

**WILTSHIRE HOUSING SITE ALLOCATIONS PLAN
EXAMINATION IN PUBLIC**

MATTER 4

**STATEMENT ON BEHALF OF
LEDA PROPERTIES LTD**

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1.0 INTRODUCTION

- 1.1 This statement is submitted by Leda Properties Ltd (“Leda”) in relation to the Examination in Public of the Wiltshire Housing Site Allocations Plan (“WHSAP”). Carter Jonas LLP is instructed by Leda.
- 1.2 Leda is the owner of Land at Marsh Farm, Royal Wootton Bassett (RWB). A description and outline of the site is shown at **Appendix 1** of this representation.
- 1.3 It is understood that the WHSAP was submitted for examination in July 2018 and therefore before the deadline (24 January 2019) for assessing development plans against the revised National Planning Policy Framework (NPPF) as outlined in the ‘transitional arrangements.’ This statement therefore, is with reference to the NPPF 2012, unless where necessary some cross reference has been made to the revised 2019 version.
- 1.4 Leda has an overall view that the WHSAP is a plan that has been overtaken by the passage of time and includes more development that has already been completed or consented – in the various calculation tables – than is allocated for future development. There is a surplus of development identified above the quoted needs of the WCS that renders the WHSAP unnecessary. The purpose of the WHSAP is therefore not clear, and its value in managing development is severely limited by its critically flawed 6.5 year time horizon.
- 1.5 The WHSAP should be withdrawn from examination and instead energy and resource should be better directed into a review of the strategic plans for Wiltshire, this potentially jointly with Swindon Council. The housing needs for at least the next 15 years should be identified and planned for effectively.
- 1.6 A revised strategy that will identify a continued need for new housing development should include a spatial strategy and housing targets for the unitary authority area of Wiltshire, each of the identified housing market areas and for settlements and/or parishes should they wish to development a Neighbourhood Plan. As part of the revised spatial strategy – whether at a local or neighbourhood level – land at Marsh Farm should be allocated for mixed use development. This development could be effectively landscape led to ensure the management of its settlement edge setting and include an element of employment to help reduce the out-commuting of residents to get to work.
- 1.7 This statement is in response the Inspector’s **Matter 4: Issue 6 – questions 1, 2, 3 and 4**; and should be read in conjunction with statements for Matters 1 and 2.

2.0 MATTER 4: SETTLEMENT BOUNDARIES

Issue 6: Are the proposed settlement boundaries justified, effective and consistent with national policy?

Question 1

What is the policy basis for use of settlement boundaries and their review?

- 2.1 Settlement boundaries are an arbitrary and blunt instrument, which do not have regard to the contribution that some open spaces within settlements make to the character and appearance of those settlements. There is no explicit national policy support for settlement boundaries instead there is only reference to rural development or isolated development. The introduction of settlement boundaries fetters planning judgement and is not positive planning in that it reduced the opportunities for sustainable development.
- 2.2 In terms of impact on amenity and the local landscape it might be preferable to locate new homes in edge of village locations which technically, might sit outside the arbitrary boundaries.
- 2.3 Development is needed in all sustainable settlements to improve the availability of affordable housing to provide for housing needs to all communities. This is with particular reference to Planning Practice Guidance Reference ID: 50-001-20160519:
- “Assessing housing need and allocating sites should be considered at a strategic level and through the Local Plan and/or neighbourhood plan process. However, all settlements can play a role in delivering sustainable development in rural areas – and so blanket policies restricting housing development in some settlements and preventing other settlements from expanding should be avoided unless their use can be supported by robust evidence.”*
- 2.4 Leda is concerned by the “blanket” approach to managing change in rural areas, which is presented by settlement boundaries.

Question 2

Is the Council’s methodology for reviewing settlement boundaries soundly based?

- 2.5 Notwithstanding the concerns outlined above that Settlement boundaries are arbitrary and potentially unsound, Leda is not convinced that the council’s approach to reviewing them is sound.
- 2.6 A particular concern is that the review of boundaries has focused closely on drawing a tight line around existing built form. It would appear that the review of settlement boundaries, if it is to exclude allocations and unimplemented permissions and only consider what is currently built form, is more closely akin to a Green Belt boundary review and not a positive approach to managing change and providing certainty for communities and potential development applicants.
- 2.7 The net result of this exercise is that new allocations that are at an edge of settlement location are generally contrary to the policies of the development plan.

- 2.8 Furthermore, Leda considers the Council's approach to identifying Settlement boundaries to be short sighted and restricts development in an ineffective and unjustified way. Through a review of the Core Strategy (based on up to date housing need over an appropriate timescale), it is likely that further housing sites will be required by the Council. As such, it should be taking this opportunity to provide further directions for growth in sustainable locations, not reducing its options.
- 2.9 It is Leda's view, therefore, that the settlement boundary review – if considered to be sound – should form part of a Core Strategy Review with housing allocation sites included within the revised boundaries. This will help ensure the delivery of the allocation and offer greater certainty to communities.

Question 3

Has the review of settlement boundaries been carried out in a consistent manner across the plan area?

- 2.10 The answer, in short, to this question is 'no.'
- 2.11 There is a significant discrepancy at RWB that is explained in detail in response to question 4 hereunder. The council has not considered its own criteria in a consistent manner and some judgements that have been have not been clearly explained.

Question 4

For specific settlements, are there any factors which indicate the settlement boundary is not justified or effective?

- 2.12 Lead is of the view that the general premise of settlement boundaries is unjustified and ineffective as explained in response to question one. Notwithstanding this, the settlement boundary at RWB is not properly justified and inexplicably excludes an area of built development contiguous with the settlement. The area is shown on a map at **Appendix 2**.
- 2.13 The Council's 'Topic Paper: Settlement boundary Review Methodology' includes Table 8.1 which sets out areas which have been included and excluded in the new boundaries:

Included –

- "Built and commenced residential and community facilities development such as religious buildings schools and community halls, that is physically related to the settlement.
- Built and commenced employment development in principal settlements, market towns and local service centres that is physically related to the settlement.
- The curtilage of a property that relates more closely to the built environment (e.g. a garden) or has limited capacity to extend the built form of the settlement in terms of scale and location
- Recreational or amenity space at the edge of a settlement that relates more closely to the built environment"

Excluded –

- Employment development, farm buildings and farmyards, at the edge of large villages.

- Isolated development that is physically detached from the settlement (including farm buildings or agricultural buildings and renewable energy installations).
- The extended curtilage of a property that relates more closely to the open countryside (e.g. a field or paddock) or has the capacity to substantially extend the built form of the settlement in terms of scale and location.
- Recreational or amenity space at the edge of the settlement that relates more closely to the open countryside.
- All types of unimplemented planning permission.
- Site allocations

2.14 There is limited explanation of what is meant by the term “*more closely to the open countryside.*”

2.15 At the north of RWB beyond the B4042 a substantial sports complex including build pavilion, hall and changing rooms; car parking; multi use and all weather pitches; tall fences; and, floodlights has breached the extant and proposed settlement boundary. It is Leda’s submission that: First; this exemplifies the arbitrary nature of settlement boundaries; but, second that this constitutes: “*Recreational or amenity space at the edge of a settlement that relates more closely to the built environment*” and as such should be included in the settlement boundary following the Council’s methodology.

APPENDIX 1

Land at Marsh Farm, Royal Wootton Bassett

Land at Marsh Farm is located on the northern edge of the town at Coped Hall, lying to the west of the A3102 and north of the B4042, extending northwards to the M4 motorway. The land is presently in agricultural use and generally has gentle contours and a level topography. There is varied landscaping around the site's perimeter, with hedges demarcating the existing field pattern and some mature trees.

To the southwest, across the B4042, are residential properties, while to the east, across the A3102, are agricultural fields. To the west is an area that is being developed to accommodate a new sports 'hub' comprising a range of facilities for rugby, cricket, football and tennis. Along the A3102 frontage of the site there are also a number of residential properties and the Marsh Farm Hotel.

The Coped Hall roundabout to the south west corner of the site is a key gateway into Royal Wootton Bassett from Swindon and the M4 and is the focus for a range of commercial activities including a car sales garage (given permission to become Aldi supermarket), public house, Travis Perkins builder's merchants and a Rapid Hire tool and plant hire centre.

There is potential at Land at Marsh Farm to deliver a comprehensive landscape led mixed use development of around 100 (or more) dwellings, a care home, community facilities, employment, public open space, a supermarket, landscape works, and an extension to the sports 'hub'.

A number of studies have already been carried out on the site including:

- Landscape and Visual Impact Assessment
- Ecology Survey
- Air Quality Assessment
- Flood Risk Assessment
- Noise Survey
- Archaeological Evaluation
- Transport Assessment
- A Statement of Community Involvement
- Illustrative Masterplan

No 'show stopper' constraints were identified in the studies. The site is not located within any areas where development should be restricted i.e. it is not designated as a SSSI, Green Belt, green space, schedule ancient monument etc. In short, there are no over-riding obstacles to development. The site is readily available for development.

Location plan

The plan shows Leda's whole land holding north of Royal Wootton Bassett but it is not necessarily considered that the entire land area would be pursued for development.

APPENDIX 2

The settlement boundary at RWB is not properly justified and inexplicably excludes an area of built development contiguous with the settlement. The Gerard Buxton Sports Ground is not shown on the map but is a substantial sports complex that at least ought to be included within the settlement boundary. As shown in the plan below that is taken from the Revisions to Wiltshire's Policies Map Part 10 document, with our annotation:

