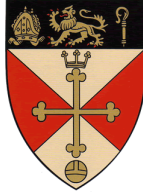


Malmesbury Town Council

(ENGLAND'S OLDEST BOROUGH - CHARTER GRANTED 880)



THE TOWN HALL
MALMESBURY
WILTSHIRE
SN16 9BZ

Telephone: (01666) 822143
Facsimile: (01666) 826166
E-mail: richard.spencer-williams@malmesbury.gov.uk

Richard Spencer-Williams
Town Clerk

8.8.19

Catherine Blow
Planning Case Officer
Economic Development and Planning
Wiltshire Council
Monkton Park Offices
Chippenham
Sn15 1ER

Re: Response to Planning application 19/05898/OUT - Land off Park Road, Malmesbury, Outline application for 50 residential units, internal road, parking, open space and associated works, with all matters reserved other than access.

Dear Catherine,

As this is an Outline application, Malmesbury Town Council is commenting only on the principle of development and access. The Council strongly objects to this application on the following grounds.

1. Location

The development is outside the Malmesbury settlement boundary and is on land not allocated for development in the Malmesbury Neighbourhood Plan (MNP). The MNP was approved in 2014 by 90% of a 32% turnout of voters in the Malmesbury Neighbourhood Area.

2. Housing numbers

The proposed dwellings would be in addition to the MNP allocation of over 1000 dwellings to satisfy the minimum housing requirement for Malmesbury of 885 required until 2026 by the Wiltshire Core Strategy.

3. Impact on community resources

During the development of the MNP, the proposed housing allocation was tested against the capacity of local education and healthcare provision to ensure the extra planned demand could be accommodated. MTC consider that an additional unplanned 50 dwellings would have a deleterious impact on the provision of local healthcare and education services, and a further adverse impact upon on the town's existing highways infrastructure and town centre car parking availability.

4. Conditions of NPPF2 para 71

The core of this application is the policy stated in the July 2018 NPPF para 71 which says that local authorities "should support the development of entry-level exception sites unless the need for such homes is already being met within the Authority's area." In this respect:

a) No evidence that need is not being met

- The applicant provides no evidence of how many homes are already built or proposed to meet the need either in Wiltshire or locally. The Town Council is however aware of the delivery of 54 affordable homes at Filands View, Malmesbury, which is now nearing completion and the 80 affordable homes proposed for the Backbridge Farm Malmesbury development.
- Wiltshire Council has not provided any clear statement of the need for such additional numbers of entry-level housing.

- Therefore it is impossible to say whether this application satisfies the NPPF's requirement to demonstrate whether the need is already being met. This alone should be grounds for refusal.

b) Importance of local connection priority

Wiltshire Council operates a scheme of priority allocation for affordable homes for those with a local connection; the Town Council considers this to be a commendable approach. By prioritising the provision of affordable housing for Malmesbury-linked people builds community cohesion and prevents long-distance commuting. Should this application be successful, the Town Council would want to see the local connection priority rigorously applied in order to ensure the provision of entry-level housing for people with a connection to Malmesbury, both immediately and in future years. The Town Council therefore recommends that Wiltshire Council announces a policy for entry-level exception sites that mirrors these provisions from its Core Policy 44 for rural exception sites:

'This exception to policy allows housing for local need to be permitted, solely for affordable housing, provided that:

- i. The proposal has clear support from the local community*
- ii. The housing is being delivered to meet an identified and genuine local need'.*

5. Flooding

Park Road from its junction westwards with Park Lane, past the point of access to the proposed development, and eastwards to its junction with Old Alexander Road, lies in a mix of high and medium flooding risk regions according to Environment Agency maps. There is also considerable local experience of the flooding of Park Road which has been highlighted by residents. Therefore the proposed access to the site is unacceptable.

6. Highways aspects

Currently HGVs delivering to Build Base in Park Road cause obstruction and delay to the present levels of traffic using the route, an additional 50 dwellings (100+ cars) will only exacerbate the situation. A great deal of traffic will be generated along Park Road, which is at its western end narrows to one-lane and is already subject to considerable commuting and HGV traffic.

The development is on the wrong side of town for access to the principal facilities, main roads and local schools including the proposed primary school facility in Lea. The development would result in a significant amount of additional traffic along Park Road and through the town generated by commuting, shopping, school and social trips.

7. Landscape and ecology

The proposed site is close to an AONB and many local residents have commented from first-hand experience of its mixed and vibrant ecology.

8. Future development

Applications for 77 houses on a larger site, which included the current site, were made by the present applicant (White Lion Land LLP) in 2011 and 2012 and were subsequently refused on appeal in 2014. The two applications and the appeal were vigorously opposed by the Town Council. The Town Council is now very concerned that if the present application is approved it could provide encouragement, notably by providing access to the larger site, to more development applications at this problematic and inappropriate location.

MTC urges you to refuse the application.

Yours sincerely

Richard Spencer-Williams
Town Clerk