

<b>Rep ID:</b> Malmes1	
<b>Consultee code:</b> General Public	<b>Consultee Organisation (if applicable):</b> None
<b>Is this response on behalf of someone else/another organisation?</b> No	
<b>Organisation being represented (if applicable):</b>	
<b>Does this representation refer to attachment(s):</b> no	<b>If this representation refers to attachment(s), these are listed below:</b>
<b>MM1. What do you think to the scale of growth? Should there be a brownfield target?</b>	
The target described above seems adequate	
<b>MM2. Are these the right priorities? What priorities may be missing? How might these place shaping priorities be achieved?</b>	
These seem ok	
<b>MM3. Is this the right pool of potential development sites?</b>	

No. Area 4 may be appropriate. Not sure why are 1 is so big; The Worthies should be protected. 5 & 3 are next to flood planes. 2 is conservation area and development here doesn't really make any sense

**MM4. What land do you think is the most appropriate upon which to build?**

Probably 4 on the condition that local infrastructure really is upgraded appropriately

**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 sites?**

The layout, space available for parking and road sizes in the Town Centre were determined centuries ago and cannot be upgraded. Unless pedestrian/cycle paths connecting new developments (and recent developments) to the town centre are properly implemented, the Town as a whole will be dysfunctional

**MM6. Are there any issues or infrastructure requirements that should be identified?**

Convenience stores and hospitality destinations (pubs, restaurants) in easy walking distance of any new development

**Further comments**

None

**Rep ID:** Malmes2

**Consultee code:** General Public

**Consultee Organisation (if applicable):**

**Is this response on behalf of someone else/another organisation?** No

**Organisation being represented (if applicable):**

**Does this representation refer to attachment(s):**  
no

**If this representation refers to attachment(s), these are listed below:**

**MM1. What do you think to the scale of growth? Should there be a brownfield target?**

Malmesbury cannot cope with any additional housing . The local infrastructure would put a strain on the medical centre , schools who are Already stretched . There will also be environmental factors of pollution within the house with more cars causing the air quality to be poorer .

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

No , malmesbury does not need more housing we need to maintain our green spaces

**MM3. Is this the right pool of potential development sites?**

No , some areas selected flood and you do not have facilities to cope with more developments .  
By building more homes we also bring social and economic issues to the town which we no longer need as managing these issue on a smaller scale currently

**MM4. What land do you think is the most appropriate upon which to build?**

None

**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 sites?**

As I have stated above , roads are not designed for the high volume of traffic or the population . Already limited places at an outstanding school , medical care will be comprised as already itnis hard to ovarian appointments .

**MM6. Are there any issues or infrastructure requirements that should be identified?**

We cannot later the big street or space of roads in town , the town cannot cope on any scale with any more housing

**Further comments**

<b>Rep ID:</b> Malmes3	
<b>Consultee code:</b> Statutory Body	<b>Consultee Organisation (if applicable):</b> Sport England
<b>Is this response on behalf of someone else/another organisation?</b> No	
<b>Organisation being represented (if applicable):</b>	
<b>Does this representation refer to attachment(s):</b> no	<b>If this representation refers to attachment(s), these are listed below:</b>
<b>MM1. What do you think to the scale of growth? Should there be a brownfield target?</b>	
No comment	
<b>MM2. Are these the right priorities? What priorities may be missing? How might these place shaping priorities be achieved?</b>	
Creation of a healthy, inclusive sustainable town. this can be done in part through the use of 'Sport England and Public Health England' Active Design: <a href="https://www.sportengland.org/how-we-can-help/facilities-and-planning/design-and-cost-guidance/active-design">https://www.sportengland.org/how-we-can-help/facilities-and-planning/design-and-cost-guidance/active-design</a> when designing new housing and in environmental improvements	

**MM3. Is this the right pool of potential development sites?**

No - Sport England will be submitting a Statutory objection to the redevelopment of the cricket ground unless the cricket is replaced prior to the redevelopment. I would refer to the Wiltshire playing Pitch Strategy (including updates) Any re-provision should not be on a flood plain. We will wish to attend the EIP to make representations. Also consideration needs to be given to possible ball strike. I would draw your attention to the East Meon CC v Hants DC case.

**MM4. What land do you think is the most appropriate upon which to build?**

Non Sports Land

**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 sites?**

Yes see above

**MM6. Are there any issues or infrastructure requirements that should be identified?**

No

**Further comments**

No

<b>Rep ID:</b> Malmes4	
<b>Consultee code:</b> Other Advisory Bodies	<b>Consultee Organisation (if applicable):</b> Malmesbury Civic Trust
<b>Is this response on behalf of someone else/another organisation?</b> No	
<b>Organisation being represented (if applicable):</b>	
<b>Does this representation refer to attachment(s):</b> no	<b>If this representation refers to attachment(s), these are listed below:</b>
<b>MM1. What do you think to the scale of growth? Should there be a brownfield target?</b>	
The allocation is reasonable. To the best of local knowledge, there are no brownfield sites available.	
<b>MM2. Are these the right priorities? What priorities may be missing? How might these place shaping priorities be achieved?</b>	
Malmesbury has peculiar - possibly unique - spacial issues in that its historic core is an ancient hill-fort on a steep headland and modern development has resulted in a comet-shaped town with the ancient centre as the head and residential areas as the tail to north and west. Ribbon developments in the 20thC have cut off access to otherwise attractive sites. "Place Shaping" requires detailed local knowledge and aspirations to avoid recent planning mistakes.	

**MM3. Is this the right pool of potential development sites?**

Some sites are unsuitable, see question 4.

**MM4. What land do you think is the most appropriate upon which to build?**

Site 1 should be considered as two separate parts, divided north and south along the line of "Reeds Farm Road" from Stainsbridge to Whychurch Farm that was proposed in the 1990s but never executed. It would provide a valuable relief road to reduce Town Centre congestion. North of that line is worth developing, being adjacent to current proposed housing. South of the line is an area traditionally regarded as a "green lung" for recreation and should be reserved for that purpose.

Site 2, while seemingly close to the town centre, is cut off by the river and water meadows and accessible only from the busy A429. Not recommended.

Site 3 is the Caravan Park, a valuable asset for tourism which is a potential growth prospect for this historic tow. Leave well alone.

Site 4. Possible. High ground free from flood risk. Access from B4040. Downside: adjacent to AONB.

Site 5 Floods! Also, bad impact on wildlife. Major objections current on planning applications.

**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 sites?**

Covered by above comments.

**MM6. Are there any issues or infrastructure requirements that should be identified?**

**Further comments**



<b>Rep ID:</b> Malmes5	
<b>Consultee code:</b> General Public	<b>Consultee Organisation (if applicable):</b>
<b>Is this response on behalf of someone else/another organisation?</b> No	
<b>Organisation being represented (if applicable):</b>	
<b>Does this representation refer to attachment(s):</b> no	<b>If this representation refers to attachment(s), these are listed below:</b>
<b>MM1. What do you think to the scale of growth? Should there be a brownfield target?</b>	
<p>The scale of growth according to the sites selected is too large. Malmesbury is a very small market town that has already been enlarge significantly, and cannot successfully incorporate such a scale of growth.  How can it be said that there is enough employment land? There are very few jobs in Malmesbury, most people work elsewhere.  New development needs to include employment locally, to reduce commuting.</p>	
<b>MM2. Are these the right priorities? What priorities may be missing? How might these place shaping priorities be achieved?</b>	
These look good priorities in writing. Where is the action?	

Where is the priority for access to green space? Malmesbury has very little access to green space for the size of the town. This pandemic has proved that people need access to green space - not just streets and houses, and not just tidy, mown parks. Malmesbury doesn't have enough infrastructure now - eg there are not enough primary school places in the town for all the children in the town. This must be addressed before even more houses are built.

Malmesbury doesn't have enough jobs now, most people work elsewhere. What is being done to create local jobs - and not just minimum wage ones?

Plan needs to attract new businesses to the town centre, not just encourage spending. Town Centre would be much nicer pedestrianised - but with adequate parking.

Malmesbury's "local needs" are not as big as the development suggested.

### **MM3. Is this the right pool of potential development sites?**

If all these sites are developed, the scale is too fast. Malmesbury isn't big enough to assimilate all this extra development in a short space of time.

Site 1 is huge. Malmesbury does not require this level of development. Site 1 includes the cricket pitch - is the town to be denied its cricket pitch? The southern end of Site 1 is very steep. Site 1 has lots of public footpaths and is used as green access - this needs to be replaced with alternative green access if it's developed.

I believe Site 5 is subject to flooding although not shown as such on map. Flooding this year covered more land than shown on the map.

Site 2 seems to include Waitrose, which has already been developed.

It would seem to me to make sense to consider the land to the north of the river, north of Site 5, as that is adjacent to development land.

### **MM4. What land do you think is the most appropriate upon which to build?**

Probably Site 2 as employment land - but not a warehouse. More employment is needed.

A new primary school is definitely needed - before any more houses are built.

**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 sites?**

Yes. The needs of the people of Malmesbury for access to green space has been completely overlooked. Site 1 is very well used as it has lots of footpaths. Building more houses increases the need for access to green space, but there is nothing in the planning priorities to do anything about that need.

**MM6. Are there any issues or infrastructure requirements that should be identified?**

Access to green space.  
Employment - especially green employment.  
Where is the plan to create a community? This is all about creating buildings, whereas people need to feel part of a community - and it doesn't just "happen".

**Further comments**

The scale of proposed development is too much - Malmesbury does not require that scale of development.

<b>Rep ID:</b> Malmes6	
<b>Consultee code:</b> General Public	<b>Consultee Organisation (if applicable):</b>
<b>Is this response on behalf of someone else/another organisation?</b> No	
<b>Organisation being represented (if applicable):</b>	
<b>Does this representation refer to attachment(s):</b> no	<b>If this representation refers to attachment(s), these are listed below:</b>
<b>MM1. What do you think to the scale of growth? Should there be a brownfield target?</b>	
Brownfield sites should be prioritised over greenfield sites as the infrastructure is usually in place already. However, reducing all targets (both green and brown) is preferable, enabling brownfield sites to be converted back to more environmentally friendly use of land, and greenfields sites to be left as they are.	
<b>MM2. Are these the right priorities? What priorities may be missing? How might these place shaping priorities be achieved?</b>	
Malmesbury is a market town with a community feel, built and grown reflecting local topography and geography. Developing space to encourage visitors to enjoy its natural beauty is surely preferable to simply building more houses on green and brown field sites. Developing brownfield sites into park and ride or cycle hire locations may attract more investment into the town.	

**MM3. Is this the right pool of potential development sites?**

Very small development parcels of land which reduce impact on the environment are preferable to large scale development which potentially creates new communities rather than building and using established communities. Site 1 is therefore not an option to be considered.

**MM4. What land do you think is the most appropriate upon which to build?**

In order: (and only if there are no options to halt housing build! )  
Site 4,5,2,3,1

**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 sites?**

Large sites (site 1) will effectively create a new community, rather than building on an established community. Culturally this is not healthy for the town.

**MM6. Are there any issues or infrastructure requirements that should be identified?**

**Further comments**

Please do not over develop Malmesbury and change it's community character, or ruin its natural beauty. Protect its small town feel, and consider only ways to re use brownfield sites without ruining any additional green field sites. The pandemic has taught us the value of green outside space, and the benefit that this has on our well being - lets preserve what we have already.

<b>Rep ID:</b> Malmes7	
<b>Consultee code:</b> General Public	<b>Consultee Organisation (if applicable):</b> Resident and Business Owner
<b>Is this response on behalf of someone else/another organisation?</b> No	
<b>Organisation being represented (if applicable):</b>	
<b>Does this representation refer to attachment(s):</b> no	<b>If this representation refers to attachment(s), these are listed below:</b>
<b>MM1. What do you think to the scale of growth? Should there be a brownfield target?</b>	
No not required	
<b>MM2. Are these the right priorities? What priorities may be missing? How might these place shaping priorities be achieved?</b>	
We already have a good diversity of different housing her and a furthe 290 houses to be built no more are required, I think we already addressing number 3	

**MM3. Is this the right pool of potential development sites?**

Absolutely not - site number one provides a wonderful open view, walking area to appreciate the whole town this would be ruined if developed. The static caravan site again no this is a wonderful well used site where people live already and touring caravans use in the summer months again would lose beautiful countryside if developed. Unsure about site 2, 4 and 5

**MM4. What land do you think is the most appropriate upon which to build?**

I'm sure land has already been allocated for the 290 houses we have to accept are to be built as per our neighbourhood plan

**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 sites?**

Our town is big enough already we have a great community atmosphere as proven during the recent epidemic, we are a very caring community, our schools are full already, car parks full, we do not need further development

**MM6. Are there any issues or infrastructure requirements that should be identified?**

Roads congested, schools full - ancient historic town does not need further housing pressure and traffic congestion

**Further comments**

Please leave our beautiful town alone, we have been through the Neighbourhood Plan agreed allocated development areas, the housing companies are now being greedy without paying any attention to the community needs, schools full, car parks full, roads congested, we need to protect our sense of community here in our beautiful historic town.

**Rep ID:** Malmes8

**Consultee code:** General Public

**Consultee Organisation (if applicable):**

**Is this response on behalf of someone else/another organisation?** No

**Organisation being represented (if applicable):**

**Does this representation refer to attachment(s):**  
no

**If this representation refers to attachment(s), these are listed below:**

**MM1. What do you think to the scale of growth? Should there be a brownfield target?**

Far to great

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

**MM3. Is this the right pool of potential development sites?**



No

**MM4. What land do you think is the most appropriate upon which to build?**

Some where there is no flooding

**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 sites?**

Schools , doctors , increase of traffic

**MM6. Are there any issues or infrastructure requirements that should be identified?**

**Further comments**

Park Road Development is totally not suitable as it regularly floods , and is far too narrow , there is always traffic congestion in the Build Base area as lorries are parked in the road for loading and unloading ,the local school cannot take any more and local residence have to transport their children to Sherston.

<b>Rep ID:</b> Malmes9	
<b>Consultee code:</b> General Public	<b>Consultee Organisation (if applicable):</b> Resident
<b>Is this response on behalf of someone else/another organisation?</b> No	
<b>Organisation being represented (if applicable):</b>	
<b>Does this representation refer to attachment(s):</b> no	<b>If this representation refers to attachment(s), these are listed below:</b>
<b>MM1. What do you think to the scale of growth? Should there be a brownfield target?</b>	
It is very sad that malmesbury is becoming all houses. We really need to keep our countryside. We don't always need more housing we need to think of the wildlife and country walks that we all need.	
<b>MM2. Are these the right priorities? What priorities may be missing? How might these place shaping priorities be achieved?</b>	
To meet local needs we need to bring back our lovely high street. Shops are closing rapidly with the pandemic and it's becoming a ghost town. I have lived in malmesbury all of my life and feel privileged to live here. I do understand we need housing but with dyson making 900 redundant the economy is struggling. Let's concentrate more on our lovely town/high street.	

**MM3. Is this the right pool of potential development sites?**

I'm not sure I think it should be up by Filands.

**MM4. What land do you think is the most appropriate upon which to build?**

Filands.

**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 sites?**

We really more things for the younger generation

**MM6. Are there any issues or infrastructure requirements that should be identified?**

More things for the younger generation. We should never have got rid of our pool. We need an outdoor skate park

**Further comments**

Bring back a buzzing town open the shops reduce the rents so they can come back

<b>Rep ID:</b> Malmes10	
<b>Consultee code:</b> General Public	<b>Consultee Organisation (if applicable):</b> None
<b>Is this response on behalf of someone else/another organisation?</b> No	
<b>Organisation being represented (if applicable):</b>	
<b>Does this representation refer to attachment(s):</b> no	<b>If this representation refers to attachment(s), these are listed below:</b>
<b>MM1. What do you think to the scale of growth? Should there be a brownfield target?</b>	
Malmesbury appears to have taken its fair share of new homes to date with more on the way. If houses are to be built surely brownfield sites are the way forward.	
<b>MM2. Are these the right priorities? What priorities may be missing? How might these place shaping priorities be achieved?</b>	
Investment in the town centre, making life easy for business and customers alike. Keeping the town and surrounds attractive, protecting green space.	

**MM3. Is this the right pool of potential development sites?**

It seems excessive?

**MM4. What land do you think is the most appropriate upon which to build?**

Malmesbury has already been developed. My preference is for protecting the town from further development.

**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 sites?**

Antisocial behaviour appears to be getting worse in the town. Possibly somewhere for the young to go, off the streets.

**MM6. Are there any issues or infrastructure requirements that should be identified?**

Youth facilities to stop antisocial gatherings

**Further comments**

<b>Rep ID:</b> Malmes11	
<b>Consultee code:</b> General Public	<b>Consultee Organisation (if applicable):</b> Resident
<b>Is this response on behalf of someone else/another organisation?</b> No	
<b>Organisation being represented (if applicable):</b>	
<b>Does this representation refer to attachment(s):</b> no	<b>If this representation refers to attachment(s), these are listed below:</b>
<b>MM1. What do you think to the scale of growth? Should there be a brownfield target?</b>	
I think this figure is too high. Malmesbury is surrounded by greenfield, this should not be used for house building, regardless of this strategy figure.. Brownfield should be targeted, if there is any available	
<b>MM2. Are these the right priorities? What priorities may be missing? How might these place shaping priorities be achieved?</b>	
I feel that genuine affordable social housing is needed most. It is in short supply. Following that genuinely affordable small homes, not 4 plus bedroom homes, of good quality, for the younger people of malmesbury to be able to buy. I don't know about the economic growth of the town, but I think that with 2 out of the town supermarkets malmesbury certainly doesn't need any more. The doctors surgery/ primary health care centre is already extremely busy and the schools are too. With	

more houses and residents these would both surely need to have capacity increased. I don't think that the town centre, with its narrow streets can take much more traffic. Parking for close to centre residents is difficult, maybe a resident parking scheme? There is a call for there to be better youth services and facilities.

**MM3. Is this the right pool of potential development sites?**

I don't know, maybe on the road to Crudwell, and between Milbourne and the main Chippenham road?

**MM4. What land do you think is the most appropriate upon which to build?**

Areas marked 3, 4 and 5, they are unused and could extend housing that is already present, without impacting the town's natural landscape. The Worthy's site will have a huge impact on the appearance of Malmesbury and remove a large area of green space that is used and needed for people to access green space easily, it's walkable. I am in favour of smaller development, not large scale mass building of generic housing.

**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 sites?**

The area behind Dyson towards Park Road is a very beautiful, peaceful untouched piece of land that should remain so, I feel. It is hugely important environmentally, it is ancient pastureland, never ploughed, full of wildlife.

**MM6. Are there any issues or infrastructure requirements that should be identified?**

### Further comments

I think large scale housing development is not right for malmesbury. It is an ancient town with historical importance. Allowing developerrs and a single land owner ton profit without considering the wants and needs of those already living here would be wrong. People who live here love malmesbury because it is a small community. It should not have its Greenfield sites asset stripped , there is plenty of space and time for housing needs to be met. That should be done on a smaller, quality driven agenda with social and affordable housing as a priority, preserving wildlife and natural landscape s .



<b>Rep ID:</b> Malmes12	
<b>Consultee code:</b> General Public	<b>Consultee Organisation (if applicable):</b>
<b>Is this response on behalf of someone else/another organisation?</b> No	
<b>Organisation being represented (if applicable):</b>	
<b>Does this representation refer to attachment(s):</b> no	<b>If this representation refers to attachment(s), these are listed below:</b>
<b>MM1. What do you think to the scale of growth? Should there be a brownfield target?</b>	
The figure should be much lower. The numbers are unsustainable for the town	
<b>MM2. Are these the right priorities? What priorities may be missing? How might these place shaping priorities be achieved?</b>	
Points 2 & 3 are good. Point 1 increase in housing is not acceptable as it cannot meet present infrastructure as it is.	

**MM3. Is this the right pool of potential development sites?**

The areas are not suitable as for housing. Malmesbury cannot sustain these levels of families entering these homes.

**MM4. What land do you think is the most appropriate upon which to build?**

You should have bought halavington airfield when it was on offer.

**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 sites?**

Access to go, schools that are over populated. Overcrowded contions as if there are 1000 homes built, that would mean an increase of population size of 45%. This overcrowding will cause stress and lack of access to amenities.

**MM6. Are there any issues or infrastructure requirements that should be identified?**

If building goes ahead, overcrowding will be an issue

**Further comments**

<b>Rep ID:</b> Malmes13	
<b>Consultee code:</b> General Public	<b>Consultee Organisation (if applicable):</b> Private individual
<b>Is this response on behalf of someone else/another organisation?</b> No	
<b>Organisation being represented (if applicable):</b>	
<b>Does this representation refer to attachment(s):</b> no	<b>If this representation refers to attachment(s), these are listed below:</b>
<b>MM1. What do you think to the scale of growth? Should there be a brownfield target?</b>	
Should be lower and a general requirement for brownfiled sites to be developed before greenfield.	
<b>MM2. Are these the right priorities? What priorities may be missing? How might these place shaping priorities be achieved?</b>	
Those priorities are good especially number 3	
<b>MM3. Is this the right pool of potential development sites?</b>	

Site 1 seems logical from an access point of view and would seem more than capable of taking us to 2036 and beyond.

**MM4. What land do you think is the most appropriate upon which to build?**

See 9 above

**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 sites?**

No

**MM6. Are there any issues or infrastructure requirements that should be identified?**

All covered above

**Further comments**

Please don't spoil our little town, the jewel on the edge of the cotswolds.

<b>Rep ID:</b> Malmes14	
<b>Consultee code:</b> General Public	<b>Consultee Organisation (if applicable):</b> private
<b>Is this response on behalf of someone else/another organisation?</b> No	
<b>Organisation being represented (if applicable):</b>	
<b>Does this representation refer to attachment(s):</b> no	<b>If this representation refers to attachment(s), these are listed below:</b>
<b>MM1. What do you think to the scale of growth? Should there be a brownfield target?</b>	
Fine for growth No brownfield sites if it mean less employment land	
<b>MM2. Are these the right priorities? What priorities may be missing? How might these place shaping priorities be achieved?</b>	
More focus on employment land More focus on sport/leisure spaces provided by the large developments. The big development at Filands did not give anything back in terms of sport/leisure. This must change.	

**MM3. Is this the right pool of potential development sites?**

yes

**MM4. What land do you think is the most appropriate upon which to build?**

any of them

**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 sites?**

Not enough employment land  
Not enough sport/leisure land  
Housing should use local stone only and not brick that does not suit this historic town

**MM6. Are there any issues or infrastructure requirements that should be identified?**

no

**Further comments**

all has been said  
thank you

<b>Rep ID:</b> Malmes15	
<b>Consultee code:</b> General Public	<b>Consultee Organisation (if applicable):</b> Home owner
<b>Is this response on behalf of someone else/another organisation?</b> No	
<b>Organisation being represented (if applicable):</b>	
<b>Does this representation refer to attachment(s):</b> no	<b>If this representation refers to attachment(s), these are listed below:</b>
<b>MM1. What do you think to the scale of growth? Should there be a brownfield target?</b>	
No more houses in this area	
<b>MM2. Are these the right priorities? What priorities may be missing? How might these place shaping priorities be achieved?</b>	
No - leave the town as a historic and beautiful Cotswold town	
<b>MM3. Is this the right pool of potential development sites?</b>	

No we don't want them!

**MM4. What land do you think is the most appropriate upon which to build?**

None of them!

**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 sites?**

Infrastructure, the roads, the parking facilities - the nature of the beautiful town.

**MM6. Are there any issues or infrastructure requirements that should be identified?**

Too small roads, too many cars and not enough facilities.

**Further comments**

Enough is enough regarding the houses.... just leave it as a historic place people like to visit



<b>Rep ID:</b> Malmes16	
<b>Consultee code:</b> General Public	<b>Consultee Organisation (if applicable):</b>
Is this response on behalf of someone else/another organisation? No	
<b>Organisation being represented (if applicable):</b>	
<b>Does this representation refer to attachment(s):</b> no	<b>If this representation refers to attachment(s), these are listed below:</b>
<b>MM1. What do you think to the scale of growth? Should there be a brownfield target?</b>	
The scale of growth proposed is disproportionate to the current size of the town and the amenities and infrastructure, including parking. The significant loss of outdoor green space, particularly that of Whitchurch Farm and surrounding area, for residents will have a detrimental impact on people's mental health and well-being.	
<b>MM2. Are these the right priorities? What priorities may be missing? How might these place shaping priorities be achieved?</b>	
Yes, particularly the inclusion and emphasis on capitalising on heritage assets - however I would also explicitly include preserving and protecting those assets as a market town. A huge USP of Malmesbury is its green spaces, access to countryside and river, this is under threat under the new plan	
<b>MM3. Is this the right pool of potential development sites?</b>	

Several of these development sites hold significant flood risk. The development of site 1 is completely disproportionate in terms of the negative impact it would have on Malmesbury and its residents, particularly in relation to other planning developments proposed in surrounding villages and local area.  
Site 3 potentially holds economic detriment to the town, reducing the amount of holiday accommodation for tourists as well as uprooting residents living in static homes.

**MM4. What land do you think is the most appropriate upon which to build?**

Small developments dotted around in keeping with heritage town style. The town cannot sustain another large development without losing its soul and what makes it Malmesbury.

**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 sites?**

Included above. In addition, Site 3 in particular is home to a lot of wildlife, including deers. The loss of Malmesbury cricket club would also have a detrimental impact on the positive social and wellbeing aspects of grassroots sport.

**MM6. Are there any issues or infrastructure requirements that should be identified?**

N/A

**Further comments**

N/A

**Rep ID:** Malmes17

**Consultee code:** General Public

**Consultee Organisation (if applicable):**

**Is this response on behalf of someone else/another organisation?** No

**Organisation being represented (if applicable):**

**Does this representation refer to attachment(s):**  
no

**If this representation refers to attachment(s), these are listed below:**

**MM1. What do you think to the scale of growth? Should there be a brownfield target?**

The growth is too high and outside of the agreed plan, which was consulted on widely.  
There is not enough infrastructure to support such growth, particular primary school places, within walking distance.

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

The housing laid out in the original plan, and timescales, with supporting infrastructure, is the correct priority, no more

**MM3. Is this the right pool of potential development sites?**

please see previous answer. Please stay within the previously agreed plan, no more

**MM4. What land do you think is the most appropriate upon which to build?**

Please stay within the previously agreed plan, no more

**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 sites?**

Please stay within the previously agreed plan, no more  
the number of primary school places, in walking distance, are insufficient. T

**MM6. Are there any issues or infrastructure requirements that should be identified?**

supporting local businesses

**Further comments**

none

<b>Rep ID:</b> Malmes18	
<b>Consultee code:</b> General Public	<b>Consultee Organisation (if applicable):</b>
<b>Is this response on behalf of someone else/another organisation?</b> No	
<b>Organisation being represented (if applicable):</b>	
<b>Does this representation refer to attachment(s):</b> no	<b>If this representation refers to attachment(s), these are listed below:</b>
<b>MM1. What do you think to the scale of growth? Should there be a brownfield target?</b>	
There should be less built on greenfield land and more on brownfield, so hearing that this has been taken into consideration is great, but 70 is too little on brownfield compared to the amount that will be built on greenfield land, which should be protect around malmesbury	
<b>MM2. Are these the right priorities? What priorities may be missing? How might these place shaping priorities be achieved?</b>	
Sure you mention about climate change, but none of those are put into the list of prorities that you mention, the more homes that are built the more impact that will have on climate change with an increase in traffic to the area and cars.	

Helping the economy is great, but trying to better manage traffic and parking within the town centre would not help as it is an old town, trying to adjusting this would be difficult and could case more trouble than encouragement as parking as getting into the town is hard enough for visitors as it is.

**MM3. Is this the right pool of potential development sites?**

I agree with the smaller sites as this would have a less impact on the environment or wildlife too greatly.

**MM4. What land do you think is the most appropriate upon which to build?**

The development should be one that is equal to the openness of the area, create housing but also encouragement more wildlife with trees, garden sizes, perhaps even corridors that wildlife can use.  
Building new houses in small estates, having wildlife areas between would keep the area balanced btween develement and nature.

**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 sites?**

The smaller sites I think would work better as they would not cause overcrowding when the sites are built up, but keep in concideration the balance.  
Site 1 is too large, taking away from the environment of the beauty of malmesbury, not taking into concideration the wildlife that lives all around malmesbury. If this site was split in to smaller sites, a few here and there with large wildlife corridors, would bring more of a balance.

**MM6. Are there any issues or infrastructure requirements that should be identified?**

The schools are already under pressure from the number of students they accept every year, they are so full that most have to apply somewhere else, more housing means more pressure of these facilities.

The energy used to build and power these homes will have an increase on the carbon foot print and increase the traffic around malmesbury.

The sports and Leisure facilities would not be able to handle such an increase in the number of new residents as each home would have between 2-4 people per home. It may all help with the economy, but would also put more pressure on already struggling facilities to keep up with demand.

There isn't really the sustainability for more people within malmesbury for the education system, facilities and surgery.

More housing might help the economy, but would case more traffic within the town centre which is already hard for finding parking.

More housing will also effect the health of the town as more cars and houses increases the polution within the area, either way too much would cause a strain on the two resourses and the wildlife that live around the area, tearing up their homes, and may cause more flooding in certain area as concrete can not absorb the rain on the wettest of days.

**Further comments**

Yes building housing is important but you never really take into concideration of anything else, wether the area is more likely to flood which some areas have, how it will effect local wildlife and the beauty of the area. You can't just build houses by thinking about this. As at site Dyson for example, it may have buildings and car parks, but the area is covered in nature walks, trees and plants that encourage bugs such as bumble bees as they take into concideration that this is the country side not some big city and needs to be balanced out

<b>Rep ID:</b> Malmes19	
<b>Consultee code:</b> General Public	<b>Consultee Organisation (if applicable):</b> Resident
<b>Is this response on behalf of someone else/another organisation?</b> No	
<b>Organisation being represented (if applicable):</b>	
<b>Does this representation refer to attachment(s):</b> no	<b>If this representation refers to attachment(s), these are listed below:</b>
<b>MM1. What do you think to the scale of growth? Should there be a brownfield target?</b>	
Malmesbury has already had more than its fair share of development. The proposals are outwith the abilities of the infrastructure to cope.	
<b>MM2. Are these the right priorities? What priorities may be missing? How might these place shaping priorities be achieved?</b>	
Wrong The priority should be on town centre regeneration, followed by economic growth. The two go hand in hand as small businesses are in need of support to ensure a vibrant town centre. The importing of people from outside the town is evidence of the fact that the current housing meets local needs.	



Better internet and mobile phone signals.

**MM3. Is this the right pool of potential development sites?**

No. Please look at the last Neighbourhood Plan in which, we the residents, suggested how the town could expand over time in a generous way, whilst protecting the fragile nature of this historic town.

Area 3 The caravan site impinges on the conservation zone where we are not even allowed to trim a tree without permission. This should definitely not be developed. The camping provides valuable accommodation for the tourists that visit the town. Not everyone can afford hotel prices.

Area 1 is outrageously extensive and will impact on the visual amenity of the town. There is absolutely no way the town centre could cope with this scale of development. There is no demand for housing on this scale in this town. Where are the people supposed to come from to populate this housing, they are certainly not local.

Area 2 The long views of the town from the bypass would be obliterated by this development. I remember being assured when the Waitrose store was given permission, that this land would not be developed.

Area 4 seems a reasonable suggestion

Area 5 This has been a contentious site for development for many years. You have the community's opinions on record.

**MM4. What land do you think is the most appropriate upon which to build?**

Eco housing, low impact, starter homes and 3-bed family homes. Not executive style. The emphasis must be on sustainability.

**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 sites?**

This plan totally ignores the historic nature of this small market town. The envisioned growth would damage the cultural amenities of the town. It is a destination for tourists who are likely to be unable to gain access to the historic centre should this scale of housing be considered. The town is working towards becoming an eco-town. Any development must be sustainable in every sense of the word. Children should be able to walk to school safely, old people should be able to access the town, young mothers should be well supported.

This plan puts all the above at risk because of the excess demands that would be made on all our local services.

**MM6. Are there any issues or infrastructure requirements that should be identified?**

Malmesbury School has expanded from 1150 peoples when it moved to its current site, to 1550 students. It has had to have two wings expanded already. There is limited room for further expansion. It requires a larger hall or auditorium where students can be brought together. The current hall is inadequate. The same is true for the specialist facilities such as the sports hall and the specialist teaching spaces.

Malmesbury Primary is at capacity and small children are already having to attend the school in Lea. There is no room for expansion at either this site or at the St Josephs Catholic Primary.

Youth centre facilities are woefully inadequate now.

The town has no astroturf so either educational or recreational sport.

**Further comments**

Wiltshire Council has a responsibility to earmark sufficient land to prevent small towns such as Malmesbury from taking too much of the burden of development.

**Rep ID:** Malmes20

**Consultee code:** General Public

**Consultee Organisation (if applicable):**

**Is this response on behalf of someone else/another organisation?** No

**Organisation being represented (if applicable):**

**Does this representation refer to attachment(s):**  
no

**If this representation refers to attachment(s), these are listed below:**

**MM1. What do you think to the scale of growth? Should there be a brownfield target?**

lower

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

**MM3. Is this the right pool of potential development sites?**

**MM4. What land do you think is the most appropriate upon which to build?**

**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 sites?**

**MM6. Are there any issues or infrastructure requirements that should be identified?**

lack of schooling

**Further comments**

<b>Rep ID:</b> Malmes21	
<b>Consultee code:</b> General Public	<b>Consultee Organisation (if applicable):</b>
<b>Is this response on behalf of someone else/another organisation?</b> No	
<b>Organisation being represented (if applicable):</b>	
<b>Does this representation refer to attachment(s):</b> no	<b>If this representation refers to attachment(s), these are listed below:</b>
<b>MM1. What do you think to the scale of growth? Should there be a brownfield target?</b>	
<p>The scale of growth is far too high for a town the size of Malmesbury. It's already difficult getting appointments at the local GP surgery, the pharmacies are starting to struggle with the workload since one was lost, children are already having to go to nearby villages for school, and the traffic through town can already be tight and slow at peak times. The brownfield target is far too low, and especially some of the proposed potential sites are surprising to say the least. Some have flood risks, some are popularly used for recreational purposes, and even the caravan park where many people already live in static caravans considered permanent dwellings is up for grabs. A neighbourhood plan was put in place, and it has been overruled to some extent. Malmesbury cannot cope with too high a growth. The community will be affected. Of course houses are needed, but at the time of writing there are multiple areas of which are being developed, one that has been approved for development but not yet started, and a couple of areas developers are trying to get planning permission for, despite having failed multiple times before. Serious improvements to infrastructure and local amenities need to happen if further houses are going to be built. The parking situation across all of town can at times be dangerous, as the lack of off road parking forces cars onto pavements, meaning children, pushchairs, wheelchairs and everyone else are forced out into the road, at times in awkward places where the view is obstructed.</p>	

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

A range of housing is needed if further development is to happen. Malmesbury isn't a cheap place to buy, and many locals are kept off the property ladder because of it.

The town centre is pretty much entirely consisting of listed buildings, and it is difficult to imagine how accessibility can be improved. If the town centre is pedestrianised, as an example, the local businesses would be severely impacted. Parking in town is already difficult, and with an aging population this becomes a problem for the local businesses. The long stay car park is sadly out of bounds for many, due to the steep incline to get into town, either via steps or a hill, it's a heavy walk, especially for people of reduced mobility.

The town centre also appears to be full of shops with high rents and costs, driving businesses out of the town. Further development would make it less likely for smaller independent shops to return or thrive in Malmesbury, and we'd likely see further developments of chains, taking away the personality of the town. The community spirit would go down, and it would become yet another generic English town, with some pretty buildings and not much else.

**MM3. Is this the right pool of potential development sites?**

No. Site 1 is a dear community leisure area, and it would be devastating to see it be developed. Access to the site would likely impact the roads a large amount of children use to get to school, making an already busy area even busier, making it an accident waiting to happen.

Site 5 has been opposed many times by locals, and it frequently floods in heavy rain and storms. Several people already call Site 3 home, with static caravans considered permanent dwellings.

**MM4. What land do you think is the most appropriate upon which to build?**

Brownfield sites are the obvious answer, though obviously not always possible. Desirable sites would be with minimal impact on the already busy routes to school, would impact as few people as possible in their homes in the long term, and would lend themselves to good opportunities to development of infrastructure.

**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 sites?**

Socially, the range of development proposed goes above what a town like Malmesbury should do. If the full amount of houses gets built, we're looking at 30-50% growth in population size as per 2019, and the town cannot deal with this. The town centre is expensive enough and lacks enough parking that it already drives people out of town to neighbouring larger towns for shopping, costing the local economy. A growth of that size means it would also lose the character that keeps some people here and draw some people to visit, but the attraction of just Malmesbury Abbey already seems to be bringing in fewer tourists, considering pre-pandemic times. A serious look at the flooding of certain areas as well need to be looked at, as particularly one of the sites frequently floods, and the roads currently leading to the area are rendered useless after storms.

**MM6. Are there any issues or infrastructure requirements that should be identified?**

**Further comments**

<b>Rep ID:</b> Malmes22	
<b>Consultee code:</b> General Public	<b>Consultee Organisation (if applicable):</b> Resident of Malmesbury
<b>Is this response on behalf of someone else/another organisation?</b> No	
<b>Organisation being represented (if applicable):</b>	
<b>Does this representation refer to attachment(s):</b> no	<b>If this representation refers to attachment(s), these are listed below:</b>
<b>MM1. What do you think to the scale of growth? Should there be a brownfield target?</b>	
<p>The brownfield target should be lower and the greenfield should be protected from development altogether!  Small towns like this area already at breaking point and pumping thousands more families into overloaded small towns will only create havens for crime and vandalism and destroy the beauty of these small country towns!</p>	
<b>MM2. Are these the right priorities? What priorities may be missing? How might these place shaping priorities be achieved?</b>	
<p>These priorities are clearly built maximising short term profit with little regard for the crushing affects it will have on local businesses and the local community as a whole..once again resulting it a disconnected town which will create a haven for crime!  The town is already at a tipping point and two or three more estates on the edges and a few commercial food venders in the town</p>	



will all but kill the community and turn another beautiful heritage town into a cashcow for the wealthy few and a massive depreciation in living standards for everyone else!

**MM3. Is this the right pool of potential development sites?**

Absolutely not! The fact that you are going to turn that entire area into new housing is disgusting and if we go that far then it'll never end! With that many people you'll have to expand further to provide for them all and that will lead to being bullied by big corporations to allow them to be the saviours and give funding for small local projects whilst simultaneously killing small businesses and the community as a whole!

**MM4. What land do you think is the most appropriate upon which to build?**

Tell Dyson to use his site in Hullavington and leave Malmesbury all together and use his factory site to build 800 homes if you absolutely must over the next 15 years!

**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 sites?**

The town is already overstretched! The medical centre is already too busy! The police are way too over stretched and the current recruitment drive will barely make up for the current levels of crime let alone when the town becomes a free for all! Corona virus has shown that even with all the current greenfield land available, all areas of interest are already crowded and that's during a lockdown situation, can't imagine what post lockdown plus 1000 extra families will be like..horrendous shame to see you trying to push the town this way!

**MM6. Are there any issues or infrastructure requirements that should be identified?**

The youth in the town are already using it as a haven for petty crimes and, like the most recent developments have already proven, huge estates plopped into small towns only exasperate this!

**Further comments**

I strongly oppose ALL developments on greenfield land and feel that the town is already under too much pressure to have more families squeezed in.

More houses will lead a requirement for more local amenities and possibly even more classroom space.

The small heritage town will have sold it's soul once and for all!

Please don't let this be on your conscience!

<b>Rep ID:</b> Malmes23	
<b>Consultee code:</b> General Public	<b>Consultee Organisation (if applicable):</b> Office for national statistics
<b>Is this response on behalf of someone else/another organisation?</b> No	
<b>Organisation being represented (if applicable):</b>	
<b>Does this representation refer to attachment(s):</b> no	<b>If this representation refers to attachment(s), these are listed below:</b>
<b>MM1. What do you think to the scale of growth? Should there be a brownfield target?</b>	
I think the scale of growth should be reduced as much as possible, on aesthetic and cultural grounds. Malmesbury is a beautiful, unique market town in the Cotswolds and forms a part of English heritage. it is already, in the words of its TripAdvisor page 'somewhat marred by the suburbs'. It has had many new houses built since the early 2000's.	
<b>MM2. Are these the right priorities? What priorities may be missing? How might these place shaping priorities be achieved?</b>	
Develop as little as possible.	

**MM3. Is this the right pool of potential development sites?**

3 and 4 will least spoil the town's character.

**MM4. What land do you think is the most appropriate upon which to build?**

Do not build on places where people walk

**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 sites?**

See above, which is social and environmental

**MM6. Are there any issues or infrastructure requirements that should be identified?**

- heritage
- culture
- local community

**Further comments**

<b>Rep ID:</b> Malmes24	
<b>Consultee code:</b> Other	<b>Consultee Organisation (if applicable):</b> Malmesbury Cricket Club
<b>Is this response on behalf of someone else/another organisation?</b> No	
<b>Organisation being represented (if applicable):</b>	
<b>Does this representation refer to attachment(s):</b> no	<b>If this representation refers to attachment(s), these are listed below:</b>
<b>MM1. What do you think to the scale of growth? Should there be a brownfield target?</b>	
No comment	
<b>MM2. Are these the right priorities? What priorities may be missing? How might these place shaping priorities be achieved?</b>	
No comment	
<b>MM3. Is this the right pool of potential development sites?</b>	

No comment

**MM4. What land do you think is the most appropriate upon which to build?**

No comment

**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 sites?**

This comment is in respect of site 1 (649) and the location on the southern edge of Malmesbury Cricket Club (MCC Est 1839) 's ground. I am disappointed to note that no mention is made of the club's facilities as a 'notable issue' to the development of this land. I would like to point out the development of this site would be contrary to Malmesbury's Neighbourhood Plan, Wiltshire Council and National government policies on the efficacy and provision of participation in sport.

The MCC is a mix of adult (~50 members) and junior cricket (80 members) offering sport for boys and girls 5-19 in one of only three outdoor sport facilities in Malmesbury and is also used by local schools, volunteer and other sporting groups.

I would, therefore, urge you to note this objection in any future documentation and discussions regarding this site.

[NAME REDACTED]

Chairman

Malmesbury Cricket Club.

**MM6. Are there any issues or infrastructure requirements that should be identified?**

No comment

**Further comments**

I am available for any further comment or discussion on the points raised in this response.

<b>Rep ID:</b> Malmes25	
<b>Consultee code:</b> General Public	<b>Consultee Organisation (if applicable):</b>
<b>Is this response on behalf of someone else/another organisation?</b> No	
<b>Organisation being represented (if applicable):</b>	
<b>Does this representation refer to attachment(s):</b> no	<b>If this representation refers to attachment(s), these are listed below:</b>
<b>MM1. What do you think to the scale of growth? Should there be a brownfield target?</b>	
There is plenty of scope for this scale of growth on brownfield sites in the area. There is no need to building on community use green areas like the cricket club. It is a historic centre of the community in malmesbury and cricket has been played there for well over 100 years.	
<b>MM2. Are these the right priorities? What priorities may be missing? How might these place shaping priorities be achieved?</b>	
The priority for malmesbury should be growth but keeping the community spirit of the area. The town sets itself apart from most of the other towns in wiltshire by this spirit. To do this only brownfield dissused sites should be built on so nothing is taken away from the town.	

**MM3. Is this the right pool of potential development sites?**

Site 1 should never be in consideration. The cricket ground has been at that location for so long, any proposals to move the club are unjust.

**MM4. What land do you think is the most appropriate upon which to build?**

Site 4 is the most logical, away from the river and is a natural extension of a pre-existing housing development.

**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 sites?**

As previously mentioned, community hubs like the cricket club clearly haven't been considered in the selection of areas for development.

**MM6. Are there any issues or infrastructure requirements that should be identified?**

**Further comments**

I can't strongly enough oppose the proposals to develop the Wortheys cricket ground, it is completely unneeded and noone actual resident of the town (the people these developments should benefit and the planners should be consulting) would agree to this.



**Rep ID:** Malmes26

**Consultee code:** General Public

**Consultee Organisation (if applicable):**

**Is this response on behalf of someone else/another organisation?** No

**Organisation being represented (if applicable):**

**Does this representation refer to attachment(s):**  
no

**If this representation refers to attachment(s), these are listed below:**

**MM1. What do you think to the scale of growth? Should there be a brownfield target?**

The scale of growth in Malmesbury should be minimised in order to save the unique character of a historic town

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

Preserving the character of the town. Why is the town's 'economic growth' a top priority? It's already a wealthy area and does not need more housing estates at all. It will slowly turn into Chippenham at this rate

**MM3. Is this the right pool of potential development sites?**

The fact that Malmesbury cricket club is included is a disgrace. It is one of the most picturesque and historic club cricket grounds in the country. Why on earth is it included in the plans? What planet do you people live on? The plan is clearly to increase the size of the town by a quarter by putting hundreds of homes on site 1 which is the last nice green space in the town. No one in the town wants this! Open your eyes. Develop the town slowly in line with what everyone living there wants

**MM4. What land do you think is the most appropriate upon which to build?**

2,3,4

**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 sites?**

I feel I've made my point in regards to these already, site 1 should be protected for the sake of the town's unique character

**MM6. Are there any issues or infrastructure requirements that should be identified?**

No

**Further comments**

Again, no one in the town wants significant amounts of housing and the fact the cricket club is being considered is just a disgrace. Whoever decided to include it is clearly not fit to be making such decisions, it's absolutely mind blowing. What planet do you people live on?

<b>Rep ID:</b> Malmes27	
<b>Consultee code:</b> General Public	<b>Consultee Organisation (if applicable):</b> N/A
<b>Is this response on behalf of someone else/another organisation?</b> No	
<b>Organisation being represented (if applicable):</b>	
<b>Does this representation refer to attachment(s):</b> no	<b>If this representation refers to attachment(s), these are listed below:</b>
<b>MM1. What do you think to the scale of growth? Should there be a brownfield target?</b>	
<p>I am horrified by the scale of growth as given in the Wilts and Glos this weekend. 1,000 new houses planned around Malmesbury?</p> <p>Your Current Strategy states a figure of only 95 homes, less 71 homes south of Filands which has been given permission, so only another 24 homes need be built up until 2036 over and above planned housing already given permission. Yet I am shocked by permission already granted north of Dyson along the Tetbury road, and around to the east down to the site given permission 2 or 3 years ago which still hasn't been built, behind the Primary School. Where are families going to send their children to school, as there is no more capacity within Malmesbury schools? Where are they going to work, as there is little planned business growth, and Dyson has contracted by a considerable amount due to taking their business HQ to Singapore.</p> <p>Your development land for Assessment includes areas on the flood plain of the River Avon, an appalling idea. Site 798 not only involves all of the flood plain of the river, a considerable amount of the site, but would access onto a single track lane with few passing places.</p>	

Site 502 and 452 also would access onto a single track lane with no passing places, but the lane also floods regularly in the Winter, so badly that the lane becomes impassable.  
You state 'In Malmesbury only a small amount of land is required to meet strategic housing requirements.'  
Please do not consider going against your own decisions about planning in Malmesbury to satisfy greedy developers and land owners.

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

I agree with 1, with the understanding that housing should only be built for 'local needs'  
2, local businesses should be encouraged,  
3, the town centre needs serious consideration. Malmesbury is an ancient market town, and nothing can change that. It should be respected for its character, nurtured and maintained. Businesses should be encouraged to bring a thriving shopping experience for local people, business rates should be assessed, are they too high? We already have 4 Charity shops, and with Aldi soon available for people to shop in, yet more strain will be put on businesses in the High Street. What chance the 2 bakers or the 2 butchers surviving? WH Smith? If people can buy newspapers, pens and diaries elsewhere WH Smith will likely be pulled out of town. Yet more housing does not mean more business in the High Street, as people will shun parking problems in town which would increase if yet more drivers try to park n the main car park, to shop at Aldi or elsewhere.

**MM3. Is this the right pool of potential development sites?**

I do not believe this much extra housing is required in Malmesbury.  
The only site which could provide limited extra housing, as stated to be required by Witshire Council in its current strategy is site No 4.

**MM4. What land do you think is the most appropriate upon which to build?**

Site no 4

**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 sites?**

Housing should not be considered where it opens onto single track lanes, those which regularly flood, or flood plains.

**MM6. Are there any issues or infrastructure requirements that should be identified?**

Potential for flooding, access problems on single track lanes, destruction of the town by excessive building surrounding the ancient centre of Malmesbury.

Consideration of present facilities; schools, lack of places available; transport problems, excessive traffic on small country lanes due to commuting traffic turning Malmesbury into a dormitory town.

**Further comments**

Don't be bullied by greedy developers!

<b>Rep ID:</b> Malmes28	
<b>Consultee code:</b> General Public	<b>Consultee Organisation (if applicable):</b>
<b>Is this response on behalf of someone else/another organisation?</b> No	
<b>Organisation being represented (if applicable):</b>	
<b>Does this representation refer to attachment(s):</b> no	<b>If this representation refers to attachment(s), these are listed below:</b>
<b>MM1. What do you think to the scale of growth? Should there be a brownfield target?</b>	
Far too large, infrastructure will not be able to cope. Malmesbury Schools and Primary Care will be overwhelmed. Also Greenfield sites should be the last resort, at all times brownfield sites should be prioritised.	
<b>MM2. Are these the right priorities? What priorities may be missing? How might these place shaping priorities be achieved?</b>	
We need much better traffic management, if you are disabled parking is not ideal in malmesbury. Why not turn market cross into disabled parking only. Environment is also my concern as we are heavily polluted with cars and low flying planes. We have no bank or decent small shops in the town, we have even lost the large Lloyds chemist. It would be good to look at diversity in the high street.	

**MM3. Is this the right pool of potential development sites?**

I object most strongly to area 1 and 5. Does Malmesbury have to be inundated with houses that may or may not be affordable.

**MM4. What land do you think is the most appropriate upon which to build?**

Brownfield not greenfield

**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 sites?**

I am particularly keen on minimising the overburdening of the environment.

**MM6. Are there any issues or infrastructure requirements that should be identified?**

Health and local transport should be top priority and green infrastructure all the green fields seem fair game to developers and landowners who want to cash in on Malmesbury historic background.

**Further comments**

Malmesbury has had so many houses built in the last 30 years, this is draining the resources of the local town council and we don't have facilities for the youth. Covid has highlighted inequalities and more houses would I believe ruin the town. We do need affordable houses, but what is affordable. Malmesbury has very little employment opportunities for the young and after Covid who is going to buy these houses!!!!

<b>Rep ID:</b> Malmes29	
<b>Consultee code:</b> General Public	<b>Consultee Organisation (if applicable):</b>
<b>Is this response on behalf of someone else/another organisation?</b> No	
<b>Organisation being represented (if applicable):</b>	
<b>Does this representation refer to attachment(s):</b> no	<b>If this representation refers to attachment(s), these are listed below:</b>
<b>MM1. What do you think to the scale of growth? Should there be a brownfield target?</b>	
Definitely a greater use of brownfield sites with a target. Scale of growth should be much lower as town has had too much housing for the infrastructure and it changes character of small rural town.	
<b>MM2. Are these the right priorities? What priorities may be missing? How might these place shaping priorities be achieved?</b>	
Limited improvement to Malmesbury Town centre is possible due to its geography. It is a small settlement on a hilltop. Residents will have to drive to larger places to shop etc increasing traffic.	



**MM3. Is this the right pool of potential development sites?**

Probably to consider except that site 1 is too big and will have huge visual impact and should Not include the cricket club which is a very special place.

**MM4. What land do you think is the most appropriate upon which to build?**

2, 4 and 5

**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 sites?**

As before, cricket club should be preserved as important social and environmental site in heart of town. Most people will have to travel to workplaces

**MM6. Are there any issues or infrastructure requirements that should be identified?**

Town centre too small for amount of housing planned. Although a429 chipp to cirencester is a good road, other routes through the town are problematic because of small town centre, tight corners, The Triangle junction, route to Sherston Road etc. A no brainer!

**Further comments**

Please don't let the developers bully the Council into allowing excessive housing in small town on a hill

<b>Rep ID:</b> Malmes30	
<b>Consultee code:</b> General Public	<b>Consultee Organisation (if applicable):</b>
<b>Is this response on behalf of someone else/another organisation?</b> No	
<b>Organisation being represented (if applicable):</b>	
<b>Does this representation refer to attachment(s):</b> no	<b>If this representation refers to attachment(s), these are listed below:</b>
<b>MM1. What do you think to the scale of growth? Should there be a brownfield target?</b>	
The brownfield site no seems a bit high, it should be lower.	
<b>MM2. Are these the right priorities? What priorities may be missing? How might these place shaping priorities be achieved?</b>	
<b>MM3. Is this the right pool of potential development sites?</b>	

Site3, the caravan site. The residents/owners are covered by a licence in perpetuity, so if the site is to be built on, the residents will need rehousing. The land between the homes and the river is unsuitable for building, the field adjacent to the river is a recognised flood plain, and the field above that is a steep slope. The field that forms the western part of the site is a camping/caravan site and brings a lot of visitors and money into the town during the summer months.

**MM4. What land do you think is the most appropriate upon which to build?**

Area 1

**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 sites?**

The High Street will need support to bring customers back to the mainly independent shops.

**MM6. Are there any issues or infrastructure requirements that should be identified?**

The medical centre will need to be expanded, if not physically, certainly staff and services will need to increase.

**Further comments**

<b>Rep ID:</b> Malmes31	
<b>Consultee code:</b> General Public	<b>Consultee Organisation (if applicable):</b>
<b>Is this response on behalf of someone else/another organisation?</b> No	
<b>Organisation being represented (if applicable):</b>	
<b>Does this representation refer to attachment(s):</b> no	<b>If this representation refers to attachment(s), these are listed below:</b>
<b>MM1. What do you think to the scale of growth? Should there be a brownfield target?</b>	
The brownfield target should certainly be higher than the 70 targeted. Perhaps attempting to reach a 20% target of total homes identified.	
<b>MM2. Are these the right priorities? What priorities may be missing? How might these place shaping priorities be achieved?</b>	
The most pressing needs for the community are entry level housing for younger people and young families. To achieve this, without forcing those requiring help to be perpetual renters, requires a ban on buy-to-rent properties and indeed to prevent built properties ever being rentals.	

Safe, direct and dedicated cycle routes need to be introduced between Malmesbury and surrounding employment opportunities; Cirencester, Chippenham, Royal Wootton Bassett, Swindon, Kendell Railway Station etc.

**MM3. Is this the right pool of potential development sites?**

These proposals simply remove green spaces that improve the lives of Malmesbury residents. As mentioned in Q8 unless there is prevention in place many will be investment purchases and add zero to the medium/long-term health of the community.

**MM4. What land do you think is the most appropriate upon which to build?**

2, 5 and 4.

**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 sites?**

Restriction of short-term and long-term investment properties within the new housing pool.  
Green spaces for residents.

**MM6. Are there any issues or infrastructure requirements that should be identified?**

Mandatory installation of solar and heat-source pumps to power/heat the housing stock.

**Further comments**

<b>Rep ID:</b> Malmes32	
<b>Consultee code:</b> General Public	<b>Consultee Organisation (if applicable):</b> Resident
<b>Is this response on behalf of someone else/another organisation?</b> No	
<b>Organisation being represented (if applicable):</b>	
<b>Does this representation refer to attachment(s):</b> no	<b>If this representation refers to attachment(s), these are listed below:</b>
<b>MM1. What do you think to the scale of growth? Should there be a brownfield target?</b>	
There should be no further growth in Malmesbury as the infrastructure is not good enough.	
<b>MM2. Are these the right priorities? What priorities may be missing? How might these place shaping priorities be achieved?</b>	
These aspirations are OK, however the town is already over crowded and does not have enough infrastructure abilities. The children of the town have to leave town for primary education as there are not enough places in the school system for the size of town now!	

**MM3. Is this the right pool of potential development sites?**

NO

**MM4. What land do you think is the most appropriate upon which to build?**

No further building please

**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 sites?**

Town has grown too much already.

**MM6. Are there any issues or infrastructure requirements that should be identified?**

The above is a starting point

**Further comments**

Please do not ruin our town for the failings elsewhere. Malmesbury is already at maximum capacity and further building will ruin a beautiful old market town. It is really that simple.



<b>Rep ID:</b> Malmes33	
<b>Consultee code:</b> General Public	<b>Consultee Organisation (if applicable):</b>
<b>Is this response on behalf of someone else/another organisation?</b> No	
<b>Organisation being represented (if applicable):</b>	
<b>Does this representation refer to attachment(s):</b> no	<b>If this representation refers to attachment(s), these are listed below:</b>
<b>MM1. What do you think to the scale of growth? Should there be a brownfield target?</b>	
<p>The scale of growth calculated will exceed the infrastructure support in the Malmesbury area: GP availability, schools both primary and secondary are already full to capacity, the roads are gridlocked at peak times particularly on the near the propose development site near Filands. These plans, if they come to fruition, will reduce the quality of life for all who live in the area. During the recent restrictions in response to combating Covid, the green areas of Malmesbury have come under increasing pressure and are now over-used. Therefore, any development should be limited and confined to brownfield sites in order to preserve the precious green spaces for Malmesbury citizens.</p>	
<b>MM2. Are these the right priorities? What priorities may be missing? How might these place shaping priorities be achieved?</b>	

These are admirable aims, however, if 2. Support good prospects for economic growth including diversifying the local economy and building on local skills is prioritized above the others more diverse needs could be accommodated by proposing that any new homes provided have integral work space and adequate networking capabilities to support the shift towards home-based working that is occurring internationally and globally.

**MM3. Is this the right pool of potential development sites?**

The large pool of land in 1. a is worrying and the smaller proposed development sites 2 and 3. Access to the A429 road is limited resulting in large traffic queues both morning and evening as the main employers are situated on this side of Malmesbury town.

**MM4. What land do you think is the most appropriate upon which to build?**

Proposed sites 4 and 5 allow better access to the A road and access towards the motorway but eat into the green land around Malmesbury.

Development that provides lower cost housing, preferably with integral space for home working will allow for greater economic diversity within the town.

Green space should be preserved, where possible and brown field sites should be identified as green space becomes more important in promoting health and quality of life for the local community.

**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 sites?**

As already stated, including space in new homes for home working and ensuring the Wi-Fi network is adequate throughout the area to support a more diverse workforce able to compete in the global market rather than being so reliant on the limited large employers in the town.

**MM6. Are there any issues or infrastructure requirements that should be identified?**

Opportunities for smaller entrepreneurial businesses have not been considered. If lower cost housing was combined with space for small businesses, Malmesbury's local economy would be more diverse and future proof. Additionally the strain on the road network would be less as workers would travel less and stagger the times of travel.

**Further comments**

Any housing development should improve the quality of life for existing Malmesbury residents not be detrimental to it. Adding so many new home would put pressure on schools, make travel more difficult and reduce the green space around Malmesbury needed for recreation and health.

<b>Rep ID:</b> Malmes34	
<b>Consultee code:</b> General Public	<b>Consultee Organisation (if applicable):</b> N/a
<b>Is this response on behalf of someone else/another organisation?</b> No	
<b>Organisation being represented (if applicable):</b>	
<b>Does this representation refer to attachment(s):</b> no	<b>If this representation refers to attachment(s), these are listed below:</b>
<b>MM1. What do you think to the scale of growth? Should there be a brownfield target?</b>	
Too high. Yes to brownfield sites	
<b>MM2. Are these the right priorities? What priorities may be missing? How might these place shaping priorities be achieved?</b>	
<p>Local housing needs always seems to end up being 4 and 5 bedroom expensive houses.          No idea what can possibly be envisaged by "prospects for economic growth"          Time and time again it has proved impossible to improve roads, parking etc in Malmesbury simply because of the geography of the town. Nothing has changed here</p>	

**MM3. Is this the right pool of potential development sites?**

No, far too many houses proposed. Park road has flooding problems, site 1 is much too big and intrusive. Lose the caravan site? What about the residents there?

**MM4. What land do you think is the most appropriate upon which to build?**

At a push site 4

**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 sites?**

Definitely nothing on prominent high ground or in areas prone to flooding. More housing here is fine as long as residents don't get ill, have children or use a car. Almost everyone over 60 wants to know where are the small one and two bedroom homes we want so that ours can be used to house families to save building more and more large houses.

**MM6. Are there any issues or infrastructure requirements that should be identified?**

Need more units for small businesses

**Further comments**

<b>Rep ID:</b> Malmes35	
<b>Consultee code:</b> General Public	<b>Consultee Organisation (if applicable):</b> n/a
<b>Is this response on behalf of someone else/another organisation?</b> No	
<b>Organisation being represented (if applicable):</b>	
<b>Does this representation refer to attachment(s):</b> no	<b>If this representation refers to attachment(s), these are listed below:</b>
<b>MM1. What do you think to the scale of growth? Should there be a brownfield target?</b>	
Scaler of growth is ok. Agree that brownfield sites should be prioritised for development.	
<b>MM2. Are these the right priorities? What priorities may be missing? How might these place shaping priorities be achieved?</b>	
Yes	
<b>MM3. Is this the right pool of potential development sites?</b>	

Area 1 looks far too big for the number of houses required. If areas 4 & 5 are developed due consideration needs to be given to widening the adjacent narrow roads

**MM4. What land do you think is the most appropriate upon which to build?**

4 & 5

**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 sites?**

**MM6. Are there any issues or infrastructure requirements that should be identified?**

**Further comments**

What provision is being made for self build housing, in Malmesbury and the remainder of Wiltshire?  
Could some of the land identified as suitable for development be set aside for small builders, rather than allocating the whole site for one developer? This would help small builders to thrive.

**Rep ID:** Malmes36

**Consultee code:** Statutory Body

**Consultee Organisation (if applicable):** Wessex Water

**Is this response on behalf of someone else/another organisation?** No

**Organisation being represented (if applicable):**

**Does this representation refer to attachment(s):**  
no

**If this representation refers to attachment(s), these are listed below:**

**MM1. What do you think to the scale of growth? Should there be a brownfield target?**

Where developing on brownfield sites opportunities must be realised to redirect surface water from the foul water networks and limit the surface water flows from site using multi benefit SuDS schemes.

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

**MM3. Is this the right pool of potential development sites?**



In view of Wiltshire Council's comments made under "Scale of Growth" for Malmesbury and in view of the timescales available for comment we will engage further on potential development in Malmesbury when pertenant to do so.

**MM4. What land do you think is the most appropriate upon which to build?**

In view of Wiltshire Council's comments made under "Scale of Growth" for Malmesbury and in view of the timescales available for comment we will engage further on potential development in Malmesbury when pertenant to do so.

**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 sites?**

In view of Wiltshire Council's comments made under "Scale of Growth" for Malmesbury and in view of the timescales available for comment we will engage further on potential development in Malmesbury when pertenant to do so.

**MM6. Are there any issues or infrastructure requirements that should be identified?**

In view of Wiltshire Council's comments made under "Scale of Growth" for Malmesbury and in view of the timescales available for comment we will engage further on potential development in Malmesbury when pertenant to do so.

**Further comments**

<b>Rep ID:</b> Malmes37	
<b>Consultee code:</b> General Public	<b>Consultee Organisation (if applicable):</b>
<b>Is this response on behalf of someone else/another organisation?</b> No	
<b>Organisation being represented (if applicable):</b>	
<b>Does this representation refer to attachment(s):</b> no	<b>If this representation refers to attachment(s), these are listed below:</b>
<b>MM1. What do you think to the scale of growth? Should there be a brownfield target?</b>	
<p>Malmesbury has grown much too quickly, with little thought on the impact on the town, the schools, healthcare services etc. The housing quality has been really terrible (compare the quality of recent housing developments with the fantastic ones in Tetbury, which make every attempt to compliment this historic nature of the town). I know from experience that the councils make it as hard as possible to develop brownfield sites, the additional cost burden makes it unaffordable for developers.</p>	
<b>MM2. Are these the right priorities? What priorities may be missing? How might these place shaping priorities be achieved?</b>	
<p>I'm particularly concerned about the development encroaching on the Cotswold AONB. This is a spectacularly beautiful piece of land and is enjoyed by many dog walkers, birdwatchers and wildlife.</p>	

**MM3. Is this the right pool of potential development sites?**

The area around the roundabout by the petrol station is the most obvious

**MM4. What land do you think is the most appropriate upon which to build?**

1 & 2, but there has already been way too much development

**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 sites?**

is there also going to be a new school?

**MM6. Are there any issues or infrastructure requirements that should be identified?**

the sport fields, parks and playgrounds need to be very near any new housing, as part of any development

**Further comments**

There has been relentless low-quality development. If there has to be more housing, please make sure they are well built and the materials are suitable (cotswold stone for the walls and roof, particularly on the entrance to any development). See Whitelands in Tetbury as an example of well-built houses and note that these houses sold much more quickly than lower-quality properties. Plant trees and create green spaces.

<b>Rep ID:</b> Malmes38	
<b>Consultee code:</b> General Public	<b>Consultee Organisation (if applicable):</b>
Is this response on behalf of someone else/another organisation? No	
<b>Organisation being represented (if applicable):</b>	
<b>Does this representation refer to attachment(s):</b> no	<b>If this representation refers to attachment(s), these are listed below:</b>
<b>MM1. What do you think to the scale of growth? Should there be a brownfield target?</b>	
Too large scale for current infrastructure. Doctors surgery and schools in particular	
<b>MM2. Are these the right priorities? What priorities may be missing? How might these place shaping priorities be achieved?</b>	
Limited economic growth due to age of Malmesbury layout	
<b>MM3. Is this the right pool of potential development sites?</b>	

Too many for Malmesbury layout and infrastructure. Also number 4 floods

**MM4. What land do you think is the most appropriate upon which to build?**

Number 1 dependent on the number of houses planned

**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 sites?**

Flood plain development is totally unacceptable. Access for emergency vehicles needs to be considered

**MM6. Are there any issues or infrastructure requirements that should be identified?**

**Further comments**

No further development should be allowed without the current infrastructure being improved first

<b>Rep ID:</b> Malmes39	
<b>Consultee code:</b> General Public	<b>Consultee Organisation (if applicable):</b> House owners
<b>Is this response on behalf of someone else/another organisation?</b> No	
<b>Organisation being represented (if applicable):</b>	
<b>Does this representation refer to attachment(s):</b> no	<b>If this representation refers to attachment(s), these are listed below:</b>
<b>MM1. What do you think to the scale of growth? Should there be a brownfield target?</b>	
I don't feel too many Brownfields should be developed. I think employment land sites should be dedicated to help build jobs for the people of Malmesbury especially industrial units. I think the figure is about right.	
<b>MM2. Are these the right priorities? What priorities may be missing? How might these place shaping priorities be achieved?</b>	
Primary Schools are too small in Malmesbury with no space to expand, Doctors surgery is too small to accommodate growth with housing built all around the site. I also believe local employment should be considered and bigger spaces made available to aid there growth.	

**MM3. Is this the right pool of potential development sites?**

No comment

**MM4. What land do you think is the most appropriate upon which to build?**

No comment

**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 sites?**

Site 5; Flooding Risks - Effects too many people

**MM6. Are there any issues or infrastructure requirements that should be identified?**

As mentioned can't think of anything other than more Local jobs.

**Further comments**

There should be local jobs for local people & space made available for industrial units, office spaces for them to expand. Malmesbury isn't just a commuting town.

<b>Rep ID:</b> Malmes40	
<b>Consultee code:</b> General Public	<b>Consultee Organisation (if applicable):</b>
<b>Is this response on behalf of someone else/another organisation?</b> No	
<b>Organisation being represented (if applicable):</b>	
<b>Does this representation refer to attachment(s):</b> no	<b>If this representation refers to attachment(s), these are listed below:</b>
<b>MM1. What do you think to the scale of growth? Should there be a brownfield target?</b>	
Scale of growth too high. Where construction is necessary it must be on brownfield	
<b>MM2. Are these the right priorities? What priorities may be missing? How might these place shaping priorities be achieved?</b>	
We must have a commitment to protect the environment, meet carbon neutral objectives, and protect wildlife habitats, and protect against climate change threats such as increased flooding. Also their needs to be sufficient increases in infrastructure (medical, schools etc) to support any increase in population	



**MM3. Is this the right pool of potential development sites?**

I am concerned in particular about development of site 5. The increased speed of rainwater run-off from this urbanised site will add to the already very significant flooding issues along Park road. Increasingly during wet weather Park road can not be accessed due to being completely underwater.

**MM4. What land do you think is the most appropriate upon which to build?**

Site 3 (brownfield caravan park)  
Followed by site 2 and then 4.

**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 sites?**

I am concerned in particular about development of site 5. The increased speed of rainwater run-off from this urbanised site will add to the already very significant flooding issues along Park road. Increasingly during wet weather Park road can not be accessed due to being completely underwater.

**MM6. Are there any issues or infrastructure requirements that should be identified?**

We need to protect wetland habitats along the rivers, including that along Park Road. These are important habitats for wetland animals and birds (there is a resident Egret living in the Park Road wetlands for example). We also should also be careful not to prevent the flooding of the rivers, since this would increase the river flowrate downstream and create unintended additional flooding risk downstream elsewhere in Wiltshire. I am also concerned that there are not sufficient schools, medical facilities and

possibly emergency services (including fire and police) to cater for the planned population growth in Malmesbury. Also, as Covid has shown us, there is a need for more parks and green spaces for people to enjoy around malmesbury. Certain recent residential developments (like the one near Dyson) do not have any facilities, and are very cramped for residents. They also do not seem safe since the roads are blocked with parked cars.

#### **Further comments**

Suggestion: how about we turn the wetland along Park Road into a Nature park and wildlife conservation area?

**Rep ID:** Malmes41

**Consultee code:** General Public

**Consultee Organisation (if applicable):**

**Is this response on behalf of someone else/another organisation?** No

**Organisation being represented (if applicable):**

**Does this representation refer to attachment(s):**  
no

**If this representation refers to attachment(s), these are listed below:**

**MM1. What do you think to the scale of growth? Should there be a brownfield target?**

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

**MM3. Is this the right pool of potential development sites?**

**MM4. What land do you think is the most appropriate upon which to build?**

**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 sites?**

**MM6. Are there any issues or infrastructure requirements that should be identified?**

**Further comments**

Dear Planning Department

We are unable to accommodate any more houses in Malmesbury. It would overwhelm our Medical Practise, schools and other infrastructure. We have a neighbour hood plan which nobody takes any notice of!! Why should Malmesbury become a over burdened just because it is pretty, or should I say was pretty but now we have no green spaces on the edge of town. Anywhere unscrupulous builders can obtain planning permissions to build they will.

We are under assault, noise and air pollution are on the rise and nobody seems to care about the residents of Malmesbury and their views.

**Rep ID:** Malmes42

**Consultee code:** General Public

**Consultee Organisation (if applicable):**

**Is this response on behalf of someone else/another organisation?** No

**Organisation being represented (if applicable):**

**Does this representation refer to attachment(s):**

no

**If this representation refers to attachment(s), these are listed below:**

**MM1. What do you think to the scale of growth? Should there be a brownfield target?**

Malmesbury already has 290 new homes in the planning pipeline. We do not need and cannot cope with any more. Local schools are full with primary school children being bussed out of Malmesbury.

I have been a resident for 6 years and cannot find an NHS dental place. This is critical as I can no longer afford private dental care.

Malmesbury has a strong community spirit which has been strengthened further during the pandemic and increasing the number of houses will kill this.

Car parks are full already.

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

I disagree that current employment opportunities will be sufficient, particularly with Dyson HQ now moving to Singapore. This has not been mapped. Insufficient local employment opportunities particularly with younger generation who cannot travel easily outside of Malmesbury without having a negative impact on Carbon Footprint.

\*\*\*\*\*

Malmesbury already has 290 new homes in the planning pipeline. We do not need and cannot cope with any more. Local schools are full with primary school children being bussed out of Malmesbury.

I have been a resident for 6 years and cannot find an NHS dental place. This is critical as I can no longer afford private dental care.

Malmesbury has a strong community spirit which has been strengthened further during the pandemic and increasing the number of houses will kill this.

Car parks are full already.

**MM3. Is this the right pool of potential development sites?**

Malmesbury has a Neighborhood plan which should be followed.

**MM4. What land do you think is the most appropriate upon which to build?**

Malmesbury has a Neighborhood plan which should be followed.

**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 sites?**

Malmesbury has a Neighborhood plan which should be followed.

**MM6. Are there any issues or infrastructure requirements that should be identified?**

The section on local economy is completely incorrect as Dyson has recently moved HQ to Singapore and made >1000 people redundant from local offices. This is significant contraction, not expansion as listed in the report. This has not been addressed and will need new forms of local employment.

Health section is incomplete as it does not cover dental services. There is a shortage of dental services in Malmesbury and, for example, I have been unable to find an NHS place in 6 years. This has not been addressed.

Primary schools are currently full with primary age children being bused to schools outside of Malmesbury. The situation for secondary school children needs clarifying as the study has not been done.

Insufficient parking for existing residents.

**Further comments**

Malmesbury already has a neighbourhood plan which goes above and beyond its requirements. Malmesbury cannot cope with additional housing; infrastructure is already stretched (see comments on stretched education, and lack of dental services), local employment opportunities have contracted and there is insufficient parking.

<b>Rep ID:</b> Malmes43	
<b>Consultee code:</b> General Public	<b>Consultee Organisation (if applicable):</b>
Is this response on behalf of someone else/another organisation? No	
<b>Organisation being represented (if applicable):</b>	
<b>Does this representation refer to attachment(s):</b> no	<b>If this representation refers to attachment(s), these are listed below:</b>
<b>MM1. What do you think to the scale of growth? Should there be a brownfield target?</b>	
The proposed scale of growth is much too high. No brownfield target	
<b>MM2. Are these the right priorities? What priorities may be missing? How might these place shaping priorities be achieved?</b>	
Yes	
<b>MM3. Is this the right pool of potential development sites?</b>	



No

**MM4. What land do you think is the most appropriate upon which to build?**

None of the above. Only minimal brownfield development should be considered

**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 sites?**

Yes, Malmesbury is a beautiful town that would be ruined with large scale developments

**MM6. Are there any issues or infrastructure requirements that should be identified?**

**Further comments**

Please do not ruin our beautiful town

<b>Rep ID:</b> Malmes44	
<b>Consultee code:</b> General Public	<b>Consultee Organisation (if applicable):</b>
<b>Is this response on behalf of someone else/another organisation?</b> No	
<b>Organisation being represented (if applicable):</b>	
<b>Does this representation refer to attachment(s):</b> no	<b>If this representation refers to attachment(s), these are listed below:</b>
<b>MM1. What do you think to the scale of growth? Should there be a brownfield target?</b>	
Given that there is existing planning permission for homes that we need, and given that these unbuilt houses are not included in the count, the calculation used will mean a surfeit of housing build in Malmesbury, without the infrastructure to support such large numbers of houses. Therefore, the number is too high.	
<b>MM2. Are these the right priorities? What priorities may be missing? How might these place shaping priorities be achieved?</b>	
There is no real mention of sustainability and carbon footprint, and although the wording of the three points seem to look right in terms of priority, the points are too vague to be of any real service to the Town.	

**MM3. Is this the right pool of potential development sites?**

Areas 3, 4 and 5 will increase the water run off onto the flood planes, which frequently overflow and cause flooding to roads around Park Lane and contribute to flooding in houses on St John's Street, so they're not the right places. site 2 is not brown field, it's a green belt, so no, not the right place. Site number 1 is also Greenfield, and it is so big that using any of it would open the floodgates (no pun intended) to a vast housing estate in a town that would not have the capacity and infrastructure to accommodate it or to bind it into our community. Furthermore, Malmesbury wouldn't be able to offer sufficient employment or education for such numbers of residents, and thus so much more housing would divide the community into fragmented and disparate sections that would be isolated from each other with no real coherence - and possibly no interest in the other areas of town.

**MM4. What land do you think is the most appropriate upon which to build?**

See our Neighbourhood Plan.

**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 sites?**

See my previous comments.

**MM6. Are there any issues or infrastructure requirements that should be identified?**

### Further comments

it's so frustrating that property development companies are able to obfuscate the calculation of Wiltshire's actual housing need by delaying CIL agreements and using the new planning regulations to force through more housing development than we need - housing that won't actually serve communities. What passes for 'affordable housing' isn't affordable for ordinary residents, and the quality of the housing, with it's lack of sustainable design and materials, means that the town will end up with sub-standard housing and an increase in flooding, with no redeeming features to alleviate the pressure that will be put on our already stretched infrastructure.

<b>Rep ID:</b> Malmes45	
<b>Consultee code:</b> General Public	<b>Consultee Organisation (if applicable):</b> none - private individual
<b>Is this response on behalf of someone else/another organisation?</b> No	
<b>Organisation being represented (if applicable):</b>	
<b>Does this representation refer to attachment(s):</b> no	<b>If this representation refers to attachment(s), these are listed below:</b>
<b>MM1. What do you think to the scale of growth? Should there be a brownfield target?</b>	
<p>The proposed scale of growth is FAR too high. The figure should be very much lower. Malmesbury cannot cope with any more housing. By building endless new housing estates around the edge of Malmesbury you are changing the whole character of our much-loved town and really spoiling this beautiful place. Keeping this town from growing too large is very important for maintaining the sense of us being a small community.</p>	
<b>MM2. Are these the right priorities? What priorities may be missing? How might these place shaping priorities be achieved?</b>	
<p>1. When you talk about 'supporting infrastructure', I cannot emphasise strongly enough the need for cycle access and walking access into the centre of town. I am deeply concerned that the kinds of modern housing estates which are built these days are</p>	

all completely 'car-centric'. This has many negative impacts including drawing people away from the town centre as it's easier for people to get in their cars and simply drive to out-of-town shopping centres. I also think it's bad for the environment as well as for people's mental health.

Please also consider the desperate need for people to have access to green space. There isn't a public park in Malmesbury and the more fields around Malmesbury are built on, the less green spaces we have left.

People need decent gardens as well. Please consider the mental well-being of people needing green spaces.

2. Fine. Local employment for local people is always a good thing. We want at all costs to avoid Malmesbury simply becoming a 'dormitory settlement' where people only live in order to be able to commute away to the big towns and cities for work.

3. The town centre cannot be changed. Malmesbury is an ancient town with over 1,000 years of history. The town centre is tiny; we have just one high street. The limited parking already available is completely full to capacity at all times of day. There is no room for more cars. I don't see how you can make any alterations to the town centre. As I say it is tiny. The high street is doing reasonably well and its independent shops are hanging on. We must do all we can to support the independent shops and businesses on the high street.

### **MM3. Is this the right pool of potential development sites?**

Site 1. Absolutely wrong. This would completely block the beautiful views of Malmesbury Abbey from the hill and the ring road which adds so much value to the precious character and nature of the town. Local people actually use those fields for walking in and walking their dogs and enjoying a little bit of countryside. Developing this area would massively increase the size of the town and it would not be sustainable and it would make that whole chunk north of the river and south and west of the ring road into one massive urban sprawl. This would hugely and irreversibly spoil the character and beauty of the town for the entire community.

Site 2. Don't know

Site 3. Don't know

Site 4. Don't know

Site 5. Unsuitable. The lane here is very narrow and is barely wide enough for two vehicles to pass. The lane is bounded on the north side by the river. In addition, the lane (the end of Park Road) regularly floods HEAVILY every winter. This road is not suitable to accommodate the 100 or so additional cars which would be using it daily were the whole of this area built into housing. In addition, the lane going up the hill to reach the Sherston road is even narrower. Additionally, more housing here would add a significant number of traffic using the route through Brokenborough as a short-cut to the Tetbury road; Brokenborough is a small

village with only a single-lane road going through it and children, dogs, horses, tractors, walkers, cyclists etc all already trying to use this lane at once.

**MM4. What land do you think is the most appropriate upon which to build?**

I don't know

**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 sites?**

See my answer re: Site 5 above.

**MM6. Are there any issues or infrastructure requirements that should be identified?**

Protection of the rich biodiversity and natural ecology of this environmentally precious and beautiful location.

**Further comments**

<b>Rep ID:</b> Malmes46	
<b>Consultee code:</b> Landowner	<b>Consultee Organisation (if applicable):</b>
<b>Is this response on behalf of someone else/another organisation?</b> No	
<b>Organisation being represented (if applicable):</b>	
<b>Does this representation refer to attachment(s):</b> yes	<b>If this representation refers to attachment(s), these are listed below:</b> MALMES46, MALMES46a
<b>MM1. What do you think to the scale of growth? Should there be a brownfield target?</b>	
The proposed scale of growth appears to be unambitious. In effect it is suggested that almost all of the growth in Malmesbury needed by 2036 has taken place already. This figure should be higher or there will not be enough homes for the natural growth and progress of the town. The Brownfield target is a good idea but can only be achieved if there is actually enough brownfield land available, which does not appear to have been investigated. It should not be relied on for delivery.	
<b>MM2. Are these the right priorities? What priorities may be missing? How might these place shaping priorities be achieved?</b>	
No answer	



**MM3. Is this the right pool of potential development sites?**

As per my attached letter [MALMES46, MALMES46a]; the Landowner and I will be bringing forward a site to the east of Waitrose (which was partially the former proposed Lidl site).

This proposal will be for a combination of retirement and self build homes, in accordance with Wiltshire Council's findings on the growth of the ageing population in Malmesbury and the shortage of self build opportunities in Malmesbury and Wiltshire. I believe the site which I am proposing is more suitable for development than the 5 sites identified in this consultation. In particular the 5 sites identified would all create a notable intrusion into the countryside. I believe the development of the site I am proposing can be better managed in terms of countryside impact and is located in a superior position with regard to its relationship to the town centre and local services. Transport matters can also be better managed than is the case with the 5 proposed sites. The proposal will come forward in the next 3 months as a formal planning application. The Landowner and I are committed to the site becoming deliverable as soon as possible. [Plan of site in doc MALMES46]

**MM4. What land do you think is the most appropriate upon which to build?**

See my answer to Q3.

**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 sites?**

All of the identified sites have notable constraints in particular regarding landscape / countryside, transport links and relationship to the town centre and services.

**MM6. Are there any issues or infrastructure requirements that should be identified?**

No answer

**Further comments**

I would be keen to engage with policy officers regarding this proposed site if it is if interested to them.

Attached letter text:[MALMES46, MALMES46a]

I wish to bring to the Council's attention that a Landowner and I intend to bring forward a proposal to develop a site in Malmesbury to the east of Waitrose as shown in the map below (part of this site was formally proposed for a Lidl store). As I have set out in my response form I believe this site is more suitable for development than the 5 sites identified in this consultation. The proposal will be for a combined scheme of self build and retirement housing to be deliverable as soon as possible. Should the policy officers wish to contact me regarding this proposal they should do so using the email address above.

[See doc MALMES46 for site plan]

<b>Rep ID:</b> Malmes47	
<b>Consultee code:</b> Other Advisory Bodies	<b>Consultee Organisation (if applicable):</b> The Campaign to Protect Rural Wiltshire (CPRE)
<b>Is this response on behalf of someone else/another organisation?</b> No	
<b>Organisation being represented (if applicable):</b>	
<b>Does this representation refer to attachment(s):</b> no	<b>If this representation refers to attachment(s), these are listed below:</b>
<b>MM1. What do you think to the scale of growth? Should there be a brownfield target?</b>	
<p>The required growth was 95 homes up to 2036 but Filands permission for 71 has reduced the requirement to 24. Many environmental and historic constraints in the town. Growth should remain within any available brownfield sites at least over the next 10 years. Emphasis on smaller units which facilitate young people to be able to live and work within the immediate area. The priorities are to find means of creating local employment, on a small scale. It will be difficult to place a brownfield target, numerically, but it should be expressed as a priority requirement much more strongly than at present in the Policy for Malmesbury. It should feature in the Neighbourhood Plan as well as Wiltshire Council Plan.</p> <p>The council refer to a target of possible 70 homes over next ten years. What assessment is this based on? Will there be a new assessment within at least a year to consider the employment situation post Covid?</p> <p>The Neighbourhood Plan must be able carry out this assessment, with Council help, and decide through community involvement what the situation is and how to plan for first 5 years, then a new review for the subsequent 5 years. The Neighbourhood Plan should be given the power to allocate the type of housing required following a Local Needs Assessment. The likely need will be for social rent, discounted market sales with resale eligibility protection and delivered through Community Land Trusts.</p>	

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

There should be a much greater degree of environmental considerations when economic growth is being planned. High importance of consideration of not only flood risk, but of increased winter rainfall, greater consideration of a move to encourage public transport of a standard able to provide convenient and acceptable alternatives to the car for the town and the rural villages.  
Place Shaping Higher standards of construction and design for those houses already permitted. Character building through design must be an essential requirement.

**MM3. Is this the right pool of potential development sites?**

This should be decided through the Neighbourhood Plan committee and public representation.

**MM4. What land do you think is the most appropriate upon which to build?**

Sites 1 -5 all appear to have issues either of landscaping and groundwater levels. This is why there should be no development for the next 5 – 10 years whilst new evaluations are carried out on housing affordability and the economic situation is understand.

**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 sites?**

Re-skilling of the work force. In order to obtain employment this is fundamental.  
Unemployment figures within the next 12 months should be assessed. This leads to the question of housing affordability and appropriateness. A proper consideration of a small town in a high value environment and how that will affect its social, economic and environmental factors.  
Consideration of the land at Hullavington airfield and future employment provision at Jt17M4 could have major effects on Malmesbury. If there were to be jobs available at logistics or warehousing the issue of transport, avoiding at all cost's daily car commuting, must be included in the longer term for the town.  
If Malmesbury and surrounding community is to develop with a proper balance of employment to houses whilst retaining the intrinsic character of the historic town, growth must be constrained and managed to encourage the creation of new small local businesses, new skills and a self-sufficient identity.

**MM6. Are there any issues or infrastructure requirements that should be identified?**

No comment

**Further comments**

<b>Rep ID:</b> Malmes48	
<b>Consultee code:</b> Developer/Agent	<b>Consultee Organisation (if applicable):</b> Pegasus
<b>Is this response on behalf of someone else/another organisation?</b> Yes	
<b>Organisation being represented (if applicable):</b> Hannick Homes	
<b>Does this representation refer to attachment(s):</b> no	<b>If this representation refers to attachment(s), these are listed below:</b>
<b>MM1. What do you think to the scale of growth? Should there be a brownfield target?</b>	
<p>Pegasus consider the scale of growth proposed at Malmesbury to be insufficient for the proposed plan period to 2036. The emerging spatial strategy for Chippenham Housing Market Area document identifies that 665 dwellings should come forward at Malmesbury in the plan period 2016-2026 with no associated employment land.</p> <p>The Local Plan Review Interim Sustainability Appraisal Main Report states on p.24 at paragraph 4.2.7 for Malmesbury that; " the town is constrained in heritage terms and it is recommended that a lower level of growth is directed to the town. However, it has also been noted 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." (emphasis added)</p> <p>The Planning for Malmesbury (Jan 21) consultation document evidences that the Core Strategy planned a minimum of for 885 dwellings to come forward at Malmesbury for the plan period 2006-2026 and yet the WLPR now reduces that figure by 220 (25% rounded) to just 665 for the period 2016-2036 against a national planning policy context of increasing the supply of housing to meet the Government's stated ambition of delivering 300,000 new homes per annum by the mid 2020's. The document goes onto state that existing completions since 2016 and current commitments at the Market Town would only serve to reduce the residual</p>	

number of new homes required further such that the Neighbourhood Plan can will identify the sites on which these homes can be built.

However, the Council's own Interim SA identifies affordability as a key issue at Malmesbury alongside the prioritisation of the delivery of new affordable homes. Not allocating a new site for residential development in the WLPR will prejudice the delivery of new affordable homes at the Market Town as Neighbourhood Plans are encouraged to consider the allocation of brownfield sites over which there is less certainty over delivery and which may face greater viability considerations owing to planning constraints such as flood risk, heritage, contamination and remediation requirements.

The proposed reduction in percentage of housing compared to the Core Strategy will also do little to improve self-containment in and around the Market Town or north of the M4 in the Chippenham Housing Market Area, with workers travelling to jobs at the Dyson sites at the town and Hullavington from further afield owing to the lack of suitable and affordable housing at Malmesbury.

Pegasus consider that there should not be a brownfield target for the town and that the WLPR should allocate additional land for new housing development alongside any sites allocated in a reviewed Neighbourhood Plan which meet local need.

There will be no incentive for the Neighbourhood Plan to be reviewed or to allocate sites to meet plan period needs if the minimum indicative number of dwellings for the plan period has already been met on adoption of the WLPR.

This does not represent 'positive planning' in the spirit of the NPPF given the fact that Malmesbury is a sustainable location for development with a range of local services and community facilities, including a thriving secondary school and is home to the research and development institute of the international engineering and product design company Dyson.

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

Pegasus query how the first place shaping priority to deliver a range of housing to meet local housing needs will be met if the Market Town has already met its minimum housing requirement before the plan is adopted and no allocations are provided to address the priority?

Nor is it understood how economic growth will be supported if no new employment sites are allocated.

**MM3. Is this the right pool of potential development sites?**

Pegasus make no comment

#### **MM4. What land do you think is the most appropriate upon which to build?**

Pegasus support the identification of land parcel 452 (the land parcel closest to the existing built form of Malmesbury in Site 5) 'Land South West of Park Road' for further assessment for potential allocation. The site is suitable, available and deliverable and can accommodate up to 26 dwellings. The site will provide for continuity of housing land supply at the Market Town in the plan period and is currently the subject of an outline planning application (20/08431/OUT).

The WLPR states that completions and commitments account for nearly all the 665 dwellings proposed at the Market Town for the plan period up to 2036. However it is noted that the housing allocation in the made Neighbourhood Plan at Backbridge Farm (site 3A in the MNDP) is yet to receive planning permission. There is therefore no certainty that this site, identified as a commitment by the WLPR will deliver in the plan period. This allocation is currently subject of a pending planning application (LPA ref: 16/06401/FUL) for 201 dwellings plus land for the expansion of Malmesbury Primary School.

Land South West of Park Road can make provision for a range of tenures including 40% affordable housing in accordance with WCS Policy CP43 of the adopted Core Strategy.

The outline application proposals represent a density of approximately 32 dwellings per hectare. The indicative layout is based on a mix of detached and semi detached with on plot car parking and street visitor parking. Properties are envisaged to face onto a single main street through the development to provide a strong frontage to the public realm and ensure there is no adverse overlooking of neighbouring properties along White Lion Park and Park Close.

The development will be served by a single point of access from Park Road. The access will be 5.5m wide with 2m wide footways on either side. As part of the development it is proposed to widen Park Road to 5m between the site access and Park Close to the east. An emergency access is proposed from White Lion Park which already extends to directly abut the south east corner of the site. The purpose of the access is to provide pedestrian and cycle access and access for emergency vehicles should Park Road be flooded at any time in the future.

Existing mature hedgerows around the site will largely be retained, except for where access onto Park Road will be created.

All consultees have now responded to the application with no indication of any specific objections to the development of the site in principle.

The Indicative Planning Layout submitted with the outline application and attached at Appendix 1 envisages two areas of public open space either side of the main access providing a buffer between Park Road and the proposed properties. A drainage detention basin will provide suitable means of draining surface water runoff from the development on the majority of the site.

Based on site levels this will be required to be located in the north east corner of the site (the lowest point of the site) as shown on the Indicative planning Layout. This will also provide an opportunity to incorporate wetland grassland to enhance biodiversity.



There is no physical connectivity between our client's site and the remainder of Site 5 and no current intention for there to be so or for the sites to be promoted comprehensively, contrary to the findings of p.16 of the Malmesbury Site Selection report. Our client's site is a discrete site on the edge of Malmesbury that will assist in providing continuity of supply, including affordable housing as identified by the SA for the Market Town within the plan period.

**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 sites?**

The Malmesbury Site Selection report scores site 452 amber for flood risk and landscape. It is noted that there is no published scoring mechanism to ascertain for how the site selection criteria assess each site, this is an omission in the transparency of the site selection process. Notwithstanding the amber scoring in the site selection process there have been no overriding environmental objections emerging from the consultation responses to submitted planning application 20/08431/OUT with no objections to development at the site being raised by consultees relating to flood risk or landscape matters. The amber scoring for the site in relation to these matters is therefore considered to be erroneous. Indeed, the authority have requested information on the deliverability of the site as part of the application. The additional evidence prepared states that the site is in single ownership and that a local family run development company, Hannick, has an interest in the land which is available now and achievable within five years. It is noted that site 452 is one of the top 3 performing sites in the site selection study, however changing the two amber scores (flood risk and landscape) to green will result in the site being the top performing site of all sites considered in the site selection report. Arguably therefore our client's site is the most sustainable site in Malmesbury to be taken forward for allocation for new housing by either the WLPR or the Neighbourhood Plan.

**MM6. Are there any issues or infrastructure requirements that should be identified?**

Pegasus make no comment

**Further comments**

<b>Rep ID:</b> Malmes49	
<b>Consultee code:</b> Developer/Agent	<b>Consultee Organisation (if applicable):</b> Nexus Planning
<b>Is this response on behalf of someone else/another organisation?</b> No	
<b>Organisation being represented (if applicable):</b>	
<b>Does this representation refer to attachment(s):</b> yes	<b>If this representation refers to attachment(s), these are listed below:</b> MALMES49, MALMES49a, MALMES49b
<b>MM1. What do you think to the scale of growth? Should there be a brownfield target?</b>	
<p>The 'Planning for Malmesbury' document proposes a requirement of 665 homes in Malmesbury for the plan period 2016-2036. As set out within our response to the Spatial Strategy Paper, this is lower than the existing Core Strategy requirement of 885 dwellings. The justification for this as set out in the Interim Sustainability Appraisal is that: "Malmesbury – the town is constrained in heritage terms and it is recommended that a lower level of growth is directed to the town. However, it has also been noted 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." HSL considers that Malmesbury can accommodate a higher level of growth than that identified by the Emerging Spatial Strategy. The level of growth that is identified in the Planning for Malmesbury paper does not reflect its inherent sustainability nor its important role as an employment centre within the wider Housing Market Area. Whilst the identified constraints relating to heritage and flood risk are noted, the 'Planning for Malmesbury' Paper has identified sites, including Site 4 Land adjacent to Park Lane (SHLAA ref 691), which are</p>	

considered to be relatively unconstrained and which would not impact upon heritage assets. Such opportunities would assist in addressing the need for additional market and affordable housing within Malmesbury.

The 'Planning for Malmesbury' Paper identifies that the average price for a 2-bedroom property in Malmesbury is £247,000 - this is higher than all other market towns within the Chippenham Housing Market Area. Furthermore, the Interim Sustainability Appraisal makes clear that the ratio of house price to earnings in Malmesbury continues to be one of the highest in Wiltshire. A reduced housing requirement for Malmesbury (when compared to the figure in the existing Core Strategy) would only further exacerbate such affordability issues. As such, the proposed distribution of housing growth should be reviewed to increase the level of growth afforded to Malmesbury.

The principle of building on brownfield land is supported, although HSL is concerned that the target for Malmesbury represents too large a proportion of the overall housing requirement for the settlement (as set out in further detail in our response to the Emerging Spatial Strategy Paper). This is considered to create an over-reliance on windfall sites given the limited and diminishing opportunities to redevelop brownfield land within the settlement. Such an over-reliance has the potential to impair Malmesbury's ability to grow strategically and does not build in flexibility in housing supply in the event that levels of delivery moving forward are lower than they have been historically. Furthermore, the Council has not provided an indicative supply of sites to justify and evidence the brownfield target. In the absence of this information it cannot be concluded that sufficient compelling evidence has been provided to indicate these sites represent a reliable source of supply, in accordance with Paragraph 70 of the Framework:

"Where an allowance is to be made for windfall sites as part of anticipated supply, there should be compelling evidence that they will provide a reliable source of supply. Any allowance should be realistic having regard to the strategic housing land availability assessment, historic windfall delivery rates and expected future trends. Plans should consider the case for setting out policies to resist inappropriate development of residential gardens, for example where development would cause harm to the local area."

Notwithstanding this, it is noted that the Emerging Strategy emphasises that the brownfield target is not an absolute figure i.e. it is an indicative target. It is understood that the Malmesbury Neighbourhood Plan review will be responsible for ensuring sufficient sites are allocated to meet strategic requirements. Any policy wording in the emerging Local Plan must ensure that the Malmesbury Neighbourhood Plan identifies sufficient deliverable sites to meet residual housing needs over the emerging Local Plan period (in addition to the "indicative" brownfield target).

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

HSL supports the place shaping priorities set out in the report, particularly with regards to delivering a range of housing to meet local needs. However as set out above, HLS considers that Malmesbury, in light of its inherent sustainability and economic contribution, and ongoing affordability issues, should be contributing more significantly to meeting the market and affordable housing needs of the Chippenham HMA.

The priority of supporting prospects for economic growth is also supported, and HSL believes that an increased housing requirement for Malmesbury is key to supporting this priority. It is noted that local employer Dyson has experienced significant expansion in recent years and there is, as a consequence, net in-commuting to the settlement. Additional housing growth would ensure that market and affordable housing needs in Malmesbury are responded to whilst safeguarding and enhancing the economic contribution the town makes to the housing market area.

### **MM3. Is this the right pool of potential development sites?**

HSL welcomes the identification of Site 4 Land adjacent to Park Lane (SHLAA ref. 691) as a potential development site and agrees with the assessment in the accompanying 'Site Selection Report' that 'there does not appear to be any overriding significant impacts that justify excluding the site at this stage'. As we set out in our response to question MM4 (below), the site has no technical or physical constraints which would impede housing delivery and it is suitable for development, available and housing can be delivered within 5 years. The site can, therefore, make an important contribution to meeting market and affordable housing needs in the Chippenham Housing Market Area, and Malmesbury in particular.

### **MM4. What land do you think is the most appropriate upon which to build?**

The 'Planning for Malmesbury' report notes that if Malmesbury is to expand to meet development needs, consideration will need to be given to the release of greenfield land for development. HSL supports this position, and believes that the release of greenfield land for development represents the most appropriate route responding to market and affordable housing needs in Malmesbury.

HSL also supports the conclusions of the Stage 2 assessment that has been undertaken for Site 4 Land adjacent to Park Lane (SHLAA ref. 691), which found that the site is relatively unconstrained in terms of its wider environmental impacts. Unlike some other sites on the edge of Malmesbury, this site is not impacted by any heritage or flood risk constraints, has strong defensible

boundaries and is well related to existing built development. It is a wholly logical and sustainable location for development that provides an opportunity to respond to local housing needs in Malmesbury in a location which respects the neighbouring suburban built form and the adjacent Cotswolds AONB (albeit the site lies outside of the AONB).

HSL has undertaken a considerable amount of survey work and has, having considered the site's opportunities and constraints, developed a Concept Masterplan (Appendix 2). The Masterplan identifies a proposed development area which could deliver around 60 dwellings. Vehicular and pedestrian access will be gained from the B4040 Sherston Road. Indeed, HSL are willing to bring forward a wholly affordable scheme at this site in order to meet the affordable housing needs of Malmesbury and Wiltshire as a whole.

The Masterplan recognises the unique character and setting of the location and addresses this positively through the inclusion of appropriate landscaping treatments and responses to the local topography. Hedgerows are to be retained and additional landscaping provided to bolster the sites boundary features, and informal open space is provided at the west of the site, to assist in creating a transition to / from the AONB (albeit the site lies outside of the AONB).

In terms of accessibility, the site is in walking distance of Malmesbury town centre and a number of local services including Malmesbury C of E Primary School, Malmesbury Secondary School and Sixth Form, Co-op Food Store and a medical practice. The site is well located for access to play areas and leisure opportunities such as White Lion Recreation Park to the north of the site, and the Activity Zone gym and pool which is located to the east. Furthermore, a number of Public Rights of Way are easily accessible from the site, which lead into the Cotswolds AONB (MALM 12, BROK 2, 16, 17 and 19).

There is an excellent public transport network available to potential future residents. Existing bus stops immediately to the south of the site along Sherston Road serve bus routes 41 and 278, providing regular services to Malmesbury, Easton Grey, Acton Turville, Chipping Sodbury and Yate during peak times. Bus route 30 is the Malmesbury Town Bus service and it has stops on Parklands, within a short walk from the site. The Town Bus provides links to other bus stops which then link Malmesbury to the wider bus network. The site is therefore accessible by a range of sustainable modes and able to cater for needs of residents and visitors and assist in promoting a choice of travel modes other than the private car, as required by the Framework.

The site has no technical or physical constraints which would impede housing delivery and is suitable and available and could deliver housing within 5 years. The site can make an important contribution to meeting development needs in the Chippenham Housing Market Area.

**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 sites?**

In relation to Site 4, the 'Planning for Malmesbury' Paper identifies that development would have the potential for "built form to form an abrupt, new settlement edge". As demonstrated in the submitted Concept Plan (Appendix 2) the proposed development of the site would ensure that existing hedgerows are retained and additional landscaping could be provided to bolster the site's boundary features. An area of informal open space would also be provided towards the site's western edge, to assist in creating an appropriate transition from / to the AONB. This would allow for the creation of a soft and wholly appropriate new settlement edge to Malmesbury.

The 'Malmesbury Site Selection Report' identifies that the site is "below average in terms of accessibility by non-car modes of travel". HSL would disagree with this conclusion. As set out in the response to MM3, the site is accessible by a range of sustainable modes other than the private car. Existing bus stops immediately to the south of the site along Sherston Road serve bus routes 41 and 278, ensuring regular services to Malmesbury, Easton Grey, Acton Turville, Chipping Sodbury and Yate during peak times. Bus route 30 is the Malmesbury Town Bus service and it has stops on Parklands within a short walk from the site. The Town Bus provides links to other bus stops and links Malmesbury to the wider bus network. Additionally, the site is in walking distance of Malmesbury town centre and a number of local services including Malmesbury C of E Primary School, Malmesbury Secondary School and Sixth Form, Co-op Food Store and a medical practice.

It is noted Figure 3 of the 'Planning for Malmesbury' Paper identifies the site within a "Strategic Nature Area". No evidence or justification is provided for this and whilst it is noted these are "draft plans" and are, therefore, subject to change, HSL would object to any such designation for which there is no evidential basis. A Preliminary Ecology Assessment has been completed for the site which confirms that the site is of low ecological importance and that with standard mitigation measures, development could proceed without adverse impacts on wildlife (please refer to Appendix 3). Furthermore, the report records that the site is located a sufficient distance away from the Cloatley Manor Farm Meadows SSSI site to avoid any direct impacts. The Ecology Assessment prepared for the site concludes that development of the site would in fact provide the opportunity to deliver net gain in biodiversity through new areas of landscaping as identified in the Concept Plan.

#### **MM6. Are there any issues or infrastructure requirements that should be identified?**

The 'Planning for Malmesbury' Paper identifies that the older population is expected to increase over the emerging Local Plan period - by 39% in the 60-74 age group and 96% in the 75+ age group. Additionally, it identifies that the average price for a 2-bedroom property in Malmesbury is £247,000 - this is higher than all other market towns within the Chippenham Housing Market Area. Furthermore, the Interim Sustainability Appraisal makes clear that the ratio of house price to earnings in Malmesbury continues to be one of the highest in Wiltshire.

As set out earlier in this representation, there are limited opportunities within the settlement boundary of Malmesbury to respond to emerging development needs. The Council should, therefore, ensure that sufficient sites are allocated in Malmesbury to meet the full range of housing needs identified, including those for affordable housing and housing suitable for older persons. A reduced housing requirement for Malmesbury (when compared to the figure in the existing Core Strategy) would only further exacerbate affordability issues and is unlikely to respond appropriately to the housing needs for older persons as identified by the Council.

**Further comments**

<b>Rep ID:</b> Malmes50	
<b>Consultee code:</b> Developer/Agent	<b>Consultee Organisation (if applicable):</b> Blue Fox Planning
<b>Is this response on behalf of someone else/another organisation?</b> Yes	
<b>Organisation being represented (if applicable):</b> Persimmon Homes (Wessex) Ltd	
<b>Does this representation refer to attachment(s):</b> yes	<b>If this representation refers to attachment(s), these are listed below:</b> MALMES50, MALMES50a
<b>MM1. What do you think to the scale of growth? Should there be a brownfield target?</b>	
<p>In terms of the overarching strategy for Malmesbury we are concerned that the proposed level of development is at a level which is significantly below the baseline figure and also lower than the two reasonable (lower) alternatives presented and taken through to the Sustainability Appraisal.</p> <p>Reference to 'extensive' environmental constraints at Malmesbury appears to be a key determinant in the decision opt for lower levels of development. Yet this does not appear to be supported by the SA and its conclusions on likely effects. Moreover, the site selection process identifies a number of site options (which should include site 738) and in doing so, this appears to run counter to this approach. It raises questions as to the robustness of the decision to constrain the levels of housing growth at Malmesbury.</p>	
<b>MM2. Are these the right priorities? What priorities may be missing? How might these place shaping priorities be achieved?</b>	



**MM3. Is this the right pool of potential development sites?**

**MM4. What land do you think is the most appropriate upon which to build?**

**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 sites?**

**MM6. Are there any issues or infrastructure requirements that should be identified?**

**Further comments**

Introduction

1.1 On behalf of our client, Persimmon Homes (Wessex) Ltd, Blue Fox Planning Ltd is instructed to submit representations in response to the March 2021 Wiltshire Council Local Plan Review public consultation.

1.2 The representations set out herein are focused on land controlled by Persimmon Homes at Backbridge Farm, Malmesbury. This land, circa 16ha, forms part of the land identified within the Wiltshire Strategic Housing and Economic Land Availability Assessment (SHELAA), site reference: 798 (Backbridge Farm).

1.3 The eastern boundary of land promoted within these representations adjoins the Neighbourhood Plan site allocation, which is subject to a live planning application (LPA ref: 16/06401/FUL), comprising a development of 201 dwellings.

Planning application 16/06401/FUL

1.4 Persimmon homes has submitted a detailed planning application for 201 dwellings (of which 40% are affordable homes) on land at Backbridge Farm, pursuant to the area allocated within the made Malmesbury Neighbourhood Plan. This application is

supported by a range of technical studies and reports, including Heritage Assessment; Flood Risk Assessment and a Landscape and Visual Impact Assessment. Chapter 2 relates to the Emerging Spatial Strategy.

### 3. Land at Backbridge Farm, Malmesbury

3.1 The Malmesbury Site Selection Report provides a high-level assessment which is intended to refine the options for future development, based on a staged approach with individual sites and locations either excluded at this initial stage, or taken forward for further detailed assessment.

3.2 Land controlled by Persimmon Homes at Backbridge Farm forms part of land which is identified in the Wiltshire Strategic Housing and Economic Land Availability Assessment (SHELAA) (site ref: 738).

3.3 This 16ha site represents the balance of the SHELAA site, i.e. excluding those areas where development has taken place, e.g. Dyson Village and factory to the north/northeast, and where land is allocated in the made Malmesbury Neighbourhood Plan and subject to a live planning application for residential development (201 dwellings -16/06401/FUL).

3.4 The area shown on Figure 2 of the Malmesbury Site Selection Report, annotated as 'land for assessment' broadly aligns with the land area subject to promotion through these representations.

3.5 In order to assist the Council, a Concept Plan has been prepared (Appendix 1 [MALMES46, MALMES46a]), based on known opportunities and constraints (Appendix 2). Taken together this sets out the resulting suitable areas for development in support of these representations.

APPENDIX 1: CONCEPT PLAN [MALMES46, MALMES46a]

APPENDIX 2: CONSTRAINTS AND OPPORTUNITIES PLAN [MALMES46, MALMES46a]

3.6 As explained, this site has not been taken forward to further stages and the reasons for this are set out in the site assessment tables contained within the Site Selection Report.

3.7 In general terms we are concerned that the assessment of this site is apparently premised on an assumption that the entirety of the land identified will be developed. It does not consider or have regard to, the fact that not all of the land promoted will be developed and there is no consideration of the varying sensitivities of different land areas within the land promoted.

3.8 As we demonstrate on the enclosed Concept Plan, the constraints that impact on the development potential of this site, do not render the site in its entirety as unsuitable for development.

3.9 The Council's high-level assessment recognises that this site forms part of the wider land area identified in the SHELAA, with areas to the east benefiting from locally endorsed allocation within the made Malmesbury Neighbourhood Plan, which is itself subject to a live planning application (16/06401/FUL).

3.10 There is no reference within this assessment to the proximity of the Dyson Factory or the recently completed Dyson village. In fact, the high-level assessment appears to deliberately omit references to the immediate built physical context and in doing so, fails to set the context within which this land should be assessed.

3.11 The site selection summary concludes that ‘the further reaches of the site do not have good accessibility and there are flood risks’. It then goes on to explain that ‘if developed’, it would extend the urban area towards the AONB and would ‘be likely to harm the landscape setting of the river Avon.’

3.12 There is no dispute in terms of the constraints identified, these are factual and therefore it is entirely appropriate for such constraints to be taken into account. However, our concern is that the high-level assessment set out in the Site Selection Report determines that these considerations represent absolute constraints and therefore justify the decision to reject this site from further consideration, this is of particular concern in respect of the references to the Cotswold AONB.

3.13 The current SHELAA identifies at Appendix 2 ‘exclusionary criteria’ which is used in the determination of whether a site, or any area of a site, is unsuitable. It should be noted that none of these identified exclusionary criteria have been applied in the SHELAA to site 738. Moreover, the SHELAA assessment for site 738 conclude that the site is ‘suitable’ and specifically states ‘Yes. No suitability constraints’.

3.14 Whilst the SHLEAA is not determinative in the site selection process, the consideration of site 738 is a relevant consideration. Figure 1 of the Malmesbury Site Selection Report summarises the stages of the site selection process and at the current stage (Stage 2 –sifting), it is explained that this involves:

“Removing further land that is relatively inaccessible where development would have impacts upon its surroundings difficult to make acceptable and does not align clearly with plan objectives.” (Our emphasis)

3.15 There is no detailed consideration as to the accessibility of this site, the high-level assessments simply states that: ‘The further reaches of the site do not have good accessibility’. The scoring of this site in the summary assessment tables concludes that the site scores ‘amber’ which is ‘medium’ which is itself somewhat inconsistent with the commentary on the site set out in the Site Selection Report. Notwithstanding, it is evident that this assessment has no regard to the proposal subject to the live planning application which includes the following:

A pedestrian and cycle bridge link over the River Avon to the south of the site

Provision for a pedestrian and cycle linked to the east

3.16 The Council assessment simply comments on the circumstances at the outer periphery of the site, which self-evidently would represent a worst case scenario and it has no regard for the potential connectivity of this land to the allocated site and its associated connections to the centre of Malmesbury.

3.17 The high-level assessment also refers to the fact that ‘there are flood risks to manage’. This is not an usual constraint associated with sites, indeed, the same ‘risks’ prevail at the land which has been allocated. There is no consideration as to the potential for the flood zone area to provide an opportunity to extend the riverside park Public Open Space from the allocated sites.

3.18 Moreover, the site is scored ‘amber’ (medium), which is the same score as other potential sites which have been taken forward for further assessment (e.g. sites 649 and 1108).

3.19 In respect of other considerations, i.e. heritage and traffic, the site is assessed as 'Green' and therefore such considerations are not relevant in terms of the decision to exclude this site from further assessment. Notwithstanding this, it should be recognised that due to the limited scale of infrastructure that would be required to support development at this location, owing to the access road being delivered by the allocated scheme, the site is capable of providing an immediate contribution to housing delivery.

3.20 In terms of landscape, the site is scored 'red'. At paragraph 30 of the Site Selection Report it is explained that: 'A site that creates a harmful landscape or visual impact that is unlikely to be successfully mitigated may be rejected.' On this basis, it is evident that the Council has determined, without any specific detailed assessment, that development at site 738 would be both harmful and could not be mitigated. Yet there is no meaningful analysis to demonstrate that such conclusions are justified.

3.21 The Cotswold AONB lies to the west and the edge of this designated area is defined by the single-track road (Park Lane). The site does not therefore sit within the AONB but given its proximity, it is evident that the site is within the setting of the AONB. It is therefore a factor which needs to be considered when preparing development proposals at this location.

3.22 Proximity does not in itself automatically mean harm, which is the approach taken in the Council's high-level assessment. Such an approach is considered too high level and has been applied specifically with the intention to justify the exclusion of this site from further assessment.

3.23 There is no consideration in this assessment as to the potential for new development to be accommodated within the least sensitive areas of the site and for strategies for mitigation and landscape enhancements, to comfortably and successfully incorporate development at this location in a manner that does not result in harm to its wider setting. In doing so, providing the completion of a modest high quality urban extension to the town.

3.24 The River Avon runs along the southern extent of this site and in a similar way to considerations related to the AONB designation, the Council's assessment lacks any consideration of the potential for new development, not to just avoid this area, but to incorporate this as part of any future development. Such an approach lacks any consistency with the decision to allocate land to the east, which is subject to the same considerations in respect of the River Avon, and which forms part of the proposed riverside park Public Open Space area.

3.25 For the site assessment process at Stage 2 to make definitive conclusions on harm and scope for mitigation, and for this to be presented in little more than a simple traffic light scoring system with extremely limited commentary on the assessment, significantly undermines the value of this process.

3.26 It is our position that site 738 provides a genuine development opportunity that can facilitate sustainable patterns of development at Malmesbury and supports its role and function as a Market Town within the county. Moreover, the decision to reject this site from further assessment is based on extremely limited evidence and judgments on specific matters that are neither properly articulated nor presented in evidence.

3.27 Consequently site 738 should not be excluded from further assessment. As explained at paragraph 18 of the Site Selection Report, the next step in the site selection process is for 'reasonable alternative' sites to be examined in more detailed (Stage 3). Critically, this process addresses the shortcomings of the Stage 2 assessment, on the basis that: "They will be subject to sustainability appraisal, stage three. This assesses the likely significant effects of potentially developing each site under a set of twelve objectives, covering social, economic and environmental aspects. It helps to identify those sites that have the most sustainability benefits over those with less. It also helps to identify what may be necessary to mitigate adverse effects and what measures could increase benefits of development."

3.28 The scope of the Stage 3 assessment is more extensive than Stage 2 and whilst it is accepted that there needs to be a process of filtering out unsuitable sites and locations, the approach set out in the Site Selection Report is based on a filtering process which lacks sufficient detail to demonstrate why this is appropriate for particular sites.

3.29 In the context of site 738, the Stage 2 process draws definitive conclusions on harm and scope for mitigation which is precisely what the further detailed assessment through Stage 3 is intended to achieve. This demonstrates that Stage 2 is not supported by any detail, given that this is part of the next stage in the site selection process.

3.30 In the wider context of the proposed strategy for Malmesbury and specifically the levels of growth, this is driven by the 'planning judgement' that there are 'extensive environmental constraints'.

3.31 It is therefore essential that opportunities for development are subject to a sufficiently detailed assessment in order to determine the extent to which such constraints impact on the ability of specific sites and locations to provide for development.

3.32 The concern is that the reference to 'extensive environmental constraints' is informed by the Stage 2 process and the conclusion on specific sites, including site 738. If this is the case, then we question how robust this process is, not just for site 738 but for the key determinant in the growth strategy for the town.

3.33 In the context of site 738, we do not consider that the Stage 2 assessment and the decision to reject the site from further assessment is sufficiently robust to justify this conclusion. Accordingly, it is our position that site 738 should progress to the more detailed assessment stages.

#### 4. Alternative Development Strategies (ADSs) – Chippenham HMA

4.1 This ADSs Paper sets out the conclusions of various assessments to identify reasonable alternative development strategies in the Chippenham Housing Market Area (HMA). The conclusion of this process is three alternative strategies, summarised as follows.

4.2 For Malmesbury, the three reasonable alternatives indicate a housing range over the plan period to 2036 of between 885 dwellings and 1260 dwellings.

4.3 It is explained within the Planning for Malmesbury paper that the new strategy proposes a requirement of 665 homes for the plan period to 2036, a figure which is lower than any of the three initial reasonable alternative options. On the basis of a

requirement to provide for 665 homes, owing to completions and commitments, this leaves only a minimal number of new homes which would need to be planned for.

4.4 As a consequence, there are no proposals within the Local Plan Review to allocate any further land for housing. Any further land to come forward at Malmesbury is proposed to be left to the Neighbourhood Plan process which has the option to allocate land should it wish to do so.

4.5 The process of identifying reasonable alternatives uses as the baseline, the rolling forward of the current strategy (as set out in the adopted Wiltshire Core Strategy) from which an 'informed planning judgement' is made on what alternatives to test.

4.6 Through this assessment process, the evidence referred to is then used to conclude whether alternatives to the current strategy suggest that higher or lower levels of growth should be tested, i.e. whether future growth levels should be higher or lower than those that emerge by rolling forward the current Spatial Strategy.

4.7 For Malmesbury, the summary conclusions set out in the ADSs paper, explains that the approach should be to consider reasonable alternative strategies that are based on lower levels of growth when compared to rolling forward the current strategy.

4.8 It is explained in the ADSs that although there are 'good prospects for continued economic growth', this contrasts with 'extensive environmental constraints' which extends to constraints associated with local infrastructure and 'a relatively restricted pool of land available for further development.'

4.9 In terms of past housing trends, Figure 3 of the ADSs sets out how much house building has been below what would be needed to roll forward the current strategy. For Malmesbury this figure is -27%, which compares with other Market Towns, such as Corsham (-54%) and Melksham (-27%). On this assessment of past development trends Malmesbury performs better or equal to other Market Towns in the HMA, and significantly better than Chippenham which has a figure of -189%.

4.10 In terms of 'Land Availability', i.e. how much of the land needed to roll forward the current strategy is already in the pipe line (April 2018), at Malmesbury the figure is 42%, this compares with 41% at Melksham, 29% at Devizes and 27% at Corsham.

4.11 These factual indicators demonstrate that when considered against the baseline requirement, Malmesbury performs comparatively well against other settlements at a similar level in the settlement hierarchy.

4.12 In terms of employment and land availability, Figure 6 of the ADSs shows how much of employment landed need to roll forward the current strategy is in the pipeline. For Malmesbury this figure is 100%.

4.13 Paragraph 85 of the ADSs explains that if a high proportion of land needed to roll forward the current strategy is already in the pipeline, then this suggests exploring alternatives for higher amounts of employment land. The ADSs (Paragraph 96) then goes on to note that at Malmesbury the prospects for job growth suggest higher rates of housing development than rolling forward the current strategy.

4.14 Notwithstanding the strong performance of Malmesbury in terms of employment land delivery and availability, the Planning for Malmesbury Paper explains that further employment land is not needed as land is already allocated in both the Local and Neighbourhood Plan.

4.15 Based on our view of the evidence produced, it is evident that the economic context at Malmesbury suggests that higher levels of growth should be planned for. Yet the proposed strategy is based on a significantly lower level of housing growth when compared to the 'baseline' scenario.

4.16 The Spatial Strategy Paper (paragraph 3.33) states that the results of the Sustainability Appraisal (SA) identify the level of environmental constraints at Malmesbury 'should lead to a smaller proportion of growth if possible.'

4.17 It is difficult to reconcile the approach to Malmesbury when read alongside the Site Selection Report. Notwithstanding our concerns relating to the assessment of site 738, 5 sites are identified as the final pool of sites which are to be taken forward for further detailed assessment. Yet the scale of growth proposed at Melksham, determined by the fact that the environmental constraints are 'extensive', is effectively addressed through existing pipeline development.

4.18 Paragraph 41 of the ADSs explains:

"At Malmesbury it was considered challenging to implement the numbers without detriment to the setting and hence the character of the town itself. This historic town core, including the abbey and its setting, need to retain strong connections with countryside along river valleys from outlying countryside. Large areas of land are at risk of groundwater flooding resulting in minimal development opportunity and any development to have careful consideration of its impact downstream."

4.19 The site selection process identifies potential development locations in parallel to the consideration of the development strategy for Malmesbury, and in doing so shortlists potential development locations, some of which include significant areas of land (Site 1). There is an inherent inconsistency in this regard, if the range of constraints are as extensive as stated and applied to lower the overall housing requirement, then we question how it can be the case that the Site Selection Process identifies a number of site options as potential development locations.

4.20 This range of sites options is increased further when site 738 is correctly re-introduced to be assessed through Stage 3

4.21 With regards to the repeated references to the extensive environmental constraints at Malmesbury to justify the levels of growth proposed, we reiterate our observations regarding the SA. Specifically, that within the SA, for SA Objective 6 (Historic Environment), against the baseline option of rolling forward the current strategy, which equates to 1260 dwellings for Malmesbury, the assessment concludes that there would be 'moderate adverse' effects.

4.22 Whilst the SA assessment recognises that the proposed growth levels under CH-A would be challenging for heritage in and around Malmesbury, it does not provide basis upon which it is reasonable to adopt an approach that is highly restrictive in terms of the capacity to accommodate development, as is suggested by the quantum set out as the preferred approach for Malmesbury. The same level of effects, i.e. 'moderate adverse effects' is also identified in respect of SA Objective 7 (landscape).

4.23 Against other SA Objectives, such as Objective 8 (housing), 9 (poverty and deprivation) and 11 (economy) the alternative of rolling forward the current strategy scores positively in terms of identified effects.

4.24 We are concerned that it appears that the preferred approach for Malmesbury is driven by conclusions relating to extensive environmental constraints. Yet this is not reflected in the SA process

## 5. Conclusions and Recommendations

5.1 On behalf of our client, Persimmon Homes (Wessex) Ltd, we welcome the opportunity to submit representations in response to the Wiltshire Council Local Plan Review. Our representations are concerned with the proposed strategy for Malmesbury, as part of the Chippenham Housing Market Area (HMA), and the site selection process as it relates to land at Backbridge Farm (site 738).

5.2 In support of these representations, we provide a concept plan for site 738 (see Appendix 1)[MALMES46, MALMES46a]. This demonstrates how the site could be developed, responding to the constraints and opportunities identified.

5.3 For reasons set out in our representations it is considered that the decision to exclude land at site 738 is not supported by any specific evidence to demonstrate that this is appropriate.

5.4 We explain our concerns with the high-level (Stage 2) assessment and how this appears to assume that the entirety of the site will be developed. In doing so, it makes no allowance for a development scheme to come forward within the boundary of this site, in a manner that is sensitive and responsive to its constraints.

5.5 It is evident from the information presented within the Site Selection Report that landscape considerations are the key determinant in the decision to exclude the site from further assessment stages. We have serious concerns with this approach. It appears to be based on judgements, both in terms of harm and scope for mitigation, which are not published. Moreover, such judgements are expressly stated as being part of the more detailed assessment at Stage 3, leading to questions as to how robust the decision to exclude this site on these grounds at Stage 2 can be.

5.6 In terms of the overarching strategy for Malmesbury we are concerned that the proposed level of development is at a level which is significantly below the baseline figure and also lower than the two reasonable (lower) alternatives presented and taken through to the Sustainability Appraisal.

5.7 Reference to 'extensive' environmental constraints at Malmesbury appears to be a key determinant in the decision opt for lower levels of development. Yet this does not appear to be supported by the SA and its conclusions on likely effects. Moreover, the site selection process identifies a number of site options (which should include site 738) and in doing so, this appears to run counter to this approach. It raises questions as to the robustness of the decision to constrain the levels of housing growth at Malmesbury.

5.8 It is our position that site 738 should be taken forward for further assessment and not excluded at Stage 2. Moreover, such opportunities for development should be appropriately reflected in the proposed strategy for Malmesbury, such that the strategy which emerges responds positively to development opportunities which are suitable and appropriate, rather than constraining such opportunities by limiting the overall housing to levels below the identified reasonable alternatives.



<b>Rep ID:</b> Malmes51	
<b>Consultee code:</b> Developer/Agent	<b>Consultee Organisation (if applicable):</b> Willis & Co. Limited
<b>Is this response on behalf of someone else/another organisation?</b> Yes	
<b>Organisation being represented (if applicable):</b> Charlton Park Estates	
<b>Does this representation refer to attachment(s):</b> yes	<b>If this representation refers to attachment(s), these are listed below:</b> MALMES51, MALMES51a
<b>MM1. What do you think to the scale of growth? Should there be a brownfield target?</b>	
<p>Malmesbury is identified as a market town, and has the potential for significant development that will increase the number of jobs and homes to help sustain/enhance services and facilities and promote self-containment and sustainable communities. The strategy proposes only 95 additional dwellings in Malmesbury over the plan period. It is questioned whether the level of development proposed in Chippenham and Melksham are achievable over the plan period and why so many dwellings are proposed in the 'Rest of HMA'. It is considered to Malmesbury provides an opportunity to provide an increase level of housing to help meet the requirement.</p> <p>For the reasons set out in these representations it is not considered that the scale of growth is appropriate and that additional housing and employment could be accommodated within the Malmesbury, reducing the reliance on Chippenham and Melksham, and less sustainable settlement in the HMA.</p>	

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

**MM3. Is this the right pool of potential development sites?**

It is considered that this is not the right pool of potential development sites and that site 3630 and 3631 should be included in the assessment going forward, either in addition to other identified site or in the place of site 691 and 502.

Please refer to attached letter.

[Extract below]

Planning for Malmesbury

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

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

16. With respect to potential development site, the document sets out that land around much of Malmesbury is being promoted for development by landowners or prospective developers. From this larger amount of land, the Council is focussing its own assessment on a smaller pool of potential development sites. How these sites have been chosen is explained in a separate 'Site Selection Report', published alongside this document.

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

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

19. Accordingly, the document poses the following questions:

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

MM4. What land do you think is the most appropriate upon which to build? What type and form of development should be brought forward at the town?

MM5. Are there important social, economic or environmental factors you think we've missed that need to be considered, generally or in respect of individual site?

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

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

Site 1: Whychurch Farm and Inglenook, Crudwell Road (SHELAA sites 649, 866217, 3432)

Site 2: Land east of the A429/Crudwell Rd, Malmesbury (SHELAA site 3630)

Site 3: Malmesbury Static Caravan and Camp Site (SHELAA site 1108)

Site 4: Land adjacent Park Lane (SHELAA site 691)

Site 5: Land West of Malmesbury and Land at Park Road (SHELAA sites 502 and 452)

Site Selection Report for Malmesbury

22. This document sets out the stages reached in the site selection process for the settlement and concludes by showing the reasonable alternative sites that could be appropriate for development around the built-up area of Malmesbury. The document explains how this set of potential development sites has been arrived at based on a range of evidence and objectives of the plan.

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

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

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

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

3630 Land east of the A429/Crudwell Rd, Malmesbury

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

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

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

29. The nearest bus stops to the site are located on the B4040 to the south of the site within 50m. The stops are currently served by the 31/93 bus services which provide connections between Malmesbury and Swindon via Wootton Bassett as well as services to Cirencester. A number of public rights of way (PRoW) provide connections to Gloucester Road, Lovers Lane, Old Station Mews and Reeds Farm Road. In addition to this an intermittent footway is provided on the B4040 in to Malmesbury and on the A429 and B4014 providing connections to northern Malmesbury.

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

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

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

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

3631 Land north of the B4014/Tetbury Road

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

“Its accessibility to important destinations in the town is below the average of available sites as a result. Existing development in the area takes the form of sporadic development along the B4014 without development rising up the slope. Significant development of the site would represent a marked change. This site is very exposed to views from the countryside to the encroachment into the open countryside and significant harmful landscape impacts. Given its location the site has limited scope for development; a low density or frontage development at best. On this basis the site is rejected.”

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

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

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

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

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

40. It is considered that site 3630 would lend itself to residential led development, which would help enhance pedestrian and cycle connections between Milbourne village and the proposed garden centre redevelopment which would help to enhance the

sustainable credentials of the village. Additional housing will help support local services, schools and will result in increased public transport patronage which will help to maintain the viability and sustainability of the town (Malmesbury)/village (Milbourne).

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

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

#### Summary of Representations

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

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

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

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

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

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

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

[Other sections of the letter deal with the emerging spatial strategy]

**MM4. What land do you think is the most appropriate upon which to build?**

Turning to the specific proposal for Malmesbury, it is considered that site 3630 should not have been excluded in the site selection process as its development for residential use would help enhance pedestrian and cycle connections between Milbourne village and the proposed garden centre redevelopment which would help to enhance the sustainable credentials of the village.

Furthermore, site 3631 should similarly have not been excluded as its employment led development would help support the established principle employment area and the nearby Dyson site, improving the sustainability and accessibility of this part of the town.

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

**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 sites?**

Please refer to attached letter (MALMES51).

[Extract below]

Planning for Malmesbury

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

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

16. With respect to potential development site, the document sets out that land around much of Malmesbury is being promoted for development by landowners or prospective developers. From this larger amount of land, the Council is focussing its own assessment on a smaller pool of potential development sites. How these sites have been chosen is explained in a separate ‘Site Selection Report’, published alongside this document.

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

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

19. Accordingly, the document poses the following questions:

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

MM4. What land do you think is the most appropriate upon which to build? What type and form of development should be brought forward at the town?

MM5. Are there important social, economic or environmental factors you think we’ve missed that need to be considered, generally or in respect of individual site?

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

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

Site 1: Whychurch Farm and Inglenook, Crudwell Road (SHELAA sites 649, 866217, 3432)

Site 2: Land east of the A429/Crudwell Rd, Malmesbury (SHELAA site 3630)

Site 3: Malmesbury Static Caravan and Camp Site (SHELAA site 1108)

Site 4: Land adjacent Park Lane (SHELAA site 691)

Site 5: Land West of Malmesbury and Land at Park Road (SHELAA sites 502 and 452)

Site Selection Report for Malmesbury



22. This document sets out the stages reached in the site selection process for the settlement and concludes by showing the reasonable alternative sites that could be appropriate for development around the built-up area of Malmesbury. The document explains how this set of potential development sites has been arrived at based on a range of evidence and objectives of the plan.

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

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

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

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

3630 Land east of the A429/Crudwell Rd, Malmesbury

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

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

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#### Summary of Representations

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

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

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

**MM6. Are there any issues or infrastructure requirements that should be identified?**

**Further comments**

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

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<b>Rep ID:</b> Malmes52	
<b>Consultee code:</b> Developer/Agent	<b>Consultee Organisation (if applicable):</b> Turley
<b>Is this response on behalf of someone else/another organisation?</b> Yes	
<b>Organisation being represented (if applicable):</b> Bloor Homes South West	
<b>Does this representation refer to attachment(s):</b> no	<b>If this representation refers to attachment(s), these are listed below:</b>
<b>MM1. What do you think to the scale of growth? Should there be a brownfield target?</b>	
<p>We advocate directing more growth in the LPR to Malmesbury for the reasons set out in all scenarios considered. We acknowledge that based on the current allocation of growth, there is not a residual requirement for further sites in the LPR when considering commitments granted permission after 1st April. We consider this an obvious missed opportunity to accommodate housing growth in the most sustainable locations in the County and do not consider that this strategy, based on reducing growth at the settlement due to notional environmental constraints, to be suitably justified.</p> <p>It is important to note that some of the residual requirement for Malmesbury in the LPR has been taken up by housing commitments which have been recently permitted under a very specific set of circumstances. The Officers Report on the land south of Filands, Malmesbury (ref: 19/11569/OUT), which was granted in 2020, is very clear that the scheme was granted to assist in meeting a County-wide immediate shortfall in housing supply which was required due to the Council's current lack of a five year housing land supply, which has arisen in part through delivery issues with the previous Core Strategy spatial strategy.</p>	

In our opinion, these commitments should be considered fully in context and acknowledged as a short term remedy to a County wide problem (as they were presented to Councillors). In essence, the Gleeson scheme (ref: 19/11569/OUT) was granted to meet the needs of the whole County in the immediate five year period and therefore plays a role in meeting the needs of every other HMA as much as it does Malmesbury's own need. Beyond meeting the needs of the immediate County, Malmesbury still has a significant role to play over and above this as part of a LPR spatial strategy for accommodating growth. It would be perverse if in granting permission for additional development based on shortfalls at a County level, development at a key market town were constrained further within the new plan period (to at least 2036).

We are content with the identification of a brownfield 'target' as an approach which encourages the use of brownfield land but does not 'require' it, in this regard we suggest the brownfield target should be considered a windfall allowance (being based on past delivery rates), with suitable, available and deliverable brownfield sites being allocated through the Development Plan.

It is essential that expectations of delivery from brownfield land are realistic and thoroughly evidenced to be both viable and deliverable. We would urge caution in over reliance and over optimism in the lead in times to delivery of housing on brownfield sites in some of the Wiltshire settlements, which from our experience often take significantly longer to deliver than greenfield housing options due to complications including, but by no means limited to, complex site assembly, remediation, development viability matters, and more challenging planning considerations. This is why we prefer an availability/allocation led approach. Whilst the supply of housing on brownfield sites will be a relevant and important component, the capacity available from this source of supply within the plan period and in accordance with a required delivery trajectory, should be very carefully and cautiously considered, to ensure that any planned supply is robustly justified.

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

We support the priorities identified for Malmesbury, but do consider that the level of growth identified for Malmesbury does not assist in most effectively meeting those priorities, particularly:

- "i. Deliver a range of housing to meet local needs with supporting infrastructure at a level that recognises environmental constraints that affect the town's growth;
- ii. Support good prospects for economic growth including diversifying the local economy and building on local skills;"

A further priority should be included which is to ensure the role and function of Malmesbury is maintained as an important local employment centre and as a key location to accommodate sustainable growth in the County.

### **MM3. Is this the right pool of potential development sites?**

The right pool of development sites has not been considered in the preparation of the LPR. The supporting documents identify the land at Filands (Site Location Plan included as Appendix 1) as a planning permission.

Whilst the site does benefit from planning permission (for a Primary School), the Council's evidence base has not been sufficiently updated in the LPR process to reflect that the site is being promoted for housing development.

We consider that the Council should update the SHELAA immediately as part of the LPR, as the latest published version (July 2017) is now dated and does not take account of any sites that could have been submitted in the intervening period. This comprises a gap in the evidence base and means that the Emerging Spatial Strategy may not be considered to be justified as sites which are suitable, available and achievable have not been factored into the consideration of the most sustainable sites at given settlements.

The current consultation will therefore receive no comments on the potential of the land at Filands as a residential development option, and the option will not be able to be fairly judged and assessed against other options. This is a flaw in the Council's evidence base for the settlement.

For the avoidance of doubt we promote the land at Filands as suitable, available and achievable for housing development and as a sustainable choice for meeting housing needs.

### **MM4. What land do you think is the most appropriate upon which to build?**

As we have set out the site is subject to outline planning applications, for which we have undertaken a suite of technical assessments.

Following assessment of the site it is clear that there are no constraints to the proposed residential development that cannot be resolved or satisfactorily addressed by the proposals. All matters relating to traffic, transport, ecology, flooding, drainage, and archaeology (and others) can all be agreed in principle as acceptable or can be addressed as necessary through relevant conditions or obligations as can be agreed with the Council and other relevant stakeholders.



The application documents for the site are summarised in the Turley Planning Statements for the applications, are available to view as part of the outline applications on the site or are available from us on request.

As stated above, despite not being properly considered in the pool of development sites put forward, we consider the Bloor Homes land at Filands to be the most appropriate land to build on the town.

**MM5. Are there important social, economic or environmental factors you think we've missed that need to be considered generally or in respect of individual sites?**

We do not consider any important social, economic or environmental factors have been missed.

**MM6. Are there any issues or infrastructure requirements that should be identified?**

We agree with the infrastructure requirements stated and do not consider any other issue or requirements should be identified. In relation to the education topic, we consider the current situation regarding early years education has been correctly summarised by clearly stating that future early years provision can be delivered through financial contributions, as we are aware of appropriate, active and feasible projects for this in the town.

Furthermore we also agree with the statement, which reflects our understanding, that it is also possible to add 210 places to Malmesbury Primary School.

We would also like to comment on the 'local economy' topic which aptly indicates the status of health of the local economy, retail and employment provision in the Town. The indicators identified, particularly including high concentration of employment and recent major investment from Dyson, demonstrate the important status of Malmesbury as a settlement in north Wiltshire. As we have suggested, this important status supports a strategy that directs additional housing towards the settlement and suggests that growth should not be reduced due to notional or general environmental constraints.

**Further comments**

Taking all of the above together, the summary and conclusions of our Representation are as follows:

- We advocate the level of growth at Malmesbury to be increased in all of the alternatives presented to be carried forward in the LPR; CH-A, CH-B and CH-C. This will ultimately amount to positive and effective preparation of the plan, responding correctly in our view to environmental constraints, and utilising the most sustainably located available housing land.
- We advocate extending the LPR Plan Period to be in accordance with the NPPF, adjusting one of the delivery principles and considering further how the spatial options have been arrived at against truly realistic alternatives to maximise chances of success/compliance with the tests of soundness.
- Due to the Council's out of date evidence base, the site has not been adequately considered in this consultation, which amounts to a flaw in the justification of any strategy for Malmesbury as the consultation has not considered all suitable, available and achievable sites for development.
- We promote the land at Filands as suitable, available and achievable for the housing development presented in the current planning applications on the site and as a sustainable choice for meeting the needs of Malmesbury and wider County.

<b>Rep ID:</b> Malmes53	
<b>Consultee code:</b> Developer/Agent	<b>Consultee Organisation (if applicable):</b> Savills
<b>Is this response on behalf of someone else/another organisation?</b> Yes	
<b>Organisation being represented (if applicable):</b> Miller Homes	
<b>Does this representation refer to attachment(s):</b> yes	<b>If this representation refers to attachment(s), these are listed below:</b> MALMES53, MALMES53a
<b>MM1. What do you think to the scale of growth? Should there be a brownfield target?</b>	
<p>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.</p> <p>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.</p> <p>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.</p>	

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.

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

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'.

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.

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.

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.

### **MM3. Is this the right pool of potential development sites?**

Yes, there are other sites that should be considered.

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'.

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

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.

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.

#### **MM4. What land do you think is the most appropriate upon which to build?**

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.

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.

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.

**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 sites?**

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'.

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

**MM6. Are there any issues or infrastructure requirements that should be identified?**

**Further comments**

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) [MALMES53, MALMES53a] 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.



**Rep ID:** Malmes54

**Consultee code:** General Public

**Consultee Organisation (if applicable):** n/a

**Is this response on behalf of someone else/another organisation?** No

**Organisation being represented (if applicable):**

**Does this representation refer to attachment(s):**  
no

**If this representation refers to attachment(s), these are listed below:**

**MM1. What do you think to the scale of growth? Should there be a brownfield target?**

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

**MM3. Is this the right pool of potential development sites?**

**MM4. What land do you think is the most appropriate upon which to build?**

**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 sites?**

**MM6. Are there any issues or infrastructure requirements that should be identified?**

**Further comments**

We received your leaflet yesterday about the plan to build new homes next to Parklands/Silverston Way and tried, as you suggested, to lodge our comments with the Council through the web address you provided. Unfortunately, we were not able to get through so have been unable to lodge our objections. We are as concerned as you are that any additional housing in this area would damage local wildlife and the current green spaces around Malmesbury. Plus, we are not convinced that the current local amenities would be able to cope.

<b>Rep ID:</b> Malmes55	
<b>Consultee code:</b> Other	<b>Consultee Organisation (if applicable):</b> Wiltshire Councillor
<b>Is this response on behalf of someone else/another organisation?</b> No	
<b>Organisation being represented (if applicable):</b>	
<b>Does this representation refer to attachment(s):</b> no	<b>If this representation refers to attachment(s), these are listed below:</b>
<b>MM1. What do you think to the scale of growth? Should there be a brownfield target?</b>	
<p>Before appraising each of these sites, it should be noted that your document proposes an additional 95 houses for Malmesbury by 2036. In fact a far greater number of new houses are already in train than this number:  The Backbridge Farm development is due to commence at the end of this year. In the made Malmesbury Neighbourhood Plan on which your calculations are based, this site was to accommodate 170 houses. The actual number due to be built on this site is 201. An increase of 31</p> <p>The contentious decision made in the Spring of 2020 by majority vote of the Council's Strategic Planning Committee to grant permission to Gleason Ltd to develop the site at Filands in contravention of the made Malmesbury Neighbourhood Plan, sees a further 70 houses to be constructed on this site.</p> <p>In addition, planning permission is highly likely to be granted to convert from office use to domestic dwellings on the sites of the former Malmesbury Sorting Office and the former doctors surgery at Gable House. Together this will provide more than 20 town centre flats.</p>	

A number of in-fill development have also taken place notably of two properties on the school lane entrance at Newton Grove/Alexander Road

Further development by Green Square is also due on land behind the Primary Care Health Centre running parallel to the Swindon Road.

In total, these developments will see some 130 houses/flats built or converted in Malmesbury in the next few months and years. A far greater number than the proposed 95 additional houses as set out in your 2036 Local Plan consultation document. Frankly, Malmesbury simply cannot take any more development.

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

- Malmesbury children of primary school age are already being sent to Lea and Garsden school. There is no further primary school capacity available in Malmesbury.
- Our dentist surgeries are also full
- Our town centre road network is clogged leading to stationary traffic emitting harmful exhaust fumes
- Our town centre car parking arrangements are inadequate for current population numbers with little prospect of further spaces becoming available.

Malmesbury is recognised as an historic and beautiful, hill top town. Views of the historic abbey have been painted down the years by great artists. Those vistas need protection for generations to come.

The split of the River Avon around the town leaves very little appropriate development space and the contours of the land lead to flooding challenges

Having stated the clear case for no further housing development beyond that which is already agreed or about to be, let us examine each of your sites for consultation, noting that none if them formed part of the Malmesbury Neighbourhood Plan and are very unlikely to feature in any revision of that Plan being considered currently.

**MM3. Is this the right pool of potential development sites?**

Site 1: Wychurch Farm known locally as the Worthies and related small site of the bungalow named Inglenook and related paddock (SHELAA sites 649, 866217,3422)

This site dominates the eastern approach to Malmesbury and is home to the Malmesbury Cricket Club. It forms an integral part of the separation of the built area of Malmesbury and the neighbouring community of Milborne. While the land is privately owned, it is regularly used as a venue to mark significant national events such the Jubilee or to base “Sealed Knot” reenactors camps as they gather to mark Malmesbury’s key strategic role in the Civil War.

It is absolutely inconceivable that any part of the Worthies should turn into a housing estate that would dominate the skyline of Malmesbury.

The Inglenook site is a problematic one sitting on the corner of the roundabout to the entrance of the Aldi site now under construction. The scale of this site would take around 7 houses. It’s development would create an unwelcome spread of development along Filands. This road is now a very busy one as it services the Dyson site.

Further development here would create more traffic problems and the small nature of the site would not make any meaningful contribution to new housing while losing current green space.

Site 2: Land East of the A4 behind Waitrose opposite Baskerville (SHELAA site 3630)

This site has just seen a planning application rejected for the building of a gabion wall. The site sits in the Malmesbury Conservation area and forms a natural, open barrier between the built area of the town and the by pass

Development on this site would intrude in an unnecessary and unwelcome manner on the Malmesbury Conservation Area. There are also flooding and access challenges as the site is bordered by the river Avon and the A429. The latter would be the only access point to any development. Such access would constitute a significant hazard.

Site 3: Malmesbury Static Caravan and Camp Site (SHELAA site 1108)

Malmesbury is recognised as an important visitor destination. The Town is an Ambassador Member of the Great West Way.

Tourism is a key economic driver for Malmesbury. The WOMAD global festival takes place nearby in Charlton Park.

In addition to this site being home to a significant number of local residents who own their static caravans, the loss of this site would be a major blow to tourism in Malmesbury. It is the only camp and caravan site in the area and certainly the only one accessible to the town.

The balance of the site not occupied by static or temporary caravans is at real risk of flooding. Development here would also begin to link the built area of Malmesbury with the separate community of Burton Hill.

Access to this site is also an issue. It could only be gained from Arches Lane. Its small road has a challenging junction with the A249, opposite the turning to the Malmesbury Primary Care Centre.

For all of the above reasons this site is completely unsuitable for development.

Sites 4 and 5: Two sites next to each other on Park Road (SHELAA sites 691 and 452) flanked by the built developments of Park Close and White Lion Park

Park Road narrows to a single track highway at the point where the first of these two sites starts (the second is further along that narrow highway). The road is the subject of frequent flooding and was in passable in January.

Development here will only serve to exacerbate an already significant flooding problem and will create serious highway access issues.

Site 5: Land to the West of Malmesbury flanked by the Sherston Road, road to Brokenborough and the built developments of Parklands and Silveston Way (SHELAA site 502)

This site sits outside of the development boundary of Malmesbury (as do all the other sites being consulted upon). The site is bordered by the main road to Sherston and the smaller road to Brockenborough. The land also has flood risk.

**MM4. What land do you think is the most appropriate upon which to build?**

Further development here will see the sprawl of Malmesbury to the West. It will increase traffic pressures on Parklands, an area of disproportionately large numbers of elderly and vulnerable residents. As such it is an inappropriate site for development.

**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 sites?**

**MM6. Are there any issues or infrastructure requirements that should be identified?**

**Further comments**

The case against further development in Malmesbury is a compelling one. The existing sites for building and conversion already identified and approved more than provide for the numbers of new homes being consulted upon.

The educational, health and physical infrastructure of this historic and beautiful town simply cannot cope with yet more development.

Each of the consultation sites have no real merit when they are examined specifically and significant environmental and economic harms harm attaches to each.

I urge that no further development should take place on any of them.

<b>Rep ID:</b> Malmes56	
<b>Consultee code:</b> Developer/Agent	<b>Consultee Organisation (if applicable):</b> Montagu Evans LLP
<b>Is this response on behalf of someone else/another organisation?</b> Yes	
<b>Organisation being represented (if applicable):</b> White Lion Land LLP	
<b>Does this representation refer to attachment(s):</b> yes	<b>If this representation refers to attachment(s), these are listed below:</b> MALMES56, MALMES56a, MALMES56b, MALMES56c
<b>MM1. What do you think to the scale of growth? Should there be a brownfield target?</b>	
Generally supported but should be treated as a minimum growth requirement and sufficient land allocated to exceed it	
<b>MM2. Are these the right priorities? What priorities may be missing? How might these place shaping priorities be achieved?</b>	
Please see Supporting Statement. [MALMES56, MALMES56a, MALMES56b, MALMES56c] There is limited brownfield land available in Malmesbury to meet housing requirements. Greenfield land is necessary to meet housing and other needs. This should be located on the edge of the settlement where there would be no environmental or other	



constraints to delivery. "Land West of Malmesbury" forming the majority of Site 5 (SHELAA Ref 502) (MALMES56, MALMES56b, MALMES56c) would meet these requirements as detailed in the attached statement (MALMES56).

**MM3. Is this the right pool of potential development sites?**

Please see Supporting Statement. (MALMES56, MALMES56a, MALMES56b, MALMES56c)  
"Land West of Malmesbury" forming the majority of Site 5 (SHELAA Ref 502) is located in the edge of the settlement and comprises a suitable, available, achievable and deliverable development site with capacity of approximately 175 new homes in the short term. Identification of the site in combination with land to the south (SHELAA site 452) for development is therefore supported by the landowner

**MM4. What land do you think is the most appropriate upon which to build?**

We act on behalf of White Lion Land LLP in respect of land off Park Road, Malmesbury ("the Site") edged red on the Site Location Plan at Enclosure 1. [MALMES56, MALMES56a, MALMES56b, MALMES56c]

We have been invited to make representations to Wiltshire Local Plan Review Consultation which commenced in January 2021. The Site forms the majority of Site 5 identified for development within the "Planning for Malmesbury" document and these representations confirm support for this provision within the emerging Local Plan as set out below.

**Site Analysis**

Following a site sifting process the Site is included with the pool of potential development sites identified with the "Planning for Malmesbury" document "Land West of Malmesbury" forming the majority of Site 5. The "Site Selection Report for Malmesbury" document confirms the following in respect of Site 502:

"The area extends the existing built up area, with boundaries defined by local roads. It has a range of constraints that potentially might limit the site's acceptability and capacity for development. It would be appropriate to combine this site with 452 to consider one logical extension continuing the past pattern of growth. Take forward for further assessment as there does not appear to be any overriding significant impacts that justify excluding the site at this stage"

The rationale for combining SHELAA Site 502 with Site 452 is confirmed as follows:

“These sites abut each other and have no strong physical barriers. The area extends the existing built up area, within boundaries defined by local roads.”

The assessment of Site 502 within the 2017 SHELAA document is attached at Enclosure 2. It confirms the following:

- Suitable - There are no suitability constraints
- Available - The Site is available for development;
- Achievable - Residential development is achievable at the Site
- Capacity - The Site could provide 174 new homes
- Deliverable - Development could be delivered in the short term.

It should be noted that the southern part of the Site has been subject to three planning application proposals which have confirmed the suitability of the site for housing development as follows:

Application N/11/01382 – March 2012 – It was determined that there are no physical or environmental constraints that would prevent development of 77 dwellings and the Site would be a sustainable location for housing.

Application N/12/03464/OUT - September 2014 – It was determined that there are no physical or environmental constraints that would prevent development of 77 dwellings and the Site would be a sustainable location for housing.

Application 19/05898/OUT – Current Application – A proposals for 50 dwellings has been subject to extensive consultation which has again demonstrated that there are no physical or environmental constraints that would prevent such development and the site would be a Sustainable location for housing.

Accordingly, we confirm that there have been no material change in circumstances since the Site was considered as part of the SHELAA analysis in 2017 and up to date assessments carried out in respect of current planning application 19/05898/OUT confirm that there are no suitability constraints.

#### Conclusion

These representations confirm support for identification of the Site within the emerging Local Plan as a suitable, available, achievable and deliverable development site with capacity of approximately 175 new homes in the short term. We also confirm support for combining the Site with SHELAA Site 452 to the south for the reasons identified by the Council above.

We trust that you will treat this submission as duly made representations in support of Site 5 as identified with the “Planning for Malmesbury” document and look forward to receiving your confirmation of this in due course.

**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 sites?**

Housing development on most greenfield sites should be capable of accommodating affordable housing to meet identified needs in line with policy requirements.

**MM6. Are there any issues or infrastructure requirements that should be identified?**

Please see Supporting Statement (copied in MM5) [MALMES56, MALMES56a, MALMES56b, MALMES56c]

**Further comments**

Please see Supporting Statement (Copied in MM5) [MALMES56, MALMES56a, MALMES56b, MALMES56c]

**Rep ID:** Malmes57

**Consultee code:** General Public

**Consultee Organisation (if applicable):**

**Is this response on behalf of someone else/another organisation?** No

**Organisation being represented (if applicable):**

**Does this representation refer to attachment(s):**  
no

**If this representation refers to attachment(s), these are listed below:**

**MM1. What do you think to the scale of growth? Should there be a brownfield target?**

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

**MM3. Is this the right pool of potential development sites?**

We are as concerned as Councillor Grant is that any additional housing in the Parklands/Silverston Way area would damage local wildlife and the current green spaces around Malmesbury. Plus, we are not convinced that the current local amenities would be able to cope.

**MM4. What land do you think is the most appropriate upon which to build?**

**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 sites?**

**MM6. Are there any issues or infrastructure requirements that should be identified?**

**Further comments**

<b>Rep ID:</b> Malmes58	
<b>Consultee code:</b> General Public	<b>Consultee Organisation (if applicable):</b>
<b>Is this response on behalf of someone else/another organisation?</b> No	
<b>Organisation being represented (if applicable):</b>	
<b>Does this representation refer to attachment(s):</b> yes	<b>If this representation refers to attachment(s), these are listed below:</b> MALMES58
<b>MM1. What do you think to the scale of growth? Should there be a brownfield target?</b>	
We broadly support the representations of Malmesbury Town Council ('Support M.T.C'). Brownfield target inappropriate for Malmesbury insufficient potential sites.	
<b>MM2. Are these the right priorities? What priorities may be missing? How might these place shaping priorities be achieved?</b>	
Support M.T.C	

**MM3. Is this the right pool of potential development sites?**

Support M.T.C

**MM4. What land do you think is the most appropriate upon which to build?**

Support M.T.C

**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 sites?**

Yes: As to Brokenborough - village and parish - see attached Sheet A [MALMES 58] Text of photo attachment transcribed as follows:

1. Site 798

Moreton Site, back of Dyson and Persimmon. Totally agree this should not be expanded further opposite the Cotswold National Landscape (AONB) and into the countryside towards the village of Brokenborough.

2. Site 691

This is on a corner site as you turn in towards Brokenborough village from the Sherston Road. There is an obvious long term temptation/plan to wrap around the White Lion Park Estate joining up with Sites 502 and 452) Once you have houses on one side of the road it follows that there will be less sustained objection to mirroring that with housing on the opposite side of the road into open countryside.

3. Sites 452 and 502

Again (as with 691) we object. In the past year Malmesbury people have even more so than ever illustrated the amenity value of ready access to the countryside by exercising in Brokenborough Parish, walking, running and cycling. Walk out 100 yards and they are into the river valley and the countryside. If these sites were developed they would trudge out from the built up area past yet another extended housing estate. Traffic would exponentially increase and destroy the safety and enjoyment of the route. At

present they can walk along towards Back Bridge or then go as far as they wish on public lanes and footpaths right through the AONB,  
We should be proud to be the foothills of that Cotswold National Landscape and seek to preserve the countryside views without allowing it to be hemmed in by residential development.  
Lastly (which applies to these two sites as well as 691) this is one entrance to Brokenborough village and as with all the rest of the entrances they are completely country lanes which help retain the charm of the elongated rural Parish stretched along the Fosse in the northernmost part of the County.

**MM6. Are there any issues or infrastructure requirements that should be identified?**

**Further comments**

The Local Plan Review pays insufficient attention to protecting the countryside and in the case of Malmesbury fails to address the potential adverse affects of development upon the surrounding countryside and access to it.



<b>Rep ID:</b> Malmes59	
<b>Consultee code:</b> Parish/Town Council	<b>Consultee Organisation (if applicable):</b> Malmesbury Town Council
<b>Is this response on behalf of someone else/another organisation?</b> Yes	
<b>Organisation being represented (if applicable):</b> Malmesbury Town Council, St. Paul Without Malmesbury Parish Council and Brokenborough Parish Council	
<b>Does this representation refer to attachment(s):</b> yes	<b>If this representation refers to attachment(s), these are listed below:</b> MALMES59
<b>MM1. What do you think to the scale of growth? Should there be a brownfield target?</b>	
<p>Allocation Calculation  We are advised there is an outstanding allocation of a minimum 95 homes to 2036, due to housing already in 'the pipeline' for the plan period. Depending on what has been included in this calculation we estimate that further housing has been permitted, therefore the minimum allocation of 95 has already been exceeded.</p> <p>Scale Of Growth  We do not agree with the proposed scale of growth which has been put forward, because the allocated housing figure to 2036 has already been, or is in the pipeline to be well exceeded.  There is no current need to plan for more housing in Malmesbury and so a zero target should be set for the remainder of the period to 2036.  Malmesbury has seen exponential growth in the last few years for the size of our town.</p>	

To illustrate this fast-escalating scale of growth, we refer you to Wiltshire Council's report "Wiltshire Housing Site Allocations Plan: Adopted February 2020"

It shows that the minimum requirement in Malmesbury for new housing has already been exceeded by an extra 18% at the very least and likely twice as much as this. (We understand that 'Developable Commitments' may have been calculated as at 2019 and therefore these figures do not include more recently permitted sites).

"4.24 Growth at Chippenham and Trowbridge has not matched expectations. Land has been in short supply or delayed in coming forward. As Principal Settlements within the HMA they are intended to be the primary focus for development, providing significant levels of jobs and homes.

4.25 In contrast, rates of development at most Market Towns have met expectations and at Bradford on Avon, Calne, Malmesbury, Melksham and Bower hill, Royal Wootton Bassett and Westbury anticipated levels of growth have been exceeded over the first half of the plan period. Land has been available and some additional sites granted consent by planning appeals. Over the same interval, scales of development within rural areas in many places have also exceeded those anticipated by the WCS."

A lack of brownfield has meant large new housing developments on greenfield sites, which were permitted outside of the Malmesbury Neighbourhood Plan.

These developments have eroded the finite green space on the north-eastern side of Malmesbury and changed the landscape setting of the town irrevocably. This recent increased growth, which has caused the loss of so much greenfield, cannot continue. An ONs Survey 2017 shows a town population of 5729 and it is estimated that the population could rise by an additional 1400, due to new housing built since that survey or because of new housing which is currently in the pipeline. This rate of population growth is again not sustainable for a town of our size, with local infrastructure already stretched and under very substantial pressure.

Future growth, including site allocations and types of development after 2036 (or if before to meet a local need), must be better managed and ideally through Neighbourhood Planning.

#### Local Needs

There is no recognised local need or priority which would require additional housing, especially after the considerable growth during the past few years.

Also, no up-to-date information or data has been provided as part of this review, which would indicate a shortfall of any particular type of housing, such as affordable homes.

However, there are still housing planning applications which are currently being determined and we would expect Wiltshire Council to ensure that sufficient affordable and other appropriate housing (for example - suitable for older people) is allocated in these.

We would also respectfully remind Wiltshire Council that the 2015 Malmesbury Neighbourhood Plan considered local needs, evidenced by a substantial Neighbourhood Survey and other data and in consequence, Policy 4 outlines how all new housing developments must be tested against current evidence of local demand, which we would expect has been applied to all housing developments given permission since the Neighbourhood Plan was made and those currently in the planning system.

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2. A housing mix to suit the ages and needs of the local people

Policy 4: Planning applications for new housing, including conversions, must be tested against the current evidence of local demand and supply from sources including Wiltshire Council population forecasts, the Social Housing Register, the Strategic Housing Market Assessment and the most recent Neighbourhood Survey.

Brownfield Sites

We do not agree that there should be a set target for developing brownfield sites for housing in Malmesbury. Although the suggested 70 is worked out on a pro-rata scale, this does not mean that it is actually achievable in the future. Due to the nature of Malmesbury's built environment, most brownfield sites are likely to be retail shops or offices and perhaps agricultural outbuildings and will come forward as 'one-offs'.

Conversely, we have seen some recent movement towards change to residential use, but again we view these as 'one-offs'. At present, there are two commercial sites in our High St, which are likely to be given permission for change to residential use very shortly, despite our opposition and prospectively this will mean 15 new homes on 'brownfield' in the near future.

Additionally, our Police Station on the edge of our town, has recently been advertised for sale, apparently with pre-planning advice for circa 10 new dwellings and will also count as brownfield development.

Lastly, depending on the cut-off date and what has been included in the calculation, there are some dwellings which have or are coming through infill/ windfall sites, which might possibly be counted too.

However, despite these recent or soon to be developments, we iterate that these are 'one-off' opportunities to build on brownfield sites.

For these reasons and given there is no need to plan for more housing in Malmesbury to 2036, we believe it is not appropriate in our case to set a target for brownfield sites.

[Table in MALMES59]

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

These are broadly some of the requirements we would wish to see should there be a need for more housing to be allocated to Malmesbury, but as explained in MM1, we do not agree that Malmesbury should have any further development for the rest of the plan period to 2036. There are no specific local needs which would warrant further growth.

The Malmesbury Neighbourhood Plan (which is now under review) considered local priorities and as such has brought forward housing which holistically meets these requirements. We believe this is not always the case with other developments, permitted outside of the Neighbourhood Plan over the last few years.

#### Infrastructure And Environmental Constraints That Affect The Town's Growth

So, although we reject the need for a further housing allocation in the plan period, other than that already 'in the pipeline', we do welcome recognition of the importance of environmental and other constraints in Malmesbury. Please refer to the Malmesbury Neighbourhood Plan, which is the principal planning document for Malmesbury, where these are discussed.

Two main issues are:

Our local infrastructure is now very overstretched, due to permissions for housing not in the Neighbourhood Plan and further housing development will make this situation worse.

The special irreplaceable characteristics of our town, including landscape, heritage and ecology will be affected detrimentally by further housing developments.

- Parking in Malmesbury town centre is already at maximum capacity and at times parking is just not available. There is no spare area to provide extra public parking space.
- Traffic is an issue at peak times especially, including large lorries and vehicles. Adding to this situation with hundreds of extra vehicles from new housing developments will exacerbate congestion even more and result in further town gridlock.
- Our primary schools are under pressure and some children are being bussed to a neighbouring village school. There is a shortfall in nursery space. (A priority is to see Malmesbury Primary School extended and adequate provision of nursery places in the town).
- Malmesbury is located at the very north of the county and we are not well connected by road or bus and have no rail infrastructure. This is not an appropriate scenario for further housing as it encourages even more car use, when the reduction of vehicle travel is vital to help lessen climate change.
- There are areas of the town which are in Flood Zones 2 and 3 and we experience quite severe, regular fluvial and run-off flooding. Instances of this appear to be increasing over time, possibly due to climate change. It is important that roads which are regularly flooded are not used as access roads to housing and other development. It is also important to recognise that ground water and run off can cause a flood, as well as add significantly to an existing flood situation and also to raise river levels.
- Malmesbury Abbey and scheduled monument the Market Cross are located in the centre of our medieval town, which is mostly listed. These landmarks are unique and iconic and the historic character of our ancient town as a whole should be especially protected. Also important is setting of Malmesbury in it's historic landscape which needs to be preserved. Increased

traffic is already detrimentally affecting the fabric of our historic buildings. Any further housing developments, which would interfere or detract from the iconic setting of our ancient town and even its skyline, should be avoided. Local important archaeological sites are yet to be investigated. British Romano sites in green fields bordering the built area of the town are of interest, given the proximity to the Fosse Way and major Roman camp settlement of Cirencester. Also, Malmesbury played a significant role in saxon, medieval and civil war history in particular. The tomb of the first King of England, Athelstan is in Malmesbury Abbey.

- The town is in a rural location, bordering on to an AONB. The landscape around the town is outstanding, however development of any significant size will have to be on greenfield land which is to be resisted. This is also not in conformance with the Settlement Assessment by Robert Camlin, as was used in evidence to support the Malmesbury Neighbourhood Plan. N.B. The housing developments permitted outside of the Neighbourhood Plan and outside the settlement boundary of the town are on greenfield sites and have already detrimentally impacted on the landscape setting on the north-eastern side of Malmesbury.

- Our local ecology and green environment are very important to us and there are colonies of protected wildlife species in parts of the town, including in our river valleys, these include great crested newts, slow worms, grass snakes, bats and other animals and birds. Development, especially in pockets in greenfield sites or in locations near to habitats will have a hugely harmful effect that should be avoided.

#### Priorities Of Climate Change And Carbon Neutrality

We very much support any implementation of 'greener' sources of energy and also energy efficiency, building options reducing pollution, single use plastics and other non-recyclables and using sustainably produced recyclable materials wherever possible. It is essential to include the provision of electric vehicle charging points in new homes, as well as in public spaces such as car parks. We wish to see this expanded in Malmesbury and for Wiltshire Council to implement these in respect of all new building developments.

We recognise there will be challenges to the provision of electricity as an energy resource in the next few years, due to increased usage of electric vehicles and away from gas appliances and boilers. Wiltshire Council must include this in their planning for the future as a priority.

ii. Support good prospects for economic growth including diversifying the local economy and building on local skills

We agree that supporting economic growth is a priority, as is diversification, especially given the rise in population over the last years.

Technological progress together with the recent pandemic have changed the way people work and shop, which sometimes means the traditional reliance on a physical building as a business centre has diminished. For example – three branches of major banks have closed down in Malmesbury High St over the last few years. They have responded to their customers move to online banking and electronic transactions, plus the reduction in the use of cash, although some provision is still made for those unable to access the internet.

Many workers are now able to work from home, rather than from a large main office or plant and this is one factor which may have led to a 'change of use to residential' planning application for a multiple-use office complex in our High St. This does however disadvantage those smaller and start-up businesses who require some, but not large office space.

So, we will welcome further exploration and support for this from Wiltshire Council, recognising that economic growth does not always indicate the need for more large-scale commercial developments.

There is currently employment land designated in Malmesbury, which is not yet in use. We view that as suitable for smaller businesses and do not wish to see Malmesbury's local economy and High St detrimentally affected by huge out of town commercial development, on sites such as the Malmesbury Garden Centre site. These would not be in keeping with the size, characteristics and constraints of our town. They would not bring associated spending to the town and local employment options would be minimal. In fact, the likelihood is that they would seriously diminish Malmesbury's retail town centre. Additional out-of-town retail outlets would also greatly increase traffic and congestion on connecting roads.

We refer you the principal planning document Malmesbury Neighbourhood Plan, Chapter 4 "A diversified local economy that provides more employment".

iii. Develop a town centre strategy for the town centre that encourages spending, improves accessibility, better manages traffic and parking and safeguards, as well as capitalises on, heritage assets

We agree that this is a priority and we would welcome support from Wiltshire Council to build on our existing town centre strategy.

The two main issues mentioned were recognised and discussed in the Malmesbury Neighbourhood Plan Section 3.2. 'A Prosperous Town Centre' and the establishment of a Malmesbury Town Team was also a priority.

As a result of planning contribution from the building of a Waitrose supermarket, the Malmesbury Town Team was formed in 2014.

An expert local retail study was undertaken shortly after this and a Town Centre Action Plan devised, much of which has been implemented in partnership with Malmesbury Town Council.

So, we appreciate the opinion from Avison Young's "Wiltshire Retail and Town Centre Study 2020" as we believe that it somewhat reflects the outcome of initiatives undertaken so far to support our town centre.

4.137 Overall, Malmesbury is considered to be a healthy town centre. Over the past several years vacancies in the centre have fallen which is an encouraging sign of the level of business demand for premises in the centre. Since the opening of the Waitrose store to the east of the town centre the number of convenience goods retailers does not appear to have been negatively affected and the trend in comparison goods retailers and service has generally followed the national average. With a strong local socio-economic profile and attractive town centre we can conclude that Malmesbury is a vital and viable town centre.

Tourism and day visiting to Malmesbury have always been encouraged, but changes to the town due to increased population have affected traffic and parking, which is not always conducive to visitors experience of the town. We do subsidise 2-hour free parking in Malmesbury's Long Stay Car Park, to help offset this.

Malmesbury High St and town centre have also changed because of the pandemic and the effects of technological advancement. Yet, the High St remains the hub of the town in the setting of our medieval buildings, iconic Market Cross and Abbey. The High St is a tourist attraction in its own right, as well as a central component of our local economy and it is imperative that it continues to flourish.

Unfortunately, we have seen recent changes of use to residential in office/ retail space, which we have objected to, as any further erosion will undermine the High St's viability. Whilst it is current policy to allow 'change of use to residential', we believe Malmesbury should be considered as a special case in this respect, given the importance of our town centre and High St to our local economy and tourism.

Also, we would welcome a review and revision of the primary and secondary frontages as we believe these are no longer appropriate as they are.

### **MM3. Is this the right pool of potential development sites?**

We reject the need for further housing during the plan period to 2036 for the reasons stated previously.

During the last few years, we have been targeted with speculative development, which has been permitted outside of the Malmesbury Neighbourhood Plan, due to Wiltshire Council's lack of 5-year land supply. So, we contend that there is no requirement for sites to be put forward in a pool for future development.

The Malmesbury Neighbourhood Plan is under review and currently considering an additional 31 dwellings to come forward on the Backbridge site which is already in the Neighbourhood Plan, although we note it is not in your pool of sites. Should any new sites come forward driven by as yet unknown local need, then they should be considered through the Neighbourhood Plan.

The Neighbourhood Plan has and is delivering a minimum of 306 homes, which exceeds the minimum requirement of 183 for the Neighbourhood Plan period to 2026 by 123 homes. These dwellings also contribute to the already exceeded minimum required in the Local Plan Review proposal to 2036.

Therefore, we are reluctant to comment on any future potential development sites, however we make the following observations on the pool of sites, without prejudice or commitment.

Site 1: Whychurch Farm and Inglenook, Crudwell Road (SHELAA sites 649, 866217, 3432)

A large swathe of green fields of Whychurch Farm encircles Malmesbury from the north to the east of the town, bordering with neighbouring parish St. Paul Malmesbury Without.

Starting at the north, development has already been permitted for approx. 251 dwellings with another 70 currently being decided. (We are objecting to this last application for a variety of reasons, but importantly because the area of land was set aside for educational use and not housing).

Permissions for development on these greenfield sites were granted despite being outside of the Malmesbury Neighbourhood Plan, outside of the Settlement Boundary and in our view suffering from many of the constraints mentioned in MM2, especially lack of connectivity, the effect on the landscape setting of the town, as well as protection of ecology.

Part of the site is called The Worthies and is the home of Malmesbury Cricket Club and now defunct Rugby Club. It is also a very valued large open space situated on a hill, which has been used in the past with permission of the owner for town events such as an annual Kite Festival. We would not wish to see any part of The Worthies site ever developed for housing.

In April 2004 evidence was found under the roadway to the Cricket Club of the possible site of the 12th century Filands village, which has yet to be investigated. Consideration would also be needed for the setting of Whychurch Farm itself, which is of historical and archaeological importance.

The current developments occupy around one third of the site and we understand that the developer may wish at some point to continue on, with possibly as much development again if not substantially more, given Wiltshire Council's SHEELA entry states capacity 1203 homes.

Inglenook is a single residential dwelling with land adjoining the Whychurch Farm site, on the corner of Crudwell Rd and A429 Malmesbury Garden Centre Roundabout. The SHEELA indicates possible development of 13 dwellings.

Site 2: Land east of the A429/Crudwell Rd, Malmesbury (SHELAA site 3630)

Abbey View Farm SHEELA indicates potentially 122 dwellings on the site. Development in this setting would harm the value of our Malmesbury Conservation Area and the landscape setting of the town. The site is far outside of the settlement boundary, bordering the A429, but with a lack of connectivity to the town therefore it is not currently considered appropriate as a site for housing development.

Site 3: Malmesbury Static Caravan and Camp Site (SHELAA site 1108)

Malmesbury Static Caravan and Camp site is south of the main town, bordered by a river. With the SHEELA capacity of 117 new homes and no direct exit to the main road, the development would cause extra traffic congestion at a point opposite the PCC (Doctors Surgery), which is already very problematic, especially at peak times.

Development in this setting would harm the value of our Malmesbury Conservation Area and the approach and landscape setting of the town. Although technically just inside the settlement boundary of the town, this site abuts St. Aldhelm's Mead which is a large green public park area. Permanent housing on the whole of this site, will infringe this green open space. We do not currently view this as an appropriate site for development.



Site 4: Land adjacent Park Lane (SHELAA site 691)

This site has an apparent capacity for 115 houses to be built here. However, we believe there are two major constraints which will need to be considered. (Also noted is that groundwater run-off will need to be assessed on this site).

Firstly, there are large electricity pylons with overhead cabling which will need to be moved and cabling rerouted and we do not know if this would be feasible.

Secondly, the site is on the gateway to the town and area adjoining an AONB. The landscape setting will be affected and we understand that there would be objections re the AONB view.

Development here would challenge the settlement boundary of the town, between Malmesbury and Brokenborough and will seriously encroach on the amenity value of the AONB which it borders.

Site 5: Land West of Malmesbury and Land at Park Road (SHELAA sites 502 and 452)

The SHEELA data indicates possible development of 200 houses for both sites. Neither of these sites are suitable for housing developments.

The mostly single-track road which accesses the sites is often severely flooded especially during the winter months. There is not the capacity for the hundreds of residents' cars to travel on what is more or less a lane at peak times, without complete gridlock. Residents will not have good connectivity with the town centre.

Also, the sites are next to an AONB and housing will detrimentally affect this setting. The area is also very rich in wildlife, with newts, slow worms, grass snakes and the lane is a bat corridor. The wildlife on the other side of the lane to the proposed sites is also to be protected as this includes river birds and a resident pair of egrets. Even the act of building development here, with no tree or hedge buffer, will be enough to detrimentally affect the special wildlife here. Additionally, there are oak trees with Tree Preservation Orders along one edge of the site, which together with the old boundary hedge will be harmed by building works and building pollution, even if they are left standing. These sites are not in the Neighbourhood Plan and not within the Settlement Boundary of the town.

Applications to build housing on these sites have been refused twice already and even at appeal. We have objected to another two recent applications for the reasons mentioned, which we trust will be refused again.

**MM4. What land do you think is the most appropriate upon which to build?**

As stated previously, there is no current need for further development in the Plan period and there are no further unconstrained sites available.

**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 sites?**

There are many special constraints and unique Malmesbury characteristics to take into account in respect of development as outlined above. In addition, there are some further priorities which should be considered:

- Ensure adequate primary school and nursery spaces in the town to meet the needs of existing and new residents.
- Work is required to try to ameliorate current traffic parking issues and to promote alternative greener methods of transport.
- Any new developments should also help to provide additional community infrastructure. More details are in the

Malmesbury Neighbourhood Plan.

Sports facilities in the town, namely Malmesbury Victoria Football Club, Malmesbury Boxing Club and also Athelstan Players, all of whose premises and pitch are regularly flooded, especially in the wintertime, would welcome transferring to other suitable locations.

Malmesbury Secondary School outdoor sports fields also flood regularly and cannot be used in times of inclement weather.

There is an unequivocal requirement for flood free sports/ community space and/ or artificial sports pitches.

- The landscape and setting of Malmesbury, Brokenborough and St. Paul Malmesbury Without parishes are very important and should be preserved. This is especially so, where the AONB is located and borders with town settlement, particularly in the parish of Brokenborough.

- We would wish to see further investment in our Malmesbury Town Team given the importance to Malmesbury High St, town retailers and other businesses to our local economy and tourism. We wish to see our High St recognised as a tourist attraction as well as an economic centre for our town. We would also welcome support from Wiltshire Council for 'economic regeneration' in the town, to help with recovery from the pandemic and lockdowns.

**MM6. Are there any issues or infrastructure requirements that should be identified?**

**Further comments**

<b>Rep ID:</b> Malmes60	
<b>Consultee code:</b> Statutory Body	<b>Consultee Organisation (if applicable):</b> Natural England
<b>Is this response on behalf of someone else/another organisation?</b> No	
<b>Organisation being represented (if applicable):</b>	
<b>Does this representation refer to attachment(s):</b> no	<b>If this representation refers to attachment(s), these are listed below:</b>
<b>MM1. What do you think to the scale of growth? Should there be a brownfield target?</b>	
<b>MM2. Are these the right priorities? What priorities may be missing? How might these place shaping priorities be achieved?</b>	
<b>MM3. Is this the right pool of potential development sites?</b>	
Planning for Malmesbury	

Sites 4 and 5 (respective SHELAA references 691 and 502) both of these sites are in the setting of the Cotswolds AONB. Please see general commentary on proposed site allocations within the setting of nationally protected landscapes. In the absence of LVIA Natural England does not concur with the SHELAA assessment for landscape.

**MM4. What land do you think is the most appropriate upon which to build?**

**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 sites?**

**MM6. Are there any issues or infrastructure requirements that should be identified?**

**Further comments**

Further general comments have been provided and are available under the summary of representations to the Emerging Spatial Strategy.

**Rep ID:** Malmes61

**Consultee code:** General Public

**Consultee Organisation (if applicable):**

**Is this response on behalf of someone else/another organisation?** No

**Organisation being represented (if applicable):**

**Does this representation refer to attachment(s):**  
no

**If this representation refers to attachment(s), these are listed below:**

**MM1. What do you think to the scale of growth? Should there be a brownfield target?**

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

**MM3. Is this the right pool of potential development sites?**

**MM4. What land do you think is the most appropriate upon which to build?**

**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 sites?**

**MM6. Are there any issues or infrastructure requirements that should be identified?**

**Further comments**

My comments are as follows, and concern the area Site 1: Whychurch Farm and Inglenook, Crudwell Road (SHELAA sites 649, 866217, 3432), specifically site 649.

1. You write concerning site 649, 'Development of the whole site would potentially have a set of significant effects upon the character of the town as whole. Although there are notable issues in the southern portion of the site, these may not be insurmountable or rule out the whole area'. You describe the southern section as elevated but it is only elevated with respect to the river; this whole land falls away from the Filands B4014 towards Lover's Lane.

There is then no description of the notable issues. My take on this would be a) loss of views of the Abbey, b) no sensible access road especially to the south which is steep towards Station Yard, c) loss of a valuable amenity, (of which more later).

2. You do not appear to mention amenities or amenity value in any of your documents. It seems that this is not a consideration, yet in planning terms the loss of a local amenity should be considered.

Whilst I understand that the owner of site 649 wishes to include all of this plot, this is not viable under current planning law and one section should be removed. The cricket ground shown on the map has been so designated for far more than the stipulated

25 years. It has been shown as a cricket ground on Ordnance Survey maps for about 50 years at least, probably since the 1950s. The rent on the ground has been paid regularly for all the 50+ year period that Malmesbury Cricket Club have occupied the land. Under the current lease agreement, then as long as the cricket club continue to pay the rent (which is a standing order) then planning law states no development is permissible. So please remove this section from the plan, and designate it as a sports ground.

3. Obviously the owner of site 649 wants houses on this cricket club land because it is closest to the town centre. These houses would attract the best premium prices compared to any of the Filands developments. The fact that up to 80 local children receive coaching on the ground every Friday in the summer, plus all the benefits that a cricket club brings to Malmesbury for all the youth and adult teams, should not be underestimated or ignored.

4. The ground is not perfectly flat. One option would be for the owner to swap this ground with another preferably larger flat field with access from Filands. A changeover period of two years would be required to ensure continuity of ground conditions. Cricket squares do not appear overnight. However I am not on the Committee of the Cricket Club and do not know their wishes.

**Rep ID:** Malmes62

**Consultee code:** Other Advisory Bodies

**Consultee Organisation (if applicable):** Malmesbury River Valleys Trust

**Is this response on behalf of someone else/another organisation?** No

**Organisation being represented (if applicable):**

**Does this representation refer to attachment(s):**  
yes

**If this representation refers to attachment(s), these are listed below:**  
MALMES62

**MM1. What do you think to the scale of growth? Should there be a brownfield target?**

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

**MM3. Is this the right pool of potential development sites?**



The Worthies (Whychurch Farm site 649) was not identified in the Malmesbury Neighbourhood Plan (MNP) as a site for housing. The MNP stated that the Worthies was a valued open space for recreation & sport. It also stated that it was believed the Worthies was protected by a covenant. The area is used by families for recreation, for the use of its footpaths plus sledging in winter - all improving mental health. In addition, the land provides much valued views of the Abbey & the silhouette of the town both of which were key protective items in the MNP. Hence, the Whychurch Farm (649) LANDSCAPE column in the Site Selection report should be RED not AMBER due to the harmful & visual impact it would have on the town.

The Worthies (Whychurch Farm site 649) is an important wildlife corridor that is used by wildlife to access the MRVT Conygre Mead nature reserve for food &/or water. A plethora of wildlife live & use the Worthies such as small animals, birds & insects. In addition, Conygre Mead is home to owls & bats that may use the Worthies for hunting. MRVT have recorded deer, fox & badgers transiting between the two sites. Hence, the Whychurch Farm (649) HERITAGE column in the Site Selection report should be RED not AMBER due to the impact it would have on wildlife & Conygre Mead nature reserve.

The Worthies (Whychurch Farm site 649) is an important area of ground vegetation that can delay rainwater entering the Tetbury Avon. Soaking up heavy rain & releasing it slowly. If the Worthies is used for housing the roads & concrete areas would increase surface runoff. For a town that suffers from flooding this could be catastrophic. The Worthies may not be directly susceptible to flooding but building on it will likely increase flooding to the town & those areas downstream of Malmesbury. In addition, the stormwater runoff may directly affect the Conygre Mead nature reserve & the wildlife that live there, including the endangered carpet moth. Finally, climate change & the likelihood of heavy storms will only exacerbate the situation over time. This was demonstrated last night when the river rose >0.5m in approximately 6hrs following a storm. Hence, the Whychurch Farm (649) FLOOD RISK column in the Site Selection report should be RED not AMBER due to the loss of a significant area of high ground rainwater absorption

Note: I think the area of land on the Worthies (Whychurch Farm site 649) shouldn't be considered as one site due to the varied nature of the terrain & the land that it borders. However, the points above are valid for the whole area.  
(See MALMES62 for a photographic evidence in support of this comment)

**MM4. What land do you think is the most appropriate upon which to build?**

**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 sites?**

**MM6. Are there any issues or infrastructure requirements that should be identified?**

**Further comments**

The Worthies (Whychurch Farm site 649) was not identified in the Malmesbury Neighbourhood Plan (MNP) as a site for housing. The MNP stated that the Worthies was a valued open space for recreation & sport. It also stated that it was believed the Worthies was protected by a covenant. The area is used by families for recreation, for the use of its footpaths plus sledging in winter - all improving mental health. In addition, the land provides much valued views of the Abbey & the silhouette of the town both of which were key protective items in the MNP. Hence, the Whychurch Farm (649) LANDSCAPE column in the Site Selection report should be RED not AMBER due to the harmful & visual impact it would have on the town.

**Rep ID:** Malmes63

**Consultee code:** Other

**Consultee Organisation (if applicable):** Railfuture

**Is this response on behalf of someone else/another organisation?** No

**Organisation being represented (if applicable):**

**Does this representation refer to attachment(s):**  
yes

**If this representation refers to attachment(s), these are listed below:**  
MALMES63

**MM1. What do you think to the scale of growth? Should there be a brownfield target?**

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

**MM3. Is this the right pool of potential development sites?**

**MM4. What land do you think is the most appropriate upon which to build?**

**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 sites?**

**MM6. Are there any issues or infrastructure requirements that should be identified?**

Planning for Malmesbury

Malmesbury, like Devizes, is about three miles from a main line railway but has no station. Given the town's favourable economic situation and its tourist potential, consideration should be given to opening a station on the South Wales- London main line, either at Little Somerford, accessed via the B4042; or where the A429 passes under the line. As this line is electrified, a semi-fast service could be provided using Class 387 electric multiple units.

Our preferred station site would be Little Somerford because all the required land appears to be railway owned and within Network Rail fences; there is parking space in the former goods yard on the up side of the line; the site is marginally nearer to Malmesbury than is the A429 road bridge and there is space to relocate the former up platform slightly westward to avoid a lineside structure.

By contrast the A429 site would require platforms to be built on an embankment and acquisition of farmland for parking.

**Further comments**



<b>Rep ID:</b> Malmes64	
<b>Consultee code:</b> Statutory Body	<b>Consultee Organisation (if applicable):</b> Historic England
<b>Is this response on behalf of someone else/another organisation?</b> No	
<b>Organisation being represented (if applicable):</b>	
<b>Does this representation refer to attachment(s):</b> yes	<b>If this representation refers to attachment(s), these are listed below:</b> MALMES64
<b>MM1. What do you think to the scale of growth? Should there be a brownfield target?</b>	
<p>The form and character of the historic settlement, within its wider landscape setting, and the availability of suitability sites should inform the proposed scale of growth.</p> <p>We would support Wiltshire Council's efforts to identify, allocate and prioritise all potential brownfield opportunities, big and small, including repurposing existing vacant sites, or underused buildings of historic interest to help reinforce and enhance the character of the town and in turn limit sprawl. An ambitious brownfield first target is encouraged although the related future capacity (numbers/amount of brownfield development) must relate to the context of the site(s) and the future form ensuring a good fit with the townscape. An accurate capacity can be informed by an up to date Conservation Area Appraisal.</p>	
<b>MM2. Are these the right priorities? What priorities may be missing? How might these place shaping priorities be</b>	

**achieved?**

An up to date Conservation Area Appraisal and Management Plan and or Heritage Topic Paper can help to inform such priorities and in doing so demonstrate a positive strategy for the conservation and enjoyment of the historic environment, including heritage assets most at risk through neglect, decay or other threats (NPPF para 185).

**MM3. Is this the right pool of potential development sites?**

The Council should consider whether an updated Conservation Appraisal and setting assessment is required to inform the promotion of suitable development sites within the town.

Disclaimer – Historic England has not undertaken a detailed assessment of the suggested sites due to Wiltshire Council's intention to provide further evidence. We therefore reserve judgement until then. We note several proposed sites adjoin or effect the setting of designated heritage assets. Their significance needs to be determined and applied to inform site suitability and if the principle is acceptable, the form that development should take to avoid or minimise harm and deliver potential enhancement.

**MM4. What land do you think is the most appropriate upon which to build?**

An understanding of the history, character, identity, appearance and landscape setting should inform the level of growth and site suitability in accordance with national policy. Historic England's published advice on site allocations may be useful.

<https://historicengland.org.uk/images-books/publications/historic-environment-and-site-allocations-in-local-plans/>

An up to date Conservation Appraisal and setting assessment might help inform the Plan.

It would also be helpful to appreciate the views on proposals of the Council's in-house heritage and landscape expertise, and any germane planning history.

**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 sites?**

It is evident the Council appreciate that further heritage evidence needs to be gathered and applied.

**MM6. Are there any issues or infrastructure requirements that should be identified?**

We note that the historic environment/heritage assets is an important component part of Wiltshire's infrastructure – described in your Settlement Profile as Green & Blue Infrastructure. A heritage topic toper could establish the issues, needs and opportunities relating to the historic environment.

**Further comments**

It will be important to demonstrate how proposals have considered and responded to the historic environment, the town's history, character and landscape setting. Malmesbury doesn't appear to have an up to date and the towns character assessment is now 13 years old. The Council should consider the preparation of a setting assessment to inform edge of town expansion and also whether an update of the 2010 Conservation Area Appraisal and Management Plan is required.



<b>Rep ID:</b> Malmes65	
<b>Consultee code:</b> Developer/Agent	<b>Consultee Organisation (if applicable):</b> Hollins Strategic Land
<b>Is this response on behalf of someone else/another organisation?</b> No	
<b>Organisation being represented (if applicable):</b>	
<b>Does this representation refer to attachment(s):</b> yes	<b>If this representation refers to attachment(s), these are listed below:</b> MALMES65
<b>MM1. What do you think to the scale of growth? Should there be a brownfield target?</b>	
<b>MM2. Are these the right priorities? What priorities may be missing? How might these place shaping priorities be achieved?</b>	
<b>MM3. Is this the right pool of potential development sites?</b>	

#### **MM4. What land do you think is the most appropriate upon which to build?**

##### Appendix 3: Land at Sherston Road, Malmesbury – Chippenham HMA

1 HSL is promoting land at Sherston Road, Malmesbury in partnership with the Gloucestershire Health & Care NHS Foundation Trust as landowners.

2 The land at Park Lane is located to the west of Malmesbury. Sherston Road (B4040) is located to the south of the site. It forms the southern boundary and is the main access from the west into the centre of Malmesbury. The site extends to approximately 7 acres (2.8 hectares) and is a field bounded by hedgerows and hedgerow trees on all sides. There are no other notable features on site with the exception of telegraph poles which run across the site from the north-west to the south-east corners. To the immediate east of the site is the existing residential cul-de-sac of Silveston Way and Parklands. The north-western boundary of the site is formed by Park Lane. Land to the north, west and south is agricultural land. The site therefore has strong defensible boundaries comprising Sherston Road and Park Road, and the existing residential development to the east. By virtue of this, the site is well related to the existing built development and a logical location for future development.

3 The Environment Agency flood map confirms the site is located in Flood Zone 1 and is therefore at the lowest risk from flooding. There is a Grade II listed milestone along Sherston Road to the immediate south-west of the site. The site is surrounded by the Cotswolds AONB to the north-western and south-western sides but not within it. A variety of services and facilities are available within a short walking distance of the site. These include:

- Bus stop (Parklands SE bound and NW bound) – adjacent to site boundary on Sherston Road
- Malmesbury School (high school, 11-18 years) – 600 metres, 7 minute walk
- The Activity Zone Leisure centre – 850 metres, 10 minute walk
- Red Bull Pub – 950 metres, 12 minute walk
- Malmesbury Youth Football Club – 1.1km, 13 minute walk
- Co-operative Food – 1.3km, 15 minute walk
- Malmesbury Church of England Primary School – 1.5km, 17 minute walk
- Town centre – 1.6km, 20 minute walk
- St Joseph's Catholic Primary School 1.8km, 22 minute walk
- Malmesbury Primary Care Centre – 2.5km, 31 minutes

4 Swindon railway station is located within a 35 minute drive from Malmesbury and provides access to the Great Western Railway and a direct route to Bristol, London and the national rail network.

5 Malmesbury is one of the key settlements in Wiltshire and is a sustainable location for development. The site is located on the edge of the existing urban area of the market town of Malmesbury. Access to the town centre and local public services is excellent, making it a highly sustainable location for future development. The site is currently use as grazing/pasture land. The site has capacity to deliver at least 50 dwellings. [see attachment MALMES65 for site location plan].

**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 sites?**

**MM6. Are there any issues or infrastructure requirements that should be identified?**

**Further comments**

<b>Rep ID:</b> Malmes66	
<b>Consultee code:</b> Developer/Agent	<b>Consultee Organisation (if applicable):</b> Terrence O'Rourke Ltd
<b>Is this response on behalf of someone else/another organisation?</b> Yes	
<b>Organisation being represented (if applicable):</b> Gleeson Strategic Land	
<b>Does this representation refer to attachment(s):</b> yes	<b>If this representation refers to attachment(s), these are listed below:</b> MALMES66
<b>MM1. What do you think to the scale of growth? Should there be a brownfield target?</b>	
<p>1.1 Key to the production of a positive plan is a strategy that ensures that the right number of homes are delivered in the right locations. This task needs to be carefully considered to ensure the right level of development is directed to the most sustainable locations. As set out in our representations to the Spatial Strategy, we consider overall more homes need to be allocated.</p> <p>1.2 As a market town, that has potential for significant growth, Malmesbury is well placed to accommodate additional dwellings.</p> <p>1.3 Malmesbury is a sustainable market town. It contains a wide range of services and facilities, including</p> <ul style="list-style-type: none"> <li>• Primary and secondary schools</li> <li>• Significant employment base, to the extent that there is a pattern of in-commuting, partly because there is insufficient lower-cost housing locally to support local workers</li> <li>• A range of community and leisure opportunities</li> <li>• A range of retail facilities including high street shops and major supermarkets.</li> </ul> <p>1.4 The document 'Planningfor Malmesbury' fails to provide any background evidence to the function of the town, how it</p>	

operates and how it can become more self-contained to help meet the objectives of the plan.

1.5 As noted above, Malmesbury has an established pattern of in-commuting for work, to access the significant employment base in the town. This is not considered in the context of 'Planning for Malmesbury' and the growth that could be accommodated at the town to address this.

1.6 The Sustainability Appraisal notes that Malmesbury is constrained in landscape terms, because of the Cotswold AONB and the setting of the Abbey and town, as well as the connections from the town centre along the river valley to the Countryside. Whilst there are designated and protected areas at and around Malmesbury, there is also land on the northern / eastern edge of the town that can deliver development without adversely affecting the SA objectives. It is not accurate or appropriate to suggest, as a starting principle, that Malmesbury should take less growth without positively considering, and testing, the ability of the town to accommodate that growth on individual sites. This process would identify a higher-level of housing for the town, better related to its function and ultimately a more sustainable approach.

1.7 Malmesbury can and should accommodate more housing growth. Only 665 homes are allocated to Malmesbury over a 20 year period. Given the growth that has occurred, this equates to only a further 95 homes to be delivered until 2036. Malmesbury will need more housing growth to ensure there is sufficient housing for its younger generations and to support the wide range of shops, services and facilities the settlement has to offer, particularly in a post-Covid world.

1.8 In fact, Malmesbury needs to be allowed to grow and provide new housing in the plan period. The Interim Sustainability Appraisal Annex 1 (Assessment of Alternative Development Strategies on four Housing Market Areas, January 2021) notes that "the ratio of house price to earnings in Malmesbury continues to be one of the highest in Wiltshire at 14.13" (page 25), this highlights the need to deliver more market and affordable homes to the town to improve the affordability ratios, and how simply not delivering any new housing will not improve this situation and is not acceptable.

1.9 In regard to the brownfield target, there is no evidence to demonstrate that the target can be achieved in the plan period, for example, in the form of historic brownfield land delivery rates or in the form of a brownfield register. Given the character of the town, and without any clear evidence, reliance should not be placed on delivery from this source. The plan should ensure sufficient sites are allocated to deliver housing to meet local needs and sustain the town.

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

### MM3. Is this the right pool of potential development sites?

1.10 Gleeson is promoting land to the south of Filands on the northern edge of Malmesbury and as such supports the site being taken forward as a development site in the plan for the reasons set out below (please see appendix 1 for a site location plan). This area on the north of Malmesbury has a proven track record of delivering new homes in a sustainable location. 1.11 The site boundary for the land to the south of Filands has moved further north, away from the Abbey Church due to changes in land ownership. As part of this response Gleeson would be grateful if Wiltshire Council could update the SHELAA to reflect the revised boundary as shown on the site location plan in appendix 1. 1.12 The site is well related to both the settlement boundary, Dyson HQ and new and planned supermarkets. The area is established as a sustainable and suitable location for the growth of the town and this site is no exception to that, building on the existing developments. 1.13 There are existing footpath connections from the site into the town centre that will enable the development in this location to integrate well into the town. The site is deliverable, available now and offers a suitable location for development. 1.14 As mentioned, the suitability and sustainability of this area of the town for housing growth has been established through the grant of planning permission at Filands view at appeal and more recently by Wiltshire Council. In granting permission for 71 dwellings adjacent to the site boundary to the north, the Council acknowledged that the site was accessible and that there “were no objection was raised on sustainable transport grounds” (8.7 Transport Sustainability, page 46, Strategic Planning Committee Report, Wednesday 27 May 2020). 1.15 The site could deliver up to circa 200 market and affordable dwellings along with areas of open space. Enclosed with this response is a revised site boundary following changes to land ownership (appendix 1). 1.16 There are no major constraints to the development of the site. The site is on the opposite side of the town to the Cotswold AONB and is located away from environmental and flood risk constraints to the south of the town. As noted above, the site boundary has moved further north away from the Abbey, due to changes in land ownership. The boundary in the SHELAA showed the site included the southern field adjacent to the Abbey. This is not proposed for development (see appendix 1) and as such any future reports or consideration of the site should take this into account. The proposed development can be delivered to retain views of the Abbey and avoid harm to the setting of the nearby listed buildings. 1.17 The area is well located in terms of its proximity to the existing employment opportunities, such as the Dyson Campus and new and planned supermarkets and is well related to the built form of Malmesbury. 1.18 Development in this location would integrate well into the landscape and provide a natural edge to the town, being contained by the A429, B4040 and B4014. 1.19 This site would be able to integrate well with the surrounding landscape, in fact the site selection report correctly concludes that the site could form “one logical extension continuing the past pattern of growth”. Whilst the site selection report scores the site as amber in relation to accessibility, flood risk, heritage and landscape, from detailed work on the site and as provided through recent adjacent planning permissions, this site is known to be able to

acceptably deliver new homes and any adverse impacts can be mitigated in the normal way. From a traffic perspective the site is scored green. It is considered suitable and a sustainable location to deliver development. 1.20 There are a wide range of facilities within a reasonable walking distance of the site, including: •Dyson to the west (Malmesbury's major employer) •Gloucester Road and Park Road Industrial Estate to the south •Malmesbury Town centre to the south and the local and high street shops on offer there •Primary school and secondary school •Existing and planned supermarkets. 1.21 There are no overriding significant impacts that would prevent the development of the site. It would make a logical extension to the town to deliver much needed market and affordable housing.

**MM4. What land do you think is the most appropriate upon which to build?**

1.22 As a natural extension to the town, and in line with recent patterns of growth, site 649 is the most appropriate site on which to build. Gleeson has a proven track record of delivering suitable and sustainable housing growth in this location of the town. 1.23 Gleeson are working towards the submission of a planning application on the site and are carrying out technical studies to support that application, which demonstrate that the site is deliverable and can potentially accommodate up to 200 homes.

**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 sites?**

1.24 The site selection report for site 649 scores the site as amber (medium) in regard to accessibility, flood risk, heritage and landscape. In response to those scoring we set out our response below, based on the detailed technical assessments undertaken for the site to date. Accessibility 1.25 The site is in an accessible location. The principle of development at this location is established by the recently completed 180 Bloor home site and planning permission for 71 homes at Filands (19/11569/OUT). Much of the site is closer to the centre of Malmesbury and existing and proposed supermarkets locally than the permitted development sites are. There is also the potential to provide new and improved footpath and cycle links to minimise the distance to the schools and facilities in the town centre. 1.26 This does not present a constraint to development of the site. Flood Risk 1.27 The site is in flood zone 1 and Wiltshire Council SFRA historic flood mapping shows no historic surface water flooding at the site. The site is significantly above the River Avon. The technical work undertaken by Gleeson to date suggests the risk of flooding is low. Like any housing development the introduction of hard surfaces will increase run off rates, but this can be

controlled through SUDS mitigation. 1.28 This does not present a constraint to development of the site. Heritage 1.29 In terms of heritage, there is no built heritage assets within the site. A proportion of the site forms the setting of two designated heritage assets at Whitchurch Farm (the farmhouse and outbuildings being designated as Grade II). The site forms a small part of the wider setting of the Abbey Church of St Mary and At Aldhelm (Grade I). 1.30 The site area has been reduced from the area assessed in the SHELAA, the boundary moving further north due to changes in land ownership. Therefore, the proposed development area is further from the Abbey Church than assessed in the SHELAA. 1.31 A historical building impact assessment has been carried out in regard to the built heritage surrounding the site which has concluded that for much of the site there is no inter-visibility with the Abbey Church, although there are some sequential views of the Abbey, but the site currently provides a negligible / minor contribution to the Abbey Church's significance. It is recognised that the development could mitigate or eradicate any potential limited harm to this asset by keeping development away from the more sensitive southern extreme and strengthen landscape planting and could potentially frame views of the Abbey Church (although noting these are not key views). 1.32 Whitchurch Farmhouse and outbuildings are listed buildings that in close proximity to the site. It is recognised that any potential harm from the development can be mitigated by keeping built development away from the south-eastern part of the site and introduce landscape planting. 1.33 This does not present a constraint to development of the site. Landscape 1.34 The site section report suggests "development of the whole of the site could potentially have significant effects on the character of the town. Although it is notable issues on the southern portion of the site, these may not be insurmountable or rule out the whole area". It is important to note here firstly that the enclosed map identifies a reduced area proposed for development due to land ownership changes. This removes the southern portion of the site from the proposal. 1.35 Development of this site would present a natural rounding off of the town and assimilate well with the existing residential areas to the west of the site. 1.36 This does not present a constraint to development of the site. Ecology 1.37 In addition to the above work, ecology appraisal work has also been carried out for the site. An Extended Phase 1 habitat survey has been undertaken, along with a range of further (Phase 2) protected and notable species surveys. The surveys confirmed the presence of an outlier badger sett and a low population of slow-worms in the field margins of the site. A limited assemblage of breeding birds was recorded, comprising predominantly common and widespread species but including several notable species such as linnet and stock dove. At least 10 bat species were recorded commuting/foraging, with activity dominated by common pipistrelle. Hedgehog was assumed to be present. 1.38 No notable plants or invertebrates, bat roosts or evidence of hazel dormice were identified. The presence of great crested newt was considered very unlikely. 1.39 Following the survey work, the ecologist has been able to conclude that there are no over-riding ecological constraints that have been identified, and any impacts will be mitigated in accordance with the mitigation hierarchy (avoid, mitigate, compensate). 1.40 This evidence supports the site being taken forward as a development site in the plan.



**MM6. Are there any issues or infrastructure requirements that should be identified?**

**Further comments**