

<b>Rep ID:</b> RWB1	
<b>Consultee code:</b> Other Advisory Bodies	<b>Consultee Organisation (if applicable):</b> Wiltshire Swindon Oxfordshire Canal Partnership
<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>WB1. What do you think to the scale of growth? Should there be a brownfield target?</b>	
No Comment	
<b>WB2. Are these the right priorities? What priorities may be missing? How might these place shaping priorities be achieved?</b>	
Restoration of the Wilts & Berks Canal to Swindon using the towpath as a sustainable transport route	
<b>WB3. Is this the right pool of potential development sites?</b>	

**WB4. What land do you think is the most appropriate upon which to build?**

Areas 5,6,7 should include restoration of the Wilts & Berks Canal as part of the development

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

**WB6. Are there any issues or infrastructure requirements that should be identified?**

Wilts & Berks Canal

**Further comments**

<b>Rep ID:</b> RWB2	
<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>WB1. What do you think to the scale of growth? Should there be a brownfield target?</b>	
<p>Comparing the local employment opportunities to the proposed number of houses to be provided, it would appear that the town is being set up even more as a dormitory for Swindon. I think the number of dwellings is too high.</p> <p>As for the brownfield target, there is a shortage of employment land and primarily brownfield land is former employment land. I would always prefer brownfield land to be developed for homes near the town centre.</p>	
<b>WB2. Are these the right priorities? What priorities may be missing? How might these place shaping priorities be achieved?</b>	
<p>Missing a priority about enhancing the Town Centre .</p> <p>Needs to be better connectivity to the town centre and a balancing up of the shape of the town so that the High Street is actually in the centre. Most of the new estates built on the edge of town don't use the High St as all roads lead away from the town.</p>	

Also need to encourage regeneration of the Town Centre car park area

**WB3. Is this the right pool of potential development sites?**

Take a look at the High Street, then take a look at where all these sites are. Most of them will not add to the viability of the High Street as they are on the wrong side of town.

None of the roads in the town are suitable for taking large amounts of additional traffic so the only solution would be to build a bypass.

To rebalance the town you would probably need to develop land to the North West of the town, and no sites have been put forward there

**WB4. What land do you think is the most appropriate upon which to build?**

3 and 5

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

AS previously mentioned, to me the 2 most precious things the town has is the High Street and the green fields surrounding the town.

Developing the Former Wilts and Berks Canal is not going to add anything to the town as it is too far away and most people already go there by car, causing problems with parking.

**WB6. Are there any issues or infrastructure requirements that should be identified?**

<b>Further comments</b>
The town is now suffering from lack of connectivity and cohesion. The Local Plan needs to bring back the cohesion to the town.

The town is now suffering from lack of connectivity and cohesion. The Local Plan needs to bring back the cohesion to the town.

<b>Rep ID:</b> RWB3	
<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>WB1. What do you think to the scale of growth? Should there be a brownfield target?</b>	
<p>There has already been much development for both residential and industrial in Wootton Bassett. Greenfield sites have been used for both. The current development in Whitehill Lane is an eyesore. The units are much larger and worse they are of pale colour and do not blend in to the beautiful landscape. Site 4 North of Whitehill Lane has a right of way across it and is also very wet and should be a flood consideration.</p>	
<b>WB2. Are these the right priorities? What priorities may be missing? How might these place shaping priorities be achieved?</b>	
<p>If the land on Whitehill Lane is further developed then there will be an increase in heavy vehicles going through the historic town. Increased pollution and traffic is not good.</p>	

**WB3. Is this the right pool of potential development sites?**

Site 4 would result in increased heavy traffic through the town.

**WB4. What land do you think is the most appropriate upon which to build?**

Site 2 and 8. There is better access to the M4 and less likelihood of land floods.

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

The area on Whitehill Lane is well known, locally, for its beauty and many come to walk there. It is already being marred by the increased development and it would be dreadful to increase that further.

**WB6. Are there any issues or infrastructure requirements that should be identified?**

no

**Further comments**

<b>Rep ID:</b> RWB4	
<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>WB1. What do you think to the scale of growth? Should there be a brownfield target?</b>	
No comment	
<b>WB2. 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	



**WB3. Is this the right pool of potential development sites?**

I have concerns regarding sites 1 and 3. They are adjacent to sports site and the housing could prejudice the use of the playing fields.

Site one: there is an Artificial Grass Pitch, stadia football pitch and cricket pitches - I draw your attention to the East Meon CC v Hants DC case on issues of ball strike. Regarding the AGP and Stadia football pitch, I am concerned the the noise generated form these uses could cause nuisance to the new homes. therefore an acoustic survey would be required. Any mitigation for the cricket or football woudl have to be on the housing land and paid for and maintained by the the developer.

**WB4. What land do you think is the most appropriate upon which to build?**

Non sporting land

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

see above

**WB6. Are there any issues or infrastructure requirements that should be identified?**

No

**Further comments**

No

<b>Rep ID:</b> RWB5	
<b>Consultee code:</b> General Public	<b>Consultee Organisation (if applicable):</b> Openwork
<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>WB1. What do you think to the scale of growth? Should there be a brownfield target?</b>	
Higher target for brownfield sites	
<b>WB2. Are these the right priorities? What priorities may be missing? How might these place shaping priorities be achieved?</b>	
Minimising development West of the town (and off Whitehills lane) which would; encroach on the oldest parts of Wodetun. Spoil the historic view of the town eastbound from the M4. Force all residents traffic onto/down the length of an already over congested high street & cross roads at the bottom.	

**WB3. Is this the right pool of potential development sites?**

Not site 4.

Also, should consider site behind Sally pusseys allowing infrastructure to cater for non-motorised traffic to cross the M4 via the spittle born farm bridge, and all the land that development (by the solar farm) would allow for.

**WB4. What land do you think is the most appropriate upon which to build?**

Site 3

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

Site 4 has many negative impacts based on positioning to town, on preserving historic views, traffic, congestion, flooding, all seem to be underplayed in their assessment

**WB6. Are there any issues or infrastructure requirements that should be identified?**

No/deterred pedestrian traffic between RWB and Swindon. NOT promoting green incentives

**Further comments**

We should be planting up woodland on site 4 for so many reasons or at least a 20-30m wide strip bordering the existing Western boundaries

<b>Rep ID:</b> RWB6	
<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>WB1. What do you think to the scale of growth? Should there be a brownfield target?</b>	
Lower	
<b>WB2. Are these the right priorities? What priorities may be missing? How might these place shaping priorities be achieved?</b>	
Importance of ensuring green space is maintained	
<b>WB3. Is this the right pool of potential development sites?</b>	

**WB4. What land do you think is the most appropriate upon which to build?**

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

**WB6. Are there any issues or infrastructure requirements that should be identified?**

**Further comments**

In relation to SHELAA site 3156 I do not feel this should proceed due to impact on traffic in this area and in RWB, the green area was being eroded and there will be a significant impact on wildlife. There will be an impact on a public right of way if houses are built and limited access to the countryside for the public. We will be eroding an green area and the look of RWB and will be turning it into a sprawling urban landscape which is not an area I will want to live in.

**Rep ID:** RWB7

**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:**

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

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

**WB3. Is this the right pool of potential development sites?**



**WB4. What land do you think is the most appropriate upon which to build?**

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

**WB6. Are there any issues or infrastructure requirements that should be identified?**

**Further comments**

The RWB escarpment overlooking the Dauntsy Vale has a wonderful view and this will be destroyed.

<b>Rep ID:</b> RWB8	
<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>WB1. What do you think to the scale of growth? Should there be a brownfield target?</b>	
<b>WB2. Are these the right priorities? What priorities may be missing? How might these place shaping priorities be achieved?</b>	
<b>WB3. Is this the right pool of potential development sites?</b>	

**WB4. What land do you think is the most appropriate upon which to build?**

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

**WB6. Are there any issues or infrastructure requirements that should be identified?**

**Further comments**

I do not feel the development should proceed for site 3156 land at Whitehall Way as a young person I feel that public right of way and access to the countryside is crucial. We are being encouraged to get exercise by the Government and you will be limiting areas we can go to for walks and runs. I do not feel the infrastructure of RWB can continue to cope with more people.

<b>Rep ID:</b> RWB9	
<b>Consultee code:</b> General Public	<b>Consultee Organisation (if applicable):</b> Property Owner within local area
<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>WB1. What do you think to the scale of growth? Should there be a brownfield target?</b>	
<p>Over the past years living at the above address from 1967, I have seen more and more developments built. In fact, I personally think that sufficient properties are already in place. Therefore, I think the number you have suggested is far too high. Also the major problems are associated to roads, especially Whitehill Lane, where there is to be a parking depot for the largest vehicles allowed on British Roads. Your plans will tell you that major work has been carried out to enable the lorries to "turn" in and out off the parking areas. Therefore if the field adjoining the lane is to be built upon, then it will be CHAOS. I also bring to your attention the major hold ups when they turn out of the lane into the A3102 to get up the hill, with cars allowed parking throughout the day and night.</p>	
<b>WB2. Are these the right priorities? What priorities may be missing? How might these place shaping priorities be achieved?</b>	

Having tried to digest the above ten priorities, which seem to me satisfactory, but not one is new, as I have heard these ideas over and over again. During the past years, we still have not managed to cover any of your list, so I do not wish to add more,, until some of the priorities listed are carried out.

**WB3. Is this the right pool of potential development sites?**

As I have already mentioned, I feel that the majority of suggestions of sites, are being placed in areas which are not suitable for example SITE 4 Land at Whitehall Lane (SHELAA 3156 has to date been turned down on at least two occasions - your records will indicate this - so why does it still remain?

**WB4. What land do you think is the most appropriate upon which to build?**

I have little knowledge of land management and will leave it to the specialists who deal with land structures, which can link in with areas which have no "springs" - as you are aware there are many in the area! If left to me, I must be honest knowing

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

Re Site 4 Land at Whitehall Lane (SHELAA Site 3156) would be a disaster for houses to be placed there, as it would be a nightmare for those elderly folk living in Whitehall Lane, commencing from the A3102 down to and past the industrial site. There would also be a problem with exit into the lane from Number 4 site.

**WB6. Are there any issues or infrastructure requirements that should be identified?**

The list seems to be well thought through.

**Further comments**

I trust that when a decision has been made, the public will be invited to a meeting to discuss any plans that are being brought forward.

<b>Rep ID:</b> RWB10	
<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>WB1. What do you think to the scale of growth? Should there be a brownfield target?</b>	
<p>I would like to share the thoughts of my family and I with regards to the up-and-coming development strategy of Royal Wootton Bassett. I have read through the last strategy plan and other various documents online to try and put forward my honest and best-informed opinion of what I think will suit our beautiful town and the people that live in it.</p> <p>From the 8 potential development sites there are significant concerns with site 5. Development in this area would be catastrophic to the towns rural setting and would be harmful to the countryside landscape that can be seen by the whole of Royal Wootton Bassett. Development of site 5 would create an out of town residential area because off the separation from the town due to the railway which is not in keeping with the values of this market town. I have also highlighted concerns with sites 6 &amp; 7 which are stated below.</p> <p>However, there is strong and appealing development opportunity in sites 1, 2, 3, 4 and 8 which could really benefit the town. In my letter below there I have detailed the concerns and benefits of each site including the concerns of site 5 which I feel the application could safely be refused without any further consideration.</p>	

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

**WB3. Is this the right pool of potential development sites?**

Site 5 – Significant concerns regarding development

This site does not meet the shaping priorities set out in the Wiltshire council development plan.

Firstly, the concern is that this does not protect the distinct character and identity of the town. There is no direct link between this site and the town of RWB and development here would feel truly out of town, creating a new urban edge and would not be in keeping with RWB tight knit community and would be cut away from the towns amenities. With regards to the current access to the town from site 5 there is no footpath access over Skew bridge and it is only wide enough for one bus or lorry to cross at one time. Even if the development explored footpath bridges over the railway for access back into RWB this would make the access very limited and still an out of town development. This site is also a significant distance from schools, shops, restaurants and sports facilities. The concern here is the segregation from the town and the steep gradient to back into RWB which is quite a distance, and will not encourage the residents of site to use green methods of transport such as walking or cycling and will increase the use of cars and traffic into RWB high street. This also applies for the current residents of RWB, due to the significant out town location of the site people who currently live in RWB will have very limited benefits from the new facility's due to distance and difficulty accessing meaning the development will offer no benefit to the current residence and cause further segregation. From reviewing previous neighbourhood plans I understand the town has explored a bypass through the location of site 5. However, a bypass would cost significant capital and would not offer a return for the town when more appropriate sites are available. For example, sites 1 & 2 wouldn't drive significant traffic through the high street and town, they provide good links to Swindon and A419. Resulting in a bypass not being required in a market town, allowing the true rural character to be kept and the significant capital require for a bypass could be better spent elsewhere. The Heritage of RWB with its rural location, country values and setting is extremely important to the residents. Site 5, south of RWB offers countryside views for the whole of the town, even from the most northern point of the town in the Woodshaw development, you can clearly see site 5. Development here would remove this beautiful countryside view that residents of the whole of RWB have. Along side this, site 5 has beautiful countryside with the Brinkworth brook, canal and footpaths that are well used by the residents of Wiltshire crescent and of the



local area. Development here would not only remove these countryside footpaths for them but risk coalescence with the Wiltshire crescent development and the hamlet of Vastern. The site is also home to a lot of wildlife such as deer, foxes', bats and water life due to the wetland areas and dense countryside this site has, more so than any other areas that have been identified. With regards to the documents you have posted so far, your initial findings state that no development would be granted or suggested the other side of brook, this is good in theory however in practice this is something the town has already been subject to abuse with recently. Another site, Woodshaw Meadows was granted planning subject to a large park being made west of the development to create a buffer zone from the rest of the town however, over Christmas the developer has now decided to disregard this and has applied for planning over the allocated park area and has caused uproar in the town! I assume the same would happen here, which is infuriating to say the least!

#### **WB4. What land do you think is the most appropriate upon which to build?**

(continued from site 5 paragraph) My strong recommendation is that development in site 5 south of RWB would be extremely detrimental, offering no benefit to current residence of the town and would have huge negative impacts on the town and neighboring villages for years to come. I feel the application could safely be refused without any further consideration due to the points detailed above.

Site 6&7 – Concerns regarding development in these areas

Concerns of these sites mirror those of site 5 however recognizing that site 6 and the north of site 7 would have minimal impact of the countryside views and wouldn't affect the traffic concerns that site 5 would have due to the size of the sites.

The south of site 7 has Brinkworth brook running through it and is prone to being very wet, development in this area would be a great shame with the same wildlife concerns detailed in site 5 above.

Site 1 and 2 – Strong sites with significant development opportunity

Site 1 and 2 offer strong development opportunity in the next 15 years without a doubt. The land is flat and can cope with the extra traffic that the families living in those houses would bring.

Sites 1 & 2 would be enjoyed sustainably by all age groups that live either in RWB currently or in the new development. The sites location would allow residents to be within walking distance of all key amenities such as, the sport center's, jobs on the high street, shopping facilities, restaurants and schools additionally allowing the current residents of RWB to access into the new development and benefit from its key features. Easy access for these key amenities would significantly encourage green transport and in turn be a huge tick for the environment as well as driving economic benefits for the towns independently owned business.

Additionally, from understanding the need for an additional schooling requirements within the full development plan sites 1&2 would give students easy access to the high quality sporting facilities that RWB has to offer.

Sites 1 & 2 offer easy access either to the M4/Swindon & Wroughton or to Cirencester/ Gloucester via the A419. This development location would allow residents to travel to these locations without putting extra stress on the high street traffic flow due to its northern location in the town. With regards to outlook of the landscape, a very small number of houses would be overlooking the new developments in these locations as the sites are located opposite a pub, Aldi and rapid hire. Further down this development towards the M4 the current houses on the other side of the road is tree lined which blocks the view and creates a natural buffer zone along with the road. If there were any concerns regarding motorway noise due to the location of these sites, I am confident there would not be a problem due to being very familiar with Hook village and the Wichelstowe development, these sites are also directly against the motorway. I am confident that sites 1 & 2 could be developed and manage the motorway noise well and enjoyed as Wichelstowe and Hook are now.

Site 8 -Strong site for development

This site I feel offers great access to the town, M4 and Swindon Via Car and public transport. It is also a site that can integrate into the town well due to its proximity to the older Woodshaw development and close to the new Woodshaw meadows development. Whilst it is located on the edge of town it is still close to key ammonites which are walkable such as takeaways, shops and pubs.

(continued in further comments section)

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

**WB6. Are there any issues or infrastructure requirements that should be identified?**

**Further comments**

### Site 3 – Good development opportunity

Site 3 offers good development opportunity. This site is nice and flat with families being able to walk and enjoy the lake and other walks next to the development land. It also offers the same benefits of walking distance to all the towns key amenity's as sites 1&2.

Being north of the town it also allows access to the motorway, Swindon and A419 without impacting the town center during peak rush hour times.

This site is also a good fit for the town as it doesn't stretch pass a road or natural boundary. Its location links nicely with other older developments in this area and would feel more infilling within the current town than sprawling out or becoming an out of town development.

### Site 4 – Good development opportunity

This site offers development and employment opportunity being close to the industrial estate and multiple business in this area. Its situation alongside the council owned allotments and has good access into the town via foot paths and road connections with minimal or no alterations to current road layouts. The development site wouldn't affect the visual aspect of the town either as its located on a north facing bank which isn't overlooked by many residences. Its also in the confinements of the natural boundary of the town and wouldn't feel or give the visual impact of an urban sprawl.

To conclude as mentioned above I have numerous, significant concerns about site 5 with regards to its visual, social and economic impacts development in this area would have on the town. Development in site 5 south of Royal Wootton Bassett would offer no benefit to current residence of the town and would have huge negative impacts on the town and neighbouring villages for years to come. Additionally, development in this area raises great concerns of developers abusing it for capital gain due to its size, rather than giving the town what it wants and needs. I feel the application for site 5 could safely be refused without any further consideration due to the points detailed above.

Sites 1,2,3,4 and 8 are much better suited for Royal Wootton Bassett and would be more than enough land to meet the towns needs without causing huge future impacts an maintaining the values of this rural farmers market town which is still key to the community today.

<b>Rep ID:</b> RWB11	
<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>WB1. What do you think to the scale of growth? Should there be a brownfield target?</b>	
<b>WB2. Are these the right priorities? What priorities may be missing? How might these place shaping priorities be achieved?</b>	
<b>WB3. Is this the right pool of potential development sites?</b>	
I believe that the land at Whitehill Lane is unsuitable for development and should be removed from the list. It was originally included in Royal Wootton Bassett neighbourhood plan for development but was removed at an early stage. Reasons included	

lack of sewerage capacity and the dangerous 5 way road junction with the High Street. Also most traffic would be going to the M4 and Swindon so would have to travel through the already congested High Street.

**WB4. What land do you think is the most appropriate upon which to build?**

Maple Drive area was put forward on the Neighbourhood Plan. Also the land at Marsh Farm and Midge Farm are both the correct side of RWB for access to the M4 and Swindon without having to drive through the High Street.

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

**WB6. Are there any issues or infrastructure requirements that should be identified?**

**Further comments**

<b>Rep ID:</b> RWB12	
<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>WB1. What do you think to the scale of growth? Should there be a brownfield target?</b>	
There must be a mixture, but brownfield sites should be looked first.	
<b>WB2. Are these the right priorities? What priorities may be missing? How might these place shaping priorities be achieved?</b>	
These are important and seem about right but things like medical centres, schools must be a priority. The RWB surgeries are not fit for purpose, could be dead and buried before you get GP appointment. With electric cars coming more charging points needed.	

**WB3. Is this the right pool of potential development sites?**

Whitehill Lane is probably the least appropriate until the Whitehill Lane/Bath Rd./New Road junction is sorted - traffic lights??  
How about the land off the old network rail road , If green field sites need to be used how about east of woodshaw near the railway line to facilitate the Wootton Bassett station to rejoin the A3102 between the Sally Pussey and the crematorium.

**WB4. What land do you think is the most appropriate upon which to build?**

1. The network rail road area or the east of woodshaw - as Q9.

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

To improve the enviroment create a bypass that would reduce through traffic, esp HGV's to reduce noise, improve air quality and improve the High Street in general.

**WB6. Are there any issues or infrastructure requirements that should be identified?**

The railway station is important but probably years away. Will the sewage works cope with all the extra volume from all these houses, shops, & factory toilets.?

**Further comments**

To get all the empty shops and those soon to be vacated, back in business preferably with useful shops, there are enough charity/coffee/bookies. Shoe shop would be useful. Could we manage with smallish industrial units in view of the huge warehouse developments at the NEV, Gablecross and the ones opposite the tip at Stanton, [J17].



**Rep ID:** RWB13

**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:**

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

All brownfield sites should be used before green fields

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

Yes

**WB3. Is this the right pool of potential development sites?**

I think that the Whitehill Lane site 4 should be removed. This site is unsuitable for development and was taken out of the Royal Wootton Bassett Neighbourhood Plan. It is unsuitable for a variety of reasons, the first one being accessibility and traffic! It is a very dangerous junction where Whitehill Lane joins the A3102. This is a five way junction on a blind corner. The traffic going to the industrial estate already causes many problems for residents. Also mostly all traffic from a new development there would be going to Swindon or the M4 causing even more congestion through Royal Wootton Bassett High Street. The High Street is already dangerous because of parking, volume of traffic and the local infant school on the hill. The Whitehill Lane site is very wet and boggy and there would be an issue with sewerage capacity. There is also a historic footpath that runs through the site, the Row De Dow.

**WB4. What land do you think is the most appropriate upon which to build?**

I think that the sites to be considered should be ones that can access Swindon and the M4 without driving through Royal Wootton Bassett High Street.

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

**WB6. Are there any issues or infrastructure requirements that should be identified?**

**Further comments**

<b>Rep ID:</b> RWB14	
<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>WB1. What do you think to the scale of growth? Should there be a brownfield target?</b>	
<b>WB2. Are these the right priorities? What priorities may be missing? How might these place shaping priorities be achieved?</b>	
<b>WB3. Is this the right pool of potential development sites?</b>	
I do not think there should be housing development along Whitehill Lane or on any part of those fields. We are already losing much of our countryside and many people enjoy walking in these fields. There aren't many areas where people can take their	

dogs in such freedom. There are also deer living and feeding in those fields. People living in the bungalows on Whitehill Lane are already plagued by traffic noise and the junction at the top of Whitehill Lane with Bath Road, High Street, New Road is very busy and more traffic would cause major problems. Cars are often parked all day at the top of Whitehill Lane and it is dangerous to drive around them without being able to see if there is any oncoming traffic. Lorries have to pull out into the centre of the road in order to turn left onto the High Street.

**WB4. What land do you think is the most appropriate upon which to build?**

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

**WB6. Are there any issues or infrastructure requirements that should be identified?**

**Further comments**

<b>Rep ID:</b> RWB15	
<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>WB1. What do you think to the scale of growth? Should there be a brownfield target?</b>	
<b>WB2. Are these the right priorities? What priorities may be missing? How might these place shaping priorities be achieved?</b>	
<b>WB3. Is this the right pool of potential development sites?</b>	
Site 4 - Whitehill Lane. I feel it would be inappropriate to develop housing in the fields along Whitehill Lane for the following reasons. There is already a large amount of traffic along Whitehill Lane (and it is a lane rather than a major road) which can be	

very noisy for the people living in the bungalows on Whitehill Lane. The crossroad is already inadequate and it would be unacceptable to add any extra pressure on this junction. Lorries coming from the Whitehill Lane Industrial Estate have to pull out into the middle of the road before they can turn left into the High Street, especially since Pickerings now use this road to transport their portacabins. Wootton Bassett is in serious danger of losing its connection with the countryside- building on these fields would destroy the habitat of local wildlife and would compromise the nature of the character of this country market town. During the lockdown we have noticed many more people walking in these fields, often with dogs, sometimes families with children. We are rapidly losing areas where people can walk safely and in the countryside.

**WB4. What land do you think is the most appropriate upon which to build?**

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

**WB6. Are there any issues or infrastructure requirements that should be identified?**

**Further comments**

<b>Rep ID:</b> RWB16	
<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>WB1. What do you think to the scale of growth? Should there be a brownfield target?</b>	
There should be no more building of any new houses in RWB unless it is complemented (perhaps even preceded) by actual, robust improvement and addition to the necessary infrastructure facilities across the board.	
<b>WB2. Are these the right priorities? What priorities may be missing? How might these place shaping priorities be achieved?</b>	
<b>WB3. Is this the right pool of potential development sites?</b>	

**WB4. What land do you think is the most appropriate upon which to build?**

See my earlier answer about no more new build until appropriate infrastructure additions / improvements are agreed. I simply don't see how any development in the south of the town can be considered until new major additional road access is agreed otherwie the log jam that is the High St and all the pollution that goes with will be unbearable and unsustainable.

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

Yes I say again complete lack of sensible road access to the southern development sites 4, 5, 6 and 7. The far reaching visual impact of Site 4 would be massively detrimental.

**WB6. Are there any issues or infrastructure requirements that should be identified?**

**Further comments**



<b>Rep ID:</b> RWB17	
<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>WB1. What do you think to the scale of growth? Should there be a brownfield target?</b>	
Scale if growth is too high unless commitment to invest in facilities such as schools and doctors.	
<b>WB2. Are these the right priorities? What priorities may be missing? How might these place shaping priorities be achieved?</b>	
Committing to building a railway station close to the town to encourage people out of cars to ease congestion and improve air quality. A bypass to take pressure off of the already busy A3102 high Street	

**WB3. Is this the right pool of potential development sites?**

No

**WB4. What land do you think is the most appropriate upon which to build?**

If the town must accept additional development, sites 2 and 8 appear to be the most suitable. They should be a mix of affordable and social housing and employment land for accessible jobs and not focused on high end

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

All residential development must be sustainable, homes must be eco friendly whilst also allowing space for parking and family growth.

**WB6. Are there any issues or infrastructure requirements that should be identified?**

Investment in schools and GPs to ensure there is enough capacity within the town for all residents to access.

**Further comments**

Royal Wootton Bassett has already taken more than it's allocated amount of new homes. Further development must make use of S106 agreements to ensure investment in facilities that support growth. Without such commitment the current infrastructure will not be able to support any further development.

<b>Rep ID:</b> RWB18	
<b>Consultee code:</b> Developer/Agent	<b>Consultee Organisation (if applicable):</b> WebbPaton
<b>Is this response on behalf of someone else/another organisation?</b> Yes	
<b>Organisation being represented (if applicable):</b> North Wootton Bassett Landowners	
<b>Does this representation refer to attachment(s):</b> no	<b>If this representation refers to attachment(s), these are listed below:</b>
<b>WB1. What do you think to the scale of growth? Should there be a brownfield target?</b>	
<p>We believe that the growth numbers at Royal Wootton Bassett should be much higher. Wiltshire Council are relying heavily on the upgrade of the A350 within their emerging Spatial Strategy. This will mean that there will be a time lapse of many years before both Melksham and Chippenham can deliver numbers, which create a shortfall in housing delivery in the early part of the Spatial Strategy period. Royal Wootton Bassett is an ideal location on junction 16 of the M4 and adjacent to one of the south west region's largest towns Swindon. It has facilities to allow for more growth than is being catered for within this emerging Spatial Strategy. Royal Wootton Bassett is also very close to a large employment area in Swindon and has access off junction 16 of the M4. Royal Wootton Bassett can also deliver housing.</p> <p>The plan does not allocated enough employment land, a large employment area should be allocated on the land being promoted by Primegate at Royal Wootton Bassett north of M4, south of Hook Street. There is existing demand for employment in this location, with a lack of employment sites at the M4 junctions at both in Wiltshire and Swindon. The Spatial Strategy is totally unambitious and limited employment land in the right areas. It is disappointing to see so little employment land proposed both around Junction 16.</p>	

For some unknown reason Wiltshire Council have ignored professional representations by developers, agents, occupiers and planners recommendations that there should be development north Royal Wootton Bassett and west of Swindon. Normal property and commercial economics are being ignore by Wiltshire Council in over looking Royal Wootton Bassett and its surrounding area for many years. Swindon BC are now constrained by its boundaries and are turning away new business and business expansion inquiries due to the lack of ambition in employment allocations by both Swindon BC and Wiltshire Council. These observations are supported both by Business west and the Thames Valley Chamber of Commerce. As Swindon is a major employment area with exceptionally good road connections along the M4 east to west, and the A419 to the M5 to the north. Along with a major railway station which is only 46 minutes to London there is huge demand for new housing adjoining Swindon. As such Royal Wootton Bassett should be allocated at similar levels to Melksham and Chippenham, our suggestion is 4,000 dwellings are allocated within the Wiltshire Local Plan. There is a strong case that Wiltshire Strategic plan should be from 2022 rather than 2016, also should consider the supply of suitable development land for a 30 year period rather than 15 years, based on the current National Planning Policy Framework consultation. We question whether the brownfield land sites are actually available and can be viably developed.

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

Yes these are the right priorities but point 5 should not refer to self containment. Royal Wootton Bassett location is ideal for connections throughout the M4 corridor between London, the south west and south Wales.

**WB3. Is this the right pool of potential development sites?**

We cannot understand how sites 4, 5, 6 and 7 are going to be accessed. Crossing the Swansea to London railway line and Penzance to London Railway line will lead to a major cost in both a Network Rail ransom and the costs of new bridges. To access sites 4, 5, 6 and 7 will also require a crossing over the Wiltshire Berks Canal and a major floodplain. Any access will be very close to the County Wildlife site. We cannot see how the Wiltshire Council or the Oxford University owned Thunderbrook

Estate can viably developed with such a large cost in crossing the railway. please note that none of the existing railway bridges are wide enough to take development south of Royal Wootton Bassett.  
The potential pool has also ignored one of the best employment / residential sites along the M4 corridor being Primegate's Hook Street South site. This should be added as a strategic site and sites 4, 5, 6 and 7 should be removed.

**WB4. What land do you think is the most appropriate upon which to build?**

Site 2: Land adjoining Midge Hall Farm (SHELAA site 3366)  
Site 8: Land at Woodshaw (SHELAA site 3357)  
Plus Hook Street South, being promoted

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

The fact the Swindon with its valuable economy adjoins Royal Wootton Bassett has been ignored for unknown reasons. Plus the town is in a very prominent position adjoining junction 16 of the M4.  
We believe that the growth numbers at Royal Wootton Bassett should be much higher. Wiltshire Council are relying heavily on the upgrade of the A350 within their emerging Spatial Strategy. This will mean that there will be a time lapse of many years before both Melksham and Chippenham can deliver numbers, which create a shortfall in housing delivery in the early part of the Spatial Strategy period. Royal Wootton Bassett is an ideal location on junction 16 of the M4 and adjacent to one of the south west region's largest towns Swindon. It has facilities to allow for more growth than is being catered for within this emerging Spatial Strategy. Royal Wootton Bassett is also very close to a large employment area in Swindon and has access off junction 16 of the M4. Royal Wootton Bassett can also deliver housing.  
The plan does not allocate enough employment land, a large employment area should be allocated on the land being promoted by Primegate at Royal Wootton Bassett north of M4, south of Hook Street. There is existing demand for employment in this location, with a lack of employment sites at the M4 junctions at both in Wiltshire and Swindon. The Spatial Strategy is totally unambitious and limited employment land in the right areas. It is disappointing to see so little employment land proposed both around Junction 16.

For some unknown reason Wiltshire Council have ignored professional representations by developers, agents, occupiers and planners recommendations that there should be development north Royal Wootton Bassett and west of Swindon. Normal property and commercial economics are being ignore by Wiltshire Council in over looking Royal Wootton Bassett and its surrounding area for many years. Swindon BC are now constrained by its boundaries and are turning away new business and business expansion inquiries due to the lack of ambition in employment allocations by both Swindon BC and Wiltshire Council. These observations are supported both by Business west and the Thames Valley Chamber of Commerce. As Swindon is a major employment area with exceptionally good road connections along the M4east to to west, and the A419 to the M5 to the north. Along with a major railway station which is only 46 minutes to London there is huge demand for new housing adjoining Swindon. As such Royal Wootton Bassett should be allocated at similar levels to Melksham and Chippenham, our suggestion is 4,000 dwellings are allocated within the Wiltshire Local Plan. There is a strong case that Wiltshire Strategic plan should be from 2022 rather than 2016, also should consider the supply of suitable development land for a 30 year period rather than 15 years, based on the current National Planning Policy Framework consultation. We question whether the brownfield land sites are actually available and can be viably developed.

**WB6. Are there any issues or infrastructure requirements that should be identified?**

The fact that any site south of the railway line is going to be unviable due to the lack of a suitable bridge over the railway line. Add to this Network Rail's standard 50% ransom and the cost of building a suitable railway bridge. plus the need to cross a floodplain, 2 oil pipelines and the Wilts Berks Canal.

**Further comments**

We still cannot understand why Royal Wootton Bassett strategic importance is being ignored by Wiltshire Council. It is only right that at a Examination in Public on the Local Plan Review that Wiltshire Council are heavily questioned on their reluctance to allocate a large number of housing and employment land at Royal Wootton Bassett. Are there any political reasons for this? Because it appears Wiltshire are not taking into sensible economical benefits. Also in the changing world of fighting climate

change Royal Wootton Bassett is among one of the best locations in teh county for sustainable transport and communications as it is so close to Swindon, the railway and the M4.



<b>Rep ID:</b> RWB19	
<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>WB1. What do you think to the scale of growth? Should there be a brownfield target?</b>	
Lower - I am all for new houses, however, I don't like building harming wildlife	
<b>WB2. Are these the right priorities? What priorities may be missing? How might these place shaping priorities be achieved?</b>	
I think you should look at improving services before building new houses, I have private health insurance due to not being able to make even routine appts with my GP.	
<b>WB3. Is this the right pool of potential development sites?</b>	

None!

**WB4. What land do you think is the most appropriate upon which to build?**

None! Leave RWB as it is

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

Yes, I used to love being able to walk my dog down the canal without houses, it was great for my mental health, now I can't walk out in the countryside because of this growth

**WB6. Are there any issues or infrastructure requirements that should be identified?**

**Further comments**

Please improve GPs before building more houses

<b>Rep ID:</b> RWB20	
<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>WB1. What do you think to the scale of growth? Should there be a brownfield target?</b>	
I believe the scale of growth for new homes in the Royal Wootton Bassett area is exaggerated. The majority of new homes built so far in the town have been filled by people who are not from the area or within a 5 mile vicinity. Too much water standing in fields and on roads due to too much grassland been built on already.	
<b>WB2. Are these the right priorities? What priorities may be missing? How might these place shaping priorities be achieved?</b>	
not building on agricultural land/ grassland needs to be a priority, use up sites that have unused industrial areas for regenerating housing. Too much grassland has been lost already and then people wonder why the water has no where to go. Traffic is another priority through the town. Too many lorries and vans going through the High Street and clogging it up. Not sure where the council would put a bypass as so much has been built up already	

**WB3. Is this the right pool of potential development sites?**

I don't believe any pool is right, as I am not sure we need the extra houses, especially when the 2 DR practices in the town have had to get rid of patience due to over capacity, the schools are not big enough and to say the Academy could extend building wise for the extra 300+ children is barking, more greenland, playing pitches that will be lost.

**WB4. What land do you think is the most appropriate upon which to build?**

If any land is to be developed on then site 8 would be my only recommendation. This would need a mixture of housing and Industrial development with at least a Dr Surgery. Industrial as closer to regenerated M4 Jct 16.

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

apart from the obvious that Schools, and Doctors are oversubscribed already, the impact on the climate by bringing more houses on grasslands, more people, more cars.  
Concern about site 4 as a development site is of particular concern. Already Whitehill Industrial estate has been extended creating more HGV traffic. The junction of Whitehill Lane/ High St/ Bath Road is already a nightmare and then you want to add to that apart from taking away agricultural land.

**WB6. Are there any issues or infrastructure requirements that should be identified?**

Transport is a major concern, no train line, no public transport to outlying villages, main route is through the high street, Council messed up when temporary road built for Skew Bridges work, should have funded the build of a permanent road, widened the

**Further comments**

<b>Rep ID:</b> RWB21	
<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>WB1. What do you think to the scale of growth? Should there be a brownfield target?</b>	
<p>The scale of growth is ambitious and would seem to reflect an aspirational goal, but the scale should be determined by pervading trends in social mobility - are people moving to the area at an increased rate/are people moving away? It is all too easy to apply a general calculation that might have been approved by central government, but there should be some autonomy by each council to truly assess whether the demand is actually there and growing/shrinking. There should always be a priority to reuse brownfield land as much as possible and preserve greenfield (the target mentioned above doesn't seem too unreasonable); that said, assessing the availability of properties that are already vacant and trying to sell/rent these before considering building on new land should be taken into account at all times.</p>	
<b>WB2. Are these the right priorities? What priorities may be missing? How might these place shaping priorities be achieved?</b>	

Broadly, these are the right priorities, and I realise that they are marked as 'draft', so there could be scope to renumber these in order of environmental concern. An environmental asset that has the potential to be compromised are allotment spaces that lie near potential construction sites, causing natural imbalances within the environment and distress to those who nurture the land. Conserving the character of the town is important but not at the expense of homogenising into identikit dwellings that could be found anywhere in the country. There seems to be no priority for diversification; encouraging those from different backgrounds to consider RWB as a potential location to live in; this would present a fundamental change in the make-up of the town and hopefully broaden the scope of its future survival in varying sectors of the population.

**WB3. Is this the right pool of potential development sites?**

In general, this would seem to be the most sensible selection of potential sites, however, Sites 5, 6, 7 and a portion of 8 are all near floodplains and should be avoided due to escalating climate issues and the threat of rising water levels. There is an area north of the town that could be investigated opposite Site 8 and adjacent to Site 2 - this would present better transport links to the M4 without encroaching on the town's current resources, potentially opening up retail opportunities to the north of the town and appear not to be in a conservation area. Site 4 is right opposite the industrial estate and although may be convenient for some staff that may potentially want to live there, the majority will be resident out of the area anyway; Site 4 also butts up against a designated allotment area, potentially disturbing an existing ecosystem that could take generations to balance out again during and after the construction period - also, it's at the bottom of a very steep hill and so wouldn't be an attractive proposition for new people moving into the area, who may have to use extra vehicles to access the town's facilities and therefore cause additional congestion.

**WB4. What land do you think is the most appropriate upon which to build?**

Land that already has appropriate infrastructure to contain expansion, such as proximity to roads, existing facilities, brownfield areas, etc. and that would enhance the character of the location without the necessity to widen roads or make costly extra e

**WB5. Are there important social, economic or environmental factors you think we've missed that need to be considered**

**generally or in respect of individual sites?**

In respect to Site 4, in particular, the encroachment onto land near/abutting the current allotments could be environmentally dramatic and also have potentially serious mental health consequences for those who use that space as a sustainable alternative resource. With any potential development proposal, the effect of carbon emission is singularly important and therefore, I would be more in favour of the council investigating current trends/usage in the settlement location to assess possibilities of transforming unused properties/dwellings into sustainable accommodation, rather than invest in developments that would potentially cause more environmental damage.

**WB6. Are there any issues or infrastructure requirements that should be identified?**

No further comment.

**Further comments**

I hope that the proposals set forth in these potential Sites are considered carefully and the views of the residents and local workers taken seriously when making future decisions. Having moved to RWB only in the last few months, it would be devastating to find out that the beautiful area I'd moved to was about to become a building site and present catastrophic environmental and social upset.



<b>Rep ID:</b> RWB22	
<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>WB1. What do you think to the scale of growth? Should there be a brownfield target?</b>	
Existing infrastructure will not allow for extra homes. If planning is agreed it should be brownfield only.	
<b>WB2. Are these the right priorities? What priorities may be missing? How might these place shaping priorities be achieved?</b>	
The infrastructure in the town is creaking. Access to the M4 means heavy traffic, esp lorries that race through the town. GPs surgeries could not provide appointments prior to Covid. Extra housing will add to that.	
<b>WB3. Is this the right pool of potential development sites?</b>	

I thought we had a development plan for the town. Why are these sites being considered? There are too many sites being considered.

**WB4. What land do you think is the most appropriate upon which to build?**

If we are concerned about the environment and our town, why would we be building on Greenfield sites. Why are we considering allowing developers to build when there is the country park broken promise still not resolved. It seems that Wiltshire Council ha

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

Increase in traffic and lorry traffic  
Increase in pressure on local services  
RWB is an access and escape route for M4 adding more traffic to the town centre would not be good for the town

**WB6. Are there any issues or infrastructure requirements that should be identified?**

**Further comments**

You have a unique opportunity to preserve the character of RWB, and make a difference to the environmental factors, by reducing the amount of building.

Extra homes need careful consideration in terms of their impact on traffic to junction 16 and through the town.  
Greenfield sites should be avoided, we cant get that land back  
Drs surgeries were at capacity before Covid and extra housing will add to that pressure

<b>Rep ID:</b> RWB23	
<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>WB1. What do you think to the scale of growth? Should there be a brownfield target?</b>	
There are still derelict buildings in Bassett, these need to be used as part of any development plan. A plan of this scale will significantly alter the character of the town, the level of traffic will make this difficult to sustain. There will I think be particular problems at the skew bridge which is already a bottle neck and traffic will have to be moved away before it reaches that point, especially coming from Lyneham.	
<b>WB2. Are these the right priorities? What priorities may be missing? How might these place shaping priorities be achieved?</b>	
I would support most of these with the exception of the railway station. Work priorities are now changing and rail use of this nature (and cost) is likely to become more limited. It might be good to explore a light rail system or tramway which can reach Swindon and cover some of the larger villages. This could go over or under the M4.	

**WB3. Is this the right pool of potential development sites?**

I do not under any circumstances support the building over of agricultural land. It is entirely counter productive when the population (UK) is growing to use for development land which is producing food for the population making us more dependent on imports. Something I understood we are trying to get away from.

**WB4. What land do you think is the most appropriate upon which to build?**

This would depend on the type of homes built. Are we trying to accommodate young families, single people, retirees, a mixture. How is the demographic changing or projected to change. Young families must have nearby recreational facilities, parks, playgrou

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

Has anybody undertaken a survey of where and how people work and travel. How many people work and remain locally, how many travel to Swindon or elsewhere or commute further afield. How is it anticipated work will change and where it will be located. These must be some of the drivers of how land is used and what infrastructure is needed to support it.

**WB6. Are there any issues or infrastructure requirements that should be identified?**

Please see comments above which has covered this question.

### **Further comments**

I would prefer to see smaller, better quality (architecturally, this does not have to mean excessive cost) rather than the continued sameness of every development. The Dutch have been doing this for years. A little developmental imagination wouldn't go amiss. Why do we always have to use the same small number of large scale developers who build in exactly the same way. Why not create a development competition where developers are asked to submit designs that innovate and make both the buildings and the environment more welcoming for the people who will be living here.

<b>Rep ID:</b> RWB24	
<b>Consultee code:</b> General Public	<b>Consultee Organisation (if applicable):</b> private citizen
<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>WB1. What do you think to the scale of growth? Should there be a brownfield target?</b>	
the proposed number of new homes is greater than the infrastructure of the town can support. additional capacity for schools and GP will be needed. I think that brown field sites should be used for housing & employment wherever possible.	
<b>WB2. Are these the right priorities? What priorities may be missing? How might these place shaping priorities be achieved?</b>	
a cycle way to Swindon possibly using the route of the canal would give everyone a save & green way to get about.	
<b>WB3. Is this the right pool of potential development sites?</b>	

Site 8 should not be developed as it poses the greatest risk of RWB merging with Swindon.

**WB4. What land do you think is the most appropriate upon which to build?**

I believe that that sites 3 to 7 should be prioritised as they pose the least risk of RWB merging with adjacent towns and villages.

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

a bypass will be needed to reduce the flow of traffic through the town.

**WB6. Are there any issues or infrastructure requirements that should be identified?**

a greater number of GP's will be required.

**Further comments**



<b>Rep ID:</b> RWB25	
<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>WB1. What do you think to the scale of growth? Should there be a brownfield target?</b>	
<b>WB2. Are these the right priorities? What priorities may be missing? How might these place shaping priorities be achieved?</b>	
<p>Missing priorities and issues</p> <ol style="list-style-type: none"> <li>1. There needs to be a safe cycle route into Swindon from Royal Wootton Bassett before any further houses are built as this is where most people go for employment. There also needs to be safe cycle routes around the town.</li> <li>2. GP capacity needs to be increased before any houses are built due to unacceptable unsafe wait times for appointments.</li> <li>3. There are numerous old trees and small areas of woodland, which support biodiversity, and carbon capture, some are in or close to 3161 Land at Whitehall lane, site 4, these need to be protected. This area often has large patches of water in the winter, so not sure why its not shown as flood zone.</li> </ol>	

4. The woodland at site 3 also needs to be protected.
5. The quantity of houses suggested do not seem sustainable in protecting areas for walking in the countryside. Many people from the town walk out through the conservation area and out on to the fields. If these greenfield sites are built on this will reduce people ability to exercise leading to increases in obesity and putting more pressure on the farmland left, which may result in conflict between the land owners and the walkers. Already one land owner has tried to stop people using a public right of way, in the area to the west north west of the town.
6. The quantity of houses suggested would really alter the character of Royal Wootton Bassett from a small market town to more of an urban sprawl which isn't in keeping with the town.
6. No house should be built unless it is carbon neutral.
7. There are quite a few empty houses in Royal Wootton Bassett, so the quantity of houses seems excessive.

**WB3. Is this the right pool of potential development sites?**

No, 4 and 3 shouldn't be considered

**WB4. What land do you think is the most appropriate upon which to build?**

brownfield

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

1. There needs to be a safe cycle route into Swindon from Royal Wootton Bassett before any further houses are built as this is where most people go for employment. There also needs to be safe cycle routes around the town.
2. GP capacity needs to be increased before any houses are built due to unacceptable unsafe wait times for appointments.

3. There are numerous old trees and small areas of woodland, which support biodiversity, and carbon capture, some are in or close to 3161 Land at Whitehall lane, site 4, these need to be protected. This area often has large patches of water in the winter, so not sure why its not shown as flood zone.
4. The woodland at site 3 also needs to be protected.
5. The quantity of houses suggested do not seem sustainable in protecting areas for walking in the countryside. Many people from the town walk out through the conservation area and out on to the fields. If these greenfield sites are built on this will reduce people ability to exercise leading to increases in obesity and putting more pressure on the farmland left, which may result in conflict between the land owners and the walkers. Already one land owner has tried to stop people using a public right of way, in the area to the west north west of the town.
6. The quantity of houses suggested would really alter the character of Royal Wootton Bassett from a small market town to more of an urban sprawl which isn't in keeping with the town.
6. No house should be built unless it is carbon neutral.
7. There are quite a few empty houses in Royal Wootton Bassett, so the quantity of houses seems excessive.

**WB6. Are there any issues or infrastructure requirements that should be identified?**

1. There needs to be a safe cycle route into Swindon from Royal Wootton Bassett before any further houses are built as this is where most people go for employment. There also needs to be safe cycle routes around the town.
2. GP capacity needs to be incre

**Further comments**

The climate crisis should be at the forefront of any future development, it needs to be the first thing considered and not just an add on. This plan has not even made it a major factor when considering the various sites, which means the council is not meeting it's obligations to get to carbon neutral.

**Rep ID:** RWB26

**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:**

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

A brownfield target is desirable because it helps encourage utilisation of these sites, instead of greenfield, where available. It is though likely that only minimal amounts of brownfield land in Royal Wootton Bassett would become available in the plan period.

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

**WB3. Is this the right pool of potential development sites?**

**WB4. What land do you think is the most appropriate upon which to build?**

It is understandable that further development is planned for the town. It must however be located in places where sustainable travel is possible and strong links can be formed with existing communities.

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

I have concerns about the inclusion of Site 8 (SHELAA reference 3357), which is land to the east of Bincknoll Lane and Woodshaw, and south of the A3102 in the future expansion plans for the town. It appears to conflict with some of the priorities identified for the town, especially in relation transport, coalescence and visual intrusion.

Pressure on the existing road network.

I am concerned about the additional pressure development of this site would have on the local road network, particularly at the Interface roundabout, the Churchill roundabout and on the A3102 leading to junction 16 of the M4. This would add to existing traffic problems in the area.

The development would be separated from existing settlements by roads with a 60mph speed limit, which would need to be crossed by walkers and cyclists needing to reach the rest of the town and community facilities. This does not encourage viable pedestrian and cycling linkages to the town centre and thus sustainable travel.

Coalescence with adjoining communities

Site 8 is most likely to lead to coalescence with the Borough of Swindon.

Wiltshire Core Strategy Policy 51 stresses the need to protect the separate identity of the Royal Wootton Bassett area particularly where this adjoins the neighbouring Swindon Borough Council area (para 6.85). Development at site would not in accordance with this aim.

Location in relation to shops and amenities

Site 8 is not well located in terms of schools. It is located more than 1.5km from the secondary school which is stated as at full capacity. It is located more than 1km from the nearest primary school.

Any development at Site 8 would be located at a considerable distance from the High Street and main shops of Royal Wootton Bassett. It would be located around 1.5-2km from the the town centre which is only slightly less than its distance from shops at the local centre at Freshbrook, Swindon. This would exacerbate the coalescence issue and fuel the lack of identity of this new community with the rest of the town.

It is therefore difficult to see how this site would meet the Item 6 of the stated RWB place -shaping priorities: "Infrastructure improvements to promote and encourage non-car travel".

#### Visual Intrusion

I am concerned that development of this land parcel would be very visible from the North Wessex Downs AONB. Development of this site would lead to an unacceptable visual intrusion when viewed from the AONB and is therefore in conflict with Core Policy 51.

The Wiltshire Core Strategy states: "The open countryside should be maintained to protect the character and identity of the area in accordance with Core Policy 51".

Wiltshire Core Strategy Policy 51 also notes "the principal pressure on the landscape arising from new development is erosion of the separate identity, character, visual and functional amenity of settlements and their setting, and impacts on the open countryside".

Core Policy 51 refers to development within the setting of an AONB or national park; "setting is considered to be all of the surroundings from which a designated landscape can be experienced, or which can be experienced from the designated landscape".

#### **WB6. Are there any issues or infrastructure requirements that should be identified?**

The "Planning for Royal Wootton Bassett" document is silent on planning for cycleways and improving connectivity around town and with adjoining settlements. Surely this should be key to improving transport links in the area.

#### **Further comments**

<b>Rep ID:</b> RWB27	
<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>WB1. What do you think to the scale of growth? Should there be a brownfield target?</b>	
It is to much for the town. Lower	
<b>WB2. Are these the right priorities? What priorities may be missing? How might these place shaping priorities be achieved?</b>	
NO. 10	
<b>WB3. Is this the right pool of potential development sites?</b>	

To put more development in Whitehill lane would impact the junction with Bath road

**WB4. What land do you think is the most appropriate upon which to build?**

NO 8

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

Access to the countryside on the north side of R.W.B

**WB6. Are there any issues or infrastructure requirements that should be identified?**

All infrastructure in the town.

**Further comments**

The development change the look of R.W.B and be harder for people to enjoy the countryside.



<b>Rep ID:</b> RWB28	
<b>Consultee code:</b> Statutory Body	<b>Consultee Organisation (if applicable):</b> Wessex Water
<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>WB1. What do you think to the scale of growth? Should there be a brownfield target?</b>	
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.	
<b>WB2. Are these the right priorities? What priorities may be missing? How might these place shaping priorities be achieved?</b>	
<b>WB3. Is this the right pool of potential development sites?</b>	

Development proposed at Royal Wootton Bassett is significant. Recent improvements have been designed and approved for construction to improve foul network operation north of the railway. These do not take into account further development of this scale. Significant improvements are likely to be required. Development is proposed close to Wessex Water's sewage treatment works at Royal Wootton Bassett restricting its ability to grow to accommodate more development flows. Significant appraisal will be required to consider solutions and how best to direct investment for growth. Sites 6 & 7 are close to the sewage treatment works. We will object to development where there is a risk of odour and fly issues and the ability of the works to expand is restricted.

**WB4. What land do you think is the most appropriate upon which to build?**

Please see comments under RB3.

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

Please see comments under RB3.

**WB6. Are there any issues or infrastructure requirements that should be identified?**

Development proposed at Royal Wootton Bassett is significant. Recent improvements have been designed and approved for construction to improve foul network operation north of the railway. These do not take into account further development of this scale.

**Further comments**



<b>Rep ID:</b> RWB29	
<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>WB1. What do you think to the scale of growth? Should there be a brownfield target?</b>	
<b>WB2. Are these the right priorities? What priorities may be missing? How might these place shaping priorities be achieved?</b>	
<b>WB3. Is this the right pool of potential development sites?</b>	

**WB4. What land do you think is the most appropriate upon which to build?**

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

**WB6. Are there any issues or infrastructure requirements that should be identified?**

**Further comments**

I am writing with reference to the eight identified sites in RWB that you are considering for development.

I am a resident of Dunnington Road and my concern is reference site 5. This is a large area of land which backs on to our property and has on several occasions been targeted for development.

Concerns I would like highlight

- Air pollution will increase due to the proposed bypass
- Noise pollution with increase
- Green areas and wildlife will be affected
- Ancient hedgerows will be destroyed
- The ground is susceptible to flooding near the brook
- The volume of houses proposed with detrimental to the rural landscape – this area is used quite heavily with dog walkers
- There is insufficient public services ( doctors etc) to support the number of houses proposed

- The development is completely detached from the high street with no clear pedestrian access via the bridge on the Lyneham road side and a small bridge at the Marlborough Rd side where two cars are barely able to pass safely now. My partner and I would like to make a record that we strongly oppose this development. I would also be very grateful if you would include me in any developments , correspondence or meetings that affect site 5 please.

<b>Rep ID:</b> RWB30	
<b>Consultee code:</b> General Public	<b>Consultee Organisation (if applicable):</b> Church st 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>WB1. What do you think to the scale of growth? Should there be a brownfield target?</b>	
Our main concern is this development will ruin the wonderful views also we are in a conservation area. What about the infrastructure and a strain on the access roads,it already is a bottleneck at the junction at the High St	
<b>WB2. Are these the right priorities? What priorities may be missing? How might these place shaping priorities be achieved?</b>	
Point 9 and 10 should be a priority	
<b>WB3. Is this the right pool of potential development sites?</b>	

Please protect the allotments and beyond

**WB4. What land do you think is the most appropriate upon which to build?**

I do not think we need any more buildings...concentrate on developing the shops and help them to restore the life back into the town

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

The effect to the environment (3161reference )

**WB6. Are there any issues or infrastructure requirements that should be identified?**

Yes ...at the Whitehill junction to the High St

**Further comments**

As already commented at Church st we do not wish to overlook an estate.we enjoy the variety of wildlife in it's natural state.



<b>Rep ID:</b> RWB31	
<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> Yes	
<b>Organisation being represented (if applicable):</b> Resident	
<b>Does this representation refer to attachment(s):</b> no	<b>If this representation refers to attachment(s), these are listed below:</b>
<b>WB1. What do you think to the scale of growth? Should there be a brownfield target?</b>	
No	
<b>WB2. Are these the right priorities? What priorities may be missing? How might these place shaping priorities be achieved?</b>	
No 1 should be a priority	
<b>WB3. Is this the right pool of potential development sites?</b>	

Site 4 (3161) we feel should not be developed...not sure about any other

**WB4. What land do you think is the most appropriate upon which to build?**

Unsure

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

The environment needs protection

**WB6. Are there any issues or infrastructure requirements that should be identified?**

Traffic jams at junction of High st.....more people will increase load on schools and the health services

**Further comments**

<b>Rep ID:</b> RWB32	
<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>WB1. What do you think to the scale of growth? Should there be a brownfield target?</b>	
<p>The scale of growth appears excessive given the volume of development in the last 10 years, including at the old Dairy site, the rugby and cricket pitches, Bicknoll Lane and Interface. The number of houses built on these combined sites is surely in excess of 265 units, which is being cited above as these sites also include a range of housing types, including flats and a nursing home. If any building is required, brownfield sites should always be a priority and the target for this type of land should be the optimum possible.</p>	
<b>WB2. Are these the right priorities? What priorities may be missing? How might these place shaping priorities be achieved?</b>	
<p>I believe these are the right priorities if they are applied and adhered to. The scale of proposed building immediately impacts the very real possibility of RWB no longer being classed as a market town. I am unsure that the combination of above priorities</p>	

adequately protects the green belt that surrounds the town on all sides. Ultimately the desire to expand the town to such an extent will shift it away from its current identity. The historic elements of the town, some of which lie in its green belt surroundings, would be either lost or overshadowed by modern development.

With all levels of development come additional traffic congestion, already all routes around RWB currently suffer from congestion; whether from on street parking or simple volume of traffic.

If criteria have been agreed on which to decide where and what volume of building should take place then these need to be strictly adhered to, looking at some of the proposed sites for expansion it is difficult to understand what criteria was used for "no impact to traffic".

To achieve place shaping priorities the opinions of those who live in the areas being reviewed must be listened to and taken into account at all stages of planning. The residents will have to live with the outcome and the consequences of all decisions, including those that are detrimental, e.g. open spaces lost forever, overcrowded housing developments, developments visually unsympathetic to the surrounding area, increased traffic flow, pressure on local services.

In no planning proposal do we ever see bungalow estates, housing suitable for ageing populations (other than nursing homes) or housing built with regional materials or in keeping with conservation status.

### **WB3. Is this the right pool of potential development sites?**

The scale of the current pool of potential development sites is initially overwhelming. Were all of these to be developed RWB would certainly be lost forever. Each of the areas has its own merits for not being included as potential development land, including as areas of outstanding natural beauty and extensive wildlife. If further housing stock were to be built areas of land would need to be identified to include additional schools, surgeries etc.

All of the areas will push the town footprint beyond its current boundaries, all of which are regrettable.

### **WB4. What land do you think is the most appropriate upon which to build?**

The most appropriate land to build on is brown site, however RWB does not have an abundance of this type of land. If building would be absolutely necessary the preference would be for Site 2. The loss of this land would be terrible but would have the least

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

Of all the proposed sites, site 4 is clearly of most impact to us as a family. The environmental impact of losing these fields is impossible to measure. During lockdown many people in the town of all ages enjoy the ability to roam responsibly here, we are blessed with herds of deer and extensive numbers of red kites, not to mention other wildlife and wild flowers. We feel this is the least favourable area for development based on practicalities of increasing the population at this end of town, if these fields were to be developed access out of the proposed site would be onto Whitehill Lane. Here the traffic from the existing business park is already extensive including heavy load vehicles due to the nature of new businesses located here due to it's recent expansion. The junction onto Bath Road gets highly congested with already extensive traffic flow passed the County Infants school on route up into RWB leading to frequent tail backs and accidents at this junction. Plus the view from the motorway would alter the historic silhouette of RWB crowned by the church, entering into RWB via this route is currently very fitting to the market town feel for which the town is favoured development along this route would significantly impact this.

**WB6. Are there any issues or infrastructure requirements that should be identified?**

I believe that the current issues and infrastructure requirements have been extensively detailed in the current Town Plan but can't stress enough the need to protect the ethos of the town and from RWB losing its historical relevance including the environm

**Further comments**

We feel passionate about where we live, we chose RWB for it's market town appeal and its rural position. The town is vibrant but further extensive expansion allowing for it to become other than a market town would change it significantly and we risk losing our unique identity. Whilst we appreciate that additional housing will be needed, the volume of expansion considered appears excessive to potential requirements and the appetite for it by residents. We simply ask that all environmental factors be carefully considered and that any planning be in conjunction with our existing town plan.



<b>Rep ID:</b> RWB33	
<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>WB1. What do you think to the scale of growth? Should there be a brownfield target?</b>	
Yes there should be a brownfield target of 100% of the need for new housing	
<b>WB2. Are these the right priorities? What priorities may be missing? How might these place shaping priorities be achieved?</b>	
<p>Priority must be given to reducing the net carbon impact of the town and its inhabitants to net zero by 2030 by</p> <ol style="list-style-type: none"> <li>1. planting trees everywhere,</li> <li>2. reducing all traffic speed to 15mph within the town boundaries</li> <li>3. Ensuring every new house is fitted with Air source heat pumps and not fossil fuel powered heating</li> <li>4. Every car parking space must have an electric charge point</li> <li>5. Solar panels must be installed on every roof of every house</li> </ol>	

6. The introduction of a circulate waste management system for all commercial and domestic waste created in the town

**WB3. Is this the right pool of potential development sites?**

I strongly object to the following are being considered for development: 3,4,5,6  
Development should be in the following areas in order 8 then 2 and finally 1

**WB4. What land do you think is the most appropriate upon which to build?**

8

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

You have not take into account the following Environmental issues at the initial selection stage

1. The carbon sequestration capacity of the current environment
2. The biodiversity capacity of the current environment
3. The additional carbon that will be created by adding houses at each site and how that impacts the overall carbon impact of the town and how this extra carbon will be offset to ensure a net zero carbon situation is maintained

**WB6. Are there any issues or infrastructure requirements that should be identified?**

Zero carbon transport must be the highest priority and must be given funding in priority to so other forms of transportation  
The plan must stipulate that new infrastructure will not increase the total carbon output of the town



<b>Further comments</b>

<b>Rep ID:</b> RWB34	
<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>WB1. What do you think to the scale of growth? Should there be a brownfield target?</b>	
<p>I feel it is already high. The town has experienced a large number of new developments in the (nearly) seven years we have lived here. The local schools our children attend have large class sizes and no physical space to move into without reducing their outside space, which would negate the benefit for the students. The doctor sugeries (two) are very busy and struggle to cope in normal times. We are close to Swindon and emplyemnt opportunities continue to be good, we have great access to the M4 and therefore other employment centres, I do not see why we need 6 hectares of employment land? The propsed sites are currently greenfield which is hugely valued and enjoyed by the local population and increasing population density on the town and reducing these greenfield assets is counterintuitive.</p>	
<b>WB2. Are these the right priorities? What priorities may be missing? How might these place shaping priorities be achieved?</b>	

Preservation of the independent high street should also feature. This is a huge local employment opportunity which has visibly suffered with the introduction of the local Aldi store for example. Local employment using existing assets such as the derelict buildings on station road and the high street should be prioritised over the creation of large new build areas and would hopefully reduce the need for such a large scale employment site (if needed). Increasing housing when the Town plan claims there is evidence that there is need for more employment seems highly counterintuitive to point 5.

**WB3. Is this the right pool of potential development sites?**

No. I cannot agree with any as I do not agree with the rationale that they are needed and are clearly counterintuitive to the Place shaping priorities on the previous screen.

**WB4. What land do you think is the most appropriate upon which to build?**

I cannot agree with any as I do not agree with the rationale that they are needed.

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

I can speak about site 4: Land at Whitehill Lane (SHELAA site 3161) as I live very near this site on Church Street. Social and environmentally I must strongly object to development of any kind on this site. The land is accessed daily by numerous local people, not just residents of the neighbouring streets or dog walkers, but from all over the town. Access from Church Street and Whitehall lane is used heavily by a minimum of 60 to 80 people per day and more at weekends who come to enjoy the walking access, the view and the iconic town vista you can see from the site. Development here would destroy that, again completely counterintuitive to the Place shaping priorities. The whitehall/bathroad junction is also extremely congested (in non lock down days) at peak times with people travelling into the schools and high street. Whitehall lane is not suitable for heavy traffic and is narrow with several blind spots and large pot holes. There are local populations of deer, badgers, red kites, woodpeckers and

buzzards. Children play freely in this area. Numerous people stop and take pictures at all times of the day and make special trips at sunset to capture the view and all but the regulars will stop and enjoy the peace and the view.

**WB6. Are there any issues or infrastructure requirements that should be identified?**

Education, sport and leisure, Health are only coping with the current level of need and any additional would surely see them collapse. The local economy (small local business) need support and not threats of large out of town competitors. Supporting I

**Further comments**

<b>Rep ID:</b> RWB35	
<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>WB1. What do you think to the scale of growth? Should there be a brownfield target?</b>	
The scale of growth is way too big in relation to the infrastructure RWB has in place - schools, surgeries, dentists, etc. The figure should be lower. If there is insufficient supply then it is obviously not going to work. Revise the target.	
<b>WB2. Are these the right priorities? What priorities may be missing? How might these place shaping priorities be achieved?</b>	
With regards the distinct character of the town, and in particular Church Street - it has amazing aspects, which scores of people enjoy every day. RWB has a strong presence of independent shops in the high street, which would be lost if additional "out of town" shops are introduced - more cars on the road. It is a particularly congested town - out of lockdown - and even at off peak times - especially at the Whitehall Ln/New Road junction. RWB is an attractive place to live and, with the proximity to the M4, it would allow more people to move with the premise of being able to easily commute to London/Reading or further afield. The	

development would introduce a big increase in light pollution. The additional environmental impact would be huge. There are deer, badgers, red kites, owls, and more besides, that inhabit the area.

**WB3. Is this the right pool of potential development sites?**

The land at site 4 is not appropriate. It should really be labelled a "Country Wildlife Site". There are many wild animals and birds that inhabit the area, including deer, red kites, buzzards, woodpeckers, and more besides. Wotton Bassett has already lost it's spectacular yearly displays of starling murmurations due to development.

**WB4. What land do you think is the most appropriate upon which to build?**

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

The land at site 4 is not appropriate. It should really be labelled a "Country Wildlife Site". There are many wild animals and birds that inhabit the area, including deer, red kites, buzzards, woodpeckers, and more besides. Wotton Bassett has already lost it's spectacular yearly displays of starling murmurations due to development.

**WB6. Are there any issues or infrastructure requirements that should be identified?**

Wootton Bassett would be in continual gridlock if plans go ahead.

<b>Further comments</b>

<b>Rep ID:</b> RWB36	
<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>WB1. What do you think to the scale of growth? Should there be a brownfield target?</b>	
I question whether RWB needs a further 1200 houses or has the necessary infrastructure to support that much growth. The congestion on the roads into Swindon/to the M4 junction is already a major problem. Brown field sites should be maximised before any green sites are developed	
<b>WB2. Are these the right priorities? What priorities may be missing? How might these place shaping priorities be achieved?</b>	
I agree with the priorities already listed. However, one that is missing is increasing people's access to green spaces and the countryside as this was seen as important by a lot of people who took part in the consultation for the RWB Neighbourhood Plan. In the Neighbourhood Plan the idea of a town park was proposed, however, generally we need to ensure that any development does not push the currently accessible countryside further away from people therefore making it less accessible.	



**WB3. Is this the right pool of potential development sites?**

More attention to the possibility of brown sites (less green sites).

**WB4. What land do you think is the most appropriate upon which to build?**

Where possible brown sites should be fully explored and developed before any new green sites are agreed.

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

I believe that development on the proposed site at Whitehill Way (Shelaa 3161) would have a greater adverse impact on landscape than the plan has scored it especially in terms of visual impact.

Two of the identified draft priorities for RWB planning are

- Conserving and enhancing environmental assets around Royal Wootton Bassett
- Maintaining the town's elevated historical setting and central conservation area

Church Street (in the conservation area) is one of the oldest streets in RWB with some houses built in the 1700s. It is part of the town's elevated historical setting and its distinctive appearance can be seen from miles around including from the M4 and the train to Bristol. It is a noticeable landmark and easily recognised. If the development of the Whitehill Way proposed site were to go ahead the distinctive appearance would be lost. In addition, development would create a conspicuous, new urban edge, and would be seen from miles around (including the M4) and therefore the potential for significant adverse historic landscape effects is high. Furthermore, the site would extend the existing settlement boundary to the north.

As mentioned in my answer to question 6, the view from Church Street and across fields at end of the street should be seen as an environmental asset for the town. The view is far-reaching and many people walk down the street to look at the view and to

enjoy the feel of being in the countryside. Many of these are not able to walk further down the hill to the fields but come to the street to enjoy the view. When we are not in lockdown many people clearly have visitors with them who they have brought to show them the view. If there were to be development on the Whitehill Way site it would not be well screened and would be visually obtrusive from Church Street (and other sites bordering the proposed site) which would be difficult to mitigate. It would create urban encroachment into the countryside and detract from the views across the countryside

**WB6. Are there any issues or infrastructure requirements that should be identified?**

Sport and leisure are listed in terms of buildings and sport facilities, however, for many people their “sport” and leisure activity is walking. Furthermore, the results of the consultation for the RWB Neighbourhood plan showed a high number of requests for

**Further comments**

Traffic – sites closer to the road into Swindon were scored as having a higher impact on generating traffic and worsening congestion – but any development in RWB including the Whitehill Way site will add to this congestion as people from this site would also want to travel to Swindon for work and leisure. In addition, residents of a Whitehill Way development would drive through the High Street to get to the Swindon Road (increasing traffic and congestion in the High Street). I also question the capacity of the junction of Whitehill Way and Bath Road to cope with more traffic. At the moment with lockdown there is less traffic but once the schools are open and people travelling to work again the junction will become more congested. More houses will add to the congestion.

**Rep ID:** RWB37

**Consultee code:** General Public

**Consultee Organisation (if applicable):** concerned house owner

**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:**

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

I believe there should be maximum usage of brownfield sites given so many of the 8 areas are greenfield and areas of important natural wildlife habitats

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

Agree. If we converge with Swindon the unique character of this town could be lost. Traffic volumes at J16 are only going to increase with the completion of Witchlestow Development and use of Hay Lane.

**WB3. Is this the right pool of potential development sites?**

Yes but site 8, 2 and 1 risk merging with Swindon and will lose the uniqueness of the road being a boundary to the market town

**WB4. What land do you think is the most appropriate upon which to build?**

Site 5 and employment at site 4. Other sites are too near important waterways, lakes, woodland or grassland

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

Maximising existing infrastructure for employment and retail. Maintaining greenspace within walking distance of the town centre, Awareness of congestion of road routes near Interface and towards J16 already. Need for a lot more capacity of GP and health services

**WB6. Are there any issues or infrastructure requirements that should be identified?**

Ensure sufficient capacity available for education and health services before allowing full development of sites. ensuring developers actually fulfil their existing obligations such as at Brynards / Lower Woodshaw development

**Further comments**

Please ensure we do not merge into Swindon or congest the town excessively. Ensure that sufficient capacity for education and health is in place before developers are signed off at their respective sites

<b>Rep ID:</b> RWB38	
<b>Consultee code:</b> General Public	<b>Consultee Organisation (if applicable):</b> house owner in RWB
<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>WB1. What do you think to the scale of growth? Should there be a brownfield target?</b>	
I think the town is beginning to lose it's character and unless the expansion is very carefully handled could further damage the unique character of RWB and the quality of life of it's residents. I definitely think there should be a brownfield target, the loss of more green field sites would be a huge loss to the town and impact on the wellbeing of current residents.	
<b>WB2. Are these the right priorities? What priorities may be missing? How might these place shaping priorities be achieved?</b>	
Yes, I think so - GP surgeries are at full capacity and congestion has increased significantly around Bicknoll lane, Interface traffic towards the motorway.	

**WB3. Is this the right pool of potential development sites?**

I do not think there are other areas available for consideration, however, i strongly feel some of the areas proposed would have a dramatic detrimental impact on RWB

**WB4. What land do you think is the most appropriate upon which to build?**

Site 4 and 5

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

I think site 2 and 8 would impact significantly on the 'feel' of RWB in terms of the view as one approaches the town and would negatively affect the uniqueness of RWB in terms of it's proximity to Swindon - these sites form a buffer, both visually and physically.

**WB6. Are there any issues or infrastructure requirements that should be identified?**

No, but thorough traffic surveys need to be implemented as traffic has increased significantly and congestion at rush hour is the norm on the approach to junction 16.

**Further comments**

RWB is a wonderful place to live with a fantastic sense of community, the countryside that surrounds the town is part of it's appeal and it would be tragic if this was lost.



<b>Rep ID:</b> RWB39	
<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>WB1. What do you think to the scale of growth? Should there be a brownfield target?</b>	
<p>No more Growth at all Re housing          We need more than 2 doctors surgery          We need NHS dentist          We need the local shops and community being Killed by over building &amp; Housing and corrupt local council and Wiltshire council          MPs who are clearly taking favours to ruin the town.</p>	
<b>WB2. Are these the right priorities? What priorities may be missing? How might these place shaping priorities be achieved?</b>	
<p>No          Priorities are keeping the Town from being over built on as in housing.</p>	

We need a new road taking traffic away and alternative routes to Swindon  
We need more for schools  
We need NHS dentists we need another Doctors surgery as you've already over built with housing causing a mass of people that no person of working age can ever get an appointment as it is only the unemployed and never ending aging pensioners.

**WB3. Is this the right pool of potential development sites?**

No

**WB4. What land do you think is the most appropriate upon which to build?**

None

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

Over population as to amenities and services  
As to any bad town planning and clear corruption would  
Leave the green spaces and the town as is  
Enough houses have been built

**WB6. Are there any issues or infrastructure requirements that should be identified?**

**Further comments**

The lovely town us now an overcrowded hell hole  
About to get worse! Well done

<b>Rep ID:</b> RWB40	
<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>WB1. What do you think to the scale of growth? Should there be a brownfield target?</b>	
<b>WB2. Are these the right priorities? What priorities may be missing? How might these place shaping priorities be achieved?</b>	
<b>WB3. Is this the right pool of potential development sites?</b>	

**WB4. What land do you think is the most appropriate upon which to build?**

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

**WB6. Are there any issues or infrastructure requirements that should be identified?**

**Further comments**

I would like to portray my thoughts to you with regards to the development strategy plan for Royal Wootton Bassett. I feel the smaller sites such as 1 +2 to the north of Royal Wootton Bassett are better suited to our town than the suggested development sites to the south. The reasons for this are that smaller sites lend themselves to having a better community feel, plus they would also be better connected to the current community and are mainly located on flatter and better established parts of the town. I also feel that the sites to the north have their own natural boundary's which would contain the urban sprawl to those sites only, as opposed to site 5 for example which is vast. Even if a little section of site 5 is developed, I feel it would just become bigger and bigger and would be abused for pure profit of the landowner and developer.

I also wanted to make a comment on the number of homes suggest which is over 800. Wootton Bassett is a small market town with character, I feel if for example a huge site like site 5 was to be developed and 800 plus homes were built, then Royal Wootton Bassett would lose its identity completely! The Biggest site in the area that has been developed recently is the old dairy site, this created a great deal of homes, however most of Bassett residence are aware that a lot of anti-social behaviour originates from the development and I am concerned that this may happen again but on a much bigger scale if development is

passed on sites 5 or 7 for example! The last thing Royal Wootton Bassett needs is an out of town development which would be created if site 5 was developed and the farmers market town identity would be lost.

<b>Rep ID:</b> RWB41	
<b>Consultee code:</b> Other Advisory Bodies	<b>Consultee Organisation (if applicable):</b> Wilts & Berks Canal 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>WB1. What do you think to the scale of growth? Should there be a brownfield target?</b>	
The canal trust does not hold a view on the scale of growth	
<b>WB2. Are these the right priorities? What priorities may be missing? How might these place shaping priorities be achieved?</b>	
The Trust notes the inclusion in the place-making priorities of item viii “Safeguarding the historic alignment of the Wilts & Berks Canal and taking forward canal restoration”. The Trust is working to restore to active use for boating, cycling and walking the complete route in Royal Wootton Bassett. The available towpath route is already used for enjoyment and exercise and opportunities will increase as restoration proceeds. The establishment of the route as a blue/green corridor is essential to the	

programme and will lead to considerable biodiversity gain and improved connectivity for wildlife populations both within and external to the town.

In response to the recent consultation on the Neighbourhood Plan for the town (November 2020) the Trust noted that the Town Council supported the restoration of the canal with the inclusion of the canal under Community Actions. The Trust recommended the inclusion of three sections planned for restoration as also being allocated for Tourism and Leisure and/or Public Open Space. The restoration of the canal is a complex engineering and environmental task which, despite the voluntary effort supplied by the trust and associated parties, is also an expensive operation. For a successful result the design has to be integrated into the development plans for adjacent land; for example integrating paths and cycleways; building road and canal intersections at appropriate locations; integrating the environmental mitigation and biodiversity gains; co-ordinating drainage and flood protection to make use of the canal as a waterway; optimising the crossings of the canal by utilities or services. For best results the construction works should also be integrated: carrying out heavy earthworks and construction before dwellings are occupied; establishing the towpath as a usable and habitual route; avoiding temporary drainage schemes pending the completion of the canal. The end result of these actions is to create a distinctive feature of the development scheme which adds to its attraction in the market place. It is well established nationally that proximity to rivers and canals increases the market value of new properties.

The above objectives can best be achieved by writing the integration and construction of the canal into the design guidance, planning conditions, S106 agreements, land sales agreements and other instruments as appropriate to ensure that the maximum community benefit is obtained.

### **WB3. Is this the right pool of potential development sites?**

The answer to this question lies largely in the overall considerations and place shaping priorities listed in the planning consultation document for Royal Wootton Bassett and the parallel consultation on addressing climate change and biodiversity. The restoration of the canal will make positive contributions to all the developments along its route in so many ways. In the case of Site 5, it is bisected by the route of the canal and further impacted by the flood plain zig-zagging across it. This section of canal includes an important historical artefact in the Dunnington Aqueduct. There is a major opportunity to use the canal route as an off-road link for cyclists and walkers, setting it in a green corridor but availing the adjacent dwellings of proximity to water whilst minimising road crossings.



In the case of Site 7, the canal is already largely restored to a rural standard and with the adjacent woodland provides a barrier between most of the developable area and the railway. It would be sensible as a part of any significant development to upgrade the area for blue/green space and ensure that a high standard of cycleway and footpath connects to the east and west. Completion of the canal between Sites 5 and 7 will be a major step forward which should be encouraged as part of either development. This will enable a continuous route for people, boats and wildlife. Planning consent is already gained for part of this route but work has been held back by delayed development of the former high ways depot. The Trust has the intention of providing user facilities for the anticipated increase in activities and is looking through the whole route in the town for a site or sites for visitor reception, boat trips, access for clubs etc for small craft, facilities for touring and local boats and a maintenance base.

**WB4. What land do you think is the most appropriate upon which to build?**

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

The canal route is already well-identified in Figure 2 Green and Blue Infrastructure Map.

**WB6. Are there any issues or infrastructure requirements that should be identified?**

Low-key water sports such as kayaking and paddle-boarding can be provided by the canal. The development sites discussed above can be developed with the intention of providing all the benefits and amenities discussed in the document and above. The key iss

### Further comments

The Wilts and Berks Canal is a valuable waterway in Wiltshire, providing amenity, flood management and environmental benefits. Several aims of the Trust work in conjunction with the Local Plan in adapting and mitigation the negative effect of climate change. The restored canal will be unique and important to wildlife and the local population. Once completed, the whole canal line will offer opportunities for active use such as boating, cycling, and walking. Recreational activities such as kayaking, paddle-boarding and fishing will also be available. Ultimately, the towpath will be accessible for all to enjoy, improving wellbeing. The canal also establishes green/blue corridors which provide a safe passage route for many species between fragmented habitats. This will be fundamental to biodiversity net gain and improving the diversity of flora and fauna. The vegetation also naturally sequestrates carbon from the environment, providing the area in and around the canal with clean air.

<b>Rep ID:</b> RWB42	
<b>Consultee code:</b> Other	<b>Consultee Organisation (if applicable):</b> Studley Farm Partnership
<b>Is this response on behalf of someone else/another organisation?</b> Yes	
<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>WB1. What do you think to the scale of growth? Should there be a brownfield target?</b>	
<p>No comment on amount of planned residential growth, except such growth must be matched by improved locally accessible employment opportunities. For the planned level of population growth, we believe that further employment land should be identified, with a particular emphasis on a range of sites to accommodate both large and small businesses. Some of these sites should take advantage of the proximity of M4 J16 to avoid drawing traffic through/around the town.</p> <p>The 2018 Wiltshire Land Review states:          “In the Wiltshire part of the M4/Swindon (Wiltshire) the FEMA, forecast demand is greater than supply over the whole Local Plan period of the plan period, and in the first five year period of the plan. New site allocations will be needed to accommodate the level of demand that is forecast.” This needs to be reflected in the Plan with sufficient, readily accessible allocations to satisfy this high level of demand (and related employment opportunities).</p>	
<b>WB2. Are these the right priorities? What priorities may be missing? How might these place shaping priorities be</b>	

**achieved?**

Priority ii – should also require improvements in the capacity at M4 J16 during Plan period

Priority v – Support provision of additional employment (as 1 above) where this provides a range of sites to suit different sizes and types of business.

Priority vi – Support. There need to be a ‘step change’ in the provision of alternative, non-car modes of travel to/from Swindon.

**WB3. Is this the right pool of potential development sites?**

Land adjoining M4 J16 should be included for employment uses. This land was omitted from the Site Selection exercise but should have been included for consideration. It is also distinct from site 3613 which was not taken forward in the study on landscape grounds.

This location provides immediate access to the M4, is readily accessible from RWB (including via the planned cycle link between RWB and Swindon) and concealed from the town. Development in this location would not adversely affect the environmental quality and setting of the town (either directly, or indirectly through increased traffic within the town). Nor would it give rise to the risk of coalescence.

**WB4. What land do you think is the most appropriate upon which to build?**

1st - Brownfield.

2nd - Smaller areas of greenfield land, especially where these are readily accessible/well related to key infrastructure (such as M4) and their viable agricultural use and landscape quality is compromised by size, fragmentation, and adja

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

Use land of lower environmental quality (such as land degraded by urban fringe uses/infrastructure) for employment development which is more difficult to assimilate, before higher quality greenfield land where development would compromise the setting of RWB.

**WB6. Are there any issues or infrastructure requirements that should be identified?**

Recognise the need to improve the capacity of M4 J16 within the Plan period and to support the planned growth around RWB. Need to improve cycle links between RWB and Swindon (connectivity between the two towns may also be strengthened by a new link alongs

**Further comments**

Refer to response to 3 above.  
Land adjoining M4 J16 (immediately west of junction) and land directly east of junction (between Hay Lane/railway and M4) should be identified for employment uses. It is of limited landscape and agricultural quality. Development in this location would be highly accessible, visually related to existing development yet very well contained from RWB. It would be accessible from both RWB and Swindon.

<b>Rep ID:</b> RWB43	
<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>WB1. What do you think to the scale of growth? Should there be a brownfield target?</b>	
<b>WB2. Are these the right priorities? What priorities may be missing? How might these place shaping priorities be achieved?</b>	
<b>WB3. Is this the right pool of potential development sites?</b>	

**WB4. What land do you think is the most appropriate upon which to build?**

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

**WB6. Are there any issues or infrastructure requirements that should be identified?**

**Further comments**

With reference to the proposed development at Whitehill lane Royal Wootton Bassett site I am concerned that I will lose my view and overlook an estate or industrial units. The access to this would be Whitehill Lane and create more traffic problems. The site is renowned for flooding ..there are springs in that area. I live at [ADDRESS REDACTED].

<b>Rep ID:</b> RWB44	
<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>WB1. What do you think to the scale of growth? Should there be a brownfield target?</b>	
<p>Based on the evidence in the reports we have commissioned we would argue that much less housing is needed. There should be a brownfield target and it should be higher and be counted in the overall numbers for the spatial strategy. There may be more brownfield spaces resulting from Covid -19. Following a housing needs survey requested by the Town Council, the number and type of affordable houses should be given priority.</p>	
<b>WB2. Are these the right priorities? What priorities may be missing? How might these place shaping priorities be achieved?</b>	



RWB is an ancient hill-top town that has retained its identity and community spirit despite the house hungry development of recent years. Jobs and services need to catch up and the Neighbourhood Plan with WC needs to map out areas for biodiversity, the Mud Springs, flooding, open space, allotments, and tree planting, before any more land is allocated for development. RWB should never again be called a dormitory town.

**WB3. Is this the right pool of potential development sites?**

No, with accelerating Climate Change and the pandemic, there is a need to look differently at what is important in planning. The area round the Mud Springs should not be considered for development.  
A buffer between RWB and Swindon should be maintained. Accessible land should be reserved for small and start- up businesses. Traffic and commuting needs to be reduced.

**WB4. What land do you think is the most appropriate upon which to build?**

Brownfield land. Possible extension of Templars Firs and Whitehill Lane.  
Affordable housing according to the need that is identified and jobs to be prioritised.  
Good farming land should be protected for supplying local food.

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

The Mud Springs and flood plains.

**WB6. Are there any issues or infrastructure requirements that should be identified?**

The station should be re-opened at the original site, where many people can walk to it. Consideration should be given to Community energy generation, for example using roofs for solar panels, and for storage which may need land to be allocated.

**Further comments**

<b>Rep ID:</b> RWB45	
<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>WB1. What do you think to the scale of growth? Should there be a brownfield target?</b>	
<b>WB2. Are these the right priorities? What priorities may be missing? How might these place shaping priorities be achieved?</b>	
<b>WB3. Is this the right pool of potential development sites?</b>	
I would like to feed back with regards to the development plans for Royal Wootton Bassett. Whilst all sites on your proposal have pros and cons, site 5 stands out to me as a horrendous mistake and would be detrimental to the whole of Royal Wootton Bassett	

if development took place here. This is countryside land, densely populated by wildlife along Brinkworth brook and Wiltshire Cannel with beautiful foot paths running through the site. Even if the development was considerate of this, it would still have a huge impact on wildlife, beautiful countryside and the rural outlook of Royal Wootton Bassett. I am unsure of how familiar you are with Royal Wootton Bassett however, site 5s country side view is enjoyed by around 60% of the town, you simply need to come and stand in site 5 to see the number of houses that enjoy this view and to see the difference between this site and the other 7 proposed. The rural setting is part of this farmers market towns heritage, to lose these countryside views for such a large proportion of the town would be devastating.

Due to the sheer size of the site proposed and the segregation of the site from the original confines of the town due to the railway it will create a badly accessed out of town development. Development here would give no benefit to the current residence of Royal Wootton Bassett even with additional amenities built due to the out of town, segregated location. Whereas sites 1 and 2 would offer benefits to the towns current and future residence due to these sites already being well located to current amenities and good transport links in and out of the town. New infrastructure links wouldn't need to be built at great expense as they would do for site 5. The town has explored the idea of a bypass since the use of the relief road that was put in place a few years ago however, a bypass over site 5 wouldn't help with congestion at all and would cause huge impact on the towns through traffic trade, impacting many local businesses.

I understand that houses need to be built in the area to house the ever-expanding population and I think a number of sites suggested would be good areas of development for the town. However, as I have mentioned to you in my letter I think site 5 would cause huge negative social, economic and environmental impacts to our town and should not be progressed.

**WB4. What land do you think is the most appropriate upon which to build?**

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

**WB6. Are there any issues or infrastructure requirements that should be identified?**

**Further comments**

<b>Rep ID:</b> RWB46	
<b>Consultee code:</b> Developer/Agent	<b>Consultee Organisation (if applicable):</b> Emery Planning
<b>Is this response on behalf of someone else/another organisation?</b> Yes	
<b>Organisation being represented (if applicable):</b> Wainhomes Severn Valley Ltd	
<b>Does this representation refer to attachment(s):</b> yes	<b>If this representation refers to attachment(s), these are listed below:</b> RWB46
<b>WB1. What do you think to the scale of growth? Should there be a brownfield target?</b>	
<p>3.1 The new strategy proposes a requirement for 1,255 homes for the plan period 2016-36 and after taking account of commitments, paragraph 11 states that “a further 990 homes to be accommodated up until 2036”. It also recognises that there are limited previously developed land opportunities so greenfield land is required.</p> <p>3.2 We support the scale of development at Royal Wootton Bassett, although we do consider that an affordable housing needs assessment should be carried out for the plan area as well as for the main towns and their wider catchment. This accords with the PPG which states that the overall housing requirement should be the starting point. A further point in the context of Royal Wootton Bassett is that the consultation paper states: “13. Royal Wootton Bassett Town Council would support higher level of growth than what is proposed, provided this enables delivery of capacity improvements to transport, education and health infrastructure, ideally by way of a strategic development. However, amongst other issues, fundamental concerns remain regarding the capacity of M4 Junction 16. Due to the complexities linked with higher growth such strategic development would have to be steered by the Local Plan.”</p>	

3.3 It is clear that development can improve the wider infrastructure in the town and we consider this would support a higher level of development which is also supported by the PPG which states: "Circumstances where this may be appropriate include, but are not limited to situations where increases in housing need are likely to exceed past trends because of:

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

3.4 To meet the housing needs, a number of sites are set out on Figure 1. We put forward the following site in answer to Question WB3.

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

**WB3. Is this the right pool of potential development sites?**

Brynards Hill, Royal Wootton Bassett

3.5 As set out in the introduction to this statement, we seek the allocation of our client's site at Brynards Hill, Lower Woodshaw for development (Appendix EP1[RWB46]). The site would provide the opportunity to deliver a sustainable development in accordance with the Framework for the following reasons.

3.6 The proposed development would meet the social role by delivering around 61 open market and affordable homes to meet housing needs in Royal Wootton Bassett. The site is currently the subject of a planning application (20/11655/FUL) and from the environmental and technical reports submitted the site is deliverable. The Design and Access Statement for the Application is Appendix EP2 [RWB46] and this set out the proposal in greater detail.

3.7 Being located adjacent to the settlement boundary of Royal Wootton Bassett, the proposed site is well located in terms of accessibility. In particular, it is in close proximity to the Interface Business Park, which provides a range of employment opportunities. There is also a pub (Woodshaw Arms) and a supermarket (Tesco Express) in close proximity to the site. Open space (including a Local Equipped Area of Play) would be provided on site and integrate into the country park. The plan enclosed as Appendix EP3 shows how the proposed site and the country park would be integrated.

3.8 The Council is relying on sites in the open countryside to meet its housing requirement to 2026 across the Borough and this is a logical site with limited visual impact. Therefore we seek the allocation of the site in the emerging Local Plan.

**WB4. What land do you think is the most appropriate upon which to build?**

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

**WB6. Are there any issues or infrastructure requirements that should be identified?**

**Further comments**



<b>Rep ID:</b> RWB47	
<b>Consultee code:</b> Developer/Agent	<b>Consultee Organisation (if applicable):</b> Carter Jonas
<b>Is this response on behalf of someone else/another organisation?</b> Yes	
<b>Organisation being represented (if applicable):</b> David Wilson Homes	
<b>Does this representation refer to attachment(s):</b> yes	<b>If this representation refers to attachment(s), these are listed below:</b> RWB47a, RWB47b, RWB47c
<b>WB1. What do you think to the scale of growth? Should there be a brownfield target?</b>	
<p>The level of housing growth proposed is supported by DWH and formulated on a sound evidence base taking into account the findings of the LHN Assessment for Wiltshire and the alternative development strategies tested for the Swindon HMA. Royal Wootton Bassett has good levels of availability of less-constrained land than other parts of the Swindon HMA, and would benefit from investment in infrastructure that could be brought forward through the delivery of large-scale, strategic housing developments such as the Land East of Royal Wootton Bassett.</p> <p>There is an important role for brownfield sites to play in contributing to overall housing need, however, their contribution should be to complement the strategic housing sites allocated in the Local Plan, rather than to be relied upon to meet housing targets. Often brownfield sites can experience delays in development delivery given issues related to site remediation, and similarly these factors can often limit the total developable area of the site, thereby reducing their overall contribution to housing targets. DWH suggests that Neighbourhood Development Plans could be an appropriate platform to positively plan for bringing forward smaller scale brownfield sites to complement the Local Plan allocations.</p>	

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

DWH is supportive of the principle of incorporating place shaping priorities for Royal Wootton Bassett however, the priorities do not clearly align with the aspirations for growth for the town as set out in the LPR evidence base, and combine a mismatch of detailed and strategic level priorities. For example, the preferred alternative development strategies for Royal Wootton Bassett look at higher levels of growth coupled with investment in infrastructure to: improve links with Swindon; control levels of traffic at Junction 16 of the M4; and encourage more sustainable travel links into the town centre. This would suggest a focus on directing development to the eastern edge of the town and promoting infrastructure opportunities e.g. a new Park and Ride, and improved cycle, pedestrian and bus links. This is touched on at criterion iii but should be elevated and made more precise in its wording, along with criterion vi. Similarly, the strategic importance of a new Park and Ride facility should be a separate criteria in the same way that Swindon Parkway is highlighted, given concerns raised throughout the LPR evidence base in relation to traffic congestion and Junction 16.

In addition, criterion vii should be elevated as a priority with reference given to improving secondary school capacity, which is identified as a strategic aim in the LPR evidence base along with primary and health service provision.

The final three criteria (viii-x) relate to historic aspects in and around the town and are interrelated, as is criteria which relates broadly to the town's character, but they seem to lack direction. An alternative approach may be to group principles by topic areas, e.g. Infrastructure; Sustainable Transport; Design and to have c.2-3 principles under each heading which are related to the topic. This could also then incorporate an 'Environment' category covering local priorities such as air quality or biodiversity.

**WB3. Is this the right pool of potential development sites?**

The potential development sites for further assessment, marked blue and numbered 1-8 on the plan at Figure 1 of the Planning for Royal Wootton Bassett document (January 2021), are all outside of the existing settlement boundary and largely contiguous with the settlement edge. It is clear from Figure 1 however, that some sites are more constrained than others: sites 5, 6, 7 (SHELAA sites 3156, 498, 462 and 463) are subject to flood risk and landscape constraints and are physically separated from the town by the railway line; site 5 (SHELAA site 3156) also poses concerns of encroachment into the countryside and coalescence

with the hamlet of Vastern. Similarly site 2 (SHELAA site 3366) poses landscape and visual constraints in terms of countryside encroachment.

Given the strategic infrastructure priorities for the town, site 8 (SHELAA site 3357) presents the opportunity for a logical extension on the eastern edge of Royal Wootton Bassett to provide c.400 new homes with education and highways infrastructure to meet an identified need in the town. The site is physically bound by existing roads to the north, west and south and has no overriding constraints. Moreover, the site can be carefully masterplanned to provide a new landscaped eastern edge with generous public open space, creating a sensitive transition to the countryside to the east without causing any concerns over coalescence.

**WB4. What land do you think is the most appropriate upon which to build?**

As above, it is important that strategic development sites that are allocated and relied upon for meeting housing requirements in the HMA, are not unduly physically or technically constrained which could in future prevent or delay their delivery. It is al

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

There appears to be a lack of consideration in the site considerations section of the document for environmental aspects and how well the selected sites perform in terms of meeting environmental objectives of the Local Plan, such as climate change targets and improvements to air quality. Those sites which are contiguous with the settlement edge and within walking and cycling distance of existing services, or close to bus connections (such as site 8/SHELAA site 3357), will naturally contribute to lower levels of car usage and therefore contribute to Wiltshire's environmental objectives in this regard. Whereas those sites which are physically segregated from the town (e.g. sites 5-7 or SHELAA sites 3156, 498, 462 and 463) will contribute to greater levels of car usage, thus leading to additional pressure on the strategic road network and increases in air pollution. Environmental considerations are part of the Sustainability Appraisal process, which is used for assessing potential development sites in the Principal Settlements but not the Market Towns, which is an unfortunate omission.

There is also a lack of consistency in considering the sites' opportunities. For example, Site 5 (SHELAA site 3156) is considered positively on the basis that it may be able to accommodate a parkway station for Swindon, whereas the potential for Site 8

(SHELAA site 3357) to provide a Park and Ride (as has been promoted through previous rounds of consultation on the Local Plan Review) is not factored in the site consideration process.

**WB6. Are there any issues or infrastructure requirements that should be identified?**

**Further comments**

<b>Rep ID:</b> RWB48	
<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> GLP	
<b>Does this representation refer to attachment(s):</b> yes	<b>If this representation refers to attachment(s), these are listed below:</b> RWB48
<b>WB1. What do you think to the scale of growth? Should there be a brownfield target?</b>	
<p>Pegasus support the scale of housing growth proposed at Royal Wootton Bassett of 1,255 new homes 2016-36 which is a greater proportion of growth at the Market Town than under the adopted Core Strategy. It is noted at paragraph 13 that the Town Council would support higher levels of growth than that proposed " provided this enables delivery of capacity improvements to transport, education and health infrastructure" but that " fundamental concerns remain regarding the capacity of M4 Junction 16. Due to the complexities linked with higher growth such strategic development would have to be steered by the Local Plan."</p> <p>Pegasus raise concern over just 6ha of employment land being sought at the market town to meet economic growth needs up to 2036, annualised over the plan period this is just 0.3ha of land per annum to meet the total economic growth needs of the Swindon Housing Market Area.</p>	

Pegasus are promoting the 36ha Site 3613 at Spittleborough Farm for employment development on behalf of GLP. Additional representations in support of the site are made to the Emerging Spatial Strategy, Evidence Base and Climate Change documents. A Parameters Plan which addresses planning constraints at the site is attached at Appendix 5 [RWB48].

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

Ten 'place shaping priorities' are identified for Royal Wootton Bassett on p.5 of the consultation document. While these are generally considered to be the right priorities Pegasus consider that the opportunity to maximise on the geographical location of our client's site to the south east of Junction 16 for economic inward investment for the plan period should also be included as a place shaping priority and opportunity for Royal Wootton Bassett.

The development of Site 3613 at Spittleborough Farm for employment purposes can contribute to achieving the published priorities as follows;

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

Development at Site 3613 would provide the opportunity for enhanced green infrastructure along the A3102 Swindon Road reinforcing the sense of separation between Swindon and Royal Wootton Bassett to the south of the M4. The site would remain separate from Royal Wootton Bassett therefore assisting in protecting the distinct character and identity of the Market Town. Further detail on the landscape setting of the site is provided in the Technical Landscape note by BDP attached at Appendix 6. [RWB48]

ii. Maintaining capacity at M4 Junction 16 throughout the Plan period

Development at Site 3613 could assist the Council in improving any capacity issues at Junction 16 (should these be evidenced) which in turn in partnership with housing developers may assist in the delivery of a strategic allocation at Royal Wootton Bassett for 900 homes.

Evidence submitted at Appendix 8 [RWB48] by MJM points to the fact that development of Site 3613 would not result in capacity issues on the A3102 or at Junction 16 that would justify the use of paragraph 109 of the NPPF by the Highway Authority.

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

Development at Site 3613 for employment purposes would help reduce traffic generated by future employment development from increasing levels of existing congestion in the town centre. Proximity to the motorway would ensure that HGV's and larger vehicles associated with employment uses did not enter the Town or impact on the residential amenity of existing residents or increase air pollution levels in Royal Wootton Bassett.

The site can be accessed by existing public transport services running between Chippenham and Swindon which pass through Royal Wootton Bassett allowing the site to be accessed by workers from within Wiltshire by sustainable modes of transport. Contributions from development could assist in enhancing sustainable transport connectivity between Royal Wootton Bassett and Swindon along the A3102 corridor as evidenced at Appendix 8 [RWB48].

iv. Safeguarding land for a Swindon parkway station

While our client has no control over land to implement this place shaping objective it is possible that contributions from development at Site 3613 could be made to achieving this objective.

v. Provision of additional employment to improve self-containment

Development of the 36ha Site 3613 for employment purposes would improve self-containment for both Royal Wootton Bassett and the whole of Wiltshire. The site would provide new jobs plus skills and training opportunities for the wider Wiltshire economy. Our client has been instrumental in delivering the UK's first dedicated Centre of Logistics, Education and Research (CLEAR) at Magna Park Lutterworth partnering with Aston University, local colleges, East Midlands Chamber of Commerce and other private sector partners to deliver a unique research, innovation, education and training facility. Our client would also be committed to enhancing skills and training

opportunities in Wiltshire, including for ex forces personnel of whom there are an above average quantum within Wiltshire.

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

Development of the site would include enhanced pedestrian and cycle connectivity to Swindon with a new route through the site linking across the M4 and delivering an integral part of a proposed Sustrans cycleway. Appendix 8 provides more detail on the proposed Sustrans route and the Council's existing commitment and funding received towards delivering this link. This would provide enhanced sustainable transport connectivity and deliver on the Council's climate change and zero carbon agenda.

vii. Increased primary education, GP and cemetery capacity

Our client has a track record of investing in local communities in association with new employment development, further details can be provided on request.

ix. Conserving and enhancing environmental assets around Royal Wootton Bassett

Development at Site 3613 for employment purposes will provide opportunity for substantial investment in blue and green infrastructure at the site which will result in on site biodiversity net gain. Off-site contributions to existing community nature conservation projects may also be negotiated where appropriate.

Employment development at Site 3613 safeguards other sites immediately adjacent to Royal Wootton Bassett which may be subject to more environmental constraints, it would also safeguard the landscape setting of the town.

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

Development at Site 3613 for employment purposes would ensure that the elevated historical setting of the town and the setting of the central conservation area is maintained.

It is clear therefore, for the reasons described above, that employment development Site 3613 would contribute directly to 9 of the 10 place shaping priorities published in the Council's consultation document for Royal Wootton Bassett and accordingly the site should be reconsidered for allocation in the emerging WLPR.

### **WB3. Is this the right pool of potential development sites?**

Pegasus consider that the WLPR has failed to consider the particular site specific benefits that Site 3613 could provide for employment development as evidenced in the accompanying representations on the Emerging Spatial Strategy and Employment Land Evidence and in the Savills report at Appendix 3 [RWB48].

Commercial operators incur significant costs when located away from a motorway junction – therefore the site offers unique locational opportunities for employment purposes to meet the needs of Wiltshire and the wider sub-region during the plan period. Sequentially Site 3613 is preferable to sites 462, 463, 498, 3156 and 3357 as it is wholly within flood zone 1, the stated Sites are in flood zones 2 and 3.

Site 3161 may affect the setting of the Conservation Area and Sites 477 and 3160 are situated immediately adjacent to a County Wildlife Site.

Our client's site is not affected by these constraints and has been erroneously removed from further consideration for allocation as described in Appendices 6, 7 and 8 [RWB48].

Other sites which score 'red' for landscape in the Site Selection report for Royal Wootton Bassett have been taken forward while our client's site has not.

It is considered that the authority has been inconsistent in its approach to site assessment and sites taken forward for four of the five site assessment criteria with regard to our clients site.

### **WB4. What land do you think is the most appropriate upon which to build?**

In accordance with the overarching aims of the NPPF in order to ensure the plan delivers sustainable development the three interdependent objectives of paragraph 8 of the NPPF should be addressed by sites that are bought forward.

The WLPR needs to consider



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

Royal Wootton Bassett Site Selection Report Site 3613 - Spittleborough Farm

This document considers sites submitted to the SHELAA for their development potential to meet plan period housing and employment land needs at Royal Wootton Bassett.

All sites within the document have been considered for selection based on Accessibility, Flood Risk, Heritage, Landscape, and Traffic. Red, Amber and Green ratings are given to each criteria based on an assessment carried out by the authority. No criteria is provided as part of the consultation for each of the five indicators to identify the scoring mechanism used to undertake the RAG review, therefore the full extent of the evidence base to support the document has not been subject to consultation and the scoring is considered subjective until proven otherwise.

Our client's site is shown as not being taken forward for further consideration for the following reason;

" The site is close to a congested corridor (500m). The site is clearly separated from the town. The site has views over the countryside to the north and is relatively well screened to the south. There is a risk of coalescence between Swindon and Royal Wootton Bassett. Exclude site from further consideration on landscape grounds."

Our client's site scores red against landscape however 5 other sites are taken forward for further consideration that also score 'red' against landscape grounds, with Marsh Farm Site 499 being, " highly visible from surrounding roads including the M4." ;Land South of Wootton Bassett Site 3156 " highly prominent with key views across to the skyline of Royal Wootton Bassett and surrounding countryside." and Land adjoining Midge Hall Farm " highly visible from surrounding roads including the M4." That these sites score red and are taken forward and our client's site is not taken forward is considered to be an inconsistent approach by the authority.

In order to provide the authority with correct evidence on which to reconsider the landscape implications of bringing forward Site 3613 BDP were commissioned to prepare a Landscape Technical Note - attached at Appendix 6 [RWB48]. The Technical Note concludes that employment development can be satisfactorily accommodated at the site without significant landscape and visual harm to the surrounding context. The report notes that the landscape character of the immediate environs has been eroded by the installation of a solar farm to the west and south and the presence of electricity pylons and that the presence of the M4 and the employment development beyond the M4 in Swindon has eroded any tranquillity at the site.

There is no visual and physical connectivity between the Site and the main settlements of Swindon and Royal Wootton Bassett and no issues of coalescence would arise if the Site were to be developed. The combination of the existing wooded vegetation and landform flanking the M4 and Lydiards Park, the physical divide created by the M4 motorway and the proposed 20-30m

landscape buffers along the Site boundaries would create a strong physical and visual green wedge which would help mitigate any perception of coalescence.

Site 3613 scores 'Amber' against the accessibility criteria. Evidence presented at Appendix 8 by MJM shows that the site is highly accessible by active travel and public transport, it is on a bus route with a 30minute daily service between Swindon and Chippenham with a bus stops right outside the site frontage. Delivery of the site would result in delivery of part of a Sustrans cycle route, enhancing cycle connectivity to Swindon from Royal Wootton Bassett.

Three other sites that score amber for accessibility are taken forward for further consideration. The authority are therefore requested to reconsider the accessibility scoring of the site.

Site 3613 scores 'Amber' against the Flood Risk criteria for no specific reason, the site is within flood zone 1 as evidenced by the authority's mapping. MJM have provided a Technical Note on flood risk attached at Appendix 7 to assist the authority in reviewing this criteria for the site.

Appendix 7 draws attention to the fact that the site is located within Flood Zone 1 and is sequentially preferable to other sites located in Flood Zones 2 and 3 including 462, 463, 498, 3156 and 3357 which are considered suitable for further consideration and taken forward by the authority.

In the event of this site being developed, the levels would be modified and a positive drainage system would be installed. The developed levels and drainage system would ensure buildings are protected from overland flows and that safe access and egress routes to these buildings are maintained for extreme rainfall events, with an allowance for climate change. In addition, the greenfield runoff currently leaving site via the culvert below the M4 could be attenuated to further improve the surface water drainage situation for the site and will ensure that the development does not increase the risk of flooding outside of the site itself.

Appendix 7 concludes;

" The extent of existing surface water flood risk for site 3613 is yet to be confirmed. Post development risk of surface water flooding is likely to be low. Post development effect on flooding outside of the site can be mitigated through a properly implemented SUDDS and drainage scheme. In terms of flood risk alone it is clear that site 3613 should be considered ahead of those sites currently within flood zones 2 and 3."

Site 3613 scores amber for Traffic as 'The site is close to a congested corridor (500m).' The MJM report at Appendix 8 provides detailed evidence on the corridor that is considered to be congested with reference the Local Transport Assessment (Jan 2021) evidence base document prepared by Atkins, locally specific traffic data and reputed industry standards.

Site 3357 identified in the report as 'Land at Woodshaw' is the closest identified development site to the proposed Spittleborough Farm development site. No mention is made within the analysis of this land parcel to any transport issues related to potential development. Site 3366 is also located along the A3102, west of the Spittleborough Farm Site and some reference is made to this site being 'Close to a Congested Corridor'. It is unclear to which highway this refers, but it is assumed to be the A3102. Again the Site Selection report is inconsistent in its findings and reporting.

The findings of the Appendix 8 with regard to Traffic conclude that;  
" Swindon Road, from which the development will take access, appears to have sufficient capacity to deal with traffic from the development. Whilst it is understood there have been capacity issues at the M4 junction 16 in the past, upgrade works have recently be completed which will have increased the ability of the junction to deal with higher volumes of traffic..... The impact of the development cannot be considered at this stage to cause a severe transport impact, which is the test as set out in Paragraph 109 in the National Planning Policy Framework."  
For all the reasons set out above and taking into account the considerations in other representations submitted with regard to the emerging Spatial Strategy, Evidence Base on employment and Climate Change, it is requested that our client's site at Site 3613 at Spittleborough Farm be reconsidered by the authority for allocation for strategic employment purposes.

**WB6. Are there any issues or infrastructure requirements that should be identified?**

Infrastructure benefits of employment development at Spittleborough Farm  
Delivery of new employment development at Spittleborough Farm would contribute towards new physical, social and community infrastructure in and around Royal Wotton Bassett including

**Further comments**

<b>Rep ID:</b> RWB49	
<b>Consultee code:</b> Developer/Agent	<b>Consultee Organisation (if applicable):</b> Carter Jonas
<b>Is this response on behalf of someone else/another organisation?</b> Yes	
<b>Organisation being represented (if applicable):</b> Leda Properties Limited	
<b>Does this representation refer to attachment(s):</b> yes	<b>If this representation refers to attachment(s), these are listed below:</b> RWB49, RWB49a, RWB49b, RWB49c, RWB49d, RWB49e
<b>WB1. What do you think to the scale of growth? Should there be a brownfield target?</b>	
<p>The level of housing growth proposed is supported and formulated on a sound evidence base taking into account the findings of the LHN Assessment for Wiltshire and the alternative development strategies tested for the Swindon HMA. Royal Wootton Bassett has good levels of availability of less-constrained land than other parts of the Swindon HMA, and would benefit from investment in infrastructure that could be brought forward through the delivery of large-scale, strategic housing developments such as Land at Marsh Farm, to the north of Royal Wootton Bassett.</p> <p>There is an important role for brownfield sites to play in contributing to overall housing need, however, their contribution should be to complement the strategic housing sites allocated in the Local Plan, rather than to be relied upon to meet housing targets. Often brownfield sites can experience delays in development delivery given issues related to site remediation, and similarly these factors can often limit the total developable area of the site, thereby reducing their overall contribution to housing targets. We would suggest that Neighbourhood Development Plans could be an appropriate platform to positively plan for bringing forward smaller scale brownfield sites to complement the Local Plan allocations.</p>	

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

Leda Properties is supportive of the principle of incorporating place shaping priorities for Royal Wootton Bassett however, the priorities do not clearly align with the aspirations for growth for the town as set out in the LPR evidence base, and combine a mismatch of detailed and strategic level priorities. For example, the preferred alternative development strategies for Royal Wootton Bassett look at higher levels of growth coupled with investment in infrastructure to: improve links with Swindon; control levels of traffic at Junction 16 of the M4; and encourage more sustainable travel links into the town centre. This would suggest a focus on promoting infrastructure opportunities in tandem with opportunities for residential growth. This is touched on at criterion iii but should be elevated and made more precise in its wording, along with criterion vi. In addition, criterion vii should be elevated as a priority with reference given to improving secondary school capacity, which is identified as a strategic aim in the LPR evidence base along with primary and health service provision.

The final three criteria (viii-x) relate to historic aspects in and around the town and are interrelated, as is criteria i which relates broadly to the town's character, but they seem to lack direction. An alternative approach may be to group principles by topic areas, e.g. Infrastructure; Sustainable Transport; Design and to have c.2-3 principles under each heading which are related to the topic. This could also then incorporate an 'Environment' category covering local priorities such as air quality or biodiversity.

**WB3. Is this the right pool of potential development sites?**

The potential development sites for further assessment, marked blue and numbered 1-8 on the plan at Figure 1 of the Planning for Royal Wootton Bassett document (January 2021), are all outside of the existing settlement boundary and largely contiguous with the settlement edge. It is clear from Figure 1 however, that some sites are more constrained than others: sites 5, 6, 7 (SHELAA sites 3156, 498, 462 and 463) are subject to flood risk and landscape constraints and are physically separated from the town by the railway line; site 5 (SHELAA site 3156) also poses concerns of encroachment into the countryside and coalescence with the hamlet of Vastern. Similarly site 2 (SHELAA site 3366) poses landscape and visual constraints in terms of countryside encroachment.

Site 1 (SHELAA site 499) presents the opportunity for a logical extension on the northern edge of Royal Wootton Bassett to provide c.175 new homes with an opportunity for substantial new, green infrastructure.

The site is physically bound by existing roads to the north and south, and built development to the east and west, and has no overriding constraints. Moreover, the site can be carefully masterplanned to provide a new landscaped northern edge without causing any concerns over coalescence.

**WB4. What land do you think is the most appropriate upon which to build?**

As above, it is important that strategic development sites that are allocated and relied upon for meeting housing requirements in the HMA, are not unduly physically or technically constrained which could in future prevent or delay their delivery.  
It is al

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

There appears to be a lack of consideration in the site considerations section of the document for environmental aspects and how well the selected sites perform in terms of meeting environmental objectives of the Local Plan, such as climate change targets and improvements to air quality. Those sites which are contiguous with the settlement edge and within walking and cycling distance of existing services, or close to bus connections (such as site 1/SHELAA site 499), will naturally contribute to lower levels of car usage and therefore contribute to Wiltshire's environmental objectives in this regard. Whereas those sites which are physically segregated from the town (e.g. sites 5-7 or SHELAA sites 3156, 498, 462 and 463) will contribute to greater levels of car usage, thus leading to additional pressure on the strategic road network and increases in air pollution. Environmental considerations are part of the Sustainability Appraisal process, which is used for assessing potential development sites in the Principal Settlements but not the Market Towns, which is an unfortunate omission.

**WB6. Are there any issues or infrastructure requirements that should be identified?**

**Further comments**

<b>Rep ID:</b> RWB50	
<b>Consultee code:</b> Developer/Agent	<b>Consultee Organisation (if applicable):</b> Terence O'Rourke Ltd
<b>Is this response on behalf of someone else/another organisation?</b> Yes	
<b>Organisation being represented (if applicable):</b> Copper Estates Strategic Land Limited & Edward Raker	
<b>Does this representation refer to attachment(s):</b> yes	<b>If this representation refers to attachment(s), these are listed below:</b> RWB50
<b>WB1. What do you think to the scale of growth? Should there be a brownfield target?</b>	
As referenced in our objections to the Spatial Strategy, there is no justification for the level of growth proposed at Royal Wootton Bassett where this is being preferred to growth at West Swindon. The evidence base simply does not support the approach being taken and will lead to an unsustainable pattern of development.	
<b>WB2. Are these the right priorities? What priorities may be missing? How might these place shaping priorities be achieved?</b>	
The priorities simply serve to highlight the inherent flaws in the approach, the significant infrastructure challenges, the lack of employment, the tendency for unsustainable travel (including noting the role of Royal Wootton Bassett as a dormitory town to	



Swindon) and environmental constraints to growth – linked to national priorities for protected areas, rather than lesser ‘coalescence matters’ that can be overcome in most instances through masterplanning and should not be considered a ‘show-stopper’. What is missing is an evidence based and sustainable approach to development in the Swindon HMA, prioritising development that is undeniably in the most sustainable location, at west Swindon.

**WB3. Is this the right pool of potential development sites?**

No. Land to the West of Swindon should be considered. Details of the development opportunity have already been submitted to the Council through the call for sites. It is unjustifiable that sites to the west of Swindon have not been assessed through the site selection paper, so that a fair comparable assessment can be made; certainly the land under the control of Cooper Strategic Land and Edward Raker would perform relatively well against the alternatives, taking the key criteria into account. It would certainly have shown potential and be maintained within the options, and overall is in a more sustainable location within the Swindon HMA. It is available and deliverable.

**WB4. What land do you think is the most appropriate upon which to build?**

None shown in the mapping of potential development options in preference to the land at West Swindon, for all of the reasons set out (but ignored) in the evidence base, in our response to the spatial strategy and as outlined above.

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

The main factors which have been set against the development of options at West Swindon are 1) the administrative boundary 2) coalescence 3) biodiversity.

With regards to 1), housing need and lifestyle choices are not determined by administrative boundaries, as clearly confirmed by the HMA evidence base and does not constrain the potential for Wiltshire Council to allocate development on the western edge of Swindon, within its own administrative boundary and Swindon HMA.

With regards to 2) the plans below demonstrate how the site could be developed / masterplanned, such that coalescence is not an issue. Indeed, it is worth highlighting that the Neighbourhood Plan does not consider the eastern side of the site to be 'local gap' and the western side was only confirmed as gap against the existing field boundaries and site features rather than the above master planning approach which would clearly retain settlement identity and separation.

With regards to 3) ecological assessments have been undertaken by Corylus Ecology and no issues were highlighted that would suggest that the site should not be developed or that achieving biodiversity gain would be a hurdle.

There are no technical reasons or site suitability reasons as to why the site should not be allocated for development and it is in the most sustainable location in the Wiltshire Council area, in the Swindon HMA.

**WB6. Are there any issues or infrastructure requirements that should be identified?**

The infrastructure constraints, do not support significant levels of development at Royal Wootton Bassett, given the alternatives, and such an approach will only serve to undermine the ability to deliver sustainable development and affordable housing.

**Further comments**

<b>Rep ID:</b> RWB52	
<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>WB1. What do you think to the scale of growth? Should there be a brownfield target?</b>	
The scale of growth is far too high. The infrastructure such as schools, doctors and dentists is already under a huge strain. Even before the pandemic waiting times for appointments were over a month. The main roads are badly congested. I understand that RWB has already had over its share of mandated houses built. Growth should be scaled back now to the absolute minimum of mandated houses. For any houses that have to built, brownfield sites should be prioritised.	
<b>WB2. Are these the right priorities? What priorities may be missing? How might these place shaping priorities be achieved?</b>	
I agree with the priorities listed. More sustainable transport would be achieved by building the cycle path to Swindon which was agreed about 10 years ago as well as a cycle path network throughout RWB. Housing must also be built to zero carbon standards and avoid developments on greenfield sites.	

**WB3. Is this the right pool of potential development sites?**

**WB4. What land do you think is the most appropriate upon which to build?**

Brownfield sites should be prioritised.

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

Land at Marsh Farm (SHELAA reference 499) This area is a 'sponge' for the head of the Thunder Brook releasing water regularly into the brook. There is a marshy wet area on site. If built on, the hydrology would change potentially causing flooding around the lake.

Land at Maple Drive (SHELAA references 477) Site 477 consists of a higher level flat agricultural area that borders the escarpment and scrubby sloping field leading down to Jubilee Lake. The lake as a Local Nature Reserve needs buffering from built up areas making the slope impractical for housing. The north and western edge of the top field is semi woodland which if removed could cause slippage. The woodland and scrub area are a wildlife haven with birdlife, deer and other animals through there all the time. It is also a very active feeding area for bats, a protected species.

**WB6. Are there any issues or infrastructure requirements that should be identified?**

The Plan covers the period up to 2036, a period in which the world needs to take decisive action to reduce carbon emissions if we are to avert the devastating consequences of uncontrollable climate change. While this is a global issue, every part of soci

## Further comments

The Plan must include specific measures to reduce emissions, including:

- Planning for new housing developments where there is genuine need, rather than being driven by out-dated, top-down targets;
- Avoiding building houses where this creates car dependency and people will need to commute long distances to their places of employment;
- Introducing planning policies that require housing and commercial development to be built to zero carbon standards in settlement designs that are genuinely sustainable, avoiding building on greenfield sites wherever possible;
- Reassessing major road schemes based on realistic projections of future traffic volumes taking into account local and national climate change policies and longer- term changes in work patterns as a consequence of COVID-19;
- Creating a planning framework that promotes renewable energy generation, including making specific provision for onshore wind generation (the lowest cost form of electricity generation), which is not currently mentioned anywhere in the Plan;
- Encouraging a significant shift away from private cars to public and active transport, investing in cycling and walking infrastructure and improving infrastructure for electric vehicles;
- Protecting and enhancing the carbon absorption properties of the natural environment (that of our natural capital and carbon sinks), including significant increases in tree planting, also helping to improve biodiversity;
- Protecting the best and most versatile agricultural land, which helps sequester carbon and ensure local food production and future food security, including the Council's own County farms;
- Introducing planning policies that require climate change impact assessment of all proposed developments, in advance, against the Council's carbon reduction targets.

This Local Plan is the best, and last, chance for Wiltshire Council to introduce a policy framework that comprehensively addresses the urgent need for material, year on year reductions in carbon emissions, in line with the Council's democratic and legislative obligations. I believe that the current proposals for the Local Plan must be completely rewritten on this basis.

**Rep ID:** RWB53

**Consultee code:** Neighbouring Authority

**Consultee Organisation (if applicable):** Swindon Borough Council

**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:**

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

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

We support the place shaping priorities but request the following additions:  
ii. Maintaining capacity at M4 Junction 16 and surrounding local and strategic road network throughout the Plan period  
vii Increased primary education, GP and cemetery capacity, and ensuring secondary education needs are met locally

**WB3. Is this the right pool of potential development sites?**

Site selection:

Understanding further work is required in respect of the site selections, however of greatest concern to Swindon Borough will be those to north and west of RWB (sites 1,2 and 8) having the greatest likely impact on the Borough. I understand further transport modelling is being undertaken, including co-ordination of transport models of both authorities. I look forward to continued joint working on that matter.

It would be beneficial to understand any options on combination of sites and whether individually or collectively they can deliver the critical infrastructure.

**WB4. What land do you think is the most appropriate upon which to build?**

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

**WB6. Are there any issues or infrastructure requirements that should be identified?**

**Further comments**

I look forward to continue joint working and development of the Statement of Common Ground through the remainder of the Plan making process.



<b>Rep ID:</b> RWB55	
<b>Consultee code:</b> Other	<b>Consultee Organisation (if applicable):</b> Cheltenham and Gloucester Omnibus Company Ltd dba Stagecoach West
<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>WB1. What do you think to the scale of growth? Should there be a brownfield target?</b>	
<p>The level of growth identified in paragraph 9 is based on the local housing needs assessment of Wiltshire for the period 2016-2036. This indicates a slightly higher level of growth than the Standard Method for the County.</p> <p>As we go on to discuss here and elsewhere, we do not agree that the overall housing requirement for the plan is appropriate, as it needlessly inappropriately and unjustifiably truncates the overall requirement by folding in an excessive amount of historic delivery between 2016-2019, and failing to provide for a suitably long horizon of at least 15 years following proposed adoption in 2023. is appropriate. We consider that 2040 is a much more appropriate horizon for the Plan, allowing proper and prudent consideration of strategic issues and their resolution, a level of flexibility, and to ensure that the plan is positively prepared to meet the assessed development needs of the plan area.</p> <p>Within that total County figure, the quantum for the Swindon HMA is itself suppressed, in a manner that is unjustified. In particular this fails to recognise the potential role that Royal Wootton Bassett (RWB) can play, and indeed should play, to meet the five delivery principles set out in the Emerging Spatial Strategy.</p>	

This role is acknowledged in the initial Sustainability Appraisal for Alternative Development Strategies. Stagecoach notes and unequivocally supports the overarching conclusion of the Sustainability Appraisal (as summarised on Page 18 of the ESS), which states that “A focus on Royal Wootton Bassett (SW-B) is a clear preferred alternative”. This is entirely in line with our previous representations and observations to the Council over the last three years.

While it is evident that the other Market Towns in the Swindon HMA have much greater physical and environmental constraints to growth than RWB, there are clear positive opportunities presented at RWB to meet development needs in a manner entirely consistent with the ESS Delivery Principles.

This is because:

- RWB is already relatively self-contained, with key services and facilities and substantial employment. To the degree that it is not, the distance to facilities outside the town, the vast majority in Swindon, is close, so much so that cycling as well as public transport could meet many trip requirements: greatly more so than alternative Market Towns within the HMA such as Cricklade.
- The scope to transform the attractiveness, relevance and reliability of both bus and cycle towards Swindon demonstrably exists. This builds on an already-high level of public transport connectivity and frequency, principally provided by Stagecoach service 55, which presents an excellent starting point from which to increase the public transport mode share both for existing and new residents, greatly reducing the carbon-intensity of mobility for the town.
- Development on sufficient scale could facilitate and catalyse a new relief road south of the town. Among the many benefits this brings would be the improvement of conditions for walking cycling and public transport in the heart of the town, reducing the severance effect caused by existing through traffic in the High Street.

Indeed we note the conclusion reached at Paragraph 3.72 of the ESS (Climate Change Outcomes), which refers to strong travel patterns into Swindon from RWB and focussing development in the town will “increase[s] the scope for public transport to cater for this demand and reduce carbon use”. It therefore is extremely concerning to us that the overall ESS and the approach taken to RWB fails to capitalise to any meaningful extent on this opportunity.

The Local Plan Review should seek to enable the allocation of development which improves the sustainability of settlements like RWB and provides opportunities to deliver enhanced levels of infrastructure to serve existing and new residents. This is far from merely justifying and facilitating the delivery of new highways infrastructure. It includes focusing development in thios localities that can crystallise and take advantage of a step change in the quality and reliability of public transport. RWB wold evidently form a key part of a “public transport corridors-focussed” approach to the spatial strategy – on that was considered at the outset by the then proposed Joint Spatial Framework but for some reason entirely dropped as a potential option thereafter.

This is a very different approach that simply finding a quantum of development land to meet a pre-judged level of housing requirement, that itself has been arrived at through a somewhat arcane methodology that is far from transparent.

The existing adopted Wiltshire Core Strategy 2006-2026, identifies a requirement for 1070 homes in RWB. The Emerging Strategy for RWB only proposes a requirement of 1255 homes for the plan period 2016-2036, only 185 more dwellings than in

the adopted Core Strategy. This figure is only marginally higher than the Core Strategy and certainly does not imply any “substantial boost to the supply of housing”. It is claimed that the work done to test alternative distribution strategies suggests that “the scale of growth should change marginally from what is currently planned”. This seems to run entirely counter to the conclusions in the evidence base and summarised in the ESS Paper, which we refer to earlier in this response.

Assuming that the current quantum is delivered, as it should be, by 2023, this creates a residual requirement to 2036 of 990 dwellings, which is more a reflection of the very limited current supply than any real intent to capitalise on the opportunities that there might be around the town to deliver sustainable development. This implies that only about 66 dwellings per annum need to be provided over the plan period to 2036. This is actually lower than the town has delivered over the last decade in most years. From first principles, it does not reflect the role of RWB as a market town and as such a relatively very sustainable location to meet pressing housing and employment needs.

Nor does this plan show any regard for the clear evidence that the town has substantial potential to accommodate growth. The high level assessment in the Alternative Development Strategies demonstrates that RWB is by far the least constrained in the HMA. A number of development opportunities exist at RWB that are quite unconstrained and would demonstrably support the place-shaping priorities.

Of these opportunities, from our perspective, in many regards the best one is represented by development to the east of Bincknoll Lane (Site 8). This would represent a compact form of development that better yet, would be exceptionally well-connected to the town centre and to Swindon by sustainable travel modes, including walking and cycling, but also public transport. If the Council had considered thoroughly our previous representations and written input to this plan review, it would have already become aware that Stagecoach is keen to see the provision of a local multi-modal interchange on the A3012, that would intercept traffic arriving onto the corridor from multiple origins across a much wider hinterland, consolidating them onto an much improved service taking advantage of bus priority on the approaches to M4 Junction 16, and beyond by as many as three potential routes to various parts of Swindon. This includes:

- Windmill Hill/Blagrove and Mannington
- West Swindon;
- Wichelstowe and potentially Old Town via the western end of Pipers Way/Nationwide.

However, the best opportunity to maximise the potential RWB offers to create a greatly more sustainable place, is provided for growth on a more strategic scale South of Royal Wootton Bassett (Sites 5, 6, and 7).

Options for higher growth should be considered to support the delivery of long-identified infrastructure to relieve congestion in the town centre. This would potentially be transformative in delivering the place shaping priorities. The achievement of a full southern relief road has long been an aspiration of the Town Council, as well as the County Council at various times in its history since the 1970s. It would link Bincknoll Lane in the vicinity of Lower Woodshaw Farm, across the Great Western Mainline (GWML) towards Marlborough Road, and then continue south of the GWML to reconnect with the A3102 near Vastern Wharf. This would open up

substantially more relatively unconstrained development opportunities. At least as important it would go a good way to deal with the impact of traffic in and around the town centre, which significantly and adversely affects the operation of our key inter-urban service 55, as well as the experience of the place overall.

This would be likely to open up good opportunities to address a serious shortage of employment land, a deficiency highlighted in the Employment Land Review (2018) and regarding which need the proposed Plan Strategy approach to RWB considers 6 Ha of land should be allocated. We wonder if this is insufficient.

Furthermore, given the current difficulties experienced in terms of housing delivery in the broader north and west of Wiltshire, including at Chippenham, and a shortage of identifiable land needed to demonstrate a 5-year supply, RWB could and should continue to play a role as a significant focus for sustainable development, that can deliver in both the immediate as well as the longer term. We believe that early releases of certain key smaller-scale sites, especially Sites 3 and 4, is likely to be justifiable under paragraph 11 c) and d) of NPPF before this plan is adopted.

According to the Council's figures, once completions and commitments have been taken into account (footnote 1 on page 3) the residual figure for the remaining plan period to 2036 is 990 dwellings. A brownfield target is proposed for the period 2021-2031 of 70 dwellings which has the effect of further reducing the requirements for greenfield land to be identified in the local plan (paragraph 17 of the Planning for RWB document).

We think this is approach is inappropriate and challengeable.

As referred to in our response to the Emerging Strategy it is considered that the plan period should be 2020 – 2040. This is essential if the plan to be positively prepared and sufficiently flexible to response to rapid change as paragraph 11 of the NPPF expects it to be. Rolling forward the plan only 10 years from the end date of the adopted Core Strategy i.e. 2026 to 2036, obviously jeopardises any ability for the Plan to provide a long-term strategy for the town. Paragraph 22 of the NPPF makes clear that the strategic policies in the plan should look ahead at least 15 years from the date of adoption to respond to long-term requirements and opportunities.

The fact that 183 dwellings have already been built between 2016-2019, and a significant development momentum exists should be taken prima facie to demonstrate significant housing need. This comes within the wider context of seriously declining housing affordability in the County. Deducting this historic delivery from the plans forward delivery target is contrary to both the spirit and the letter of NPPF and supporting PPG. As we discuss elsewhere, NPPF does not support, much less permit this principle of "retroactive offset", which is entirely at odds with requirements to "plan positively" and "significantly boost the supply of housing".

This offset should be removed from the delivery totals and added to the requirement.

Given the clear requirement at NPPF para 22 that the Plan should look ahead at least 15 years from the date of adoption we urge the Council to plan with at least a 2038 horizon and realistically a 2040 end date is considered to be the most appropriate. This will require additional supply to be identified.

This suggests in combination, that at least 1800 dwellings would be required in RWB over a 2020-2040 plan period, without in any way exceeding the rate at which the town has developed over the last few years. To the 990 residual quantum should be added the 182 offset from 2016-2019, and a further factor to meet post 2036 needs. This kind of growth would start to make it possible to unlock the strategic opportunities for infrastructure, including the Southern Relief Road.

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

Generic place-shaping priorities are not appropriate and need to directly address the opportunities and challenges that are presented by the locality. They should relate to the development and use of land, which is the primary purpose of the planning system and plan-making.

Stagecoach welcomes and broadly supports most of the principles stated. Many reflect the particular transport challenges that are a direct result of excessive car-dependency not just in RWB, but a much wider area within the County. It is a great shame that the emerging planning strategy for the town says or does nothing that would meaningfully and demonstrably address these challenges

It is stated in the settlement profile for RWB that significant additional growth could potentially deliver a southern bypass which has been a long-standing local aspiration. Indeed, on Page 12 of the Consultation document under “Transport Opportunities”, it is acknowledged by the Council that “Future development could provide a bypass of the town thus reducing traffic congestion and impacts on the High Street”. Evidently this requires development to come forward in a manner that serves to facilitate this. The Council seem to elide over the opportunity that it itself identifies, for no clear reason. The failure to even consider this major opportunity – which could have wide-ranging benefits for the sustainability of the settlement and greatly more attractive relevant and reliable public transport - is un evidenced, and impossible to understand.

We are very surprised that this is not included in the strategic priorities, especially when similar aspirations for Melksham, for example, have clearly influenced both those place-shaping principles and the much wider strategic approach the plan is looking to take. The Council’s position therefore could legitimately be characterised as inconsistent and arbitrary, even capricious.

The list of place shaping priorities should, therefore, include reference to the provision of a southern bypass, either as a separate priority or included as part of Priority (iii), which refers to “managing levels of congestion on strategic routes and in the town centre”.

However, we consider that Place Shaping requirement (iv) “Safeguarding land for a Swindon Parkway Station” should be reviewed. Although it is referred to in the Local Plan Review as being an aspiration, we see no signs that there is any Network Rail commitment to explore its delivery in any substantive manner, and it is evident from the kinds of costs we are seeing

elsewhere for new stations in the South West of England, the costs of this alone are likely to range from £15m-£21m. We see in the locality profile for RWB under the transport heading that “the estimated capital cost of an Royal Wotton Bassett rail station and necessary track improvements is £30m to £50m”. (our emphasis). Even with the prospect of funding being made available from a much higher quantum of development than the highest levels currently conceivable we see no clear way that this would be viable and therefore we conclude that, following the example of scores of new station projects over the past 30 years it is highly unlikely to be delivered during the plan period. The Council could, of course, include a suitably permissive supporting policy should the nature of the railway industry’s approach to the Great Western Main Line change. Therefore while Stagecoach broadly supports the place shaping priorities for RWB consideration must be given to the longer term, and in so doing properly reflect the strategic opportunities available at RWB. Achieving these priorities through the development strategy for RWB, is discussed in the context of the specific development sites being consulted upon. Without an appropriate amount of new development that addresses a place-specific vision and clearly informed by the opportunities it would be impossible to effectively meet these priorities.

### **WB3. Is this the right pool of potential development sites?**

In order to satisfy the tests of soundness in NPPF, the Council needs to demonstrate that it has considered a sufficient range of reasonable alternatives. At this stage, in the absence of a transparent Sustainability Appraisal of the sites the intention appears to pre-screen potential sites even before they are subjected to a sustainability appraisal process. We are concerned that this approach may fail to properly evaluate sites that potentially had strong credentials.

As a consequence of the non-NPPF-compliant plan period to 2036 (paragraph 28) there is also an inadequate site requirement to meet the alleged strategic housing requirement.

Stagecoach observes that that “The Royal Wootton Bassett Neighbourhood Plan can select sites for development for new homes, businesses, and other uses to meet local needs. Prioritising brownfield land, work would focus first on identifying opportunities using previously development land. The pool of sites provided here is a starting point for any greenfield sites.”

Stagecoach cannot fathom the Council’s intention. Th development quantum identifiable of at last 990 dwellings, and probably a rather higher number oif the plan is to be both positively prepared and properly evidenced, suggests a quantum of growth that presents strategic choices and challenges within RWB. Is it the intention to allocate sites in the Local Plan or will this is to be left entirely to the Neighbourhood Plan? What size and scale of development would be dealt with by the Local Plan and what would be left as “non-strategic” for the NP to consider?

We read NPPF and PPG in such a way that the required appropriate strategy is clearly to properly plan for RWB with strategic policies looking forward over a longer period, and fully reflect the opportunities available. NPPF is explicit that it expects that strategic policies should address the strategic priorities for the area and provide a clear starting point for any non-strategic policies, including for Neighbourhood Plans:

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

Neighbourhood Plans must be in general conformity with the strategic policies contained in any development plan that covers their area. Without this strategic steer it is far from clear that a future RWB Neighbourhood Plan could be effective, as it cannot retroactively address any higher-level policy lacuna. Simply put, in the context of the aspirations and potential to more positively meet housing and employment development needs in the RWB NP area it needs the Wiltshire Plan to lead, rather than attempt to inappropriately devolve powers to the Neighbourhood Planning Body to do a job that only the Local Planning Authority can undertake.

Eight potential sites have been identified at RWB for further assessment of their development potential. “Planning for RWB” states at paragraph 25 that “Not all these sites will be needed to meet the housing requirement in Royal Wootton Bassett,” Stagecoach considers that this is challengeable and that a realistic and positive approach needs to be taken that doesn’t start from first principles to use any number of arithmetic foils to argue down the case for any significant development in RWB, and avoid the need to evaluate development strategies that could lead to the conclusion that RWB could and should deliver a greater proportion of the County’s needs as well as that of the HMA.

As we have made plain above, the Wiltshire Plan should seek to set a clear and deliverable long-term strategy for RWB to 2040. Since reference is made to significant unconstrained growth potential that could potentially deliver an southern relief road which has been a long-standing aspiration, it is quite inexplicable that this potential is not fully tested and explored at this stage. The incremental, minimalist approach proposed can in no way be described as establishing a strategic set of policies, and could not assist in meeting longer term objectives.

Recent history shows clearly that RWB will be one of the first places that will be looked to if delivery failure results at any stage in the plan period. This reflects its fundamental sustainability and multiple consents, including appeal decisions, validate this judgment over recent years. In fact, most of the current sites were consented as departures from the adopted development plan, but there was no opportunity to leverage these to achieve wider spatial and planning policy goals.

There is a current 5-year housing land supply deficit, and a new round of departure sites has now already commenced with multiple already lodged as planning applications. We have expressed wider concern that the plans over-reliance on very large, infrastructure dependent schemes risks compounding this situation into the future. It is essential that Wiltshire Council takes a properly evidenced and positive approach to RWB, without which a greatly higher quantum of development is likely to come

forward on an un-coordinated, piecemeal basis, that may even jeopardise the realisation of key local aspirations such as the eastern relief road and the benefits this can be expected to offer to the environmental quality and role of sustainable transport in the town.

All this points to a need to make the best use of the development opportunities in RWB to achieve a more balanced and more deliverable pattern of growth, that in turn can identify, manage and maximise the positive benefits of development for the town. Stagecoach also supports in principle a more ambitious vision to complete a southern relief road for the town. Among the many benefits that this will offer it could, set within a wider package of measures, greatly improve the reliability, relevance and efficiency of bus services throughout the town and on the wider service 55 corridor in particular. It would also allow measures to be taken to make walking and cycling a good deal more attractive, taking through heavy traffic from key radial routes and reducing general levels of vehicles.

This obviously would need to be associated with a greater land release south of RWB, and the GWML, on scale somewhat higher than the town has accommodated for some years.

**WB4. What land do you think is the most appropriate upon which to build?**

As we have previously stated to the Council, RWB benefits from being on the frequent premium service 55 providing direct and frequent links to both Swindon Calne and Chippenham. The service generally takes the direct driving route and is competitive with

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

Stagecoach has no further observations to make.

**WB6. Are there any issues or infrastructure requirements that should be identified?**



We also reiterate our wider major concern is that as the plan period commences at 2016 and the end point is only 2036 the plan is fundamentally hampered in achieving all it needs to. A longer term view and a clearly strategic approach are essential to arr

**Further comments**

Stagecoach has no further comments to make.

<b>Rep ID:</b> RWB56	
<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> TOF Corporate Trustee Limited (TOF), as directed by Oxford University Endowment Management (OUEM). [OUEM manages land on behalf of TOF]	
<b>Does this representation refer to attachment(s):</b> yes	<b>If this representation refers to attachment(s), these are listed below:</b> RWB56a-f
<b>WB1. What do you think to the scale of growth? Should there be a brownfield target?</b>	
<p>- Scale of Growth</p> <p>4.1. We do not consider that the scale of growth proposed for the Swindon HMA is sufficient to accommodate a sustainable level of growth for RWB. Based on our response to the Emerging Spatial Strategy (ESS) we consider that the level of growth which should be directed to the Swindon HMA should be increased in order to accommodate 4 additional years of growth (i.e. up to 2040). The resulting residual level of growth can be accommodated within the following sites which are being promoted by TOF in RWB:</p> <ul style="list-style-type: none"> <li>- South RWB: At least 2,000 homes.</li> <li>- Land North of Whitehill Lane, RWB: 150 homes.</li> <li>- Land West of Maple Drive, RWB: 110 homes.</li> </ul>	

4.2. In terms of employment development, we note that 6 hectares of employment land is identified for RWB and confirm that as part of its promotion of land at South RWB, TOF is has identified sufficient land within this proposed development area to meet the employment target for the town.

**- Brownfield Target**

4.3. We note that a brownfield target is set for RWB for the period 2021-2031. This target is questionable and we consider that it should be deleted from the Plan. Instead, there should be a policy included in the Local Plan Review which encourages the redevelopment of brownfield sites.

4.4. The brownfield target relates to a source of housing land supply, rather than to the stated housing requirement. Whilst the target appears to be derived from past windfall rates of development, which are by their nature are uncertain and difficult to predict, it is unclear if the figure stated by the Council relates to the identification of sites which are demonstrably deliverable. The use of this target is also confusing because it relates to a period which does not correspond to the full Plan period.

4.5. We also note that the Local Plan Review identifies that its brownfield targets will be reconsidered under future reviews. This adds a further layer of uncertainty in terms of being able to establish what is the relevant residual housing requirement for RWB.

4.6. Instead of setting a brownfield target, we consider that the Local Plan Review promotes the effective use of land, in accordance with National planning policy (NPPF 2019, Paragraph 117). In this way, the Plan will seek to make as much use as possible of previously-developed or brownfield land, whilst promoting place shaping principles which allocate greenfield sites which can deliver development which improves the sustainability of towns like RWB and makes them more attractive places to live, work and socialise.

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

We are broadly supportive of the place shaping priorities identified for RWB. In particular, we note that the proposed allocation of land at South RWB will deliver or facilitate a number of these priorities. For example the proposed development at South RWB will:

- Promote sustainable modes of transport between South RWB and the centre of the town.
- Provide land for 6 hectares of employment.
- Provide improvements to the A3102 to facilitate a new bus priority lane.
- Provide a new 2.5 Forms of Entry primary school.

- Provide land for future healthcare use (subject to confirmation by the CCG).

- Safeguard and enhance the alignment of the Wilts and Berks Canal (within the proposed development area).

4.8. However, we consider that Place Shaping requirement (iv) “Safeguarding land for a Swindon parkway station” should be reviewed. Although it is referred to in the Local Plan Review as being an aspiration, we do not consider that it is viable and, without very significant funding being made available from new development, it is unlikely to be delivered

4.9. In terms of any priorities which might be missing, we note that the list of place shaping priorities does not make reference to the delivery of a southern bypass for RWB. The delivery of such a road would make a significant contribution to the alleviation of traffic congestion in the town. Indeed, on Page 12 of the Consultation document under Transport Opportunities, it is acknowledged by the Council that “Future development could provide a bypass of the town thus reducing traffic congestion and impacts on the High Street”.

4.10. The list of place shaping priorities should, therefore, include reference to the provision of a southern bypass, either as a separate priority or included as part of Priority (iii), which refers to “managing levels of congestion on strategic routes and in the town centre”.

4.11. We also request that an additional Place Shaping Priority is added in relation to the provision of strategic green infrastructure (for example gaining Building with Nature accreditation). This priority should include reference to the creation of a Town Park in the north-western part of the town and the extension of allotments in the western part of RWB. Both of these green infrastructure proposals are aspirations of the Town Council and both can be delivered through the allocation of land in the Local Plan review (i.e. at Land West of Maple Drive and Land North of Whitehill Lane, respectively).

4.12. In addition, we also request that further consideration is given by the Council as to how development of a strategic scale could potentially deliver Biodiversity Net Gains and sources of renewable energy. For example, TOF’s land ownership in the RWB area extends beyond the three sites being promoted for allocation (as identified above) and has the potential to for biodiversity net gains and also to accommodate tree planting to offset carbon emissions. TOF’s additional land could accommodate a solar park which could supply energy to new and existing residents in the town. The use of this additional land could be considered in due course as part of TOF’s sustainable development proposals for RWB and the allocation of its three sites. TOF’s wider land ownership is identified on the Plan included in Appendix 3 [RWB56].

### **WB3. Is this the right pool of potential development sites?**

4.13. TOF supports the identification of the following sites which it is promoting for development in the Local Plan Review. To confirm, these are:

- Site 3: Land West of Maple Drive, RWB: 110 homes.
- Site 4: Land North of Whitehill Lane, RWB: 150 homes.
- Sites 5, 6 and 7: South RWB: At least 2,000 homes.

4.14. With regard to the site boundaries, TOF notes the following:

- (i) Site 3 (i.e. Land West of Maple Drive, RWB): The boundaries are the same as the site being promoted by TOF.
- (ii) Site 4 (i.e. Land North of Whitehill Lane, RWB): The boundaries are the same as the site being promoted by TOF. Please refer to the Site Location Plan in Appendix 1. [RWB56]
- (iii) Site 5 (i.e. Land at South RWB): The site area is a little smaller than the area being promoted by TOF. Please refer to the Site Location Plan in Appendix 1. [RWB56]
- (iv) Site 6 (i.e. Land at South RWB): The site area differs from the area of land being promoted by TOF. The land being promoted by TOF follows the land ownership boundary rather than being 'squared off' along the southern edge. The site boundary being proposed by TOF also excludes a triangular area opposite the sewage treatment works and is retained as agricultural land. Please refer to the Site Location Plan in Appendix 1. [RWB56]
- (v) Site 7 (i.e. Land at South RWB): The site area being proposed by TOF in this locality, as part of its South RWB proposals, is larger in scale than is shown by the Council. Please refer to the Site Location Plan in Appendix 1. TOF also wishes to note that additional land should be included as part of the sites which form part of its South RWB proposed allocation. This additional land is a narrow tranche of land which is situated between Sites 5 and 6 and will form part of the corridor of land which will accommodate the proposed southern bypass for the town.

**WB4. What land do you think is the most appropriate upon which to build?**

4.16. We consider that Sites 3, 4, 5, 6 and 7 are the most appropriate sites upon which to build at RWB. The development of these sites would involve the development of the three sites being promoted by TOF (i.e. Land West of Maple Drive, Land North of Wh

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

4.29. Please refer to our answers to Questions WB1-WB4 which identify TOF's proposals for the three sites which it is promoting for allocation in the Local Plan Review. These responses identify the relevant social, economic and environmental issues which relate to Sites 3, 4, 5, 6 and 7.

**WB6. Are there any issues or infrastructure requirements that should be identified?**

4.30. In response to the contents of the table provided under Question WB6, we note the following:  
(i) Education: We have discussed education provision with the Council in relation to the proposed development at South RWB. It has been confirmed that a 2.

**Further comments**

4.33. On the basis of the responses to the questions set in the Planning for RWB consultation document, we request that the scale of growth is increased. The residual housing requirement should be raised from 990 dwellings to a minimum of approximately 2,260 dwellings for the period 2018 to 2040. In doing so, both non-strategic and strategic allocations should be made, including the three sites being promoted by TOF.

4.34. The brownfield target should also be removed and replaced with a policy requirement which promotes the effective use of land, whilst promoting place shaping principles which allocate greenfield sites which can deliver development that improves the sustainability of towns like RWB and makes them more attractive places to live, work and socialise.

4.35. The pool of sites which has been identified by the Council should also include land which is being promoted by TOF at RWB. As stated in this consultation response, we consider that land at South RWB, West of Maple Drive and North of Whitehill Lane are appropriate locations for strategic and non-strategic scale development in RWB. The delivery of development on this site will not only deliver housing to meet local needs but its development will also deliver opportunities to facilitate much needed improvements to infrastructure. Development in this location is also considered to be acceptable in landscape and visual terms, in relation to heritage assets and in terms of delivering sustainable development.

<b>Rep ID:</b> RWB57	
<b>Consultee code:</b> Parish/Town Council	<b>Consultee Organisation (if applicable):</b> Royal Wootton Bassett Town Council
<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> RWB57
<b>WB1. What do you think to the scale of growth? Should there be a brownfield target?</b>	
<p>3.2 The Town Council supports the need to deliver new homes through both the Local Plan and neighbourhood plan, as appropriate, in order to meet local housing needs. However, the Town Council believes that the Local Plan should not just focus on delivery of strategic and large or complex sites but should ensure that it also allocates sufficient small- and medium-sized sites, in accordance with paragraph 68 of the NPPF.</p> <p>3.3 As stated in our response to the 'Emerging Spatial Strategy' outlined in section 2 above, the Town Council objects to the identification of a brownfield target. The identification of a brownfield target is not in accordance with the NPPF, which requires neighbourhood areas to be given a 'housing requirement' figure. This target is also based on historic windfall delivery and it may not be possible to allocate sufficient deliverable brownfield sites to meet this need at the present time.</p> <p>3.4 In addition, the residual housing requirement figure for Royal Wootton Bassett should be updated to the latest figure at the time the Regulation 19 version of the Local Plan is published (likely to be 1st April 2021) to ensure that the requirement figure takes account of any recent completions or commitments.</p>	

3.5 The Town Council notes that Paragraph 13 of the 'Planning for Royal Wootton Bassett' document states:  
"Royal Wootton Bassett Town Council would support higher level of growth than what is proposed, provided this enables delivery of capacity improvements to transport, education and health infrastructure, ideally by way of a strategic development. However, amongst other issues, fundamental concerns remain regarding the capacity of M4 Junction 16. Due to the complexities linked with higher growth such strategic development would have to be steered by the Local Plan".

3.6 The Town Council will only support a higher level of growth where it can be assured that the infrastructure improvements needed to support this level of growth are delivered as part of the proposed development.

3.7 The Town Council welcomes the statement in Paragraph 14 of the document that Wiltshire Council will seek to align the Local Plan with the Neighbourhood Plan vision. The Neighbourhood Plan may choose to allocate sites for development, but this has not yet been decided. The Town Council would welcome further engagement with Wiltshire Council on this matter.

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

3.8 The Town Council broadly supports the draft priorities for Royal Wootton Bassett identified by Wiltshire Council, including the need to address climate change and achieve carbon reduction. In addition to those priorities listed, the Town Council would also like to add the following additional priorities which emerged from the recent initial public consultation on the Neighbourhood Plan Review:

- Infrastructure improvements to reduce congestion in the town centre, including investigating the feasibility of a bypass to the south of the town
- Retain and enhance green spaces within the town, including provision of a new town park (to the north west of the town incorporating the Row-de-Dow footpath) and country park (around Brynards Hill to the south of the town)
- Provision of additional cycle links, including along the restored canal route

3.9 In respect of draft Priority (i) the Town Council requests that this is reworded as follows to ensure that Royal Wootton Bassett continues to remain physically distinct from Swindon and to prevent the settlements from merging in the future:

"Protecting the distinct character and identity of the town, recognising its proximity to Swindon whilst retaining its physical separation"

**WB3. Is this the right pool of potential development sites?**



3.10 As noted above, in identifying sites to allocate within the Local Plan, the Council should ensure it does not allocate more land than is required to meet the identified housing need in Royal Wootton Bassett.

3.11 Any development that is allocated within the Local Plan should include a requirement to deliver all necessary infrastructure needed to support that development, including highways, education, health, leisure, and open space provision. Any allocations should also not have any adverse impacts on designated environmental sites or heritage assets.

3.12 The Town Council welcomes the opportunity to allocate sites within the Neighbourhood Plan, which is currently being reviewed. At present, the Town Council has not made any firm decision on whether the revised Neighbourhood Plan will include any site allocations. The Town Council would welcome further engagement with Wiltshire Council on this matter. It may be that a number of the potential development sites identified for the Local Plan may be suitable for inclusion as site allocations within the Neighbourhood Plan.

3.13 With respect to the 'pool of sites' identified within the 'Planning for Royal Wootton Bassett' document, the Town Council:

- Does not support the allocation of Site 1 (Land at Marsh Farm) due to site specific concerns and this is not the preferred strategic direction of growth for the town due to the potential for narrowing the gap between Swindon and Royal Wootton Bassett;
- Does not support the allocation of Site 2 (Land at Midge Farm) due to site specific concerns and this is not the preferred strategic direction of growth for the town due to the potential for narrowing the gap between Swindon and Royal Wootton Bassett;
- In principle supports the allocation of Site 3 (Land at Maple Drive) subject to ensuring there is no encroachment on the lake/nature reserve sites to north of site;
- Does not support the allocation of Site 4 (Land at Whitehill Lane) due to concerns regarding highways safety impacts (given the close proximity to an existing junior school) and development of this site would result in an unacceptable encroachment into the surrounding countryside;
- Would in principle support the allocation of Site 5 (Land South of Wootton Bassett) in preference to Site 7 (Land South of Wootton Bassett A & B) if a large scale strategic allocation at the town is required. However, this would need to be supported by evidence of housing need for a development of this scale and would need to be subject to comprehensive design and infrastructure improvements (including bypass) being delivered;
- In principle supports the allocation of Site 6 (Land South of Templar's Way) for employment use;
- Does not support the allocation of Site 7 (Land South of Wootton Bassett A & B), as Site 5 (Land South of Wootton Bassett) would be the preferred location for a large scale strategic development;
- Does not support the allocation of Site 8 (Land at Woodshaw) due to site specific concerns and this is not the preferred strategic direction of growth for the town due to the potential for narrowing the gap between Swindon and Royal Wootton Bassett.

**WB4. What land do you think is the most appropriate upon which to build?**

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

**WB6. Are there any issues or infrastructure requirements that should be identified?**

3.14 The Town Council broadly supports the infrastructure requirements identified by Wiltshire Council. Based on priorities that are emerging from the ongoing Neighbourhood Plan Review, the following items should also be added to the list of infrastrucur

**Further comments**

<b>Rep ID:</b> RWB58	
<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>WB1. What do you think to the scale of growth? Should there be a brownfield target?</b>	
<b>WB2. Are these the right priorities? What priorities may be missing? How might these place shaping priorities be achieved?</b>	
<b>WB3. Is this the right pool of potential development sites?</b>	
Planning for Royal Wootton Bassett	

Site 7 (SHELAA reference incomprehensible possible 498) Contains Wootton Bassett Mud Springs SSSI designated for its fluvial geomorphology. Further consideration/assessment for this designation is required before allocating in the local plan.

**WB4. What land do you think is the most appropriate upon which to build?**

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

**WB6. Are there any issues or infrastructure requirements that should be identified?**

**Further comments**

During the site appraisal stage and before selecting which sites to take forward as allocations in the plan, the following may be useful to ensure opportunities for biodiversity net gain are secured:

- Does the site present significant risks to biodiversity? If so, have alternative sites with lesser impacts been explored?
  - What site specific recommendations can help delivery biodiversity net gain, for example what further survey work may be required at the planning application stage?
  - Whether the site can accommodate on-site biodiversity net gain provision or whether there is a need for off-site contributions?
- What types of habitat creation or enhancement are most Page 9 of 16 appropriate?
- Does there need to be any restrictions on the type of development that will be acceptable or particular parts of the site that should be not be developed?

During the site selection process, potential sites should be judged in accordance with all policies in the NPPF, including selecting land with the least environmental value, where consistent with other policies. The Biodiversity Metric can be useful during this process to understand the opportunities on a site, test indicative biodiversity net gains and to ensure sites of high biodiversity value are not selected.

Natural England encourages developers, promoting sites for inclusion in the plan to use its Discretionary Advice Service, to discuss opportunities for biodiversity net gains on individual sites. This helps to ensure evidence is provided and appropriate ways to deliver biodiversity net gain can be included in site allocations if they progress. This can also help speed up the planning application stage. Further details on Natural England's Discretionary Advice Service is provided here. All development allocations, including those within settlements, should carefully consider impacts on the landscape and scenic beauty of the Protected Landscape (PL), including cumulative impacts and impacts on the settings of PL to ensure the highest status of protection is given to the PL, in line with NPPF para 172. We request that a Landscape and Visual Impact Assessment (LVIA) is carried out for allocations, particularly those outside of existing settlement boundaries, to assess the impacts on the character of the landscape and the visual impacts. Whilst such a LVIA would not be as detailed as one for a planning application, sufficient information e.g. on visual baseline, number of dwellings and key viewpoints are required to inform our advice. Allocations within the existing built up area may also benefit from a LVIA e.g. where extensive green spaces contribute to the character of the settlement, particularly when viewed from high points in an AONB and such views are recognised as one of the special qualities of the PL.

All development within PLs or their settings should:

- respect and enhance local landscape character;
- be of the highest design quality;
- include appropriate green infrastructure;
- incorporate appropriate enhancement measures e.g. landscape enhancement or access improvements, in line with the relevant NP/AONB Management Plan or local landscape character assessment. Biodiversity net gain should also be delivered (in line with a local plan policy/other local strategy).

<b>Rep ID:</b> RWB59	
<b>Consultee code:</b> Developer/Agent	<b>Consultee Organisation (if applicable):</b> Gleeson Strategic Land Ltd
<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> RWB59
<b>WB1. What do you think to the scale of growth? Should there be a brownfield target?</b>	
<p>Royal Wootton Bassett is an established and popular market town which is attractive both as a place to live and as a location for employment. The emerging spatial strategy and the Assessment of the Alternative Development Strategies recognise that growth at Royal Wootton Bassett is the clear preferred alternative. As such, the council should consider the potential for more growth than proposed, if it could help to deliver infrastructure improvements where needs have been identified such as medical or educational facilities. Appropriate growth would also help to improve affordability ratios and ensure sufficient market and affordable housing is being delivered for future generations, particularly young people that wish to stay in the Town. Given the nature of the Town, it would not be appropriate to set a brownfield target as there is no clear evidence that any reliance can be placed on delivery from this source.</p>	
<b>WB2. Are these the right priorities? What priorities may be missing? How might these place shaping priorities be</b>	

**achieved?**

Maintaining the vitality and viability of the town centre should be acknowledged as it plays an important role in supporting the town, local residents and employers. Allowing sustainable and proportionate growth of Royal Wootton Bassett will help to support the local economy which is likely to be more important in a post Covid world.

**WB3. Is this the right pool of potential development sites?**

This is the right pool of development sites with the addition of land to the east of Site 2 Land at Midge Farm (SHELAA Ref: 3366). Gleeson Strategic Land is promoting 'Land to the North of Swindon Road' (see red line plan attached) [attachment RWB59] which is the field adjacent to Site 3366 to the east. Indeed, the western half of this site is included within Site 3366 and it is therefore sensible to include all of it in the assessment of Site 2 as a development option and could deliver circa 135 new homes. The inclusion of this site would logically complete the frontage along Swindon Road from the roundabout junction with the B4042 up to the Churchill PH. It would be appreciated if the council could note this amendment to Site 2 and redraw the boundary.

**WB4. What land do you think is the most appropriate upon which to build?**

Site 2, with the addition of all of the field adjacent to the east, is the most logical and sustainable location for growth. This is the most readily accessible of the growth options, set on a principal transport route (A3102) with direct links to the M4

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

**WB6. Are there any issues or infrastructure requirements that should be identified?**

**Further comments**



<b>Rep ID:</b> RWB60	
<b>Consultee code:</b> Statutory Body	<b>Consultee Organisation (if applicable):</b> Environment Agency
<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> RWB60
<b>WB1. What do you think to the scale of growth? Should there be a brownfield target?</b>	
<b>WB2. Are these the right priorities? What priorities may be missing? How might these place shaping priorities be achieved?</b>	
<b>WB3. Is this the right pool of potential development sites?</b>	

**WB4. What land do you think is the most appropriate upon which to build?**

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

**WB6. Are there any issues or infrastructure requirements that should be identified?**

**Further comments**

Melksham & Royal Wootton Bassett

In Melksham and Royal Wootton Bassett the policy states 'areas to be safeguarded for the restoration of the Wilts & Berks Canal' - it would be more accurate to say 'potential restoration' at this stage, as no planning permission has been granted for these projects yet.

<b>Rep ID:</b> RWB61	
<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> RWB61
<b>WB1. What do you think to the scale of growth? Should there be a brownfield target?</b>	
<p>The form and character of the town, within its wider landscape setting, and the availability of suitable 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) ensuring a good fit with the townscape.</p>	
<b>WB2. Are these the right priorities? What priorities may be missing? How might these place shaping priorities be achieved?</b>	

Historic England welcome inclusion of the following priorities: protecting the distinct character and identity of the town; safeguarding the historic alignment of the Wilts and Berks Canal and taking forward canal restoration; conserving and enhancing environmental assets around Royal Wootton Bassett; maintaining the town's elevated historical setting and central conservation area. Have these priorities been informed by a particular study of the town? A Conservation Area Appraisal and Management Plan and or Heritage Topic Paper could certainly demonstrate how the towns 'priorities' have been identified 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).

**WB3. Is this the right pool of potential development sites?**

The Council should consider whether a setting assessment would help inform the promotion of suitable development sites. 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 respectfully 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.

**WB4. What land do you think is the most appropriate upon which to build?**

An understanding of the history, character, identity, appearance and landscape setting of the city should inform the level of growth and site suitability in accordance with national policy. Historic England's published advice on site allocations may be us

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

A strategic understanding of the history, character and landscape setting should inform the spatial distribution, capacity and specific allocations proposed. To do so a heritage topic paper is suggested; a strategic landscape setting assessment and Conservation Area Appraisal to inform brownfield capacity and place shaping opportunities. Any further site assessment should be independent and robust, undertaken or commissioned by the local planning authority rather than relying solely on evidence provided by the promoter of a site.

**WB6. Are there any issues or infrastructure requirements that should be identified?**

We note that the historic environment/heritage assets is considered an important component part of Wiltshire's infrastructure; described in your Settlement Profile as Green & Blue Infrastructure. A heritage topic paper could establish whether there are an

**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. Royal Wootton Bassett doesn't appear to have a Conservation Area Appraisal and Management Plan but perhaps more importantly is the absence of a setting assessment to inform considerable proposed edge of town expansion.

<b>Rep ID:</b> RWB62	
<b>Consultee code:</b> Statutory Body	<b>Consultee Organisation (if applicable):</b> Highways 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> RWB62
<b>WB1. What do you think to the scale of growth? Should there be a brownfield target?</b>	
<b>WB2. Are these the right priorities? What priorities may be missing? How might these place shaping priorities be achieved?</b>	
<b>WB3. Is this the right pool of potential development sites?</b>	

**WB4. What land do you think is the most appropriate upon which to build?**

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

For the Swindon Housing Area, a potentially significant level of development at Royal Wootton Bassett has been proposed. The Emerging Spatial Strategy notes that there are potentially significant obstacles to overcome if growth is to be successfully delivered at Royal Wootton Bassett, notably managing the traffic that new homes will generate both within the town and at M4 junction 16. The Royal Wootton Bassett Market Town document notes the potential impacts at M4 J16 and the issue of noise at two of the proposed development sites which abut the M4. The Transport Review report makes little reference to Royal Wootton Bassett and any impacts of this development. We would welcome information on what the transport challenges are likely to be and how it is proposed that these will be mitigated.

**WB6. Are there any issues or infrastructure requirements that should be identified?**

**Further comments**

<b>Rep ID:</b> RWB63	
<b>Consultee code:</b> Other	<b>Consultee Organisation (if applicable):</b> Railfuture
<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> RWB63
<b>WB1. What do you think to the scale of growth? Should there be a brownfield target?</b>	
<b>WB2. Are these the right priorities? What priorities may be missing? How might these place shaping priorities be achieved?</b>	
<b>WB3. Is this the right pool of potential development sites?</b>	



**WB4. What land do you think is the most appropriate upon which to build?**

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

Planning for Royal Wootton Bassett

Whilst we support the need for a railway station, we would query the stated cost of £ 30m to £ 50m. This amount would be way above anything being quoted elsewhere for new stations at towns of comparable size and would suggest that a massive Parkway station with platforms on both the Bristol and South Wales lines is being contemplated.

By way of comparison, Worcestershire Parkway station, which opened in 2020 with three platforms on two different levels, a 500-space car park and a large covered booking hall, was estimated in 2016 to cost £ 22m.

We would suggest that a two-platform station with adequate access, signage and weather protection would be more appropriate for Royal Wootton Bassett, although additional signalling may be required. A Bristol- Oxford service would not require platforms on the South Wales line.

**WB6. Are there any issues or infrastructure requirements that should be identified?**

**Further comments**

<b>Rep ID:</b> RWB64	
<b>Consultee code:</b> Other	<b>Consultee Organisation (if applicable):</b> Wiltshire Ramblers
<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> RWB64a, 64b
<b>WB1. What do you think to the scale of growth? Should there be a brownfield target?</b>	
<b>WB2. Are these the right priorities? What priorities may be missing? How might these place shaping priorities be achieved?</b>	
<b>WB3. Is this the right pool of potential development sites?</b>	
Planning for Royal Wootton Bassett	

Site 3 – Maple Drive. With the exception of the square field immediately north of the school playing fields (SHELAA 3160), on which development may be acceptable, we object to the inclusion of this site. It is unsuitable for development by reason of its proximity to Jubilee Lake and the surrounding woodland. Footpath WBAS108, which runs down the western boundary and gives excellent views to the west from its elevated position, has a strong rural feel and one section is notable for its variety of wild flowers in summer.

Site 4 – Whitehill Lane. No objection provided the northern part of the site is reserved for a town park as set out in the Royal Wootton Bassett Neighbourhood Plan.

Sites 5 & 7 – South of RWB. We object to the inclusion of these two sites. The Wilts & Berks Canal when fully restored should continue to run through the countryside as it always did and should not become an urban waterway. The inclusion in Site 5 of land west of Breach Lane, which is at a higher level, would also have an adverse impact on the countryside.

Another important consideration is that, to be sustainable, any housing development south of the railway would need additional pedestrian and cycle routes to be created across the line. The electrification of the line has made the construction of new bridges more difficult. As an example of this we understand that Network Rail wish to close the surface crossing on footpath WBAS28 and have said that the gantries prevent a footbridge being put in here. We believe there is a strong case for treating the railway line as the southern boundary of the town's development area, with the exception of sites immediately adjoining Marlborough Road.

We have no objection to the remaining sites.

**WB4. What land do you think is the most appropriate upon which to build?**

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

**WB6. Are there any issues or infrastructure requirements that should be identified?**

<b>Further comments</b>

<b>Rep ID:</b> RWB65	
<b>Consultee code:</b> Developer/Agent	<b>Consultee Organisation (if applicable):</b> Pegasus group
<b>Is this response on behalf of someone else/another organisation?</b> Yes	
<b>Organisation being represented (if applicable):</b> Wainhomes (Severn Valley)	
<b>Does this representation refer to attachment(s):</b> yes	<b>If this representation refers to attachment(s), these are listed below:</b> RWB65
<b>WB1. What do you think to the scale of growth? Should there be a brownfield target?</b>	
<p>Scale of Growth</p> <p>5.1 We are supportive of the identified level of growth identified, even if we have expressed reservations over how it has been calculated above.</p> <p>5.2 Our support is based on the fact that there is a recognition that lower scales of development would not deliver the jobs, infrastructure or services needed to boost the self-containment of the town. This is especially important given that it essentially has a dormitory role to Swindon, with relatively high levels of out-commuting.</p> <p>5.3 In general terms, the failure to reverse the growing wave of out-commuting under the Core Strategy is indicative of an area that has fallen behind its neighbours in development and economic development terms. Our analysis demonstrates that the area has not been able to provide attractive enough business and employment locations to compete with those at its boundaries such as Bath, Swindon, Bristol and Andover. With the exception of Salisbury, its towns have not been developed to a sufficient</p>	

scale to attract significant businesses and inward investment, despite individual visions for the market towns to achieve precisely this, being set out many years ago for the current WCS.

5.4 The HMA topic paper for Swindon expresses confusion around the failure to deliver additional employment land at Royal Wootton Bassett which, for all intents and purposes, should be an excellent location for such development given its proximity to Junction 16 of the M5. It is no surprise therefore to find a lack of demand for employment land, as noted in April 2019 Cabinet Paper. This should not be interpreted as an indication that these towns are inappropriate development locations. Indeed, the WCS is clear in recognising that the county's Market Towns have "potential for significant development that will increase the jobs and homes in each town in order to help sustain... services and facilities and promote better levels of self-containment and viable sustainable communities."

5.5 If the stated Visions for Wiltshire's towns are to be realised, it must be accepted that sustainable development, that grows the working-age population and creates the commercial scale necessary for business investment and employment is critical. 5 Wiltshire Core Strategy Policy 1 As is the identification of employment land to provide local employment, accepting that said commercial scale will need to be achieved before demand for employment space materialises. This would support significant growth at Royal Wootton Bassett and is why we are generally supportive of the ambition to deliver a higher quantum of development here.

5.6 We have already made general comments above on the proposed 'Brownfield Targets' element of the plan. For Royal Wootton Bassett (RWB), we have no specific comment on the target that has been identified, other than it is unnecessary. Whilst we are fundamentally supportive of maximising potential delivery on brownfield sites for sustainability reasons, it is imperative that the plan ensures a sufficient quantum and mix of housing is delivered to meet the development needs of the district and its settlements. There is a risk that an overly optimistic approach to brownfield development could limit the amount of available land for development which, in turn, could affect housing delivery. A simple, conservative windfall allowance should be made for RWB which takes into account the scope to formally allocate large scale brownfield sites. Potential Development Sites

5.7 We note the sites that have been identified for further assessment and note that part of Wainhomes' site has been included for consideration. However, the western part of the site has been omitted on the grounds that Flood Risk constraints would preclude residential development in this area.

5.8 It is important to note that the EA has already acknowledged the Flood Risk Map for Planning is not accurate.<sup>6</sup> This was acknowledged as part of a planning application for the erection of additional employment buildings on the Interface Business Park (see planning application 18/06186/FUL). However, the applicant's revised map was not accepted by the EA at that time.

5.9 Further to this work, Wainhomes have commissioned a detailed modelling assessment to support a formal flood map challenge. A report has been submitted to the EA via a pre-app enquiry in the interests of obtaining confirmation that the western

part of Wainhomes' site is not severely affected by Flood Risk constraints. 6 See EA response dated 08/10/2018 to Planning Application 18/06186/FUL.

5.10 The report has confirmed that the majority of the site actually lies within Flood Zone 1, with a small area around the southern/western corner lying within Flood Zones 2/3. The intention is to submit a formal challenge to have the Flood Map amended in this location; however, this process takes time and is unlikely to have concluded until later this year, by which time decisions will have been taken in respect of likely locations for growth at Royal Wootton Bassett.

5.11 Given that our analysis has shown that there is an extremely good prospect of a Flood Map challenge being successful in this location, it would be premature to discount this part of the site from consideration for development at this stage, given that it is shown to be suitable for residential development and is a logical option for further growth.

5.12 We discuss why the site should be considered as a preferred option for development in the Local Plan Review in the chapter below.

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

**WB3. Is this the right pool of potential development sites?**

**WB4. What land do you think is the most appropriate upon which to build?**

LAND TO THE EAST OF EVENING STAR, ROYAL WOOTTON BASSETT

6.1 As set out above, Wainhomes control 24ha of land to the east of Evening Star on the eastern edge of Royal Wootton Bassett and are promoting it for a residential led, mixed-use development in the

**WB5. Are there important social, economic or environmental factors you think we've missed that need to be considered**

**generally or in respect of individual sites?**

**WB6. Are there any issues or infrastructure requirements that should be identified?**

**Further comments**



**Rep ID:** RWB66

**Consultee code:** Statutory Body

**Consultee Organisation (if applicable):** Savills

**Is this response on behalf of someone else/another organisation?** Yes

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

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

**If this representation refers to attachment(s), these are listed below:**  
RWB66

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

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

**WB3. Is this the right pool of potential development sites?**

**WB4. What land do you think is the most appropriate upon which to build?**

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

**WB6. Are there any issues or infrastructure requirements that should be identified?**

**Further comments**

Waste Comments

The wastewater network capacity in this area may be unable to support the demand anticipated from this development. Local upgrades to the existing drainage infrastructure may be required to ensure sufficient capacity is brought forward ahead of the development. Where there is a potential wastewater network capacity constraint, the developer should liaise with Thames Water to determine whether a detailed drainage strategy informing what infrastructure is required, where, when and how it will be delivered is required. The detailed drainage strategy should be submitted with the planning application.

Water Comments

The scale of development/s in this catchment is likely to require upgrades of the water supply network infrastructure. It is recommended that the Developer and the Local Planning Authority liaise with Thames Water at the earliest opportunity to agree a housing phasing plan. Failure to liaise with Thames Water will increase the risk of planning conditions being sought at the application stage to control the phasing of development in order to ensure that any necessary infrastructure upgrades are delivered ahead of the occupation of development. The housing phasing plan should determine what phasing may be required to

ensure development does not outpace delivery of essential network upgrades to accommodate future development/s in this catchment. The developer can request information on network infrastructure by visiting the Thames Water website <https://developers.thameswater.co.uk/Developing-a-large-site/Planning-your-development>

<b>Rep ID:</b> RWB67	
<b>Consultee code:</b> Developer/Agent	<b>Consultee Organisation (if applicable):</b> Lichfields
<b>Is this response on behalf of someone else/another organisation?</b> Yes	
<b>Organisation being represented (if applicable):</b> L&Q Estates	
<b>Does this representation refer to attachment(s):</b> yes	<b>If this representation refers to attachment(s), these are listed below:</b> RWB67
<b>WB1. What do you think to the scale of growth? Should there be a brownfield target?</b>	
<p>As stated in our representations to the Emerging Strategy document, the scale of growth within Royal Wootton Bassett is broadly supported, as is the brownfield target.</p> <p>2.1 However, it is noted that Royal Wootton Bassett is one of the few towns within Wiltshire to have already met its Core Strategy growth target and has thus proven that it is a buoyant housing market and a desirable place to live particularly given the excellent sustainable transport links to Swindon and other main towns. It is clearly a sustainable location for greater growth.</p> <p>2.2 As such, it is considered that there is scope to boost the housing requirement within the town and importantly, this would also be supported by the Royal Wootton Bassett Town Council provided the development is strategic enough in nature to deliver the infrastructure improvements needed by the town. 2.3 These representations therefore demonstrate how land within L&amp;Q Estates' control to the north of the town can be brought forward for residential-led mixed use development, aligning with the aspirations of both the Town Council and Wiltshire Council. Further, as clearly demonstrated in Table 3.2 below, when ranking L&amp;Q's site against the alternatives, it is clearly the most sustainable and suitable option for development within the town.</p>	

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

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

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

2.5 Royal Wootton Bassett is a distinct settlement with an identifiable and distinct character which should be respected as far as possible through additional development. As demonstrated in Appendix 1 of this report [RWB67], few development sites are capable of truly respecting the hilltop nature of the town. However, at L&Q's site, as demonstrated in the promotional document at Appendix 2 [RWB67], the built form will be positioned on the higher area of the site, contiguous with the existing settlement, with new areas of woodland to be planted within green open space located on the gently sloping hillside to the north-east, and the original historic character of a 'hilltop settlement within the woods' being reinstated.

2.6 It is further considered that coalescence with Swindon should be avoided and this is a key concern of the local community.

L&Q's site would not contribute to coalescence with Swindon as development would not extend any further east than the existing settlement. It would also provide a large buffer of parkland to the north maintaining significant separation to the M4 and Hook.

2.7 Royal Wootton Bassett has an important functional relationship with Swindon given its proximity and this opportunity needs to be fully embraced through the spatial strategy. There is a real opportunity to provide excellent connectivity through cycling to the southern employment areas of Swindon (e.g. Windmill Business Park). In addition, the 55 bus service already provides half hourly services to Swindon and Chippenham, with potential to improve bus services further between the towns.

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

2.8 It is understood that traffic modelling is being undertaken to understand the capacity of Junction 16 and the requirement for future mitigation. If mitigation is required which would be funded in part through developer contributions, it will be important that site allocations are of a scale and critical mass capable of making such a contribution.

2.9 It should be noted that any site in Royal Wootton Bassett will generate a degree of residual traffic impact at Junction 16 and none offer alternative road routes that avoid this. As such, no location for development within the town will be superior in terms of impact on Junction 16.

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

2.10 The consultation documents raise concern regarding congestion within the town and the potential for new development to worsen this situation. As set out in Appendices 1 and 3 [RWB67], in terms of the assignment of traffic from site locations, those

sites located to the north of Royal Wootton Bassett would put the least proportion of traffic through the town centre and sites located to the south and west will put the most strain on the town centre.

2.11 Sites to the south of the town in particular have to contend with both the physical barrier of the railway where there are several 'pinch points' restricting flow as well as capacity of the High Street to accommodate a significant increase in flows.

Accommodating additional growth in this location will have significant traffic implications for the whole town.

2.12 Conversely, sites located to the north of the town provide the greatest opportunity for sustainable travel. L&Q's site is within easy walking distance of a number of services and facilities including education, health, retail, employment, leisure, bus services, the town centre and the Sustrans strategic cycle route providing access to Windmill Hill Business Park and wider Swindon.

Priority iv - Safeguarding land for a Swindon parkway station

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

2.14 While the ambition for increased self-sufficiency is supported, it must be recognised that the pull of Swindon is significant and therefore the focus should be on improving sustainable and active travel routes between the two settlements, with development in the north of the town best placed to facilitate this. The strategy will therefore need to provide an appropriate balance of employment growth at RWB (informed by what the market can sustain and deliver) and how the strategic opportunities at Swindon can be accessed to best effect from sustainably located development.

2.15 In addition, the impact of Covid-19 requires further consideration in terms of its likely legacy regarding working patterns. A Study by the Chartered Institute of Personnel and Development (CIPD) in September 2020 found that the relative success of homeworking overall points to more working from home in future, with 70% of employers saying they will expand or introduce working at home on a regular basis compared with 45% before the crisis. The survey found that, on average, employers estimated that before lockdown started, about 18% of their staff worked from home regularly (at least once a week) and 9% worked from home all the time. Looking ahead beyond the crisis they expect these numbers to double to 36% and 18%, respectively. 2.16 Increased numbers of people working from home may also change the nature of office requirements, with employers looking for smaller, more flexible workspaces closer to where people live.

2.17 In response to this, as demonstrated in the promotional document (Appendix 2 [RWB67]), L&Q's site is capable of delivering employment uses as part of a residential led mixed use development, with potential for a local hub area to include a new community/co-working centre to provide more modern, responsive and flexible working options.

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

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

2.19 L&Q's site proposes a mix of uses, including community uses which could include for a health centre if required.

Contributions could also be provided to education and cemetery provision as part of a strategic development. Priority viii - Safeguarding the historic alignment of the Wilts and Berks Canal and taking forward canal restoration

2.20 No comments on this priority. L&Q's site is located some distance from the canal and will not impact it. Priority ix - Conserving and enhancing environmental assets around Royal Wootton Bassett

2.21 The submitted promotional document (Appendix 2 [RWB67]) demonstrates the ability to provide an attractive landscape-led scheme at L&Q's site, including significant areas of green and blue infrastructure.

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

2.22 As demonstrated in Appendix 1 of this report [RWB67], few development sites are capable of truly respecting the hilltop nature of the location. However, at L&Q's site, the built form will be positioned on the higher area of the site, contiguous with the existing settlement, with new areas of woodland planted within green open space located on the gently sloping hillside to the north-east, and the original historic character of a 'hilltop settlement within the woods' being reinstated. Further details are provided in the promotional document at Appendix 2 [RWB67].

2.23 Conversely, other potential strategic sites particularly to the east of the town, are located on the lower land, which if developed would reduce the perception of the town's elevated setting and this 'priority' in the future planning of the town requires significant consideration into the next stage of the plan preparation. The Council has not completed a full assessment of how potential site options respond to this priority at the current time and this should be undertaken.

### **WB3. Is this the right pool of potential development sites?**

L&Q Estates broadly support the pool of potential development sites selected and welcome the inclusion of site 3366 / Site 2.

2.25 However, as considered further in representations to the Site Selection Report below, the boundary of Site 3366 / Site 2 is incorrect insofar as it relates to L&Q's land interest and requires amendment. Site 3366 'Land adjoining Midge Hall Farm', is included in the 2017 Strategic Housing and Employment Land Availability Assessment (SHELAA) and has thus been assessed

within the Royal Wootton Bassett Site Selection Report (RWBSSR). However, it is not clear how the boundary of this site was identified given that it incorporates several different ownerships and appears arbitrary and illogical.

2.26 L&Q Estates control circa 24.3ha of this 51.2ha site, with a red line plan provided in the promotional document at Appendix 2 [RWB67]. The remainder of the site falls within at least another two different ownerships, although the boundary of 3366 does not appear to logically follow these ownerships.

2.27 The main concern relating to the boundary is that it includes land which is more constrained and therefore due to the scoring system being applied by the Council, is artificially suppressing the suitability of L&Q's site for development. For example, L&Q's site does not abut the M4, does not wrap around a listed building, does not bring development closer to any other settlement and is wholly located within Flood Zone 1. As such, impacts relating to noise, landscape, coalescence, heritage and flood risk are all significantly overstated.

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

2.29 We have undertaken the SA assessment for the land under the control of L&Q when considered in isolation and it performs well against all the criterion. Further detail is provided below and the promotional document (Appendix 2 [RWB67]).

#### **WB4. What land do you think is the most appropriate upon which to build?**

L&Q Estates considers that the site area provided at Appendix 2 is the most appropriate site in Royal Wootton Bassett on which to build. This site represents circa 50% of the site area of Site 2.

2.31 The merits of the site are discussed further below a

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

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



Concern is also raised over the high level nature of the site sifting process, with limited account taken of the technical evidence available. L&Q's site has been subject to pre-application feedback previously and the Council has access to significant amounts of technical information relating to the site but does not appear to have utilised this information to better inform the assessment process.

2.40 To assist the Council, a more thorough assessment of the site has been undertaken as part of our comments to the Site Selection Report below which demonstrates that of all the sites in Royal Wootton Bassett, L&Q's site scores the highest. In addition, further information is provided within the submitted promotional document (Appendix 2) [RWB67], which summarises all the technical assessment work undertaken to date demonstrating that the site is technically unconstrained.

2.41 It is requested that the promotional document is read in conjunction with these representations and L&Q's site (as per the site boundary provided) be fully considered by the Council in the next stage of the site sifting process utilising the detailed evidence and information which has been provided in the representations. We would also be happy to elaborate on any aspect of the site's deliverability if required.

**WB6. Are there any issues or infrastructure requirements that should be identified?**

**Further comments**

Royal Wootton Bassett Site Selection Report

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

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

3.3 The most recent published SHELAA on the Council's website is dated 2017. However, it is understood that it is a living process, with all residential submissions assessed on receipt. 3.4 Site 3366 'Land adjoining Midge Hall Farm', is included in the 2017 SHELAA and has thus been assessed within the RWBSSR. However, it is not clear how the boundary of this site was identified given that it incorporates several different ownerships and appears arbitrary and illogical.

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

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

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

3.8 In terms of the merits of L&Q's site when considered in isolation, this is discussed further below. Stage 2 – Reassessing Site 3366 (L&Q land ownership only)

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

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

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

3.12 To assist the Council, a revised assessment for L&Q's site only is provided below. [see RWB67 for table]

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

1 Landscape: considered impact on the AONB to be unlikely. Considered development to the north and east of the site should be limited and opportunities for woodland planting, recreation and mitigated light spill should be embraced if the site is pursued in order to mitigate visual impact. Perceived coalescence of RWB, Hook and Swindon would require thorough exploration in any planning submission.

2 Highways: Neutral response. Stated that the TA will require strategic transport modelling and this should incorporate Wiltshire's West Wilts Strategic Transport Model. Council advised that due to the impact at J16, that a microsimulation model will be required by Highways England. Noted that Royal Wootton Bassett is subject to congestion, particularly along the A3102 towards J16 and through the town and requires assessment, a matter of relevance for any development site in the town.

3 Accessibility: Site located close to S5 bus service route, is close to existing shared paths for active travel, would need to connect into proposed RWB/Swindon cycle route, 3no. existing PROW across site should be retained/enhanced.

4 Ecology: Local species records include badger, bird and bat species, reptile and great crested newt. The Council highlighted the potential need for an Appropriate Assessment due to likely recreational impact on the North Meadows SAC which requires further investigation.

5 Heritage: notes that the proposed development would potentially have an impact on the setting of Midge Hall (Grade II) to the north and The Marsh (Grade II), Purton Road to the west which would need consideration through design. Archaeological potential noted. Principle issue considered to be loss of green open landscape and the manner in which this provides a buffer from the existing settlement and the M4 Corridor. Recommends application will need to consider significant landscape mitigation measures to preserve the existing sense of openness afforded by the current site.

6 Drainage: Site is Flood Zone 1 but predicted to be at risk of localised surface water flooding in the 100 year plus climate change scenario. In terms of surface water, the scheme will require a 20% betterment over pre-development discharges for both peak flow and volume. 7Other: comments made in relation to design, waste, noise etc. which would need to be taken into account but are not considered significant issues.

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

1 The site has been designed to provide 3ha of woodland planting on the northern edge to reinforce Royal Wootton Bassett's historic character as a hilltop settlement within woodland, whilst also mitigating potential views of the new development from Registered Parkland to the north-east of the site.

2 Development would not extend any further north than existing thereby limiting the risk of coalescence with Hook and Coped Hall. Development would not contribute to coalescence with Swindon as development would not extend any further east than the existing settlement. The significant strategic planting will also provide a new defined edge for the settlement. 3The scheme is demonstrated to be capable of extending the Sustrans Royal Wootton Bassett/Swindon cycle route to provide a direct cycle link between the site and south Swindon. Existing PROW across site will be retained/enhanced and 3km of new walking and cycling routes including trim and natural trails are provided within the site itself.

4 Grade II listed Midge Hall is located circa 250m to the north, separated from the site by agricultural land and farm buildings. Although impact is expected to be minimal, restricting development from the northern extents of the site will help protect the setting of the listed building. A significant landscape buffer is therefore proposed to the north of the site to maintain separation and limit impact. The geophysical survey also highlighted anomalies suggestive of the impact of modern ploughing practices and it is likely that the underlying archaeological remains will have been truncated by this activity. Further investigation may be necessary (i.e. trial trenching), but it is not expected that any remains present will be of such significance as to warrant retention.

5 The site is in Flood Zone 1, confirming a low level of flood risk. Parts of the site are predicted to have localised surface water flooding, but classified as a low risk. Surface water drainage from the site will use SuDS features to manage the 1 in 100-year

storm event plus 40% increase for climate change and accommodate a 10% increase in impermeable area for urban creep and 20% betterment to greenfield runoff rates. Surface water discharge will be in accordance with the sustainable drainage hierarchy. 6 A preliminary ecological review has not identified any 'in principle' constraints on ecological grounds such as statutory and non-statutory designations, or habitats of notable importance.

7 The North Meadows SAC is c.10.5km to the north of the site and is not hydrologically or physically connected. In terms of recreational pressure, the 'Wiltshire Core Strategy Submission Draft –Assessment under the Habitats Regulations' (WYG, February 2012) document states that the distance that people are prepared to travel for recreational purposes is c. 5km for most natural green spaces. As such, it is unlikely that residents from the proposed development will be using the SAC for recreation on a regular basis. The likelihood is reduced further due to a lack of parking at the SAC. Notwithstanding the above, it is understood that user surveys are to be undertaken to establish potential impact. Whilst it is likely that the site will be outside the zone of influence for which recreational impacts will need to be mitigated, a recognised means of mitigating is to provide areas of alternative recreational greenspace. In line with this requirement, the site masterplan includes significant areas of green infrastructure including 3km of walking routes. Stage 2 Methodology – Key Concerns 3.15 In addition to concerns as to how site 3366 has been defined and assessment. Concern is raised more generally on the scoring and assessment process adopted for the stage 2 sifting process. A summary of the key concerns are as follows:

1 Concern is raised over the consistency of the scoring within the Stage 2 site sifting table generally. For example, site 3366 was scored as 'amber' for flood risk despite its location wholly within Flood Zone 1, whereas site 3357 which is partially within Flood Zone 2 received a 'green' scoring. Site 3366 was also scored down to 'amber' for heritage due to its proximity to a listed building circa 250m to the north whereas site 3357 was scored 'green' despite directly abutting a Grade II listed building and a scheduled ancient monument to the west. This requires a significant review into the next stage otherwise the evidence base will remain flawed and seriously impair the soundness of the draft plan.

2 The Royal Wootton Bassett Strategic Context Table (Page 9) states that "Capacity at Swindon Road and M4 Junction 16 may constrain further development to the north of the town." We contest that this is clearly not the case. All sites at RWB will generate a degree of residual traffic impact at Junction 16 and none offer alternative road routes that avoid this. To be clear, sites south of RWB offer no alternative road routes to sites to the east or north for travel to/from the Motorway network or to Swindon, they will all rely upon the A3102 Swindon Road and Junction 16. It is therefore unreasonable to score any sites down for this reason. See Appendix 3 for further details. 3 The mainline railway, that skirts the current southern urban edge of RWB, forms a physical barrier to travel to the town and the key transport corridor towards Swindon. The railway acts to constrain travel by virtue of the limited points of connection over it, as well as the physical capacity of those crossings and 'pinch points'. Development south of the railway will be significantly constrained by this and the cost of mitigation works to make the sites suitably accessible, would be very high. There is clearly a significant constraint to locating development to the south of RWB due to the capacity of High Street

to accommodate a significant increase in flows. This important factor has not been sufficiently factored into the comparative site assessments to date. See Appendix 3 for further details.

4 Given the above constraints, a hierarchy of travel should be rigorously adopted whereby land-uses and locations are chosen that in the first instance minimise the need to travel, followed by minimising the distance required to travel to fulfil everyday needs, and then the ability to undertake that travel by sustainable modes. In addressing travel needs in this hierarchical way, the extent to which residual impacts occur and new infrastructure is required - both of which have carbon implications, is kept to a minimum. This approach will correctly promote sites that are best able to deliver sustainable travel by virtue of their closer proximity to key trip destinations and ability to deliver sustainable travel, as opposed to their arbitrary proximity to strategic roads. With regards to RWB, this approach will see greatest emphasis placed on sites that can best access existing services and facilities (education, healthcare, leisure, retail, and employment) on foot or by cycle whilst also making best use of existing infrastructure and transport services. The location and connectivity of sites north of RWB are far better than those to the east and south and thereby offer the best option for RWB in terms of addressing the top tiers of hierarchical sustainable development. See Appendix 3 for further details. 5 Whilst striving for greater self-sufficiency is commended, RWB's relationship to Swindon as an employment area is material given commuting typically equates to c15% of all daily travel. As such, locating development along sustainable travel corridors (cycle and bus routes) should be a weighted consideration. Land to the north of RWB is located within easy cycle distance of employment areas within Swindon and could readily link to a proposed Sustrans strategic cycle route to Windmill Hill Business Park. Additionally, north RWB is already well served by express bus services to Swindon which are an attractive alternative to car use. See Appendix 3 for further details. 6 With regards to a future railway station serving RWB, whilst it may remain a long term ambition for inclusion in future Plans, in terms of the selection of sites within the current plan period to 2036, other than safeguarding land for rail use, the location of development should not be informed or influenced by this requirement for the next plan period. Alternatively, the selection of sites should be informed on their ability to make best use of sustainable travel connections to Swindon station as per the suggested transport strategy. See Appendix 3 for further details. 7 Located on a hilltop, the settlement has, over the past 100 years, seen growth extend north-eastwards, with development maximising the level higher ground. It is considered that future development should continue the hilltop settlement pattern, therefore retaining the town's built form and landscape setting character. Other site options to the east of the town on the lower land will diminish the perception of the hilltop town and this 'priority' for the town requires thorough analysis into the next plan stages. Assessing the Alternatives 3.16 The RWBSSR has not considered the final eight sites in any further detail at this stage and thus a thorough assessment has not been undertaken.

3.17 However, as discussed above, concerns are raised regarding the consistency of the scoring applied to these eight sites and the accuracy of the information provided. 3.18 Utilising the above criteria, in addition to how the sites perform against the place shaping priorities, an assessment of the eight sites is provided at Appendix 1 and a summary is provided below. This

demonstrates that when ranking the sites, L&Q's site scores the most highly and is thus the most sustainable location for development. [see RWB67 for table]