

6th November 2015

Ashton Keynes Neighbourhood Plan Co-ordinator

Submitted via email only to: coordinator@ashtonkeynesneighbourhood.com

Land at Dairy Farm Bungalow and Dairy Fields, Ashton Keynes, Wiltshire
Response to Draft Ashton Keynes Neighbourhood Plan - November 2015

SF Planning Limited has been instructed by Partridge Homes (Cotswolds) Ltd to make representations to the Ashton Keynes Draft Neighbourhood Plan (DNP), Pre-Submission Consultation version (dated 14th September 2015), as part of its ongoing consultation process, prior to its submission for approval to Wiltshire Council.

The DNP has clearly been informed by significant amounts of local consultation following on from the approval of the Ashton Keynes neighbourhood plan area by Wiltshire Council in November 2013 including various meetings, presentations and "Housing Consultation" event held in January 2015.

Our Client has an interest in land within the village at Dairy Farm Bungalow and Dairy Fields and therefore this representation letter includes an assessment of the planning designations and key benefits of this particular site, as well as comments on the general principles and policies within the DNP.

As this representation will demonstrate, land at Dairy Farm Bungalow and Dairy Fields, Ashton Keynes is a wholly sustainable and logical location for future residential development to meet the housing needs of both Ashton Keynes and the wider Malmesbury housing market area and can offer key benefits to the village no other site within the DNP is able to do.

Our Client considers the sustainability credentials and other key benefits this site can deliver have not been adequately appreciated by the local community or robustly assessed within the DNP and accompanying "Sustainability Appraisal" (SA).

The Site

The site comprises of an area of land of approximately 2ha bounded by the B4696 to the west and River Thames to the north (Ref: Figure.1). The site is currently agricultural land/fields in very close proximity to the village centre, the school and is adjacent to existing housing along Gosditch to the south of the site and the pumping station to the northwest. Various footpaths cross the site including a link to the school.

Site Planning Designations

Core Policy 1 of Wiltshire's adopted Core Strategy (January 2015) identifies Ashton Keynes as a 'Large Village' within its settlement hierarchy, which are defined as settlements with a limited range of employment, services and facilities that have the potential for a limited level of development to support and retain the vitality of these communities.

The site itself is adjacent to residential development within the settlement boundary to the south and east and falls within the Ashton Keynes Conservation Area. The land is to the north of the listed building at Dairy Farm and adjacent to the moated site at Church Farm which is a scheduled monument. A small part of the northern section of the site is within a Flood Zone on the Environment Agency flood maps.

Planning Justification for Site Allocation

Sustainable Location

The National Planning Policy Framework (NPPF paragraph 28) sets out planning policies should support economic growth in rural areas by taking a positive approach to sustainable new development. Paragraph 55 of the NPPF seeks '*to promote sustainable development in rural areas*' and states '*housing should be located where it will enhance or maintain the vitality of rural communities.*'

Paragraph 38 of the NPPF makes it clear for larger scale residential developments, key facilities such as primary schools and local shops should be located within walking distance of most properties.

At a more local level, the Wiltshire Core Strategy (2015) sets out the hierarchy of settlements within Wiltshire, with Ashton Keynes identified as a 'Large Village' with a limited range of employment, services and facilities. This confirms its potential suitability to accommodate additional development to support the viability of local services and provide affordable housing and housing for the elderly which are in short supply.

The village currently contains approximately 600 homes and has a range of services and facilities including;

- Primary School;
- Village Hall;
- Village Shop;
- Public House;
- Doctors Surgery;
- Bradstone Sports Fields;
- Bus stops and routes;
- Small scale employment sites.

Whilst it is acknowledged Land at Dairy Farm Bungalow and Dairy Fields currently falls outside the defined settlement boundary of Ashton Keynes, these settlement boundaries are a remnant of the now much outdated former District Local Plans and are set to be reviewed as part of the Wiltshire Housing Site Allocations, as confirmed by the current Wiltshire Core Strategy (January 2015);

"These settlement boundaries will be reviewed as part of the Wiltshire Housing Site Allocations.....It will also be the prerogative of the community to review settlement boundaries through a neighbourhood plan." (Our Emphasis)

(Wiltshire Core Strategy 2015 – P22, para. 4.13)

It is also clear neighbourhood plans should undertake a review of settlement boundaries. However, it appears no such review has taken place as part of the Ashton Keynes DNP and the current housing allocations within the DNP have been proposed based upon these outdated and restrictive planning policies, adopted prior to the publishing of the NPPF.

Land at Dairy Farm Bungalow and Dairy Fields is very close to the village centre, being adjacent to Ashton Keynes Primary School and a very short walk to the village hall, village shop, public house and bus routes through the village and beyond (Ref: Figure.1). Additional housing in this location would be no more or less sustainably located than existing adjacent housing.



Figure 1: Site Location (red outline) & Services Plan

Developing this parcel of land for housing would facilitate improvements to the school, which are outlined later in this representation and would involve a logical and well-contained extension to the village. The land is bound by housing to the south, the school to the east, River Thames to the north and the B4696 / pumping station to the west and would preserve the settlement pattern and not result in development sprawl into open countryside.

Whilst it's acknowledged the site does have constraints including its location within a conservation area and its position adjacent to other heritage assets as well the very northern part of the site being located within a flood zone, these can be overcome through the detailed design and technical solutions within the final scheme. These matters should not prevent the allocation of the site for housing which would also help facilitate improvements to the school, provide much needed housing adjacent to existing development within the village and would ensure the long term viability of the its services.

Key Benefits

This site can offer key benefits to the village, given its sustainable location and proximity to Ashton Keynes School. Discussions have been undertaken with the school including head teacher and governors. These discussions have been positive and it's clear the school has a chronic need for additional teacher parking (teachers currently park in Gosditch and on the former playground to the front of the school) and a safe and secure drop off area for parents and children.

The scheme also has the potential to unlock further school extensions if / when required. These elements can be incorporated around a comprehensive proposal for developing land at Dairy Farm Bungalow and Dairy Fields.

Key benefits of the site have not been fully appreciated by the DNP. The benefits of developing this site are compelling, with key matters summarised below;

- New access point the off the B4696 with associated parking and drop off area for the school and direct pedestrian access to the rear of the school;
- Parking for school teachers freeing up playground space and space along Gosditch;
- Safety of the school and it's children will be greatly enhanced;
- Enhanced access for emergency service vehicles along Gosditch;
- Remove/reduce daily conflicts between local residents, parents and teachers;
- Possibility of helping to reduce vehicle speeds on B4696
- Potential to enable school expansion, and doing so without reducing the amount of space available to pupils/the school;
- Offer enhanced connections between the school and the Church to create a more direct route and avoid the need for children to walk on roads
- Deliverable on site affordable housing to meet local requirements;
- Deliverable on site housing for the elderly;
- Open market housing to meet local desires;
- Retention of footpath routes;
- Safeguarding floodplain;
- New public open space;
- Residents within the village will help to support all services and facilities in the village;
- Contributions to local infrastructure and facilities via CIL.

On this basis, we would urge the DNP to undertake a full and proper assessment of each of the potential housing sites within Ashton Keynes, which we believe will highlight the key benefits of bringing forward land at Dairy Farm Bungalow and Dairy Fields and including this site as an allocation within the plan.

Deliverability

Our Client is a highly respected local bespoke housing developer working in partnership with the landowner. Despite assumptions within presentations made during the preparation of the DNP and specifically the "Housing Consultation" held in January 2015 (Ref: Figure 2), ***the site is within single family ownership and is available and deliverable now and within the plan period.***

Site 702 - Land at Dairy Farm Bungalow and Dairy Fields			
Community Area	Malmesbury Community Area	Emerging HMA	North & West Wilts HMA
Address	Dairy Farm Bungalow and Dairy Farm		
Settlement	Ashton Keynes		
Previous Use	Greenfield		
Gross Site Area	2.41 ha	Suitable Site Area	2.12 ha
Reason for smaller suitable area	Part of the site is assessed as a commitment and so is included elsewhere. Part of the site is designated for employment uses. Part of the site is in a flood risk zone.		
Developable Site Area	1.59 ha	Gross-to-Net factor	0.75
Potential Suitability Constraints	Within or adjacent to County Wildlife Site. Within or adjacent to Minerals Resource Zone. Within or adjacent to Minerals Safeguarding Area. Within Cotswold Water Park. Contains or adjacent to a Scheduled Ancient Monument.		
Suitability	Suitable subject to potential constraints		
Ownership	Multiple ownership		
Availability	Not available at present as in multiple ownership		
Capacity	50	Deliverable within 5 yrs	No
Deliverable in 6-10 yrs	Yes	Deliverable in 11-15 yrs	Yes

Figure 2: Extract from "housing consultation" display boards - January 2015

It is not clear why these presentation boards contained inaccurate information which could well have influenced responses from residents within Ashton Keynes and the subsequent allocation of housing sites within the DNP.

As previously set out, we would request the DNP proposed housing site allocations are the subject of a full and proper review in light of the inaccuracies and uncertainties within the evidence base for the DNP, upon which decisions have been made.

Representations on the Ashton Keynes DNP (September 2015) & Evidence Base

Ashton Keynes "Housing Consultation" Event - January 2015

The "Housing Consultation" event undertaken in January 2015 as part of the neighbourhood plan process has clearly informed the site allocations within the plan. As part of this event, ten sites were identified that held potential for housing development. Some of these sites are listed in the SHLAA (Strategic Housing Land Availability Assessment) report issued by Wiltshire Council, whilst others have been identified through discussions with land owners with development interest.

The presentation of nine out of the ten sites at the event followed a similar format with the land identified on a plan and the key constraints highlighted along with an estimated capacity for each site. Please see below consultation board for land at Dairy Farm Bungalow and Dairy Fields - site 2 (Ref: Figure 3).

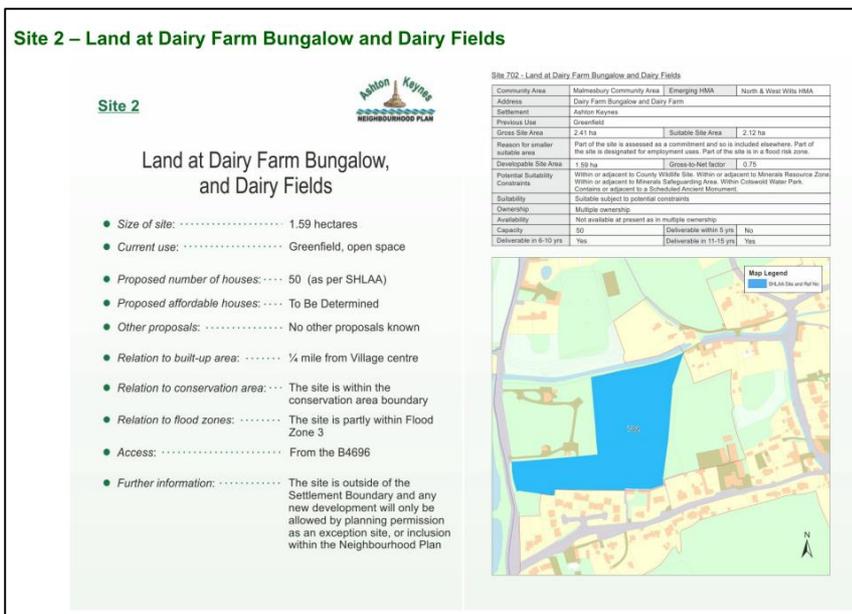


Figure 3: Land at Dairy Farm Bungalow and Dairy Fields, Ashton Keynes – consultation event information board

However, the consultation event board for one of the sites, namely the “Cotswold Community” (site 6), contained much more detailed information including a layout plan with site access, information in relation to the suggested potential benefits/affordable housing offer, as well as a site plan indicating how the site could be developed (Ref: Figure.4).

This is likely to have resulted in a potential bias in the results, since the key benefits of the other sites identified were not highlighted at the event or made clear to residents voting on which site was preferable to be allocated within the DNP.

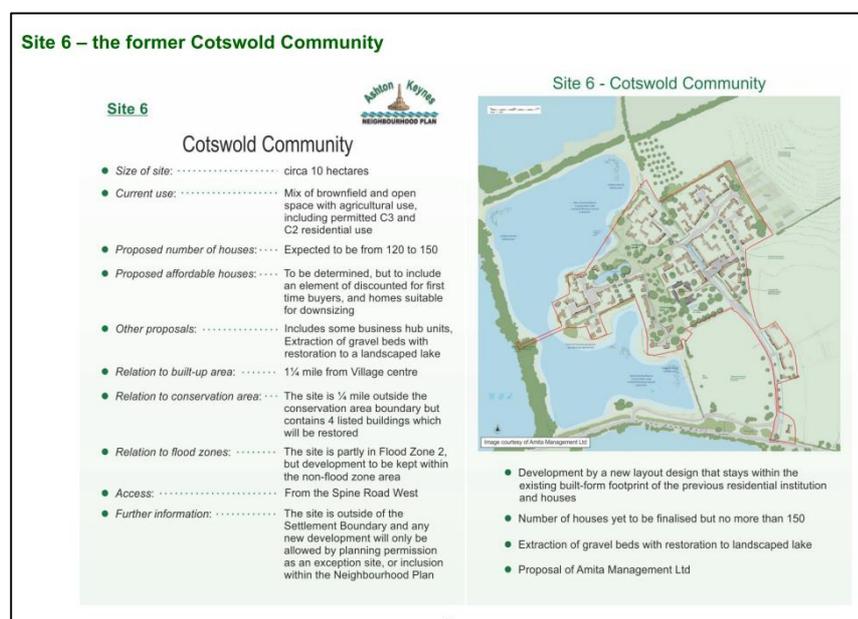


Figure 4: The Former Cotswold Community – consultation event information board

This is especially important since the majority of people voting against site 2 (land at Dairy Farm Bungalow and Dairy Fields) raised concerns about traffic access and pedestrian safety [43% of all votes felt it was not suitable for this reason].

With more information including a site plan detailing access measures and potential traffic calming, as well as other potential benefits of the scheme in relation to the traffic problems associated with the school as previously highlighted, site 2 is likely to have received a significant amount of additional support.

Being in a far less sustainable location and divorced from the village, site 6 also appears to have been presented in a far more favourable light than it might ordinarily have been if other sites had been treated in the same way.

DNP Chapter 5: Housing

The DNP utilises the Malmesbury Community Area housing land supply requirement as an evidence based for housing need. This is derived from Wiltshire Council Housing Land Supply Statement undertaken in April 2014.

This sets an indicative number of 151 homes to be identified between 2014 and 2026 outside Malmesbury Town. The majority of these units are likely to be provided across five large villages in the Community Area, including Ashton Keynes, which have been identified as the most sustainable settlements outside of Malmesbury Town.

The evidence base for the DNP in relation to housing numbers is derived from a study undertaken in April 2014 and therefore the robustness of the data is questionable.

Many much more recent appeal decisions within Wiltshire have questioned whether the Council have a 5 year housing land supply in accordance with paragraph 14 of the NPPF and therefore the data cannot be relied upon to set housing allocation numbers within the Ashton Keynes DNP area.

Notwithstanding the robustness of the data for housing allocations, there is anyway a clear question mark about the ability of site 6 (Cotswold Community) to qualify as 'at the village' as far as the settlement hierarchy in Core Policy 1 of the Core Strategy is concerned.

Policy HSP3 – former Cotswold Community

Policy HSP3 seeks to allocate land known as the "Cotswold Community" for 48 new homes. The former "Cotswold Community" is residential institution has been unoccupied since 2013 and is said to contain 27 "existing dwellings" which are at present unoccupied. On this basis 75 dwellings would be created on this isolated site which at present does not have any occupants and has very poor connectivity to the village of Ashton Keynes.

The site is approximately 1¼ miles from the village centre and has no safe and well-lit pedestrian or cycle routes to the village and very poor public transport accessibility. The future occupants are therefore high likely to use private motor cars to access local services, causing a significant amount of additional vehicle trips to and from adjoining villages.

In addition, although the Ashton Keynes DNP "allocates" this site for housing, in reality residents of the "Cotswold Community" would be so disconnected from Ashton Keynes village itself, there would be very few benefits to the local community derived from developing the site.

Local services such as the village public house or shop would not receive the same levels of additional footfall to increase their viability when compared to other potential housing sites much closer to the village centre, which would be more integrated with the village. This has been overlooked in the DNP.

Although the development of the "Cotswold Community" is very unlikely to support most of the services within Ashton Keynes in any meaningful way, new residents would be using the local school. The DNP concludes the 75 new residential dwellings would require additional primary school provision for 23 places. The existing school is nearly at capacity and all new residents of the "Cotswold Community" are likely to drive to drop children off, compounding the traffic problems along Gosditch. Policy HSP3 of the DNP does not provide any solution to this problem.

No financial evidence appears to have been provided to make an "enabling case" for the additional 48 new homes in this isolated site within the open countryside to support the restoration of the existing heritage assets and other buildings on the site. The logic for allocating this site for additional housing over and above the existing lawful dwellings that exist is therefore questionable.

There will also be significant additional costs associated with developing this site due to its very nature including the restoration of a number of heritage assets. Its ability to deliver affordable low cost housing and housing for the elderly, which are key aspirations of the DNP (Policies HSP 7 & HSP12) is therefore questionable without any information on the sites viability and deliverability.

It is also apparent the accompanying "Sustainability Appraisal" (SA - dated 23rd September 2015) considers the merits of the ten sites identified within the DNP and postdates the DNP which was produced on the 14th September 2015.

The SA has been produced to support decision making on the sites to be taken forward for the DNP. The SA process has undertaken an appraisal of the key constraints present at each of these ten sites (P35 – P44) and potential effects that may arise, and includes nine categories covering a range of subjects such as transport and landscape against which each site is said to have either;

- Likely adverse effect (without mitigation measures)
- Likely positive effect
- Neutral/no effect
- Uncertain effects

The "Assessment of alternative sites for taking forward through the AKNP" within the SA confirms the development of the "Cotswold Community", would have "uncertain effects" within six of the nine categories. Only one of the categories relating to "Economy and enterprise" would have a positive effect if the site were to be developed according to the SA.

The allocation of the site, given these uncertainties within the DNP's own SA must again be questioned and other sites, including land at Dairy Farm Bungalow and Dairy Fields, should be re-considered as preferred options.

Policy INP5 Contributions to new infrastructure and facilities

Our Client would again like to point out land at Dairy Farm Bungalow and Dairy Fields can help deliver part 2 (c) of Policy INP5 relating to new infrastructure within the village. This sets out a requirement for the acquisition of land suitable for public area parking with footpath access routes to the Village school for improvements in road safety of drop-off and pick-up traffic.

This is a key benefit of the scheme which has been overlooked in the DNP as the money would not need to be raised to purchase the land, since it would be a key part of the development scheme for the site.

Policy AMP5 Car Parking

This policy includes proposals to alleviate parking problems in the area by improving existing car parking and providing new community and public parking sites. The policy includes reference to Map-AMP5 (Ref: Figure 5):

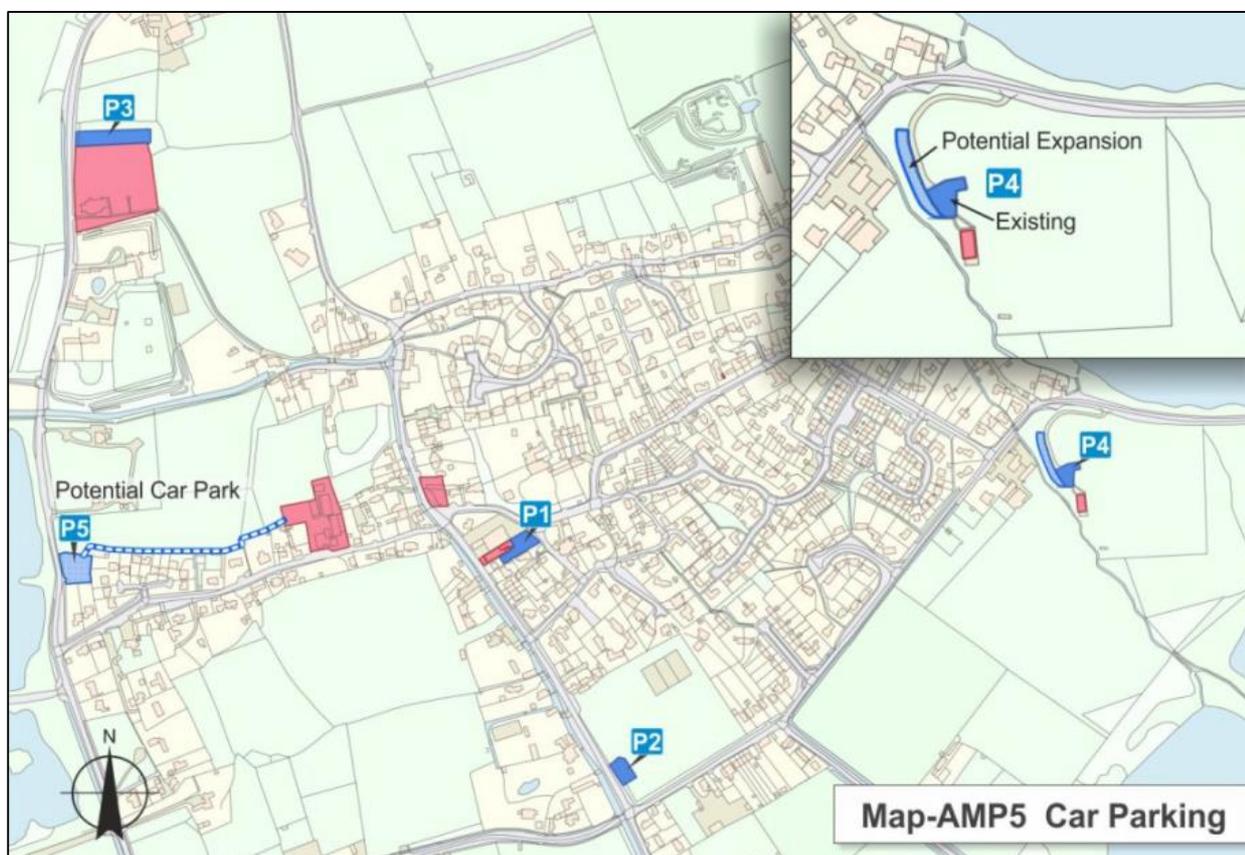


Figure 5: DNP Proposed Parking Arrangements / Enhancements

Part (g) of the policy relates to car park position P5 on the above map which seeks to allocate the site for the 'provision of a public parking site for the primary purpose of vehicles transporting pupils to the village school will be supported subject to funding and deliverability'.

The reasoning for the policy is that current pupil numbers at the school are predicted at 197 for September 2015 and additional planned housing development has a potential to increase this.

The policy acknowledges traffic and parking around the school is already a significant issue as identified by the Amenities Surveys. This would be further exacerbated by the development of the isolated site for 75 dwellings at the "Cotswold Community", as previously highlighted within this representation letter.

Additional teacher parking and a drop off area, accessed off the B4696, with pedestrian access directly to the rear of the school would improve drop off availability and significantly reduce existing risk to children, parents and teachers. This would provide a much better solution and would ensure parents and children didn't have to walk along an unlit, unmade footpath quite some distance from the school to the north of the houses on Gosditch as outlined in figure 5 above (P5).

Additional teacher parking and a drop off area can be delivered through a development at land at Dairy Farm Bungalow and Dairy Fields, Ashton Keynes and offers a much better solution and closer footpath link with the school than the present option detailed within the DNP.

Conclusion

The DNP has clearly been informed by significant amounts of local consultation following on from the approval of the Ashton Keynes neighbourhood plan area.

However, the evidence base for the DNP in relation to required housing numbers is derived from a study undertaken in April 2014, which has been defeated in numerous subsequent appeals and therefore the robustness of the data is questionable.

In addition, this representation letter demonstrates the "Housing Consultation Event", undertaken in January 2015, was technically flawed and is likely to have produced skewed results in relation to the proposed allocation of housing sites within the DNP area, for the reasons previously outlined.

In relation to Policy HSP3 and the DNP's proposal to allocate the former "Cotswold Community" for 75 dwellings, given the uncertainties within the DNP's own sustainability appraisal it is clear this policy is questionable.

Our Client contends other sites, and in particular land at Dairy Farm Bungalow and Dairy Fields, should be re-considered as preferred options within the DNP; especially considering the many and significant benefits of developing land at Dairy Farm Bungalow and Dairy Fields which have been outlined in detail in this letter, have not been fully appreciated.

We would appreciate an acknowledgement of this representation letter and look forward to working with the community, the school and the Parish Council to consider options for development within Ashton Keynes to provide much needed housing and other measures, and to support local services.

Yours sincerely

Simon Firkins MRTPI