

DRAFT ASHTON KEYNES NEIGHBOURHOOD PLAN

Representations on the Pre-Submission Consultation

On behalf of Amita Management Ltd

Our reference: 3563

November 2015



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1.0 Introduction

- 1.1 This representation is made on behalf of Amita Management Limited, in respect of the Ashton Keynes Neighbourhood Plan Steering Group's pre-submission **Neighbourhood Plan** consultation. That plan has been drafted to help guide development within the parish over the plan period to 2026.
- 1.2 Amita Management Ltd is the land owner of the former Cotswold Community site, located north of the village of Ashton Keynes. The former Cotswold Community site is a large brownfield and vacant site. It comprises an existing residential (C2 and C3) use with in excess of 120,000 sq ft of buildings; including 27 detached, semi-detached and terraced houses and extensive dormitories, hostel and staff accommodation, as well as a vast collection of associated buildings and hardstandings. The site also accommodates four listed properties, all of which are in need of restoration.
- 1.3 The former Cotswold Community site has a history in modern times of occupation as a 'settled' community. During the 1930's the property was occupied by the Bruderhof, a Christian community pursuing a life of self-sufficiency, cultivating land and developing a number of productive crafts. The Bruderhof established a settlement comprising family dwellings, communal and school buildings, workshops and farm buildings. During this period the settlement grew as a planned garden village. Agriculture with gardening, farming, poultry raising, dairying, and bee keeping were supplemented by other activities like cabinetmaking, publication, printing and book-binding; all of which formed the economic foundation to village life. The Bruderhof's educational work and the school system grew through the influx of new families, as well as the admission of 'needy' children from wider parts of the region. By 1940 the village had grown to over 300 inhabitants, with some reports suggesting over 350.
- 1.4 Following the outbreak of the Second World War, and the departure of the Bruderhof, the property was acquired by the Home Office and run as an Approved School for troubled adolescent boys. The village was later transferred to the ownership of Wiltshire Social Services and in 1960's it was transformed into a therapeutic community. The estate reverted, from the institutional establishment it had become, back to a village community. Boys began to live in separate 'family' autonomous households which formed a village community, together with a school, community buildings, farm, productive craft workshops, and extensive accommodation for staff and their

families. Living and working as families within the settlement was central to the functioning of the Cotswold Community.

- 1.5 During that post war period, a substantial number of buildings were constructed and the village again saw significant physical expansion.
- 1.6 The freehold interest in the Cotswold Community was purchased by Action for Children in 2005. Action for Children disposed of the village in March 2013 as being surplus to requirements.
- 1.7 The above background is important in the context of the emerging Ashton Keynes Neighbourhood Plan because a particular circumstance that makes the Cotswold Community unique is that it comprises an unoccupied settlement of a longstanding background. Additional to its brownfield status, is the fact that the property has a history of occupation in the twentieth and twenty-first centuries as a 'settled' community, with a significant amount of dwellings and substantial physical infrastructure.
- 1.8 Over the past 2½ years, Amita Management Ltd has undertaken extensive consultation on a vision to achieve the revival of the former Cotswold Community site as a sustainable community fit for 21st Century living. As part of that process, there has been widespread expression of stakeholder, and public support, to see the site regenerated and redevelopment with new housing.
- 1.9 With regard to the emerging Neighbourhood Plan, Amita Management Ltd recognizes the Ashton Keynes Neighbourhood Plan Steering Group has professionally and conscientiously undertaken its responsibilities in planning to deliver sustainable development within the Parish for the plan period up to 2026. Amita Management Ltd commends the Steering Group for undertaking that task and the following comments are made to help further shape the emerging Neighbourhood Plan.

2.0 Over-Arching Vision for Ashton Keynes

- 2.1 The emerging Plan sets out that the community wishes “...to make our neighbourhood an even better place to live, work and visit. We wish to sustain or enhance the beauty and vitality of our neighbourhood and make sure our infrastructure is capable of supporting us.” Amita Management

Limited fully supports that community objective. The emerging Plan goes on to set the following over-arching vision of how Ashton Keynes should be regarded by 2026:

“A thriving sustainable community in the Cotswold Water Park where people want to be, and which continues to evolve by developing in harmony with its character and natural environment”

2.2 Amita Management Limited fully supports that vision.

3.0 Housing

3.1 In order to support the Wiltshire Core Strategy objective to provide everyone with access to a decent, affordable home, the emerging Neighbourhood Plan seeks to establish a vision for housing development within the Parish for the plan period as follows: *“To maintain a strong community within the parish through planned growth and change to meet the housing needs of existing and future residents of Ashton Keynes”*. That vision is fully supported by Amita Management Limited.

3.2 To achieve that vision, the emerging Plan sets out 6 strategic housing objectives. Amita Management Limited broadly supports those objectives, which are:

Objective HS1: To enable local people to stay in the parish throughout their lifetime by ensuring housing is available as their needs change through provision of a mix of housing types including smaller homes for elderly villagers wishing to downsize and for young singles, couples or families needing their first home.

Objective HS2: To ensure an adequate supply of affordable housing to meet the needs of the parish in line with the Wiltshire Development Plan and our own housing needs.

Objective HS3: To ensure the parish is not over-developed and that new development is of high quality design, is built to a high sustainability standard and reinforces local distinctiveness.

Objective HS4: To keep all new developments on sites within the settlement boundary to a maximum of 15 homes.

Objective HS5: To give preferential access to some new homes for people with a strong local connection.

Objective HS6: To ensure that the design and location of new development is resilient to the effects of climate change and flooding.

3.3 The emerging Plan goes on to set a targeted housing strategy that seeks to give priority for smaller dwellings, including; starter homes for private purchase, affordable housing for rent or shared ownership and smaller dwellings for residents to downsize. The emerging plan then notes that it is accepted that a “*small number*” of larger homes may be necessary in order to secure viability of allocated sites and deliver the number and type of homes required to meet the local housing need. However, while Amita Management Limited understands that objective, it questions the blanket prescription of a “*small number*” of larger homes. Instead, the emerging Plan’s acknowledgement that larger homes may be required should be reworded as follows:

- ❖ *Suggested Change:* The plan should be reworded as follows, “**It is accepted that larger homes may be necessary in order to secure viability of allocated sites and deliver the number and type of homes required to meet the local housing need**”.

3.4 The emerging Plan identifies the minimum number of new dwellings required within the rural settlements of the Malmesbury Community Area as being 151 dwellings up to 2026. However, the emerging Plan should, for accuracy, clearly set out that the figure of 151 dwellings is only an “*indicative*” number. It should also be noted within the emerging Neighbourhood Plan that the Wiltshire Core Strategy explicitly states that “*neighbourhood plans should not be constrained by the specific (indicative) housing requirements within the Core Strategy*”.

3.5 Based upon population numbers the emerging Plan goes on to suggest that there is a requirement, in Wiltshire Core Strategy terms, for 15 new homes to be built at Ashton Keynes by 2026. Notwithstanding the fact that the figure should be expressed as an *indicative* and *minimum* figure, Amita Management Limited considers the methodology of division to be overly simplistic; having no regard to the level of facilities, services, housing need of the Parish or the environmental constraints that exist within the wider Malmesbury Community Area.

- ❖ *Suggested Change:* The plan should more robustly set out the Parish's housing requirement within the plan period to 2026.

3.6 Section 5.3 of the emerging Plan goes on to explain that the neighbourhood plan housing site assessment consultation has identified two suitable sites¹ for housing development and has identified broad community support for the allocation of those sites. The emerging plan suggests, as a total, those sites can yield around 59 dwellings, along with windfall development over the plan period. While Amita Management Limited supports the principal of those two sites being allocated for new housing development, the following comments are made in respect of the details contained within the two allocation policies:

Policy HSP2 – AB Carter Haulage

- 3.7 Emerging Neighbourhood Plan Policy HSP2 seeks to allocate the AB Carter Haulage site for 11 dwellings, subject to development management criteria to guide such development. However, it is noted that the plan does not appear to provide a reasoned justification for that allocation, the number of proposed houses, nor the development management criteria set out within Policy HSP2.
- 3.8 In addition, as part of the neighbourhood plan 'housing site assessment consultation', Amita Management Limited duly made representations in respect of the AB Carter Haulage site. Those representations noted that the site sits within the Ashton Keynes Conservation Area and the openness of its frontage along Happy Land positively contributes to character and appearance of that part of the conservation area. The ability of the site to yield 11 dwellings in a manner appropriate to this part of the Conservation Area was seriously questioned. The allocation, as drafted, equates to a density of 30.5 dwellings per hectare and it is considered that that density is inappropriate to the character and appearance of this part of the Conservation Area. As such, Amita Management Limited raises doubt as to whether the allocation of that number of dwellings at the site could be successfully delivered mindful of the Plan's over-arching vision of securing development in harmony with the character of the village, and mindful of other development plan policies that seek to conserve and enhance the conservation area.

¹ The AB Carter Haulage site (AKNP Ref 01), and part of the former Cotswold Community site (AKNP Ref 02).

- ❖ *Suggested Changes:* Further consideration should be given to the allocated number of units within the emerging allocation and the plan should contain a comprehensive reasoned justification for Policy HSP2 and its development management criteria.

Policy HSP3 – Former Cotswold Community

- 3.9 Emerging Neighbourhood Plan Policy HSP3 allocates the former Cotswold Community site for 48 dwellings. Additionally, the policy recognizes the potential for the re-development of some, or all, of the existing 27 (C3) dwellings at the site. The principal of allocating the site for residential redevelopment is fully supported by Amita Management Limited.
- 3.10 It is noted that the Policy states:
- “Site AKNP02 (the former Cotswold Community) is comprised of large areas of agricultural open space with a central collection of former residential institution buildings and 27 detached, semi-detached and terrace houses. There are four notable listed buildings in a quadrangle centre of the former community which served as administrative and community meeting venues. The non-housing buildings comprise workshops, sports facilities, and farm buildings. A sports field with pavilion and a large area of open field scheduled ancient monument lie to the southern part of the site”.*
- 3.11 However, it should be noted that apart from the C3 dwellings at the site, the property also comprises extensive dormitories, hostel and staff accommodation. It should also be noted that the site accommodates circa 120,000 sq. ft. of buildings as well as extensive areas of hardstandings and mature gardens and formal landscape structure. It should also be noted that the former Cotswold Community site has a history of occupation as a ‘settled’ community in modern times.
- 3.12 Moreover, it is noted that the development boundary illustrated by Map-HSP3 does not include the full extent of the existing curtilage of the former Cotswold Community site, nor does it include the full extent of the development discussed above, and its formal and structured landscape. The draft boundary as illustrated by Map-HSP3 fails to recognize the history of the site’s occupation and the boundaries that define the existing brownfield site. While the setting of a development boundary around the site is supported, the identified boundary on Map-HSP3 presents an arbitrary and unduly unnatural arrangement, without any proper reference to the context of the site, its land uses or its physical and landscaped features; ignoring the true extent of the curtilage of the current use of much of the property - C2 residential institution. The emerging development boundary sets

an artificial constraint – a line created from tying together remnants of various layers of unconnected redundant forms of development, and omits to recognize the spaces, hardstandings and mature landscape and gardens in between.

- 3.13 Once the existing buildings, internal boundaries, ruderal planting and hardstandings are demolished or removed, the redevelopment site will comprise of the courtyard of listed buildings at its centre and a healthy structured landscape defined by mature trees, ponds, and the water course. The development boundary illustrated on the emerging Map-HSP3 would relate to very little of that structured landscape, appearing unnaturally abstract. Amita Management Limited’s emerging Master Plan and design and access statement for the redevelopment of the site illustrate how development proposals could positively respond to the existing constraints and opportunities at the site. That should be the primary aim when defining the development boundary.
- 3.14 As drawn, the development boundary illustrated on the emerging Map-HSP3 unnecessarily restricts the opportunity for optimizing the site’s potential for landscape and environmental enhancement. By attempting to contain development completely within an artificial boundary the emerging Plan doesn’t relate to existing uses or historic boundaries. It ignores the potential for enhancing the wider landscape setting and the setting of the listed buildings. Moreover, the introduction of new lines of boundary fencing to the rear of new properties, instead of utilizing meaningful and established hedgerow boundaries, will result in an unnatural hinterland of land with a C2 Use Class; leaving its future use undetermined and problematical.
- 3.15 Instead, and to ensure proper environmental planning for the site, the proposed development boundary should be redrafted as illustrated below.



- 3.16 Furthermore, emerging Policy HSP3 contains a number of development management criteria that seek to guide the residential redevelopment of the site. Clause 3(c) states, *“the development includes the re-development of the sites of the former C2 Residential Institution buildings within their existing curtilages”*. Amita Management Limited contends that Clause 3(c) is overly and unnecessarily prescriptive. As drafted, the clause restricts good planning and design. The clause precludes flexibility to be applied to the master planning for the redevelopment of the site. As a result the clause would unnecessarily restrict the opportunity for optimizing the site’s potential for maximum enhancement’ placing new dwellings in appropriate locations within the existing mature and structured landscape at the site.
- 3.17 Clause 3(d) relates to affordable housing. In order to properly respond to the Wiltshire Core Strategy, Clause 3(d) should be amended to acknowledge an element of affordable will be required *“subject to viability”*.
- 3.18 Clause 4 of emerging Policy HSP3 acknowledges the potential for the redevelopment of some, or all, of the existing 27 C3 dwellings at the site. While that acknowledgment is welcomed, it is considered that the clause as drafted is overly and unnecessarily prescriptive. It states, *“It is acknowledged that a proposed development may, in certain circumstances, additionally include the re-development of some or all of the 27 C3 dwellings within their existing curtilages.”* As drafted, the clause precludes flexibility to be applied to the master planning of the redevelopment of the wider site. As a result it unnecessarily restricts the opportunity to optimize the site’s potential for maximum enhancement’ placing new dwellings in appropriate locations within the existing mature and structured landscape within the Cotswold Community site. As drafted, Clause 4 restricts good planning and design.
- 3.19 The reasoned justification for emerging Policy HSP3 notes that the wider community is of the opinion that the former Cotswold Community site should be restored to a useful purpose, but not over-developed. The justification then goes on to discuss likely school places that are likely to be generated by the proposed allocation. However, Amita Management Limited believes that by way of a reasoned justification the emerging Plan fails to robustly set the social, economic and environmental case for the residential redevelopment of the former Cotswold Community. It is contended the reasoned justification should make full reference to: i) the unique situation that the site comprises an unoccupied settlement of a longstanding background; ii) the extent and

widespread brownfield – C2 and C3 - nature of the site; iii) the need to secure optimum and viable new uses for the deteriorating listed buildings; and, iv) the national objective of encouraging the effective use of land by re-using land that has been previously developed (brownfield land)². In addition, the reasoned justification should be explicit in setting out that when asked the question, as part of the neighbourhood plan process, two thirds of respondents noted they would be happy to see carefully controlled additional housing within the parish to help secure additional support for community facilities; for example, via Community Infrastructure Levey funding.

- ❖ *Suggested Changes:* The emerging plan should be amended with the proposed development boundary illustrated on Map-HSP3 redrawn as illustrated above, in order that it incorporates the full extent of this previously developed site and its established and mature curtilage. Clause 3(c) should be deleted. Clause 3(d) should be amended to make reference to the fact that the provision of affordable housing is subject to ‘viability’. Clause 4 should be amended to refer to replacement dwellings be placed within the defined development boundary rather than restricted to existing property curtilages. The reasoned justification for Policy HSP3, should more comprehensively set out the case for allocating this brownfield site and reference should be made to its history as a ‘settled’ community in modern times.

4.0 Infrastructure

- 4.1 The emerging Neighbourhood Plan seeks to establish the following vision for infrastructure improvements within the Parish, *“To achieve an efficient local infrastructure including key services that continues to meet the needs of the residents and that contributes towards a safe and healthy community”*. That vision is supported by Amita Management Limited.
- 4.2 To achieve that vision, the emerging Plan sets out 5 infrastructure objectives. Amita Management Limited supports those objectives, which are:

² The Joint Ministerial Statement [George Osborne and Eric Pickles] of June 2014 (Titled: Brownfield Land) sets out the *“need to make the best possible use of brownfield land in a way that keeps strong safeguards in place that protect our valued countryside”*.

Objective IN1: To plan and maintain a resilient drainage system to mitigate the risk of flooding, and to implement Sustainable Urban Drainage Systems in identified problem areas.

Objective IN2: To improve road and pedestrian safety in the Parish by careful planning of new development, and implementing measures to mitigate road safety hazards.

Objective IN3: To improve General Practitioner facilities in the Parish.

Objective IN4: To improve broadband and mobile phone network coverage in the area through proactive discussions with existing and potential operators.

Objective IN5: To improve community infrastructure and facilities utilizing developer contributions.

4.3 To further Objective IN3, emerging Policy INP3 sets out details to secure improved GP facilities within the village of Ashton Keynes. Amita Management Limited supports that policy.

4.4 Policy INP5 goes on to identify key community infrastructure and facilities to which Community Infrastructure Levy funding will be channeled. That policy also provides a commitment of the Parish Council to produce and maintain a living document of local infrastructure priorities. That commitment is welcomed and Amita Management Limited supports emerging Policy INP5.

5.0 Amenities

5.1 The emerging Neighbourhood Plan seeks to establish the following vision for the improvement of amenities within the Parish, *“To protect and enhance existing amenities and their accessibility and to promote new amenity provision”*. That vision is supported by Amita Management Limited.

5.2 To achieve that vision, the emerging Plan sets out 3 amenity objectives. Amita Management Limited supports those objectives, which are:

Objective AM1: To develop a building which will form a Village hub on the site of the current

Village Hall, incorporating a post office, a larger Village shop and doctor's surgery, with improved parking facilities.

Objective AM2: To maintain and protect green areas of the Millennium Green and playing fields, and to redevelop and refurbish the facilities at the Bradstone playing field.

Objective AM3: To improve existing parking management in keeping with the Village ethos whilst improving traffic management at key times.

5.3 Specifically, Amita Management Limited supports emerging Policy AMP1, which seeks to achieve Objective AM1. The emerging Policy states:

"Policy AMP1 Village Centre Amenities.

Development proposals for new or improved amenities in the Village centre as shown in Map-AMP1 will be supported. In particular:

a. Re-development of the existing village hall site for the purpose of improving facilities that contribute to the objective of a community hub in this central location is supported.

b. The Village Hall Annexe should continue to be used to run the Village Shop unless an alternative and/or larger and/or more appropriately located premises is identified".