

Wanborough Parish Council

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Thursday, 21 February 2013

Dear Sirs

Swindon Borough Local Plan 2026

Wanborough Parish Council ("WPC") is not opposed to reasonable, orderly, high quality infrastructure growth in Swindon, providing that the concerns listed below are dealt with in an appropriate manner and are ultimately the result of thorough public consultation and robust examination.

We formed a working party with Swindon Borough Council ("SBC") planning officers following the last public consultation on the 'Core Strategy' in 2011 which preceded the now re-named 'Local Plan'. This has been a positive arrangement to increase understanding of the planning process; however, there has been little press coverage and the documents comprising the Local Plan are difficult to find, and if found, read, on the SBC website. There have been no general leaflet drops by the Borough to explain the plans and it has been entirely down to parish councils where they exist to inform residents of the proposals. We do not feel that this has resulted in fair access for all to the information available and as a result many stakeholders will have no idea about the plans.

The Localism Act 2011, provides new powers for communities to plan for their areas. The generic term for these new powers is 'Neighbourhood Planning'. **The National Planning Policy Framework 2012 ("NPPF")** allows a neighbourhood "direct power to develop a shared vision for their neighbourhood and deliver the sustainable development they need". In order to work within and coincide with the local plan, WPC would like to adopt a strategy to both support and work with the 'Local Plan' when and if this is approved.

In order for the Local Plan to be seen as both justified and effective, all parts of it should have been the subject of extensive thought from a planning perspective and the subject of thorough public consultation.

Our principal comments below relate to the inclusion of a large site at Redlands Farm which was not part of the previous consultation in 2011. The late inclusion of Redlands Farm was done without sufficient planning consideration, investigation and without fully appreciating the planning dangers of a substantial boundary change. The reason given was to accommodate a very small scale scheme as an alternative to the airfield use but this has created uncertainty and a lack of clarity in the planning process.

In order to rectify this mistake, the housing boundary should now revert to exclude all of the 'Redlands Farm' land and revert to the North of Liden Brook and then a "Neighbourhood Plan" could be prepared for a small scale development of 20-40 homes on the site, which would respect the landscape setting of the village.

Although Redlands is included in the new settlement boundary within this draft, it has not been designated with a housing development island within the plan. We strongly urge that 'Redlands Farm' (and all of the landowners who have a direct or indirect interest in the farm), are included as part of a 'Neighbourhood Plan' (along the same guidelines adopted by negotiations with Mr Hooper in Wanborough, in 1990, and supported by SBC). This will provide land equalisation and significant benefits to all stakeholders whilst additionally; it would help to avoid any on-going harassment by both neighbours and councillors, which we have seen over the years with regard to the Redland's farm and airfield.

Our objection to the Local Plan as being neither legally compliant nor sound is the very late inclusion of Redlands Farm & Airfield in Wanborough at the personal insistence of Councillor Dale Heenan (Covingham & Dorcan Ward Councillor) who is also the SBC cabinet member for strategic planning and sustainability.

The background is that Redlands operates quite legally as an unlicensed leisure airfield for skydiving and micro-lights. Over the years, this activity has caused some comment largely from residents from outside the WPC area in nearby areas such as Covingham (although we record that some within the WPC area have also objected). We contend that Councillor Heenan has used his position as Cabinet Member to order that the housing boundary be changed to satisfy some of his constituents who have remained vocal on the airfields use. Councillor Heenan claimed in the press article that announced this change to have consulted Wanborough Council which was untrue.

This change was made shortly before the local plan was due to be published and has been done in such an ill-considered way that it endangers the accepted need to protect the village and landscape setting of Wanborough (including Horpit, which is part of Wanborough) and will have a much greater impact upon the AONB because of its proximity and topography as the site sits upon the highest part of Wanborough Plain.

As Councillor Heenan was pressed on the issue, including at a packed public meeting recently held in Wanborough Village Hall on 14th January 2013, he indicated that he would support a development of no more than 30-50 homes at Redlands and promised residents and the Parish council to control this number of homes.

The legal 'issue' is that once the newly drawn housing boundary is accepted as part of the 'Local Plan', it will not be within Councillor Heenan's gift to control absolutely the number of homes and already the site is being 'promoted' as suitable for up to 500 homes by agents. Promises of a 'design brief' and its inclusion within the emerging Supplementary Planning Document for the Eastern villages will not help, as this will not necessarily form a part of the Examination in Public.

WPC had stated that they would support a small scale development at Redlands of 30-40 homes in the style of a 'hamlet' rather like some of the other extended areas of the village (Horpit, The Marsh, Foxhill etc.) with a 'farmstead' style of housing that reflects the highly visible location and to include a minimum 30% low cost/social housing for those with a village connection. It should include good quality cycle and pedestrian access to the village. As with the scheme in 1990 involving Mr Hooper we envisage that a meaningful amount of land is transferred to the village to provide additional sports and recreation facilities as well as additional recreational woodland and allotment provision. Rather deliberately the scheme would be attached to the village and without direct connection to the Eastern Villages development. Horpit and Burycroft although outside the tight housing boundary of the village are both historically connect to and considered important parts of the village of Wanborough.

To make the plan sound: The housing boundary should return to the North of the course of the Liden Brook.

Policy NC3 (5.55) states that the development will ensure the landscape, context & views to and from the North Wessex Downs AONB will be 'respected', however, the correct terminology should be to '**conserve and enhance**' - clearly development at Redlands would contradict as the boundary is closer than previously proposed, so the statement at 5.55 is not correct. This statement also promises to ensure a 'graduated transition' yet the Redlands site is one field away from the village allotments. **There is insufficient planning argument or reasoning for the inclusion of Redlands.**

Policy NC3 5.78 also promises '**measures to minimise rat running through nearby villages**' yet clearly Redlands adds to the other two proposed sites along the historic Wanborough Road. This part of the plan needs much more detail and clarity in order to be sound.

To be effective: The plan should explain why the current 'No Through Road' policy, for both lorries and cars, from Covingham to Foxhill is not or will not be enforced. This statement has often been repeated by SBC councillors, officers and the police. Therefore, an effective plan must be made which is an integral part of the transport assessment.

We feel that rat running through villages will result if an effective solution is not included. We propose that Wanborough Road should not be accessible to any major development; the closure of Wanborough Road will protect and enhance the village setting of Wanborough and provide significant benefits in terms of quality of life for both Wanborough residents and the villages beyond. The other acceptable option would be significantly restricted access - the form and layout of the new developments should be such that they make 'rat running' impossible.

NC3 5.77: The new Commonhead link road will take traffic away from Wanborough and provide a route for Wanborough residents to access the eastern development. If Wanborough Road is left open, it will create substantial traffic issues in both directions from the EDA and potentially from the new Coate development.

The Marsh is not sufficient to deal with this problem and it is widely anticipated that rat running at busy times will result in a significant deterioration in the standard of living for its residents. If the link to the Commonhead junction is to form part of the plan, significant and timely earthworks (possibly a bund) with tree planting to mitigate noise and visual intrusion of the planned road should be in place. The historically significant remains of the old watermill off The Marsh should be conserved and an explanation of how the historically important Great Moorleaze Farm is to be protected should be made. The route of the link should respect other important archaeological sites.

We have serious flooding concerns. In recent years, the Wanborough Road, Horpit and in particular 'The Marsh' has flooded and there have been instances when they have all been impassable through flooding (on many winter days, it is only possible to drive through in the middle of the road). This problem has never been solved in Wanborough and so the expectation is that if flooding concerns are not seriously considered, these issues will escalate.

Policy NC3 (5.58) discusses density. Because of the impact upon the North Wessex Downs AONB and the location of the development on a largely flat plain, the height of the development is as crucial as the quality, as it will be extremely visible. 40 homes per hectare, as an average, is considered too visually intrusive in the wider landscape and is substantially higher than the density considered acceptable at Commonhead (30 dwellings p/ha) yet no explanation has been given for this substantial increase. In order to respect the landscape the density should be reduced. We propose that the local community should be invited to engage in future planning meetings to discuss design criteria that result in a high quality development within the WPC area.

DELIVERABILITY: In order that the plan is sound and deliverable, the funding for infrastructure should be in place prior to the commencement of any of the development islands. We have concerns over the intended infrastructure delivery plan, which does not include figures for the Commonhead Link and many other important issues which will result in long term social costs. A member of the Planning team confirmed that the crucial 'link road' from the development islands to Commonhead (which is a considerable distance) has not been costed or included in the 'Infrastructure Delivery Plan' as the cost of the link road is expected to be provided by the developer. Leaving out this cost and the mechanism of funding makes the delivery plan UNSOUND.

Policy NC3 5.81: We support the ambition to provide and conserve a route to eventually link the Wilts & Berks canal to the Thames. We would encourage the early provision of the route as part of the 'green infrastructure' including cycle and pedestrian access. This must be done in joint ownership with the 'Canal Trust' to prevent intrusion.

We support the relocation of employment land and, in our view; it is now in the right place as it has direct access to the 'Strategic Road' network. We encourage provision of some smaller low cost units which will replace units lost at Lotmead business village, and we welcome a policy of encouraging technology companies to locate here as this will meet employment need better than warehousing schemes which have created a few low paid employment opportunities. The policy should be in accordance with Government guidance and seek sustainable development that achieves a pattern of land use which minimises the need to travel.

We consider that the Eastern Development Area should result in no housing target required for Wanborough or the surrounding villages. This has been highlighted in working party meetings. Housing can be dealt with in a Neighbourhood Plan to cater for local need.

Policy EN5: S.106 & Community Infrastructure Levy: We encourage the use of some of the funding that results from the developments to be made available for schemes to celebrate 'Heritage Assets' and 'The Ridgeway Trail' including canals, cycle ways, footpaths, local sport, community forest scheme and community hall/Ridgeway Trail Visitor Centre. We are of the opinion that the 'Ridgeway Trail' is given insufficient consideration as a tourism attractor to the area.

We support the inclusion of a non-coalescence buffer but notice that some significant land has been omitted at Lower Earls court Farm. A strategy should be developed to reduce the significant impact on the landscape as well as strengthen the protection afforded by the buffer, otherwise there will be constant encroachment into the countryside. Such a green buffer will help to minimise traffic noise impact and encourage significant forest planting in the Wanborough area, again helping to reduce traffic noise.

Policy EN6: In order to respect the landscape and deal with some of the flooding issues, we encourage setting aside land for a wetland habitat and amenity lake, which could also support the activities of the canal trust.

As such a significant amount of the development takes place within and further affects WPC we request that WPC be invited to attend and be able to speak at the public examination of the Swindon Borough Local Plan.

Yours faithfully

Mrs Angela Raymond

Mrs Angela Raymond
Clerk - Wanborough Parish Council