

13 October 2023

Cllr Phil Exton  
Chair of the Planning and Environment  
Committee  
Malmesbury Town Council  
Town Hall  
Cross Hayes  
Malmesbury  
Wiltshire  
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County Hall  
Bythesea Road  
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Dear Cllr Exton,

## **Wiltshire Local Plan Consultation – Malmesbury Area Strategy**

Thank you for your letter dated the 3 October 2023, and the copy of that letter dated the 9 October 2023, about the current draft Local Plan Regulation 19 consultation and matters related to Malmesbury within the draft Plan. It was also good to hear yourself and colleagues from the town council attended the Malmesbury consultation event on the 9 October 2023.

Your letter is split into three sections covering the housing requirement for Malmesbury during the plan period, the reserve site proposed at the town and then a series of subject based questions. Your queries are addressed below but also please note this consultation runs until the 22 November 2023. Following that the draft Plan, its accompanying evidence, and all submitted comments will be sent to a government Planning Inspector for independent examination. The Planning Inspector will consider all responses made within the consultation period.

## **Malmesbury Housing Requirement 2020-2038**

The draft Plan sets housing requirements for the main settlements in Wiltshire giving a total figure for the full plan period and a remaining residual requirement once completions and commitments have been taken into account up until 1 April 2022<sup>1</sup>. There is a 'Planning for' document for the main settlements that sets out the detail behind these figures as well as evidence for other parts of the strategy for each town. In your letter you refer to various figures from the Planning for Malmesbury document. However I can see from the figures and page references that you are referring to an older draft of the document rather than the consultation version of the document 'Planning for Malmesbury' September 2023<sup>2</sup>. A draft

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<sup>1</sup> In Malmesbury three planning applications granted (including via appeal) since 1 April 2022 have also been deducted.

<sup>2</sup>The correct version of the 'Planning for Malmesbury' document can be found on the following link:  
[https://www.wiltshire.gov.uk/media/11965/Planning-for-Malmesbury-September2023/pdf/Planning\\_for\\_Malmesbury\\_September2023.pdf?m=638313246568070000](https://www.wiltshire.gov.uk/media/11965/Planning-for-Malmesbury-September2023/pdf/Planning_for_Malmesbury_September2023.pdf?m=638313246568070000)

of the document was published for the Cabinet and Full Council in July 2023 but has since been updated with minor amendments and updated figures. The document sets out the following housing information for the town:

## **Housing requirement 2020-2038: 600 homes**

### **Residual requirement: 0**

This takes account of completions and commitments up until 1 April 2022 but also takes account of 3 planning applications that have been granted (including at appeal) since 1 April 2022. The three planning applications deducted since 1 April 2022 are:

- Planning app ref: PL/2021/08453: 71 dwellings on land to the north of Whychurch Farm and to the south of Filands  
Appeal ref AP-36345 – allowed 31-10-22
- Planning app ref: 20/08341/OUT: 26 dwellings on land South West of Park Road  
Appeal ref: AP-36449 - allowed 26-09-22
- Planning app ref: 19/05898/OUT: 50 dwellings on land off Park Road  
Appeal ref: AP-36450 – allowed 26-09-22

### **Small sites contribution at constrained settlements: 60**

At constrained settlements a small site contribution has been calculated to help reduce pressure on greenfield land. In Malmesbury the small sites contribution is 60 dwellings. These sites are within the built-up area and could come forward through the development management process.

### **Malmesbury neighbourhood area requirement: 35 dwellings.**

The calculation for this is 10% of the housing requirement which is 60 dwellings for Malmesbury. As Malmesbury is environmentally constrained, a number of greenfield proposals have come forward and there is already a neighbourhood plan allocation at the town the neighbourhood plan requirement for Malmesbury is reduced to 35 dwellings. In Malmesbury the residual is 0 without the neighbourhood area designation but it acts as contingency. It is also understood that through the review of the neighbourhood plan the group are looking at increasing the capacity of their existing allocation.

It should be noted that the overall requirement is indicative and acts a minimum figure.

## **Reserve Sites**

The draft Local Plan introduces the concept of reserve sites in Policy 3. Reserve sites will only be released if there is less than 5 years housing land supply, the reserve site is located in the housing market area where the shortfall is identified and provided the

developer of the site enters into a Planning Performance Agreement with Wiltshire Council to commit to the early delivery of high-quality development. There are three reserve sites identified each within more constrained settlements. They provide contingency to ensure that Wiltshire is protected from falling into a situation where we cannot provide a 5-year housing land supply. Thank you for your comments on the reserve sites in general and the one proposed in Malmesbury – please submit these comments to the consultation if you wish them to be taken into account by the Inspector.

## Subject based questions

In the final section of your letter you list six thematic questions which are answered as follows:

1. *What are the infrastructure development plans, for example, medical facilities, leisure facilities, electricity supply and water treatment in and around Malmesbury taking account of all the housing approvals that have already been given?*

The Infrastructure Delivery Plan Update (part of the supporting evidence base) identifies strategic infrastructure requirements as a result of the overall level of planned growth in Wiltshire, including Malmesbury. For the approvals already given requirements will have been addressed via S106 agreements. The latest infrastructure status for Malmesbury can be found on pp19-20 of the Planning for Malmesbury document.

2. *How can local needs on the make up of future housing stock be addressed in community areas where all or nearly all housing allocation decisions until 2038 have already been taken because of the Wiltshire wide 5 year housing land supply shortfall?*

Once the plan is adopted proposals that come forward will need to be in line with Policy 78 Affordable Housing and the requirements set within that. This will include sites within the built-up area that may come forward. The make-up of housing stock of proposals already granted permission will have been agreed via development management processes and will have been assessed against Core Policy 43 and 45 in the Wiltshire Core Strategy, and any other local evidence.

3. *Why has the draft Local Plan been realised without the essential Economic Development Plan and Transport Plan (LTP4) and when will these be available?*

For the LTP4 the Department for Transport national guidance on preparation and content of LTP4 has been delayed and is still awaited. That delay has meant it has not been possible to develop the LTP4 and Local Plan concurrently. There has however been significant transport input as part of the Local Plan development.

For the last decade local economic development has been driven, at Government direction, by the Swindon and Wiltshire Local Economic Partnership (SWLEP) who have been responsible for the development of Local Economic Assessments and Local Industrial Strategy. The most recent Local Economic Assessment, commissioned by SWLEP sits as evidence behind the Local Plan. Government committed in August 2023 to transfer economic functions to Local Authorities from April 2024. While this transition takes place, Wiltshire Council is developing its own Economic Strategy. Government have stated that guidance on expectations for economic strategies will come forward in January 2024, and therefore Wiltshire's strategy must take account of that guidance. A subsequent delivery plan will also be developed once Government agrees the financial resources available.

4. *What are the plans for the development of an adequate EV charging infrastructure in Malmesbury and Wiltshire across the plan period?*

Policy 70 Sustainable Transport in the draft Local Plan includes a requirement to work with partners and others to deliver electric vehicle charging and other alternative fuel infrastructure.

5. *What are the plans for the development of renewable energy generation in Wiltshire across the plan period and what sites in Wiltshire are considered suitable for windfarm development?*

Policy 86 Renewable Energy in the draft Local Plan sets criteria for renewable energy schemes that will be applied to any sites that come forward through development management proposing renewable energy schemes. Policy 85 Sustainable Construction and low carbon energy covers on site renewable energy provision.

6. *How will Wiltshire Council allocate its share of Community Infrastructure Levy in Malmesbury to follow planning decisions already taken because of the continuing 5-year housing land supply shortfall but not included in the draft Plan?*

Malmesbury Town Council receives 25% of CIL raised from development in the area. This applies whether it is from speculative development or planned growth. With regard to how Wiltshire Council spends its portion of CIL money, this is decided annually as part of the council's budget setting process having regard to infrastructure priorities across the whole of Wiltshire. As stated above, site specific infrastructure requirements as a result of unplanned growth would have been considered at the time those applications / appeals were considered and the necessary funding would have been secured through S106 agreements relating to those developments.

Please do not hesitate to contact us if you have any further queries and again I reiterate that this is a consultation process so please do send in comments by the 22 November.

Yours faithfully,



Nic Thomas  
Director - Planning  
Wiltshire Council