

Wroughton Neighbourhood Plan 2014 - 2026 Consultation

**Representation on behalf of Balmoral Land (UK) Ltd
Land at Artis Farm, Swindon Road, Wroughton**

16th December 2015

Introduction

This representation is submitted on behalf of Balmoral Land (UK) Ltd in respect of land at Artis Farm, Swindon Road, Wroughton. This follows the initial submission to the Neighbourhood Plan that was made with regard to this land in May 2014, and November 2014. A copy of the original submission is included here for convenience (Enclosure A).

This representation sets out the planning background to the site, highlights relevant parts of the draft Neighbourhood Plan and how the subject site should be also be considered in order to assist the Parish Council in meeting its requirement to provide sufficient land for the required future residential predictions.

Planning context

The statutory development plan for the area is the Swindon Borough Local Plan 2026 (adopted March 2015).

The Wroughton Neighbourhood Plan (WNP) has been prepared by Wroughton Parish Council under the provisions of the Localism Act 2011. The Act requires that the WNP must be in general conformity with the strategic policies of area. This is provided by the statutory development plan - the adopted Swindon Borough Local Plan 2026 which sets the wider planning context.

The key policies of the SBLP which set important context for the WPC are as follows:

- Local and Neighbourhood Planning (Policy LN1)
- Sustainable Development Principles (Policy SD1)
- The Sustainable Development Strategy - Housing and employment land distribution (Policy SD2)
- Open spaces allocations (Policy EN3)
- Indicative non-coalescence area Wichelstowe (Policy NC1)
- High Quality Design (Policy DE1)
- Rural settlements Wroughton (Policy RA2)

Policy LN1: Local and Neighbourhood Planning sets out the approach to the preparation of Neighbourhood plans in accordance with national policy guidance and legislation.

Policy SD1: Sustainable Development Principles sets out key principles to be followed by all development proposals including, for example, to be of high quality, respect and conserve and / or enhance the natural, built and historic environments.

Policy SD2: The Sustainable Development Strategy states that: “*Sustainable economic and housing growth will be delivered in Swindon Borough during the plan period through the provision of:…About, but not less than, 22,000 dwellings between 2011 and 2026*” (p.35). This proposes at least 150 dwelling units for Wroughton. The justification text for this states that this number of units may be exceeded where the acceptability of this has been tested through the Neighbourhood Planning process. The urban and rural settlement boundaries fall under this policy also.

The policy also states that outside the urban settlement of Swindon development “*…will be supported within the rural settlement boundaries as shown on the Policies map, or on land allocated in a Neighbourhood Plan or Site Allocations DPD …where it delivers (at least) the quantum of development identified in the Plan and responds positively to address local needs*”.

Policy NC1: Wichelstowe allocates land for mixed-use development comprising 4,500 homes, employment land, education, local centres, and open-space. Part (g) of the policy states that “*The character and identity of Wroughton will be protected by a principle of non-coalescence between the settlements. The land between Wichelstowe and the village shall remain part of the countryside. However, small scale development within this area, as defined on the Policies Map, will be permitted where it retains or enhances the existing character of the countryside and: involves the re-use, conservation or extension of existing buildings at a scale appropriate to their location, in accordance with the criteria specified in Policy DE1; or is an essential requirement directly related to the economic or social needs of the rural community.*”

Policy DE1: High Quality Design provides design principles against which development proposals will be assessed including: context and character; layout, form and function; amenity; and quality of the public realm.

Policy EN3: Open Space states that open space assets defined on the Policies map will be protected from development unless, *inter alia*: “*…it can be demonstrated that alternative provision can be made locally of equivalent or better size, quality and accessibility; or the proposed development is ancillary to the main use of the site and protects its public open space function…*”

Policy RA2: Wroughton states that development shall accord with policies SD1 and SD2 and support a number of local priorities including to: “*retain Wroughton’s independent identity from Swindon by maintaining separation between Wichelstow and the village*”.

The proposals map identifies land between the M4 and Wroughton as the ‘non-coalescence’ zone (policy NC1), and also a number of land parcels are proposed to be designated as open spaces (policy EN3).

Wroughton Neighbourhood Plan 2014 - 2026 Consultation

The draft Neighbourhood Plan (WNP) has been prepared by the Parish Council. The plan states that it “**must comply with Swindon Borough Council’s Local Plan 2026 and so must accommodate at least 150 new dwellings within the village settlement boundary between 2011 and 2026**” (p.1)

The majority of the residential allocations are proposed to be accommodated on two sites: DP2 Land at North Wroughton (120 dwellings), and DP7 Land east of Ridgeway School playing fields (34 dwellings). The remaining proposed allocation of 46 units is spread across five other sites around and within the settlement. Clearly the majority of the proposed allocations (in terms of unit numbers) are outside the proposed village settlement boundary. This is contrary to the aforementioned opening statement.

It states in respect of DP2 that it is “.. a mainly brownfield site which is considered to be suitable for a maximum of 120 homes. Any proposal must include soft landscaping to the north to protect the views into Wroughton from the north, and sports provision to the south. Provision must also be included for future access, possibly by way of a no-through road, to any school campus to the west of the site which may be developed in the future”.

It is considered that this land should not seek to provide the majority of the required residential units (over 86% of the required 150 units) because:

- (a) It is outside the adopted SBLP settlement boundary;
- (b) It is within the area allocated in the SBLP as the non-coalescence zone (policy NC1) and is contrary to policy RA2;
- (c) The reference to the site being ‘mainly brownfield’ is factually incorrect and misleading. Whilst clearly part of the land has been previously developed adjacent to the existing settlement, the majority is open pastoral land. This was accepted in the recent planning inquiry (Land at Berkeley Farm, Ainscough Strategic Land, PINS reference 3035660); and,
- (d) The assumption that there may, in future, be a school campus development to the west of the site would conflict with the SBLP allocation for open space (Policy EN3), and it is not substantiated sufficiently to constitute a reason for the residential allocation.

These are fundamental matters of fact which are being ignored in persisting with this allocation.

The second most significant housing allocation in the WNP is DP7. It states that it “*was already identified within the Swindon Local Plan 2011 and the emerging Local Plan 2026. This site may be required for any future development of a school campus and this use would be preferred. Should this site come forward for housing development then the sports and leisure land which would be lost must be provided elsewhere*” (p.19).

It is considered that this land should not be relied upon to provide a significant component of the required residential provision insofar as:

- (a) Although land was included in the former local plan for development, it is no longer identified for this, and is instead proposed to be retained as open space (policy EN3); and,
- (b) It would be further erosion of the area to the north of Wroughton towards the M4 which forms the wider non-coalescence area to protect this important wider area of undeveloped land.

Finally proposed allocation DP3 is dependent on a new school being built. There is not sufficient certainty that this will, or even could be, achieved. Currently the allocation cannot be delivered. This makes the allocation unsound.

The assumption that the required housing allocation can be mostly met by the above sites is highly uncertain as the majority of the land is in direct conflict with the SBLP. Site DP2 particularly is contrary to the fundamental non-coalescence policy of the plan. The deliverability of these sites is therefore uncertain, not least from a policy position, and it is advocated that further alternative sites are considered and included so that the Neighbourhood Plan has sufficient flexibility to be able to deliver the required housing numbers, taking into account potential development constraints which have not yet been clearly identified.

Alternative provision

Representations were made to the Neighbourhood Plan (May 2014, and November 2014) for land at Artis Farm, Swindon Road to be included as potential residential allocation (Enclosure A). This proposed that, of a total site area of some 34 hectares, a parcel of 5.3 ha could be developed for residential use adjacent to the Artis Farm buildings (facing onto Swindon Road). This could provide in the order of 130 dwellings, including open space. This would be accessed primarily from a new exit from the existing roundabout on Swindon Road.

The site has no known ownership constraints and a number of assessments are being undertaken to review any other site constraints which may need to be addressed through the planning and design process (such as ecology).

This land is also outside the current settlement limit boundary however it is **not** part of the important non-coalescence zone, and neither is any part of it proposed to be allocated as open space. These are all significant and important considerations which demonstrate that this land is preferable to DP2, and should be included within the overall potential residential development areas in the WNP.

A site that is included in the WNP will still need to be subject to a design and masterplanning process, including community engagement, and, of course, a rigorous planning and design

process to ensure that negative impacts are minimised, and that community and environmental benefits are maximised. This would ensure that the development of the site (i.e. the release of residential units) could be appropriately phased in accord with a potential phasing that could be set out in the neighbourhood plan.

It is considered then that this area should be included within the proposed development areas for residential development in order to give appropriate flexibility to the Neighbourhood Plan and ensure that it does not conflict with key allocations and policies in the Swindon Local Plan.

Conclusion

This representation has set out why the land at Artis Farm should be included within the WNP as a potential residential development area. It has identified that, whilst the subject site is also outside the current settlement boundary, it does not conflict with important Local Plan allocations. There is certainty of delivery of this land (willing landowners plus highway access), and subject to detailed design considerations at planning stage, its inclusion would increase certainty that the settlement of Wroughton can deliver the required housing numbers in accord with the Local Plan.

Enclosures

Enclosure A