

Wiltshire Housing Site Allocations Plan

Pre-submission Draft Representation Form and Notes

Ref:	(For official use only)
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Please return to Wiltshire Council, by 5pm on Friday 22nd September 2017.

By post to: Spatial Planning, Economic Development and Planning, Wiltshire Council, County Hall, Bythesea Road, Trowbridge, Wiltshire, BA14 8JN.

By e-mail to: spatialplanningpolicy@wiltshire.gov.uk

Tel: 01225 713223

Website: <http://wiltshire.gov.uk/wiltshsgsiteallocationsplan>

This form has two parts:

Part A – Personal details

Part B – Your representation(s). Please use a separate sheet for each representation.

Part A – Personal details

*if an agent is appointed, please fill in your Title, Name and Organisation but the full contact details of the agent must be completed.

	1. Personal details	2. Agent's details (if applicable)*
Title		Miss
First name		Tara
Last name		Maizonnier
Job title (where relevant)		Senior Planner
Organisation (where relevant)	Edenstone Homes	Hunter Page Planning
Address Line 1	C/o Agent	Thornbury House
Address Line 2		18 High Street
Address Line 3		Cheltenham
Address Line 4		Gloucestershire
Postcode		GL50 1DZ
Telephone Number		01242 230066
Email Address		Tara.maizonnier@hunterpage.net

Part B – Please use a separate sheet for each representation

Please note your representation should cover succinctly all the information, evidence and supporting information necessary to support/ justify the representation and the suggested change, as there will not normally be a subsequent opportunity to make further representations based on the original representation to the pre-submission draft consultation.

After this stage, further submissions will be only at the request of the Inspector, based on the matters and issues he/ she identifies for examination.

Name or organisation:	Hunter Page Planning (on behalf of Edenstone Homes)
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3. To which part of the Wiltshire Housing Site Allocations Plan does this representation relate?

Policy:	Paragraph:	Table:	Figure:
Site: H2.13 - Ridgeway Farm, Crudwell		Other: Community Area Topic Paper: Malmesbury	

4. Do you consider the Wiltshire Housing Site Allocations Plan is:

(i) Legally compliant	Yes:	X	No:	
(ii) Sound	Yes:	X	No:	
<i>If you have entered No to 4 (ii), please continue to Q5. In all other circumstances, please go to Question 6.</i>				

5. Do you consider the Wiltshire Housing Site Allocations Plan is **unsound** because it is not:

(1) Positively prepared	
(2) Justified	
(3) Effective	
(4) Consistent with national policy	

6. Please give details of why you consider the Wiltshire Housing Site Allocations Plan is not legally compliant or unsound. Please be as precise as possible.

If you wish to support the legal compliance or soundness of the Wiltshire Housing Site Allocations Plan, please also use this box to set out your comments.

<p>This representation relates to the Site Allocations plan with specific reference to the proposed allocation of site H2.13 - Ridgeway Farm, Crudwell for residential development.</p> <p>The draft Allocation plan identifies a residual requirement for an additional 70 new homes in the Malmesbury Community Area. We agree with the comments made at Paragraph 3.23 – 3.24 of the Council’s Housing Land Supply Topic Paper that there is a requirement to plan for additional growth to maintain supply throughout the plan period in accordance with Para 47 of the National Planning Policy Framework (NPPF). That paragraph states that ‘to boost significantly the supply of housing, local planning authorities should:</p> <ul style="list-style-type: none"> Identify and update annually a supply of specific deliverable sites sufficient to provide five years’ worth of housing against their housing requirements with an additional buffer of 5% (moved forward from later in the plan period) to ensure choice and competition in the market for land. Where there has been a record of persistent under delivery of housing, local planning authorities should

increase the buffer to 20% (moved forward from later in the plan period) to provide a realistic prospect of achieving the planned supply and to ensure choice and competition in the market for land;

- Identify a supply of specific, developable sites or broad locations for growth, for years 6-10 and, where possible, for years 11-15;
- For market and affordable housing, illustrate the expected rate of housing delivery through a housing trajectory for the plan period and set out a housing implementation strategy for the full range of housing describing how they will maintain delivery of a five year land supply of housing land to meet their housing target

It is considered that the proposed allocation is consistent with those objectives and the allocation of this site in the Plan will enable the delivery of sustainable development in accordance with the policies of the Framework.

We also note that in the February 2017 minutes from the Swindon and Wiltshire Local Enterprise Partnership Joint Strategic Economic Committee refer to the joint Wiltshire and Swindon SHMA. The minutes highlight that the full OAN for housing over the 20-year period 2016-36 is considered to be 73,000 dwellings in Swindon and Wiltshire or 3,650 dwellings per annum. This compares to a level of approximately 3,600 dwellings per annum set out in the authorities adopted Plans. Whilst it is acknowledged that this is yet to be tested at examination through the Plan making process, this OAN indicates that there could be a need for further housing over the plan period than currently identified. As such the identification of sites such as Ridgeway Farm for development in the Malmesbury Community Area will assist in the Council maintaining a 5 year supply of deliverable housing land.

Crudwell is identified in the Core Strategy as a Large Village where some development is required to support existing services and facilities, and encourage new services, but to also meet identified local needs for housing including affordable homes, helping the Council achieve its affordable housing target. Based on the Council's current Affordable Housing Register, we understand that there are currently 61 households on seeking affordable housing in the Malmesbury Community Area and the allocation of this site will therefore go some way to helping to address this need.

The evidence base supporting the plan demonstrates that the site at Ridgeway Farm is the most sustainable and logical location for new housing to contribute to meeting the identified growth needs of the area. Its inclusion as an allocated housing site for 40 additional dwellings is fully supported by Edenstone Homes.

The Framework states that for sites to be considered 'developable' they should be in a suitable location for housing development and there should be a reasonable prospect that the site is available and could be viably developed at the point envisaged. To be considered 'deliverable' the Framework requires sites to be available now, offer a suitable location for development now, and be achievable with a realistic prospect that housing will be delivered within five years and, in particular, that development of the site is viable. In respect of the subject site, those tests are addressed as follows:

Available

The site is under the control of Edenstone Homes who have a good track record of delivering quality residential development that is sensitively designed. The site was formerly a farmstead and associated agricultural land; it is no longer in use for agricultural purposes and is therefore available for development now.

The site has been the subject of initial technical appraisals which have identified that there are no significant physical or environmental constraints which would delay or preclude the development of the site.

This is further demonstrated by the current planning permission that is being developed out by Edenstone Homes at the front of the site for 10 dwellings (application reference: 15/03136/OUT). Furthermore, the Council will be aware that prior to permission being granted for 10 units, an outline application was submitted for 19 units (14/07419/OUT), which was later withdrawn.

Pre-application discussions with the Planning Authority's Development Management team have now been instigated for a scheme for a further 40 dwellings; in line with the draft allocation plan.

Suitable

The site is situated on the edge of the large village of Crudwell which is a sustainable location in line with Core Policy 1 of the adopted Wiltshire Core Strategy.

The site does not fall within any landscape or environmental designation and is not within Flood Zones 2 or 3. It is outside of the Crudwell Conservation Area and there are not any listed buildings within the immediate vicinity of the site.

Technical surveys have been carried out which conclude that the site is of limited ecological value; it has no notable landscape features and makes limited contribution to the overall character of the area.

A Heritage Desk based assessment confirms that there are no designated heritage assets within the site and setting of assets within the village would not be adversely affected by the proposals.

Initial highways studies have confirmed that safe and suitable access can be achieved from the site onto the public highway and that the addition of 40 dwellings will not have a significant cumulative impact on the local highway network. In addition, the site is suitably located for development with good accessibility to local services and employment opportunities by sustainable modes of transport. The site is within reasonable walking/cycling distance to the centre of the village and a bus stop is present providing connectivity to Chippenham, Cirencester and Bath and the wider the public transport network.

Initial drainage studies have identified that suitable drainage proposals for the management of both surface water and foul drainage can be adequately provided to support the development and its quantum of 40 dwelling units.

Initial landscape studies have identified that the site relates very well in both landscape and visual terms to the existing settlement, and that the site represents a logical development which should be easily assimilated into this part of the landscape. The site also offers opportunities to provide enhancement to the local hedgerow network and tree stock, including the management of existing features. It also offers a significant opportunity to connect to the adjacent PROW network providing a safe walkable route between the village centre to the east and the village hall to the west. This is in line with the Council's Sustainability Appraisal report which states that *"the development of the site would have the potential to appropriately protect and enhance the intrinsic character and scenic beauty of the countryside."* This conclusion is supported by the technical work that by the work undertaken by the Environmental Design Partnership.

In light of the above it is evident that the site has no notable development constraints. The site lies adjacent to a large village and existing residential development and is considered wholly suitable for residential development to address housing needs.

Achievable

The site is unused, in single ownership and is being actively promoted by Edenstone Homes for residential development. There are no legal or ownership issues that would prevent development coming forward on the site.

The site represents a viable development which can be delivered quickly. The site is adjacent to existing residential development. Furthermore, as previously noted, part of the site already has permission for the development of 10 dwellings which is currently being built out by Edenstone, further demonstrating the suitability of the site for residential development.

It is evident that residential development represents a viable future use for the site which can be delivered quickly. As such, the development of the site can be considered achievable.

Recommendations and conclusion

The above demonstrates that land at Ridgeway Farm, Crudwell, is suitable for residential development as identified by the Council's evidence base. The site does not have any significant development constraints and will help achieve the Government's aim to boost significantly the supply of housing in sustainable locations.

The site is available, suitable and achievable and thus satisfies the requirements of the Framework in terms of it being deliverable. The NPPF at paragraph 47 requires LPA's to boost significantly the supply of

housing. It is considered that the proposed allocation is consistent with that objective and the plan should enable the delivery of sustainable development in accordance with the policies in the Framework.

However, whilst Edenstone fully support the allocation of the site for 40 dwellings, they have undertaken an initial development appraisal of the land in question. It is considered that, when taking into account the necessary amenities needed to accommodate the development, the proposed boundary for the allocation will not necessarily deliver the number of dwellings that the draft Plan envisages. It is therefore considered that a slight amendment to the boundary within the draft Plan should be made. This amendment will allow the proposed allocation to be consistent with established field boundaries and the existing pattern of development in the Village; will provide a strong boundary of development for the Village and would better reflect the envisaged quantum of development to meet local housing needs.

A plan is enclosed to show the suggested amendments to the boundary. You will note from the red line plan provided that we consider it sensible to utilise the northern most field boundary which is well established and would act as an appropriate buffer to the site in landscape terms. It is our consideration that if the red line boundary depicted in the draft allocation were to be followed, this would leave an undesirable strip between the development and existing hedgerow boundary to the North.

(Continue on a separate sheet/ expand box if necessary)

7. Please set out what change(s) you consider necessary to make the Wiltshire Housing Site Allocations Plan legally compliant or sound, having regard to the test you have identified at 5 above where this relates to soundness. You will need to say why this change will make the Wiltshire Housing Site Allocations Plan legally compliant or sound. It will be helpful if you are able to put forward your suggested revised wording of any proposal or text. Please be as precise as possible.

No comment.

(Continue on a separate sheet/ expand box if necessary)

8. If your representation is seeking a change, do you consider it necessary to participate at the oral part of the examination?

<input type="checkbox"/>	No, I do not wish to participate at the oral examination	<input checked="" type="checkbox"/>	Yes, I wish to participate at the oral examination
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9. If you wish to participate at the oral part of the examination, please outline why you consider this to be necessary.

To confirm the status of the development site and land concerned and to reaffirm why Edenstone Homes strongly support the draft allocation of Ridgeway Farm at Crudwell.

(Continue on a separate sheet/ expand box if necessary)

Please note the Inspector will determine the most appropriate procedure to adopt to hear those who have indicated that they wish to participate at the oral part of the examination.

Signature:	Tara Maizonnier	Date: 19/09/2017	
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