

RIDGE

**WILTSHIRE HOUSING SITE
ALLOCATIONS PLAN
EXAMINATION: RESPONSE TO
INSPECTOR'S MATTER 3 IN
RESPECT OF RIDGEWAY FARM,
CRUDWELL H2.13
EDENSTONE HOMES
ID: 1187893
April 2019**

**WILTSHIRE HOUSING SITE ALLOCATIONS PLAN EXAMINATION
RESPONSE TO MATTER 3: SITE ALLOCATIONS
EDENSTONE HOMES**

April 2019

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1. INTRODUCTION

- 1.1. Edenstone Homes Ltd¹ have promoted the site known as Land at Ridgeway Farm, Crudwell since 2014 and throughout the preparation of the Wiltshire Housing Site Allocations Plan (WHSAP).
- 1.2. In August 2015 an outline planning application was approved at part of the site for the erection of 10 dwellings, hereafter referred to as 'Phase 1'². Edenstone subsequently acquired the site and a reserved matters application was approved in February 2017. The Phase 1 development was successfully built out by Edenstone and with a high demand for homes, all units were sold quickly. Full details of build out and sales rates are included at Appendix 1.
- 1.3. The site was originally proposed as an allocation in the draft WHSAP under reference H2.13 for an additional 40 dwellings (in addition to the 10 dwellings have already been constructed at the site). As a consequence, Edenstone planned for the extension of the site making sure that necessary services and infrastructure were in place as part of the Phase 1 development to enable a straightforward expansion of the site.
- 1.4. Edenstone subsequently held pre-application discussions with the LPA in June and July 2017 in respect of a 40-unit scheme and a pre-application response was received in September 2017. A public exhibition was also held in March 2018. As a result of feedback received, the quantum of development was reduced from 40 to 39 dwellings.
- 1.5. A full planning application was subsequently submitted in June 2018 for the erection of 39 dwellings (including 40% affordable housing) on the basis of the proposed allocation of the site for residential development and the need to boost the supply of housing in the Malmesbury Community Area³.
- 1.6. However following the Full Council meeting on 10th July 2018 it was resolved, against the advice of the Officers, to submit the WHSAP to the Secretary of State for Examination with a Schedule of Proposed Changes suggesting the deletion of site H2.13.
- 1.7. Consultation responses were subsequently received as part of the application and concerns regarding the scale and density of development were raised by the Council's Urban Design Officer. As a result, Edenstone decided to further reduce the quantum of development at the site to 36 dwellings to try and address those comments.
- 1.8. However, despite the above changes to the proposals, the planning application was refused on 7 December 2018 for 4 reasons including:
 1. Principle of development outside the settlement boundary of Crudwell
 2. Scale of development in a Large Village which was considered to conflict with the Wiltshire Core Strategy (WCS)

¹ Respondent ID: 1187893

² Application reference: 15/03136/OUT

³ Application reference: 18/05429/FUL

3. Scale, density, built form and massing of the proposal was not considered to be of a high-quality design
4. Lack of s106 agreement in respect of affordable housing, education place provision and waste collection

- 1.9. The Inspector's updated Guidance Note now advises that in order to ensure fairness and legal compliance, it is necessary that the starting point for the Examination is the version of the WHSAP that was submitted to the Secretary of State (WHSAP.01). The changes proposed by the Council in the Schedule of Proposed Changes (WHSAP.03) are therefore to be assessed on the basis of whether they are necessary to make the plan 'sound'.
- 1.10. This statement responds to Matter 3, Issue 5 with specific reference to the proposed site allocation H2.13 Ridgeway Farm in WHSAP.01. Issue 5 asks whether the proposed sites are justified, effective and consistent with national policy.
- 1.11. It should be noted that Edenstone has already responded to Matter 2 and attended the hearing sessions in respect of this matter, the issues raised in respect of this matter will therefore not be repeated in this Statement.

2. DOES THE PLAN PROVIDE SUFFICIENT DETAIL ON FORM, SCALE, ACCESS AND QUANTITY OF DEVELOPMENT FOR EACH SITE?

- 2.1. In respect of the site H2.13⁴, it is considered that the plan generally provides sufficient detail to establish the appropriate form, scale and quantity of development that this site can accommodate. Edenstone welcomes the term 'approximately' in respect of the quantum of development which will enable sufficient flexibility to avoid unnecessarily restricting the deliverability of the site.
- 2.2. With respect to the requirement for improvements for pedestrians along Tetbury Lane, Edenstone are happy to work with the Council to deliver this objective. A Transport Statement accompanied the recent planning application at the site which shows how a new footpath can be successfully accommodated along Tetbury Lane, see the full report at Appendix 2. It is worth noting that prior to the construction of Phase 1, there were no footways located along Tetbury Lane but as part of Phase 1, Edenstone constructed a footpath along the west side of Tetbury Lane to provide a safe pedestrian link from the site to the Village Hall and recreation area.
- 2.3. However, we are concerned by paragraph 5.114 of the supporting text to H2.13 which identifies that junction improvement proposals will be required to the Tetbury Lane/A429 'where feasible'. At present, the Council has not identified what type of improvements are required and the evidence to support this requirement. On the other hand, Cotswold Transport Planning (CTP) have modelled the junction as part of work to support a full planning application at the site and that work does not identify any existing capacity issues at this junction. In addition, the safety record does not identify an existing accident issue in this location.
- 2.4. Therefore, at this time, we remain unclear what works are required. Any off-site junction improvements still need to meet the relevant tests for planning conditions / obligations, as set out in the NPPF, and with the assessment undertaken by CTP we do not consider that the test of 'necessity' would be met. We therefore suggest that this element of the supporting text to the allocation is unnecessary and should be removed to avoid any ambiguity. Nevertheless, should it transpire that there is evidence that such junction improvements are required, Edenstone are happy to work with the Council to deliver these objectives.
- 2.5. It is worth noting that in response to the planning application the highway officer stated:
- "The revised Transport Statement has assessed the visibility at the junction of Tetbury Lane with the A429, and splays of 2.4m x 57m to the north and 2.4m x 54m to the south are considered appropriate, however, as the visibility to the south is often restricted by on street parking within the layby, and the radius kerblines at the junction are offset, this may need to be addressed as part of the development."*
- 2.6. No further clarification was provided from the highway officer in respect of the potential need to address this issue.

⁴ H2.13 (Ridgeway Farm, Tetbury Lane) as identified in the Submission Draft WHSAP

- 2.7. In addition, we note that paragraph 5.114 of the supporting text identifies that an extension of public footpath CRUD9 would be required, to the west of the Dawneys, linking with Tetbury Lane. It is worth noting that the outline planning permission granted at the front of the site for 10 dwellings was the subject of a s106 legal agreement requiring the provision of kissing gate to be installed to provide connectivity to the PROW from the site which has already been implemented by Edenstone at the site.
- 2.8. In all other respects, the proposed development at the site represents a continuation of the recently developed Phase 1 scheme and would be read against the backdrop of this recently completed development.

3. IS THE AMOUNT OF DEVELOPMENT PROPOSED FOR EACH SITE JUSTIFIED HAVING REGARD TO ANY CONSTRAINTS AND THE PROVISION OF NECESSARY INFRASTRUCTURE?

- 3.1. The site has been identified as being able to accommodate approximately 40 dwellings, in addition to the 10 dwellings that have already been constructed at the site⁵. We consider this to be a suitable and achievable level of development for the site and appropriate for the village.
- 3.2. It is worth noting that the site is already serviced by an existing access point from Tetbury Lane which was approved as part of the outline planning application for 10 dwellings. Equally, Edenstone was aware of the Council's desire to expand the site whilst they were developing Phase 1. Capacity was therefore made in the services and facilities serving the site to enable a straightforward expansion for 40 dwellings. Therefore, there is existing infrastructure in place to serve additional development at the site.
- 3.3. Technical reports to support a full planning application at the site were submitted and no technical objections were raised in respect of highways, flood risk and drainage and ecology.
- 3.4. However, as identified in our initial representations to the pre-submission version of the WHSAP⁶, it is considered that to ensure a generous landscape buffer and new visual boundary⁷ to the north of the site can be achieved, a slightly amended red line would enable up to 40 dwellings to be more successfully accommodated at the site. There are currently no field boundaries on the site's western boundary, as acknowledged at paragraph 5.113 of the draft WHSAP, therefore the allocation of the site provides the opportunity to establish an appropriate new visual boundary in this location.

⁵ Outline planning permission, including means of access, was granted under planning reference 15/03136/OUT on the 24th March 2016 for the erection of ten dwellings at the site. Reserved matters approval was granted under reference 16/09797/REM.

⁶ Representations to pre-submission draft WHSAP attached at Appendix 3

⁷ As required by paragraph 5.113 of the draft WHSAP

4. 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?

Biodiversity

- 4.1. As identified earlier, site H2.13 has been the subject of a full planning application for 36 dwellings. That application was supported by an Ecological Assessment prepared by Ecology Solutions Ltd which identified that the proposals would have no significant adverse effects on any statutory or non-statutory sites of nature conservation interest. It was also identified the proposals will have no adverse effects on any protected species or Priority Species. Whilst it was identified that there may be minor losses to hedgerow, the planting of new sections of native hedgerow would mitigate for these losses.
- 4.2. No objection to the application was raised by the Council's Biodiversity Officer to the proposals, subject to the imposition of suitable conditions.

Green infrastructure and agricultural land

- 4.3. Site H2.13 has the ability to provide enhancement to the local hedgerow network and tree stock, including the management of existing features. The full planning application also proposed approximately 2,700 sqm of new Green Infrastructure/Public Open Space.
- 4.4. It is currently unclear what quality/grade of agricultural land site H2.13 as there is no up-to-date information relating to this that can be relied upon. That being said, we concur with the Council's conclusion in its Sustainability Appraisal report that regardless of whether the site constitutes B&MV agricultural land, the scale of development and its location would mean any such loss would be minor to negligible.

Landscape quality and character

- 4.5. The draft WHSAP suggests at paragraph 5.112 that site H2.13 *'is in a location that has the capacity to accommodate change from an environmental and landscape perspective'*. We agree with this statement.
- 4.6. Site H2.13 is not affected by any local or national landscape quality designations. It is located outside of the AONB, this is significant given that 44% of the area administered by Wiltshire Council constitutes AONB.
- 4.7. The Council's Landscape Officer stated in respect of the application proposals at the site for 39 dwellings in September 2018⁸:

"... I do not consider that the setting of the Cotswolds AONB would experience any adverse direct or indirect effects resulting from the proposed scale or nature of development which would harm the statutory purpose and function of this national landscape designation."

⁸ Landscape Officer's full response attached at Appendix 4

- 4.8. The full planning application at the site was also supported by a Landscape and Visual Appraisal prepared by the Environmental Design Partnership⁹. That report concludes that the development of the site would inevitably result in a change in the baseline landscape character of the site and in some views available towards it. However, it also concludes that such effects are very limited in their extent with perhaps the only noteworthy effect being on views for neighbouring residents, as is often the case. The proposals also offer the opportunity to provide enhancement to the local hedgerow network and tree stock, including the management of existing features.
- 4.9. The appraisal concludes that the proposals will represent a small-scale extension to the existing settlement, which is entirely in keeping with the landscape character and would not result in any material landscape or visual effects.

Heritage assets

- 4.10. The full planning application was supported by a desk-based Heritage Assessment. The assessment establishes that there are no designated heritage assets within the study site. Development within the site will be visible in partial views from a limited part of Crudwell Conservation Area. However, the slight change in limited views from the conservation area is considered to have a negligible impact upon its character and appearance. This very low level of harm will fall well below the 'less than substantial' threshold set out in paragraph 134 of the NPPF.
- 4.11. The study site is not considered to contribute to the significance of any other designated heritage asset through forming part of their setting.
- 4.12. The site contains moderately preserved ridge and furrow, which is considered to be of low significance. Some of the ridge and furrow has been previously recorded by the Cotswold Hills National Mapping Programme (Janik et al. 2011) and there is existing detailed LiDAR data for the entire study site providing a good record of the remains.
- 4.13. The assessment also considered the potential for (as-yet to be discovered) archaeological assets within the site and has established that the study site has a low potential for significant remains dating to the Prehistoric, Roman, Saxon and medieval periods, and negligible potential for significant remains dating to the post-medieval and modern periods.
- 4.14. The Council's Archaeological Officer also confirmed on 10th July 2018 that they supported the application subject to a condition to secure a programme of archaeological recording.

Strategic and local infrastructure including transport

- 4.15. As a starting point it must be acknowledged that Wiltshire is a rural county by nature as highlighted by the Council in during the Matter 2 hearing sessions.
- 4.16. Taking this context into account, Site H2.13 is in an accessible location with good access to everyday facilities by a range of means of transport. Crudwell has a number of services and facilities that are

⁹ Landscape and Visual Appraisal attached at Appendix 5

also within walking distance of the site. Further details in this respect are set out in response to question 7 further below.

- 4.17. Wiltshire Council highway officers also did not suggest that the development of the site for either 39 or 36 dwellings would have a detrimental impact on the local or strategic highway network when considering the full planning application.

The efficient operation of the transport network, highway safety

- 4.18. The full planning application was supported by a Transport Statement and Travel Plan, as well as detailed highway access plans. Vehicular access to the application site would be via a continuation of the access road already approved at the site¹⁰, with the priority junction already constructed and in use from Tetbury Lane.

- 4.19. A consultation response from Wiltshire Council's Highway Officer confirms that there is no technical highway objection to the proposals¹¹.

Air and water quality, noise pollution, odours, land stability, groundwater and flood risk

- 4.20. The planning application at the site was supported by a Flood Risk Assessment and Drainage Strategy. Wessex Water confirmed they had no objection to the proposals subject to conditions as did the Lead Local Flood Authority.

- 4.21. The application was also supported by an Air Quality Assessment which confirmed that the level of change due to traffic generated by development is very small (less than 0.1 µg/m³ to annual mean concentrations of NO₂ and PM₁₀), which would not have a significant impact upon local air quality. Nevertheless, Edenstone proposed to provide EV charging points at the site as a form of mitigation.

- 4.22. The Environmental Health Officer raised no objection to the proposals, and it is not considered that the proposals will have any adverse impact on noise pollution, odour or land stability.

Open space, recreational facilities and public rights of way

- 4.23. The allocation of the site will enable the provision of additional publicly accessible open space. It will also ensure a connection is maintained to the PROW to the north east of the site which was secured as part of the outline planning permission granted for 10 dwellings at part of the site with a kissing gate provided.

¹⁰ Planning reference 15/03136/OUT

¹¹ The full WCC consultation response is attached at Appendix 6

5. IN RELATION TO THE ABOVE, DOES THE PLAN CONTAIN EFFECTIVE SAFEGUARDS OR MITIGATION MEASURES NECESSARY TO ACHIEVE AN ACCEPTABLE FORM OF DEVELOPMENT?

- 5.1. It is considered in respect of site H2.13 that the Plan generally provides suitable detail in relation to the mitigation measures necessary to achieve an acceptable form of development.
- 5.2. However, we would reiterate our comments raised in response to question 2 regarding the need to provide new junction arrangements at Tetbury Lane as the evidence to support this requirement is currently unclear.

6. WHAT INFRASTRUCTURE IS CRITICAL TO THE DELIVERY OF EACH SITE? WHERE CONTRIBUTIONS ARE SPECIFIED, ARE THEY NECESSARY AND JUSTIFIED BY THE EVIDENCE BASE? IS THE PLAN SUFFICIENTLY CLEAR ON HOW AND WHEN INFRASTRUCTURE PROVISION WILL BE REQUIRED?

- 6.1. The Council has indicated that the local primary school is currently considered to be at capacity. It is considered that this can be dealt with appropriately at planning application stage by way of a s106 contribution. As part of the full planning application for 36 dwellings Wiltshire Council also suggested a contribution towards the expansion of Crudwell CE Primary School as an acceptable solution to address this matter.
- 6.2. In respect of other infrastructure identified as required in respect of site H2.13, we remain concerned that the Council identifies a need for junction improvements at the Tetbury Lane which we consider are unjustified and unnecessary. Please see our full response to question 2 in this regard.
- 6.3. With regard to the suggested improvements for pedestrians along the Tetbury Lane, it is agreed that these would be helpful in providing greater safe pedestrian access to the centre of the village from the site and it was demonstrated as part of the recent planning application that these improvements can be delivered¹².
- 6.4. Prior to the construction of the 10 dwellings at the site, there were no footways located along Tetbury Lane in order to connect to existing facilities to the east or west of the application site. However, a footway has been constructed at the site access junction by Edenstone in order to provide a suitable pedestrian link west along Tetbury Lane to connect to the existing pedestrian access to Crudwell Village Hall and this was secured by a legal agreement.
- 6.5. It should however be noted that despite the lack of footways prior to the development of 10 dwellings at the site, there have been no recorded personal injury collisions and site visits undertaken by Cotswold Transport Planning indicate that pedestrians comfortably walk along Tetbury Lane, which essentially functions as a shared surface street.
- 6.6. Nevertheless, the full planning application proposed pedestrian infrastructure improvements between the application site and the A429 to the east along Tetbury Lane. The Council's Highway Officer raised no objection to these improvements identifying they could be secured by a legal agreement with the Council, and a safety audit undertaken as part of the process. Therefore, it is considered that the plan provides sufficient detail in respect of this infrastructure requirement.

¹² See accompanying Transport Statement at Appendix 2 for further details

7. IS THE SITE IN AN ACCESSIBLE LOCATION WITH GOOD ACCESS TO EVERYDAY FACILITIES BY A RANGE OF MEANS OF TRANSPORT? DOES THE PLAN PROVIDE AN ADEQUATE BASIS TO ADDRESS ANY AREAS OF DEFICIENCY?

7.1. There are a number of local services and amenities within a reasonable walking distance (between approximately 190m and 860m) of site H2.13 as identified in the Sustainability Appraisal work supporting the draft WHSAP. A local facilities map has been produced by Cotswold Transport Planning and this is provided in Appendix G of the Transport Statement attached at Appendix 2, a list of local services and approximate distance from site H2.13 is provided below:

- Recreation Ground - 190m west;
- Crudwell Village Hall – 240m west;
- Crudwell Pre-school (located within the Village Hall) – 240m west;
- Crudwell Old Post Office Bus Stops – 440m northeast;
- Best Western Mayfield House Hotel – 520m northeast;
- The Potting Shed Public House – 660m northeast;
- Crudwell C of E Primary School – 710m northeast;
- All Saints Church - 860m northeast;
- The Wheatsheaf Inn Public House – 645m southeast; and
- Crudwell Post Office – 645m southeast.

7.2. An increase in residents within the village will also help to sustain and enhance services and facilities in the village.

7.3. In addition to these local facilities and services, the towns of Tetbury and Malmesbury are both located within 6km of the application site, which offer future residents the ability to travel short distances to these locations in order to access employment, social and leisure destinations. A Tesco Supermarket is located in Tetbury some 7km west of the site and a Waitrose is located in Malmesbury approximately 7km to the south of the site. Malmesbury is also home to Dyson's Headquarters, where there are currently 333 jobs advertised.

7.4. Kemble Enterprise Park is also located some 4km north east of the site. The Park extends to some 540 acres and accommodates around 1 million square feet of warehousing, industrial and office occupiers. There are currently over 25 companies employing up to 1,000 people at the Park with a recent planning permission¹³ granting further new warehouse and office space at the Park with the potential to employ a further 95 office workers and 271 warehouse workers¹⁴, the sales particulars for the new development are attached at Appendix 7. Therefore, it is one of the largest employment locations for Wiltshire to the north of the M4.

¹³ Application reference: 16/00320/FUL

¹⁴ HCA Employment Densities Guide: 3rd Edition November 2015

- 7.5. Some 3km north east of the site is the neighbouring village of Chelworth which houses the Headquarter Offices and manufacturing facilities of Alvan Blanch Ltd. Alvan Blanch is a British manufacturing and engineering company specialising in the design, production and supply of machines and integrated systems for the primary and secondary processing of agricultural produce and waste materials. The company employs around 80 people in skilled and unskilled jobs with an annual turnover of £10m.
- 7.6. Kemble railway station is also located approximately 6km north of the application site, which offers the opportunity for access to regional and national rail services. Cotswold Airport is located some 10km north east of the site.
- 7.7. The Swindon and Wiltshire Strategic Economic Plan January 2016 also identifies Crudwell to be within Zone 1 of the Swindon M4 Growth Zone. This is identified as a geographic area with a concentration of people and business that have been shown to contribute towards improved economic performance and productivity, delivering wider economic benefits to the region as a consequence. It is an area where it is considered there are currently large clusters of economic activity and where there is the greatest capacity for supporting sustainable growth in the future¹⁵.
- 7.8. The spatial strategy in the WCS recognises¹⁶ the importance of delivering new jobs and infrastructure alongside future housing delivery. Taking into account the above, it is clear that Crudwell is situated in a position that is surrounded by existing and new local employment opportunities, such as that at Kemble Enterprise Park, and therefore it can be said that the development of up to 40 additional houses in the village would accord with the spatial strategy in this regard.
- 7.9. Overall, it is therefore considered that the site is in an accessible location for existing village services and facilities as well as wider services and facilities at Kemble, Malmesbury and Tetbury. It is also worth noting that paragraph 103 of the NPPF advises that opportunities to maximise sustainable transport solutions will vary between urban and rural areas, and this should be taken into account in plan-making.

¹⁵ Swindon and Wiltshire Strategic Economic Plan January 2016 attached at Appendix 8

¹⁶ See paragraph 4.8 of the WCS

8. IN CASES WHERE ALLOCATIONS DO NOT HAVE SPECIFIC POLICIES, IS THE RELIANCE ON SUPPORTING TEXT LIKELY TO BE AN EFFECTIVE MEANS OF DELIVERING THE COUNCIL'S REQUIREMENTS FOR EACH SITE? WHAT IS THE JUSTIFICATION FOR SOME SITES HAVING SPECIFIC POLICIES AND SOME NOT?

8.1. We have no comment in response to this question.

9. IS THE DEVELOPMENT PROPOSED FOR EACH SITE DELIVERABLE IN THE TIMESCALES ENVISAGED?

- 9.1. In respect of site H2.13 it is considered that the delivery of an additional 40 dwellings at the site over the plan period is both suitable, available and achievable.
- 9.2. Edenstone is a small-scale house builder with a good track record of delivering such development. The quality of Edenstone's houses is also evident, all units were sold for the phase 1 development within 4 months of the developments completion and inquiries are already being taken for an additional phase of development¹⁷.
- 9.3. Outline planning permission for Phase 1 was granted in August 2015. Edenstone subsequently acquired the site and the reserved matters application was approved in February 2017 with the development of the site completed in April 2018¹⁸.
- 9.4. The site also already benefits from existing infrastructure to accommodate the proposed development, including an existing access point, services and facilities.
- 9.5. Therefore, it is evident that the delivery of this site for up to 40 additional dwellings is achievable and deliverable within 5 years. It is worth noting that paragraph 68 of NPPF acknowledges that small and medium sized sites can make an important contribution to meeting the housing requirement of an area and are often built-out relatively quickly.

¹⁷ The sales brochure is attached at Appendix 9

¹⁸ See attached letter from Edenstone at Appendix 1

10. IS THE DELETION OF THE SITE NECESSARY TO MAKE THE PLAN 'SOUND'?

- 10.1. It is our opinion that the deletion of site H2.13 is not required to make the plan sound. Conversely, we consider its removal would reduce the balance and supply of sustainable housing to the north of Wiltshire.
- 10.2. We have identified our concerns in our earlier hearing statement¹⁹ regarding the ability of the plan to deliver the level of housing suggested at certain sites over the plan period. We have also raised concern regarding the Council's proposed windfall allowance. Bearing in mind this context, it is considered that the retention of site H2.13 in the WHSAP is essential and will assist the Council in meeting its housing needs over the rest of the plan period on a site that has existing infrastructure in place to accommodate new development quickly.
- 10.3. Nevertheless, even if it were to be considered that the WHSAP would not fall short on delivering its requirements this does not mean that the deletion of site H2.13 is therefore necessary in order to make the plan sound. As previously highlighted, the figures stated in the WCS for Community Areas are indicative figures in order to allow a flexible approach and enable the plan to positively respond to opportunities without being inhibited by an overly prescriptive and rigid approach²⁰.
- 10.4. Para 4.34 of the WCS also identifies that the indicative Community Area requirements should *"be capable of being a material consideration to ensure that delivery is distributed broadly in line with the strategy... The policy framework sets out the strategic pattern of growth, while allowing some flexibility to respond to future, spatially distinctive opportunities and constraints. Indeed, across the plan period, delivery should be in general conformity with the delivery strategy."* (our emphasis).
- 10.5. In line with the above, during discussions at the examination relating to Matter 2 on 2nd April, the Council stated that it was *"not critical"* for the WHSAP to be in line with the figures stated in the WCS for the community areas and it was reiterated that these figures are supposed to be flexible in order to enable sufficient housing across the HMAs as a whole. The Council also stated that *"the WCS does not say that Large Villages are unsustainable, and they should not be preserved in aspic."*
- 10.6. There is clearly a need for new development in Large Villages such as Crudwell. The Pre-submission Draft Plan stated: *"Crudwell is designated as a Large Village where development is limited to meet local needs. It has the lowest rate of growth of all the Large Villages in the community area and there is an identified local need for housing..."*²¹
- 10.7. Furthermore, Stage 4a of the Council's Site Selection Process (Appendix G to the MCA Topic Paper July 2018) stated in respect of the site:

"Additional housing development at Crudwell would address an identified need for housing in the local area. The recent Rural Housing Needs Survey conducted in January 2015 identified

¹⁹ Hearing Statement in respect of Matter 2

²⁰ See paragraph 4.20 of the WCS and also the WCS Inspector's report

²¹ Pre-submission draft WHSAP pages 57-58

a requirement for 6 affordable rented properties and 2 shared ownership properties in Crudwell. These figures only represent the needs of those who responded to the Parish Survey and as such may underestimate the total affordable housing need in the parish. Based on evidence from the Council's housing register, a further 48 households in the local area are actively seeking affordable housing. An allocation of land would bring forward affordable dwellings. This would meet the needs of the local community and clearly provide positive benefits. "

- 10.8. The recent Crudwell Parish Housing Needs Survey (March 2018) sets out that there is a need for affordable and market housing in the Parish for around 20-25 dwellings. Furthermore, as identified in the Pioneer Housing Needs Assessment report²² it is clear that the need for affordable housing in the area is likely to be even more acute than this. The Council's housing register also identifies that in the MCA specifically, there are currently 54 households seeking affordable housing²³.
- 10.9. We also note that at the hearings for Matter 2 the Council stated that flexibility of the indicative figures for community areas is a matter of judgement as to what is a reasonable level so that the strategy is not considerably distorted. When looking at table 5.8 of Topic Paper 4 it is identified that there is a 0% variation on the indicative WCS requirement in the MCAR. Therefore, if an additional 40 dwellings were to be accommodated at Crudwell, this would result in a 7.8% variation in the MCAR from the WCS indicative figures.
- 10.10. Given that the WCS figures are supposed to be indicative and flexible, it is considered that the proposed allocation of site H2.13 for up to 40 further dwellings could not, therefore, be said to result in an increase of housing in this area that would distort the purpose of the spatial strategy set by the WCS. Indeed, at Appendix G of the MCA Topic Paper (July 2018)²⁴ it is stated: *"The site would deliver a significant, but nonetheless acceptable and justified level of growth when considered within the context of the indicative housing requirements for the Community Area remainder."*
- 10.11. Furthermore, it is worth highlighting that there are no other housing sites proposed in the WHSAP to the north of the District and the M4. Therefore, the removal of site H2.13 is of particular concern given the identification of this area as a strategic economic Growth Zone as set out in response to question 7.
- 10.12. Overall, we therefore consider that the removal of site H2.13 (Ridgeway Farm, Crudwell) is not necessary in order to make the plan sound. In fact, the retention of allocation H2.13 will help to ensure that the WHSAP is positively prepared and effective in line with paragraph 35 of the NPPF.

²² Pioneer report attached at Appendix 1 of our hearing statement in respect of Matter 2

²³ Housing Register information obtained October 2018

²⁴ Also reiterated in the MCA community area topic paper to support the pre-submission draft plan dated June 2017

APPENDIX 1: LETTER FROM EDENSTONE HOMES