

Our Ref: MP/130402

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Forward Planning  
Swindon Borough Council  
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23 NOV 2015

FOWLER ARCHITECTURE  
AND PLANNING

Dear Sirs

**Wroughton Neighbourhood Plan 2015-2026 (Submission Version) – Public Consultation**  
**Potential Site for Residential Development – Land off Priors Hill, Wroughton**

I am writing on behalf of our Client, Mr. N Thomas, in response to the Wroughton Neighbourhood Plan (NP) that was submitted by Wroughton Parish Council to Swindon Borough Council earlier this year.

I made representations to the NP at the end of both 2013 and 2014, and in both instances I requested that Mr. Thomas' land at Priors Hill should be considered as a potential site for housing development as part of the Neighbourhood Plan process.

Our Client remains of the view that his site is appropriate for a modest residential scheme. It is available, achievable, and deliverable in the short term (1-5 years).

A proposal of circa 26 dwellings would preserve the character of the area and not have a harmful effect on the landscape beauty and scenic quality of the AONB.

Developer contributions and CIL monies would mitigate the impact of the proposed development on the local infrastructure, whilst the provision of affordable housing and a generous area of public open space, are notable community benefits that could result from developing the northern-most part of this site.

In light of this, I would like to make the following comments in respect of the current draft NP (submission version):

**Draft Policy RH3 – Objection**

This policy is inconsistent with the National Planning Policy Framework (NPPF), as it does not account for situations where the Local Planning Authority (LPA) cannot demonstrate a 5 years supply of housing land – as has been the case in recent years.

In line with paragraph 49 of the NPPF, Policy RH3 should be reworded to read as follows:

*“No development will be permitted on any greenfield or brownfield site outside the village settlement boundary (as defined by the Swindon Borough Local Plan 2026) unless the site is allocated as a*

potential development site within the Wroughton Neighbourhood Plan 2014-2026, or where the Local Planning Authority cannot demonstrate a five year-supply of deliverable housing sites (plus additional buffer).

With regards to the latter, preference will be given to sites that come forward, which immediately adjoin the village settlement boundary"

Rewording the policy as suggested would allow suitable sites such as that at Priors Hill to come forward over the plan period to allow the LPA to meet their full, objectively assessed needs for market and affordable housing.

#### **Draft Policy AS1 – Support**

Our Client supports the provision of play and sports facilities as part of wider development proposals, and developer contributions towards off-site facilities.

However, it is worth noting that only one of the possible development sites (DP2) set out at Chapter 9 of the draft NP would actually trigger the need to deliver the requirements of this policy. As such, the policy has not been positively prepared, contrary to paragraph 182 of the NPPF.

A more effective threshold would be 25 dwellings or more, and the policy should be reworded accordingly. On this basis, our Client's land at Priors Hill would trigger the relevant requirements, which in turn would enhance the recreational value of the site beyond what is seen at present.

#### **Draft Policy EN3 – Objection**

Our Client objects strongly to the proposed designation of his land as open space in the draft NP. Policy EN3 should be deleted accordingly.

No justification has been put forward as to why there needs to be a 'green zone' between Wroughton Airfield and the village. Furthermore, the proposed designation of this land is contrary to paragraph 77 of the NPPF, which outlines that local green space designations should only be used, where amongst other things:

- The green area is demonstrably special to a local community and holds a particular local significance, for example because of its beauty, historic significance, recreational value, tranquillity or richness of its wildlife.

The land at Priors Hill does not represent any of the above. Indeed, the undertone of paragraph 6.6 of the draft NP would suggest that the main reason for proposing to designate the site as open space is that it is considered to be "one of the most unsuitable sites for housing development".

We disagree strongly with this statement, and consider that a modest residential scheme could actually greatly enhance the recreational value of the site, as outlined in the representations we made at the end of 2013. The NPPF makes it clear that planning policies should enhance public rights of way (para. 75), create clear and legible pedestrian routes (para. 69), and promote high quality public space (para. 69).

If developed in part for residential development then the Priors Hill site could deliver the said objectives. If brought back into full-time agricultural use, whether it ploughed up or left for grazing, then a real opportunity would be missed to enhance the recreational value of the site.

Surely if a parcel of land should be designated as open space, then it should be the large agricultural field between our Client's land, and the airfield to the south (see outlined in red on the image below) – which is clearly unsuitable for housing given its proximity to the airfield (noise etc) and its exposed location on rising land.



(Source: [www.maps.google.co.uk](http://www.maps.google.co.uk))

The point is, that there will always be a buffer between the airfield and Wroughton, regardless of whether the Priors Hill site is designated as open space or not – which clearly it should not be.

#### **Draft Policy LE2 – Support**

The Client supports the wording of this policy, and the land at Priors Hill could facilitate the delivery of live-work units in the town over the plan period.

#### **Chapter 9 (Development Proposals) - Objection**

For the reasons set out in the representations we made to the NP at the end of last year, the land at Priors Hill is considered an appropriate site for a modest housing scheme of circa 26 dwellings.

Our Client respectfully requests that the Parish Council reconsider their position in respect of this site, which is physically well contained, and can deliver a number of community benefits. It is not a

site that should be designated as open space; to the contrary, the recreational value of the site should be enhanced accordingly, in line with the NPPF. This can be achieved through a well-designed residential development, which if focussed in the northern part of the site, will still allow for a 'green zone' between Wroughton Airfield and the village.

The Applicant would also like to draw to the Parish Council's attention that there are highways issues pertaining to Perrys Lane (DP4). Indeed, the Council's SHLAA (2013) notes that "*Access already exists to the site although the single-track drive would not be adequate for development of the site for housing. It would be necessary to widen the route however; this may prove difficult due to the two properties either side*". As such, this site should be omitted accordingly.

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If you require any further information, please do not hesitate to contact me.

Yours Faithfully

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Mark Pettitt – Senior Planner

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CC: Client