

Wiltshire Housing Site Allocations Plan (WHSAP) Examination

Date: 03/03/2019

Representor ID: 925419

Linda Buckley, on behalf of the Coombe Bissett Conservation Community Group.

Option 2: Further Comments

Inspector's Initial Matters, Issues and Questions (MIQs): Matter 2, Issue 3: item 3.3 and Issue 4 relating to this Further Comment and previous Response, submitted 21/01/19 (during the extension period).

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Further Comment: Housing Site Selection Anomalies in the Dual Planning Status of Coombe Bissett

QUESTION: For the duration of the Wiltshire Housing Site Allocation Plan (WHSAP) undergoing Examination; which planning outcome has the overriding authority, in relation to Coombe Bissett:

a) SHLAA Stage 1 Decision, the result of a protracted and robust NPPF/ Local Plan evaluation process, overseen by the Planning Inspectorate; or,

b) A more recent Neighbourhood Plan Registration setting the course for a Parish Referendum; initiated by a group of six self-appointed residents, enabled by: Coombe Bissett and Homington Parish Council /Qualifying Body, the guidance of a Local Planning Authority assigned planning officer, Ms Amy Burnett a pro-rata contracted planning consultant, and AECOM?

Context:

SHLAA Stage 1 Decision: 'Any indicative residual requirement for the Southern Wiltshire Community Area Remainder to be delivered during the Plan period has been met. Therefore, the Plan will not need to allocate additional land to help meet an indicative residual requirement. It is proposed that housing sites will not be identified for this Parish, it does not allocate them for development or add weight to any site for the purpose within the Southern Wiltshire Community Area Remainder and the site selection ends after Stage 1.'

MINUTES OF THE PARISH COUNCIL MEETING HELD IN THE VILLAGE HALL COOMBE BISSETT AT 7.00 PM ON TUESDAY 18th JULY 2017.

Matters arising: 'Wiltshire housing site allocations development plan: It has been announced by WC that all Coombe Bissett and Homington strategic housing land availability assessment (SHLAA) sites have been eliminated in the draft plan'.

The evidence supporting the construction of the Coombe Bissett and Homington Neighbourhood Plan Questionnaire (distributed November 2018), "**upon which the Neighbourhood Plan's policies and objectives are based**" is as follows:

2012 Village Plan (lacking rigorous methodology, pre- 2014 severe flooding episode; and pre- 2018 Wiltshire Council delivered Housing Needs Survey.)

SHELAA Site List (Including Parish Councillor Gerald Bundy's SHLAA Site No 3224, promoted by two Development companies and carried forward to SHELAA with a substantially increased density - on a

particularly sensitive site within the AONB and outside of the settlement boundary; and other sites with similar constraints.)

2018 Wiltshire Council directed CB&H Housing Needs Survey (lacking rigorous methodology.)

Cranborne Chase and West Wiltshire Downs AONB Management Plans up to 2024

Under Review for 2019 – 2024. Wiltshire Council is the lead Local Authority.

To date, the Parish Council and Neighbourhood Plan Steering Group have not explained to the community, their fundamental rationale for a Neighbourhood Plan, post SHLAA Stage I Decision; particularly, as a Neighbourhood Plan and its 5 year Review (Wiltshire Council NP FAQs) would run concurrently with the SHLAA Stage 1 Decision.

There has been a Coombe Bissett and Homington community interaction rate of 28% to the Neighbourhood Plan Questionnaire distributed during November 2018 (331 copies distributed, 94 completed copies returned.) Its distorted evidence base was signed off by the LPA, Parish Council and Neighbourhood Plan Steering Group. The NP Questionnaire also included, what many residents regard as a premature, 'Call for Sites'. Although requested, there has been no public consultation to date and the anonymised, aggregated raw data is not being made available for public viewing. This data is to be analysed by the planning consultant, Ms. Amy Burnett, contracted to the Parish Council and Neighbourhood Plan Steering Group. A *Summary* of the data is to be presented at 6.30pm on the 12 March, in a half hour slot preceding the Parish Council meeting at Coombe Bissett Village Hall.

Recently, the NP Steering Group Constitution; and the Minutes to the 11/12/18 NP Steering Group Meeting have been made available on the Parish website: www.coombebissett.com. The Minutes acknowledged my NP Questionnaire 'Addendum'/ response to Question 21 (30/11/18), raising concerns about its evidence base. To date I have not received a reply to those concerns, as recommended in the Minutes. The Minutes also reference the involvement of **AECOM 'to carry out site assessment'**, and similarly, the Parish Council's response to a recent 'Freedom of Information' request, confirmed that **'the Steering Group has also asked for AECOM to supply further research on housing needs.'** The community has not been informed of the level of AECOM involvement at this stage; and whether or not AECOM is now building SEA/EIA and Habitat Regulations Assessment reports that would underpin a planning proposal. The community is unaware of any consultation with the Cranborne Chase and West Wiltshire Downs AONB Management Team at this significant juncture.

Post SHLAA Stage 1 Decision, and with the potential for runaway costs during budget-stricken times; why is the LPA directing the Parish Council and Neighbourhood Plan Group to further their Neighbourhood Plan (as the most appropriate planning tool) running it concurrently with the SHLAA Stage 1 Decision up until 2026; and the Cranborne Chase and West Wiltshire Downs AONB Management Plan for 2019 -2024? This might be interpreted as an unnecessary, deeply divisive and profligate gamble, that could culminate in a controversial Referendum result, e.g. The *additional* housing to the NP agreement at Crich; and Winsford's Referendum result where the Plan was adopted with 69% voting in favour - with only 19% of the population turned out to vote.

There is deep concern, that any lessening of the sound layers of planning constraints that serve to protect Coombe Bissett from the unprecedented level of SHLAA pressure, loaded to the advantage of developers (i.e. professional planning expertise, unlimited resources, the art of public

consultation choreography, and the clout of Right to Appeal); would place this village in the most vulnerable position. Early in the SHLAA process Wiltshire Council planners muted the option to re-draw AONB boundaries at a later stage. Therefore, a Neighbourhood Plan re-drafting of the Local Plan, in respect of this gatekeeper village, is a weighty responsibility grounded in the breadth and depth of National and European planning legislation; and in general conformity with the Strategic policies in the Local Plan, i.e. SHLAA Stage 1 Decision? Should such an undertaking be controlled by a small group of self-appointed residents, who “do not have the time” to commit to community consultation for *their community project*; and are heavily reliant on the planning expertise of others for their sense of direction? Perhaps the 28% community interaction is indicative of the confidence that the Steering Group and Parish Council instil? In contrast, all-inclusive public planning meetings are well attended.

New Statutory planning precedents set for a NP development, up to 10 houses for example, incorporating the right to build inside the AONB; could effectively trigger a rash of more aggressive developer pressure that would overwhelm the character, setting and sustainability of this village. The surrounding AONB and recently doubled in size SSSI are deeply valued by the local community and provide crucial natural capital assets for the wider public.

Further clarification of the term ‘omission sites’ would be helpful. The unequivocal SHLAA Stage 1 Decision seemed to omit Coombe Bissett SHLAA sites from further consideration. However, the original Coombe Bissett SHLAA Sites (at increased densities), and more, appear in the SHELAA Listing; causing confusion and long-term stress for this community. Coombe Bissett SHELAA Sites are dubiously classified as ‘deliverable’, on blatantly unrealistic assumptions. Is it also the case that SHELAA sites gain ‘material’ weight in Neighbourhood Plan site selections?

Throughout the process and at the stage when a Referendum question is framed, what is the minimum number of Steering Group Committee Members required to give it legal authority; and to follow the process through, responsibly, to build-out? We read of small Steering Groups that dwindle away under pressure; leaving Parish Councils and LPAs to manage viability pressures, CILs, build out, and infringements.

There was little local take-up for the recently completed Wiltshire Council owned Chalk Pit Affordable Housing development, opposite St Michael's Grade I Listed church on the A354. Coombe Bissett also retains 5 Wiltshire Council owned retirement bungalows next to the church. Many Coombe Bissett homes have been extended. The local housing-market turnover provides opportunities to down-size and up-size. A large, privately owned, consented site: ‘The Old Vic’, on Homington Road at the centre of the village, has been surveyed recently; and following a lengthy probate battle, development might soon commence. Currently in a neglected state, this is a genuinely appropriate site for deliverable housing inside the settlement boundary.

Evidence Reference:

1. Letter of complaint, dated 30/03/17, from Coombe Bissett Conservation Community Group to Alistair Cunningham, Associate Director for Economic Development and Planning, Wiltshire Council. re: Parish Council Neighbourhood Plan Registration issues. The Parish Council, in an unpublicised meeting, voted to engage the Parish community in Neighbourhood Plan Registration, without prior notice and the opportunity for public debate to establish a consensus of support.

Re: Wiltshire Housing Site Allocations Plan (WHSAP) Examination. Preceding this stage, the CBCCG submitted a Response to Georgina Clampitt-Dix, 21/01/2019, during the extended consultation period.

For many years the Coombe Bissett Conservation Community Group has been commenting extensively, across all the participants involved in large-scale planning decisions. It is hoped that the CBCCG body of correspondence, respectful of NPPF principles, is held on record for the duration of this Plan; and it can be drawn upon as and when required. This methodology; and rare opportunities such as this, are the only means available to this small community, to deflect the overbearing capability of Developers loaded against us.

Copies of correspondence are available, if required.

Cranborne Chase and West Wiltshire Downs AONB Management Plans up to 2024.
