

20/02/2019

Dear Ian,

Wiltshire Council Housing Site Allocation Plan Examination – Site 2.4 Church Lane

Thank you for your email regarding the WHSAP Examination. In addition to my previous responses as part of the consultation process carried out by Wiltshire Council, I would like to respond to the following particular points raised by the Inspector:

Matter 3: Housing Site Allocations

Issue 5: Are the proposed sites justified, effective and consistent with national policy?

5.3 What is the likely impact of the proposed development on the following factors and do any of these indicate that the site should not be allocated:

- **heritage assets;**
- **flood risk;**
- **open space, recreational facilities and public rights of way.**

5.15 For Sites H2.4, H2.5 and H2.6, has sufficient attention been paid to the and cumulative effect of development on landscape character, biodiversity and heritage assets and Southwick Country Park?

With regard to site 2.4, I would like to draw your attention to Wiltshire Housing Site Allocations Plan. Heritage Impact Assessment. Final Report. Prepared by LUC March 2018. This report was commissioned by WC and yet the findings of which have been completely ignored in the WHSAP. This clearly demonstrates a lack of soundness and in fact incompetency in the preparation of the plan.

The HIA states the following:

Rose Villa:

“As a listed building, the asset is considered to be of high importance. Development of the proposed allocation would give rise to a degree of change to the setting of the asset. The level of harm would likely be relatively low, as setting is not fundamental to its significance.

6.16 Where more extensive issues could arise is through the insertion of access to the site via the salient strip of land to the south of the asset, to Frome Road. It is likely that significant upgrading of the currently informal junction would be required – likely in the form of visibility splays, more extensive dropped kerbs and signage. This could require a degree of land-take from the asset’s garden, in addition to new traffic movements and disturbance.

6.17 It is judged that these effects would equate to less than substantial harm; a medium-high effect for the purposes of this assessment. “

St John’s Church School, School Hall and School Master’s Dwellings:

“The asset is considered to be of high importance. Risk of harm

6.25 Development of the site would result in a degree of setting change to the asset; if this involved the removal of some or all of the trees on the northern boundary of the site / southern side of Church Lane, this would represent a relatively significant change in character.

6.26 This would likely equate to less than substantial harm; a medium-high effect for the purposes of this assessment. Options for sustainable development

*6.27 Retention of trees and shrubs on the boundary of the site adjacent to Church Lane, coupled with a sensitive layout and design principles, could help to conserve the character and setting of the asset.
“*

Church of St John:

“6.31 The asset is considered to be of high importance. Susceptibility to change

6.32 The asset is highly susceptible to change that would affect the key relationships between the church, churchyard and school – however, this is not a risk for the proposed development.

6.33 Incidental longer views of the church provide a degree of understanding of the church in its rural context. This element of the asset’s setting is vulnerable to development. Although this is not critical to the asset’s significance, change could result in a degree of harm. Risk of harm

6.34 Development of the site could change the immediate character of the church’s setting, potentially through the loss of trees along Church Lane, reducing the rural feel of this part of its setting. Similarly, development affecting incidental views to the church from the site would likely change the ability to perceive and understand the asset as an originally rural church – albeit one that has been subsumed into the urban edge – as it would be entirely surrounded by development.

6.35 Such change would likely give rise to less than substantial harm to the asset’s setting; a medium-high effect for the purposes of this assessment. Options for sustainable development

6.36 It is likely that development of the eastern half of the site – affecting sight lines to the church spire and roof from rights of way in Southwick Country Park – would result in a degree of harm to the setting and experience of St. John’s Church. Effects could potentially be avoided through careful masterplanning and restricting development to the western portion of the site.”

344 Frome Road:

“6.40 Setting makes an important contribution to the significance of the asset, in that the relationship to open agricultural land to the rear informs the reading of the buildings as explicitly rural dwelling – located, as they were, in hamlet well outside the boundaries of contemporary Trowbridge. Similarly, the asset forms an attractive and valuable group with the Church of St. John and the church school, preserving the heart of this 19th century hamlet.

6.41 The asset is considered to be of high importance. Susceptibility to change

6.42 The asset is susceptible to change within its undeveloped rural setting to the rear (west) that could erode understanding and appreciation of the cottages as originally rural settlement. Any development that severed or diminished the relationship between the asset and St. Johns Church and school would be harmful. Risk of harm

6.43 As currently drawn, the allocation would remove all of the asset's rural setting. While the structure itself would remain unharmed, preserving its architectural interest and much of its significance, its legibility as an example of rural vernacular would be entirely removed. This would likely translate to less than substantial harm – a medium-high effect for the purposes of this assessment.

6.44 In addition, depending on access options deployed to develop the site, significant increases in traffic volumes on Church Lane would undoubtedly affect the relatively quiet, rural quality of the lane and, with it, the relationship between the assets in the group. Any suburbanisation through the introduction of 'street clutter' would similarly change the character of the place, reducing its rural feel. Options for sustainable development

6.45 Development of the eastern portion of the site would inevitably harm the setting, and hence the significance, of the asset. If development could be restricted to the western end of the site, and access secured from the south-west, harm could potentially be avoided through sensitive layout and design. “

In fact, the report goes on to recommend that development should only be considered in the western portion of the site with access from Studley Green to the North as summarised by the map below taken from Wiltshire Councils HIA:



In light of this report, the number of dwellings at this site would need to be reconsidered, to less than half the number currently proposed (currently 45 in the WHSAP)

Proposed changes to the WHSAP wording

In order to protect the heritage assets which border the site, development at site 2.4 should only be considered for the area outlined by the HIA, commissioned by WC. This will reduce the number of houses which can be allocated to this site to(revised number to be inserted here) Since access is not available through Church Lane (previously ruled out), access of the site would need to be considered from Studley Green only with no further traffic onto Church Lane itself.

5.12 The supporting text for sites H2.4, H2.5, H2.6, H2.9 and H3.3 refers to parts of the sites being within Flood Zones 2 and/or Flood Zones 2 and 3? Is this approach consistent with national policy? Will the plan be effective in addressing drainage issues on these sites?

I would like to refer to the objection made by the Environment Agency (Ms Ellie Chammins) in response to planning application 18/10035/OUT at site 2.4. This can be found in full on WC planning application website. However, to summarise, The EA states “ that no 'site-specific detailed' flood risk assessment study has been undertaken” and that climate change has not been reasonably taken into account.

This further re-enforces our consultation responses with regard to WC’s lack of due attention given to flood risk and impact on Southwick Country Park of increased flooding. In addition, since the largest section of the floodplain falls within the western section of the site, the number of dwellings that could be allocated to this site would need to be further reduced. This begs the question, is the site appropriate for development at all (other constraints such as habitats will need to be considered in detail too)

Proposed changes to the WHSAP wording

A full and site-specific detailed flood risk assessment should be undertaken on the proposed site to accurately identify developable land. This assessment would need to demonstrate that flood mitigation would be guaranteed at the site but also for the adjoining Southwick Country Park.

In addition, I would also appreciate that you consider all the representations made objecting to the recent planning application at this site 18/10035/OUT as these contain further information relating to habitat, traffic, landscaping and Southwick Country Park.

The process by which this planning application has been handled is further example of Wiltshire Council’s incompetence and lack of soundness. The planning office failed to follow due process when making local residents aware that a planning application had been made and I had to chase the planning department, eventually gaining an extension to the consultation period as a result. In fact, I ended up hand delivering a copy of the planning application to residents of Church Lane to ensure that they were aware of the planning application.

I continue to feel very frustrated at the underhand way in which WC operate and am aware that, if residents had not been vocal and challenged the council, little valuable consultation would have taken place at all.

Yours sincerely,

Rachel Hunt