaken on behalf of the CBI as well as research done by FTI Consulting, cited by Shelter, shows that for every pound of capital spent in construction, between £2.09 and £2.80 was returned to the local economy.⁴

If the Government undertook a 10 year programme of building 30,000 retirement properties each year, we could therefore expect to see nearly £20bn added to the UK economy. On top of this would be 15,000 construction jobs sustained over 10 years and 7,000 jobs in the management, renovation and care jobs associated with retirement properties. These include managers, carers, gardeners and others who help to ensure that Homes for Later Living developments are vibrant and happy communities.

Over the lifetime of the 300,000 developments, this would be equivalent to adding nearly 1% to UK GDP, just by building one type of housing at the level of demand that exists for that kind of property.

The benefit of Homes for Later Living versus other developments

Having established the economic benefits of Homes for Later Living developments, the question is: how do these economic benefits compare to those that other residential units can provide to our local communities?

The answer is that Homes for Later Living developments compare favourably to both conventional houses and apartments, with additional economic benefits and additional jobs created, which are derived from multiple factors.

Firstly, the majority of retirement living developments are on brownfield sites near town centres and local transport links, this being a key driver of reduced car use and increased local spend.

Secondly, retirement properties employ additional staff, in management, care and service roles which have been included in the model, as well as bringing in local residents for part-time work like hairdressing for the residents, which has not. The manager is a net additional job compared to conventional houses, as will be the services of a gardener, cleaner and maintenance staff. In some cases, and in all Extra Care developments, there will also be a team of newly appointed on-site carers, as well as caterers and hospitality staff. These benefits are enumerated in the annex.

Thirdly, building retirement properties will free up more second-hand homes than building conventional apartments or houses for open market sale. The effect of this is to increase the number of moves occurring in the existing housing stock. When this happens, the numbers of renovation and repairs are increased. Our previous report, Chain Reaction, showed that older households tend to ‘stay put’ in their family home beyond the age of 65, partly due to the lack of availability of attractive downsizing options. Of course, building high quality retirement properties is one way to ensure that those looking to downsize have more options to choose from.

The construction benefits themselves are also large and derive from the particular specifications and requirements of building retirement properties.

Our modelling shows how retirement properties free up considerably more local homes in the chain of transactions than conventional flats and houses for open market sale. These additional freed up homes will create additional renovation and repair activity. Some of this work will be DIY efforts, but otherwise the use of tradesmen such as decorators, bathroom and kitchen fitters, central heating or window installers will support jobs and generate economic benefits nationally and locally. There may also be additional economic benefits through the local purchase of materials.

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Pegasus Jesmond Assembly - from school site to specialist retirement housing

One current example of a site development is the Pegasus Jesmond Assembly in Newcastle-Upon-Tyne. In July 2016 Central High School for Girls merged with Church High School to become Newcastle High School for Girls. The former school site became vacant in December of that year. A planning application to redevelop the site was submitted and approved by Newcastle City Council in 2018 for 63 much needed homes exclusively for the over 60s in Jesmond. The development is over five floors, with shared communal facilities including a shared landscape deck to the rear, communal lounge and social kitchen. Construction is due to be completed in early 2021, with owners and tenants moving in Spring 2021.

The development was designed by local award winning architects Faulkner Browns, with Tolent appointed as main contractor. Tolent is a local business established in 1983, that has since grown into one of the North East’s largest construction companies. With 20 people employed directly by Tolent on site and a further 26 subcontracts. At any point in time, there are between 100-125 subcontractors on site. 95% of the contractors are local to the Newcastle City Region, employing local labour and providing apprenticeships on site to help train and develop skills for the next generation of construction workers.



Some of the jobs at Homes for Later Living developments

Alongside the construction jobs brought about by the development of specialist retirement properties, there are a host of management, renovation and care jobs associated with Homes for Later Living schemes. For example:

A **House Manager** oversees front of house management, facilities, event coordination and customer service in a typical Homes for Later Living property of 45 units. They help homeowners settle into their new homes and remain on hand to offer help, support and advice as necessary. The House Manager also provides a professional front of house service, welcoming visitors, and helps to maintain a safe, secure, well maintained and pleasant environment.

An **Estate Manager** is a pivotal point in an Extra Care retirement community, leading the care and support and duty management teams and working with colleagues across the wider business to deliver operational requirements. An Estate Manager will have full accountability for the successful day-to-day running of a development and its budget requirements. They will also coordinate and facilitate activities in communal lounges to improve social and physical opportunities for residents.

A **care and support assistant** plays a vital role in empowering our residents to live life to the full through domestic support and housekeeping and personal care, including bathing, dressing, toileting and help with mobility. They may also provide lifestyle services such as chaperoning homeowners to medical appointments, and/or other community related services, or simply offering social support.



A day in the life of one of McCarthy Stone's Estates Managers during the pandemic

Rhona Hill is Estate Manager at the Dairy in Tunbridge Wells, a community of people over 70 who live independently in their own apartments, whether privately owned or rented. She is responsible for the smooth day-to-day running of the community and is the first port of call for the retirees who have made the development their home.

When Covid-19 arrived in the UK last year and the country went into lockdown, life took an unexpected turn for Rhona, her colleagues and residents.

She says: "In my role as an Estates Manager, no two days are ever really the same, especially since the world was turned upside-down in the wake of the Covid-19 outbreak. Since March last year, my day-to-day role has been governed by the needs of the homeowners, whether it is helping them FaceTime loved ones, picking up essentials or just being a friendly face to chat to.

"The biggest challenge here at The Dairy has been fitting everything into one day, it's been a huge team effort and we are lucky enough that we haven't had any Covid-19 cases, a testament to everyone's hard work."

Rhona and the team have dedicated their time to helping homeowners by posting letters and fetching all of their groceries, and they continue to do everything that is needed to minimise the number of trips homeowners feel they need to make outside of the development to help keep them safe.

"We were lucky enough to be able to host a range of socially distanced outdoor activities over the summer months, with homeowners enjoying live performances from local musicians, sweet treats and coffee in the gardens as well as themed quizzes delivered through their doors," she says.

Speaking of her enjoyment for her role, Rhona says it is especially rewarding to be able to take the hard work away from the homeowners and support them to lead their independent lives. "Usually within six months of moving-in to The Dairy, the homeowners blossom into what I can only describe as what they would have been like ten years prior - relaxed, happy and full of life. It's a joy to witness," she says.

Rhona adds: "The support that both the team and the homeowners have received from McCarthy Stone has been second to none. McCarthy Stone have sent magazines to the development for the homeowners to enjoy, hosted virtual talks, a chess club and created quiz and puzzle sheets to keep everyone entertained. As employers, they have been phenomenal. The team and I have been constantly informed and kept up-to-date and they have ensured that all of the staff feel appreciated and supported through this difficult time."



CHAPTER 2

Reviving the high street

- **Homes for Later Living Developments are typically located on or close to high streets, ensuring the residents have easy access to local shops and services.**
- **On average, 63% of residents' annual expenditure is in local shops. This is much higher than the average local spend by 80+ year olds in the general population.**
- **The residents of a typical 45-unit retirement development generate £550,000 of spending per year, £347,000 of which goes to local shops, supporting retail jobs and keeping shops open.**
- **Assuming a shop has an owner and two full time equivalent employees, one Homes for Later Living development would support one shop on the high street.**

Retirement properties can have a further positive impact on the local economy through the purchasing power of Homes for Later Living residents, also known as the 'grey pound' effect. This spending by older people can help maintain outlets from the newsagents and the butchers to the flower shop and the local cafe - in other words the shops and community spaces which make up the heart of local communities.

In this section of the report we look specifically at the high street benefits. Other reports have included other local spending benefits like those on local contractors like window cleaners and gardeners. We include those benefits as part of our management and care figures.

We know that there is an increased likelihood of older residents spending their money locally, as opposed to nationally or online. And this is especially the case with residents of Homes for Later Living developments which tend to be brownfield sites in urban locations close to town centres or high streets where there are clusters of local shops and services, which will most likely also be already familiar to older residents but will benefit from the new-found immediate proximity.

Previous research found that people in a McCarthy Stone development regularly use shops and local facilities. The study for Henley Business School found that 80% of the residents used the shops almost daily or often; over 40% used the library or post office almost daily or often. In the schemes, owners were asked about the extent to which they used local services and facilities in their current home. More than three-quarters (78%) said that they used local shops at least once a week; and around 90% used local shops and/or supermarkets more than once a month. Other local services were also used regularly by residents, with around a quarter using services such as local taxis, hairdressers, pubs, cafes and restaurants more than once a week.⁵

In order to get an idea of how much residents of specialist retirement properties spend on retail items compared to residents of other housing developments, we started by looking at ONS figures for average annual spending by households by household age band. These show that people aged 75 and over spend an annual average of £13,354 – whilst this is not surprisingly a little less than other age brackets how it is spent is of greater significance. Our polling evidence suggests that over 80 year olds in the general population spend 45% of their money in local shops - similar to 35-64 year olds. But we should not assume the residents of retirement properties fall into line with all older people when it comes to spending habits. Indeed, our survey of residents tells a very different story.

Through our polling, we found that Homes for Later Living residents actually spend on average 63% of their money in local shops. This is much higher than the average local spend by 80+ year olds in the general population. This can be explained by residents' close proximity to local shops, meaning that car journeys out of town often become unnecessary.

Using 'propensities to spend locally' we can apportion spending figures to households in alternative housing developments to get the aggregate spending in local shops and cafes. Were there to be other homes in the place of a Homes for Later Living development, it is difficult to ascertain whether this 'proximity' effect would have quite the same influence on the local spending propensity of younger households that would be living there. Therefore we have assumed two possibilities. The first is that younger household local spending propensities remain the same as the general population of the same age. The second is that they rise proportionately to the increase seen for Homes for Later Living residents.

Through our modelling, we can see that building retirement properties can be hugely beneficial to local high streets when co-located amongst shops, services and transport connections. The residents of a typical retirement development generate over £553,250 of spending per year. By our residents' survey, and based on where the residents were spending before moving into retirement properties, our modelling shows that just under 63% - or £347,441 - of this will be spent on the local high street every year. This amounts to £224,176 that previously was not spent on the local high street.

Our modelling estimates that for every one retirement housing development created in a local authority it has the potential to support more than 3 local retail jobs. Assuming that a small shop has 3 full time equivalent workers (possibly the owner and two employees) this is equivalent to each retirement property keeping one shop open on the high street. Over the lifespan of each development this is more than £2m of gross value added to each local high street versus building nothing. It is an additional £600,000 over using the same land to build conventional houses.

Finally, it is worth highlighting that unlike the construction impacts considered previously, these are 'ongoing effects' occurring through regular spending in shops in cafes each week over a 60-year period, which is how this report measures the lifespan of a development.

Greening communities

- **With c. 97% of developments on brownfield sites, building Homes for Later Living properties helps to safeguard green field land.**
- **Many retirement developments are on the cutting edge of energy-efficiency and green generation.**
- **Younger families moving into vacated properties likely induce energy efficient renovations down the chain creating better energy efficiency across the market.**
- **We estimate that building one retirement development of 45 units takes up to 15 cars off the roads.**

Homes for Later Living properties do not just bring economic benefits to communities. Both the developments and the residents that live in them can bring a number of environmental benefits.

We have already noted that the vast majority of sites used for Homes for Later Living are previously developed brownfield land. Whether that is a former garage, an old police station or surplus municipal building, this means that retirement developments often contribute to saving green fields and reducing green belt encroachment across the UK.

Land near retirement properties can also benefit as developers take steps to create habitats that will benefit local wildlife and enhance an area's appearance for local people to enjoy. This is the case in Thame, Oxfordshire, where Churchill Retirement Living has teamed up with a local environmental group on plans to create a new bio-diverse area of land opposite a new development. Prompted by support for principles embraced in the 'Thame Green Living plan', there are plans to sensitively landscape and plant the area with a variety of native trees, shrubs and flowers.

Inside Homes for Later Living developments, apartments typically include electric hobs and electric heating, pre-empting the Government's forthcoming move away from gas boilers. Many properties, including 50% of McCarthy Stone developments, now have smart meters installed, encouraging more efficient energy consumption. This both reduces carbon in the environment and also saves money for our residents.

Homes for Later Living EPC ratings are largely in line with the new build average (EPC band B), making them more energy-efficient than the UK-wide average (EPC band D). We also know that long time residents are less likely to upgrade their homes, and so residents moving into Homes for Later Living are likely to induce higher energy efficiency in properties down the chain.

As the Government aims to reach net zero carbon emissions by 2050, all Homes for Later Living developers are committed to playing their part by exploring new, efficient and sustainable systems. For example, Churchill Retirement Living properties are pioneering use of air and ground source renewable heat pump technology, which reduces energy bills and cuts CO₂ emissions by as much as 75%.

Alongside measures to promote low energy usage, a number of developments have car club partnerships with rental firms to reduce car usage. Some developments now have electric car charging points and this is something we fully expect to see more with sales of new petrol and diesel cars to end in the UK by 2030.

Already, Homes for Later Living residents are helping to reduce levels of pollution and carbon output in the local community by driving less. Instead of getting in the car, the location of most developments means that shops and high streets can be reached on foot. For when desired destinations are not in easy walking distance, many schemes are also on bus routes.

Going by our resident polling, we can see that half of those still driving say that they drive less than they did before moving. Nearly half of those who don't drive have given up because of moving to a retirement property.

Broadly, Homes for Later Living residents are a third less likely to drive - 51% vs 77%. This reduced likelihood of driving can almost wholly be attributed to those saying that moving to a Homes for Later Living property meant that they chose to give up driving.

Looking at self-reported driving among our residents, our analysis suggests that building 45 Homes for Later Living properties could take up to 15 cars off the roads who would otherwise drive a collective roughly 1,800 miles a week.

It is critical to note that these benefits do not come at the expense of residents' independence. Rather, residents are likely more mobile because of the proximity of our properties to local high streets and shops. Our residents also show wellbeing scores consistent with people 10 years younger than them in the general population.

Car Clubs - helping residents to rent electric and hybrid vehicles

People living in selected McCarthy Stone developments have been taking to the road following the introduction of an innovative 'pay as you go' Car Club initiative.

In partnership with Enterprise, McCarthy Stone has provided residents with access to a dedicated all-electric vehicle, which is available to rent for anything from 30 minutes to a couple of days – meaning residents can make short journeys to the shops and enjoy days out or even weekends away.

The scheme is aimed at retirees who don't want to give-up driving for good but are looking for an alternative to the responsibility and hassle of having to maintain their own vehicle. But the use of electric and hybrid vehicles across McCarthy Stone's fleet of Enterprise cars does not just benefit residents who want to get behind the wheel.

With electric vehicles having 43% less carbon emissions compared to the average UK car, as the programme expands it is set to have environmental benefits for many local areas. Furthermore, Car Clubs have been shown to lead to a reduction in car ownership among members, as well as a reduction in car usage in the 12 months after becoming a member.

Ground source renewable heat pump technology

At Churchill Retirement Living's Lewis Carroll Lodge in Cheltenham, residents have been making the most of the developer's pioneering use of ground source renewable heat pump technology.

Each apartment and all the communal areas at the Lodge have heating and hot water provided via the communal ground source heat pump. Designed and installed by sustainable energy company 'The Renewable Design Company', the pump system extracts heat directly from the earth to provide heating and hot water to residents.

The heat extracted from the earth is four times greater than the energy used by the process making it the most efficient heating solution for both cost and carbon emissions. At Lewis Carroll Lodge, the ground source heat pumps produce 33 tonnes of CO₂ per year to heat residents' apartments and to supply hot water compared to 134 tonnes of CO₂ per year generated by an electric heating system - a 75% reduction in CO₂ emissions.

On a recent visit, Cheltenham MP Alex Chalk (pictured) praised what he had seen as a "great example of sustainable, low carbon, development".

John and Doreen Pitt moved to Lewis Carroll Lodge last year and have been enjoying the benefits of a warm and cosy environment since then. "We think it's absolutely marvellous," says John. "The whole building is so nice and warm all the time that we've hardly had to use the heating inside our apartment.

"When we do turn it up a notch or two it's nice to know we don't have to worry about the cost or the environmental impact, as it's all so energy efficient and covered within our annual service."



Conclusion and recommendations

There is no doubt we need more housing of all types.

There is no doubt we need more housing for older people - we have an ageing population with increasing housing needs. It is estimated that 90% of the household growth until 2050 will be among our over 65 population. As a result, we have to build more suitable housing to cater for their specific needs.

Homes for Later Living has lacked priority in new housebuilding over many years. However this report shows that building more housing for older people will not only address the existing shortfall, it will do more than any other type of residential development to support local jobs, businesses and High Streets. It will also help improve the environmental footprint of a local area.

This is in addition to the clear socio-economic benefits identified in earlier reports which found that:

- On a selection of national well-being criteria such as happiness and life satisfaction, an average person aged 80 feels as good as someone 10 years younger after moving from mainstream housing to housing specially designed for later living.
- Each person living in a Homes for Later Living property enjoys a reduced risk of health challenges, contributing to fiscal savings to the NHS and social care services of approximately £3,500 per year.
- Roughly two in every three retirement properties built releases a home suitable for a first-time buyer. A typical Homes for Later Living development which consists of 40 apartments therefore results in at least 27 first time buyer properties being released onto the market.

Given that 1 in 4 over 65s want to downsize and in so doing will play their part in unlocking these benefits to society it only remains for Government, councils and house builders to play their part in making it possible. For this to happen we are calling for:

1. A commitment to building 10% of the Government's national house building target as retirement properties.

Having committed to building 300,000 new homes a year by the middle of this decade, ministers must now ensure that the right homes get built. With an ageing population, it no longer makes sense to focus almost exclusively on first-time buyers. We will need homes of different tenures to meet different demands.

We are therefore urging ministers to commit to building 30,000 retirement properties a year in England. This would be a tenth of the existing national target and would cater for the increased demand for quality homes among our ageing population. It would also be additional, and not in place of, existing supply. This is a target which is undeniably necessary – over the next decade 50% of the growth in the number of households will be amongst the over 80s.⁶ It is also a target which is realistic and acceptable to existing local communities.

2. All local plans have to include specific targets for approving Homes for Later Living.

Over 65 households will make up 90% of the household growth of the UK. We also know that 25% of this group want to downsize but many do not end up moving, causing a bottleneck at the top of the housing market.

All local authorities should be responding to the growing need for more suitable housing for older people in their local plans. To ensure that this is the case, the Government should require that local plans include an objectively assessed look at the need for types of housing by demographic, and that local authorities commit to building for this level of need.

Of course, no government can afford to ignore the many problems faced by the younger generation when it comes to housing. But as the UK gets older, action is urgently needed to ensure that all older people can live in suitable accommodation where they will experience healthy and happy retirements. Looking at the latest ONS household projections, we expect that the 3.9 million homes owned by those aged 65 and over today will grow to at least five million by 2030.

In this report, we have mapped a route for achieving both of these outcomes simultaneously. In doing so, we have demonstrated that helping more people to move into homes for later living would be a win-win for those politicians who are genuinely interested in bridging the growing generational divide.



Annex

The additional benefits of building specialist retirement properties versus building a conventional housing development on the same site:

Conventional housing developments are developments of family sized homes. There would be approximately 13 family sized homes on the same size development as 45 retirement properties.

	45 apartments – i.e. the benefits of 1 Homes for Later Living Development	30,000 apartments – i.e. one year of national building, 10% of the new homes target and the current level of demand	300,000 apartments – i.e. 10 years of national building
Construction	<ul style="list-style-type: none"> • 46 jobs for the duration of the build • £4.2m of gross value added in the local area 	<ul style="list-style-type: none"> • 8163 jobs for the duration of the build • £737m in additional economic activity 	<ul style="list-style-type: none"> • 8163 jobs sustained for 10 years • £7.4bn in additional economic activity
Repairs and Renovations	<ul style="list-style-type: none"> • 1 permanent job • £1.6m of gross value added in the local area 	<ul style="list-style-type: none"> • 174 permanent jobs • £285m in additional economic activity 	<ul style="list-style-type: none"> • 1740 permanent jobs • £2.9bn in additional economic activity
Management and Care	<ul style="list-style-type: none"> • 2.3 permanent jobs • 1.6m of gross value added in the local area 	<ul style="list-style-type: none"> • 523 permanent jobs • £366m of gross value added in the local area 	<ul style="list-style-type: none"> • 5230 permanent jobs • £3.7bn of gross value added in the local area
High Street Spend	<ul style="list-style-type: none"> • 2.3 permanent jobs on the high street • £1.6m of additional spend on the high street 	Displacement would mean benefits would net off nationally.	Displacement would mean benefits would net off nationally.
Total	<ul style="list-style-type: none"> • 46 construction jobs for the duration of the build • 5.4 permanent jobs • £9m of gross value added in the local area 	<ul style="list-style-type: none"> • 8163 construction jobs for the duration of the build • 700 permanent jobs • £1.4bn in additional economic activity 	<ul style="list-style-type: none"> • 8163 construction jobs sustained for 10 years • 7000 permanent jobs • £14bn in additional economic activity

The additional benefits of building retirement properties versus building a conventional block of flats on the same site:

Conventional apartments are suitable for first time buyers and there would be 31 first time buyer flats on the same size site as a retirement development.

	45 apartments – i.e. the benefits of 1 typical Homes for Later Living development	30,000 apartments – i.e. one year of national building, 10% of the new homes target and the current level of demand	300,000 apartments – i.e. 10 years of national building
Construction	<ul style="list-style-type: none"> • 30 jobs for the duration of the build • £2.7m of gross value added in the local area 	<ul style="list-style-type: none"> • 5231 jobs for the duration of the build • £476m of additional gross value added nationally 	<ul style="list-style-type: none"> • 5231 jobs sustained for 10 years • £4.8bn of additional gross value added nationally
Repairs and Renovations	<ul style="list-style-type: none"> • 1 permanent job • £1.6m of gross value added in the local area 	<ul style="list-style-type: none"> • 166 permanent jobs • £277.4 of additional gross value added nationally 	<ul style="list-style-type: none"> • 1,660 permanent jobs • £2.8bn of additional gross value added nationally
Management and Care	<ul style="list-style-type: none"> • 2.25 permanent jobs • 1.6m of gross value added in the local area 	<ul style="list-style-type: none"> • 523 permanent jobs • £366m of gross value added nationally 	<ul style="list-style-type: none"> • 5230 permanent jobs • £3.6bn of additional gross value added nationally
High Street Spend	Negligible	Displacement would mean benefits would net off nationally	Displacement would mean benefits would net off nationally
Total	<ul style="list-style-type: none"> • 30 construction jobs sustained over the duration of the build • 3 permanent jobs • £5.8m of additional gross value added in the local area 	<ul style="list-style-type: none"> • 5231 construction jobs for the duration of the build • 689 permanent jobs • £1.1bn of additional gross value added nationally 	<ul style="list-style-type: none"> • 5231 construction jobs sustained for 10 years • 6890 permanent jobs • £11.2bn of gross value added nationally

Retirement Living and Extra Care developments:

Some developments are Retirement Living only properties and some are Extra Care properties which have additional care associated with them. The models for the benefits of a single one of these developments are below as well as the comparison, where appropriate, to the general model. An Extra Care development directly employs c. 17 people. A single Retirement Living development directly employs c. 1 person. The below numbers are net additional jobs in the local community resulting from the development of either a standard Retirement Living development and an Extra Care development versus a series of counterfactuals.

Construction activity local GVA & jobs, per 45 RL or RL+ homes developed

	Additional local GVA			Additional local jobs			Duration of jobs
	v std flats	v std houses	v fallow	v std flats	v std houses	v fallow	
RL	+£2.4m	+£3.87m	+£7.29m	+27	+43	+81	1 year
RL+	+£3.9m	+£5.4m	+£8.8m	+43	+60	+98	
RL:RL+ 80:20 (General model)	+£2.7m	+£4.2m	+£7.6m	+39	+46	+85	

Renovation & repair activity GVA & jobs, per 45 RL or RL+ homes developed

	Additional local GVA			Additional local jobs			Duration of jobs
	v std flats	v std houses	v fallow	v std flats	v std houses	v fallow	
All	+£1.6m	+£1.6m	+£1.6m	+1	+1	+1	Permanent

Retail spending activity local GVA & jobs, per 45 RL or RL+ homes developed

	Additional local GVA			Additional local jobs			Duration of jobs
	v std flats	v std houses	v fallow	v std flats	v std houses	v fallow	
All	0	+£1.6m	+£2.25m	0	+2.3	+3.2	Permanent

Management / social care activity local GVA & jobs, per 100 RL or RL+ homes developed

	Additional local GVA			Additional local jobs			Duration of jobs
	v std flats	v std houses	v fallow	v std flats	v std houses	v fallow	
RL	+£1m	+£1m	+£1m	+1	+1	+1	Permanent
RL+	+£3.7m	+£3.7m	+£3.7m	+8	+8	+8	
RL:RL+ 80:20 (General model)	+£1.6m	+£1.6m	+£1.6m	+2.3	+2.3	+2.3	

Endnotes

- 1 This is for an 80:20 Retirement Living / Extra Care development. Extra Care developments (also known as Retirement Living Plus developments) typically "net add" around 12 permanent jobs to the local community. Extra care developments employ c 17 people directly. The lifetime of a development is cited as 60 years in line with best practice.
- 2 Knight Frank, 'Retirement housing 2016' https://www.housinglin.org.uk/_assets/Resources/Housing/OtherOrganisation/KF_Retirement_Housing_2016.pdf
- 3 Some spending benefits could fit across multiple buckets. For example, a study by the Institute of Public Care in 2014 for McCarthy Stone includes different benefits in its retail spend that we have included in our Management and Care numbers which makes up the vast majority of the difference between these two figures
- 4 CBI (2012). Bridging the gap: backing the construction industry to generate jobs; and Shelter (2010) Research: briefing: Housing Investment: Part 1. Available at: http://england.shelter.org.uk/_data/assets/pdf_file/0008/276668/Briefing_Housing_Investment_Part_1.pdf
- 5 Ball, M (2011), Housing markets and independence in old age: expanding the opportunities
- 6 ONS Household Projections (2016-based)



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