

Empowering Rural Communities Consultation Response Form

Ref:

(For official use only)

The paper 'Empowering Rural Communities' looks at ways the Council's planning policies and proposals might be changed for rural communities along with suggesting scales of housing growth.

To view this document please visit the Council's Local Plan Review Consultation page on its website at: <https://www.wiltshire.gov.uk/planning-policy-local-plan-review-consultation>

Please return to Wiltshire Council, by 5pm on Monday 8th March 2021.

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

This form has two sections:

Section One – Personal details

Section Two – Your response to the questions. Please use a separate sheet for each representation.

Section One – 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 | Mr | |
| First name | Philip | |
| Last name | McMullen | |
| Job title (where relevant) | Clerk and RFO | |
| Organisation (where relevant) | Atworth Parish Council | |
| Address Line 1 | 'Elmleigh' | |
| Address Line 2 | 37 Sandridge Road | |
| Address Line 3 | Melksham | |
| Address Line 4 | Wiltshire | |
| Postcode | SN12 7BQ | |

| | | |
|------------------|------------------------|--|
| Telephone Number | XXXXXX | |
| Email Address | atworthclerk@gmail.com | |

Section Two – Questions

Do you agree there should be a target of 40% affordable homes on all new schemes of more than five dwellings? What other approaches might there be?

Answer:

Yes, although any development within the village of Atworth would need to respond to the particular housing needs of the Parish.

Do you agree with the approach set out in the suggested policy? If not, why not? How could it be improved?

Answer:

It's unclear to which policy you are referring to, but no, we do not support the approach to development in rural settlements. In general terms, the 80-unit "housing need" identified for Atworth is an entirely top-down allocation, in that no evaluation has been made of the village of Atworth in terms of the potential location of new development or the capacity for new development. The village school is landlocked and incapable of expansion unless re-sited elsewhere. The village sits within the Neston Park Estate, which rarely releases land for development. Furthermore, the most recent Housing Needs survey in 2016 showed a requirement for four homes only in Atworth.

Do you think this approach is worth pursuing?

Please explain your answer

Answer:

No. Atworth is already classed by Wiltshire Council as a large village. This is because the last 25 years have seen a huge number of new houses being built there: Godwins Close, Clocktower View, Hayes Close, Nursery Close, Atworth Court; Mount Pleasant rebuilt with higher intensity housing, as well as individual houses infilled and garages and outhouses converted into dwellings. Atworth Parish Council's response has always to date been fair and constructive, leading to Atworth's dramatic emergence into Large Village status. It is because of this that we understand that Wiltshire Council seeks to put even more housing into the village. However, there are so many new homes proposed in Melksham, some of which are only 2 miles away, that we question why there should be further pressure on Atworth to take yet more additional housing when there is very little demand within the Parish and 80 houses would simply be to meet the unmet demand from nearby towns.

What local evidence would be needed to justify applying restrictions like these?

Whilst restrictions on PD rights might help, there would be the unintended consequence of denying the least well off the opportunity to improve their basic living conditions with extensions. The less well off may be able to afford a small extension to their property, but could not afford to move to a bigger property. People's ability to grow their family and put down roots is as important as any theoretical top-line approach to social mix. PD restrictions would unfairly limit their opportunities in this respect.

To comment on the housing figure that interests you, please state which area of the county the settlement falls within.

Answer:

Atworth near Melksham which lies within the Chippenham Housing Market Area of Wiltshire

What do you think to the housing requirements for Local Service Centres and Large Villages? Should requirements be higher or lower? If so which ones and why?

Answer:

The strategy for new housing initially identifies what could be accommodated within the major towns and other settlements and then effectively allocates the remainder of the "housing requirement" to elsewhere (mainly the "large villages"). It then further re-distributes the allocations away from any villages that are environmentally constrained (such as Colerne and Box) and transfers their housing requirement to the other villages. In the Chippenham Housing Market these are Atworth, Whitley/Shaw, Hullavington, Bromham, Potterne and Derry Hill/Studley.

Where constrained large villages cannot meet the "housing requirement", the unmet housing should be re-allocated within the larger settlements (towns), otherwise it simply overloads those less constrained villages with an unreasonable growth target for the plan period. Since the 2019 Parish Workshops the proposed allocation for Atworth has gone up from an initial (and excessive) 50 units, to 80 units, and yet no thought at all has gone into how this might impact the village, or where this development could go. It is an arbitrary figure entirely unsupported by evidence.

The rural settlements strategy is unreasonable and does not meet the tests of soundness required for a local plan.

The realistic maximum for Atworth given there are only two sites identified in the SHLAA, both of which have significant constraints (see below), and the fact that all of the land surrounding the village is under the ownership of the Neston Park Estate, would be a single figure number of units at most. A Housing Needs survey in 2016 showed a requirement for 4 homes in Atworth.

If you have any further comments you wish to make, please detail them below.

It is quite concerning that Wiltshire Council has earmarked a significant proportion of the total housing for the Chippenham HMA to rural settlements without even a cursory evaluation of the land available/deliverable, or the potential impacts upon the villages and communities it proposes accommodate these new houses.

Furthermore, the numbers between different reports do not correlate. For example, in the overarching "Emerging Spatial Strategy" (ESS) the total number for the Chippenham Housing Market Area is stated as 14297, with 1992 allocated for the rural area (i.e. local service centres and villages outside the main towns). However, the document "Empowering Local Communities" states on page 9 that the rural areas should accommodate 2900 houses, and on page 15, 2805. The point being, that in the actual ESS, rural areas are required to meet 14% of the requirement, but in the ELC, this suddenly increases to 20% of the total housing requirement.

It is clear that little or no thought has gone into how Atworth can be grown by 20% and therefore the arbitrary and entirely unachievable new 80-unit allocation for Atworth should be removed. It is probable that the whole rural settlements strategy requires further work before meaningful targets and allocations can be identified. This section of the Local Plan Review is unsound and needs to be reconsidered, including village-specific reviews of what can be realistically accommodated, and where it is intended to increase the village size significantly (eg by 20% or more) a proper assessment of land availability, including reference to the SHLAA and to local landowners needs to be undertaken to understand if there is any land likely to come forward, and for that land to be drawn up as a draft allocation. Smaller developments can already be satisfactorily addressed by Core Policies 2 and 44.

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At Atworth, there are no brownfield sites. There are currently two parcels of land registered in the 2017 Wiltshire Council Strategic Housing & Economic Land Availability Assessment (SHELAA). Site 317 Prospect Paddock in Atworth has no direct access to the public highway. Site 311 Atworth Business Park is already developed as approved under planning applications 16/09685/FUL and 19/06790/FUL. Planning conditions 4 and 5 attached to 19/06790/FUL state that the remainder of that parcel of land shall be subject to an approved Landscape and Ecology Management Plan (LEMP) and managed for biodiversity gain in perpetuity.

All other land on the edge of the village forms part of the Neston Park Estate and is unlikely to come forward.

Atworth Parish Council has not prepared a Neighbourhood Plan because of the unique land ownership situation of the village, located within the Neston Park Estate. If WCC becomes aware that the Estate is seeking to release land for development, then the Parish Council would at this stage want to prepare a Neighbourhood Plan. Clearly, this is some time away, and not within the timeframe of the current Local Plan Review, and thus the Atworth allocation should be removed until such time as the planning of the village can be taken forward.

Were this current strategy for 80 homes adopted, it would require a neighbourhood plan or review of the Wiltshire Housing Sites Allocation Plan, but this does seem to be a cart-before-the-horse approach, given the "housing requirement" for Atworth is derived from transplanting the needs of other locations upon the village, and there is no evidence base behind the number, and it is most likely undeliverable anyway.

Future notification

I wish to be notified of any future to the Local Plan Review:

YES: NO:

Clicking yes will add you to the planning policy contact database. This will mean you are kept informed of any future planning policy updates and consultations.

Further information on how the Spatial Planning Department treats your personally identifiable information can be found by reading the privacy notice available via the link below:

<https://www.wiltshire.gov.uk/planning-privacy-notice>

Here you will also find information about how and why your data may be processed and your rights under the Data Subject Information Notice section further down the page.

Signature:  Date:

Thank you for completing this form.

Data Protection

Wiltshire Council has a duty to protect personal information and will process personal data in accordance with Data Protection legislation. The personal data you provide on this form will only be used for the purpose of the Wiltshire Development Framework. It may also be used for the prevention or detection of fraud or crime and in an anonymised form for statistical purposes. The data will be stored on computer and/or manual files. You have a right to a copy of your information held by any organisation, with some exemptions. To gain access to your personal data held by Wiltshire Council or if you have any Data Protection concerns please contact Wiltshire Council's Data Protection Officer on 01225 713000 (switchboard) or e-mail to dataprotection@wiltshire.gov.uk ."