

26th March 2024

Ms T. Strange
Clerk & Responsible Financial Officer
Melksham Without Parish Council
First Floor
Melksham Community Campus
Market Place
Melksham
Wiltshire SN12 6ES

R22-053

Dear Teresa

Melksham Neighbourhood Plan Review
Land at Middle Farm, Corsham Road, Whitley – Letter of Intent

We write to you on behalf of my client, [REDACTED] in relation to his landholdings at Middle Farm, Corsham Road, Whitley. This letter follows an informal meeting with yourself, Cllr Pafford and Vaughan Thompson where we discussed the draft allocation at the aforementioned site.

The purpose of this letter is to confirm [REDACTED] continued support for the extant allocation of Plot A, and for the draft allocation of Plot B along with some explanation of intentions for the land as a whole. We appreciate that the Regulation 14 consultation on the Joint Melksham Neighbourhood Plan (JMNP2) has now ended but understand that you are accepting new evidence up to the date of the Steering Group meeting on 3rd April 2024.

Background

An area of land at Middle Farm (known as Plot A) benefits from an extant allocation for c. 18 dwellings in the JMNP (Policy 7). The site was selected as “*viable and capable of development at a scale and density that complements Whitley’s existing character*” (paragraph 4.8.5). Policy 7 sought for Plot A to contribute some affordable housing in line with Wiltshire Core Strategy Policy 43 (30%).

Further to the JMNP being ‘made’, my client instructed a number of technical advisors to prepare an outline planning application for Plot A and this is now largely ready for submission.

JMNP2 is underway and due to be submitted to Wiltshire Council this summer for a further round of consultation, leading to the Examination by a Planning Inspector prior to the referendum. The pre-submission JMNP2 was informed by an evidence base which included a ‘Site Options and Assessment’ prepared by AECOM. The report references Plot A as 3148 and Plot B as MEL07. In terms of the former, the report concludes that Plot A is suitable for development. We support the continued allocation of Plot A and set out next intentions for this site further below.

In contrast, the report considers Plot B to be unsuitable for development due: to the scale of expansion into the countryside when the site provides a buffer between the village and the electricity substation; the associated impacts on users of the PROW; the lack of connectivity with the adopted highways network (although noting that there is potential to be connected through Plot A); together with the potential impacts on the Green Infrastructure Corridor, loss of Grade 3 agricultural land, potential impacts on designated heritage assets and proximity to the electricity substation.

Despite these comments, the pre-submission consultation draft seeks to retain and revise the allocation of Plot A and allocate a further c. 40 dwellings at Plot B. The JMNP2 requires the two sites to be integrated, and for this to be illustrated on a masterplan. Both sites are required to provide buffer landscaping and an enhanced right of way. We support the proposed allocation of Plot B and we are committed to ensuring the two sites would be integrated as set out in the draft policies.

Intentions and Suggestions for the Development of Plots A and B

Due to the proposed allocation of land at Plot B, my clients are instructing an architect to update the masterplan prepared for the aforementioned planning application to demonstrate how the site can be developed and ensure connectivity with Plot B for an integrated development benefitting from combined infrastructure. We consider that the integration of the two plots can seek to resolve the concerns raised in AECOM’s Site Options and Assessment Report.

The land uses on the adjoining land to the south and east of Plots A and B include low density housing, a golf course and agricultural land. A new masterplan would be designed to ensure a landscaped soft edge between the proposed housing development and the open character of land beyond.

Notwithstanding the above, when the total proposed housing (c. 58 dwellings) is considered across both sites, it would result in a low density development of only 9 dwellings per hectare (dph). This is a crude estimate based on the total site area of 6.6ha. We suggest that the potential landscape impact raised by AECOM could be mitigated if the Plot B site area was reduced in size.

The combined developable area of both Plots A and B could be c. 2ha which would result in a more appropriate density of 30dph. The plan below has been prepared on an illustrative basis only to indicate how the site area for Plot B could be reduced. The green shading represents a total developable area of 2ha; the red shading is an area that can be included in the allocation for landscaping, enhanced open space and PROW; with the black shading representing a section of the existing allocation that could be removed.



If this approach is supported by the Steering Committee, then the planning application for Plot A could increase from 'up to 22 dwellings' to c. 30 dwellings allowing for integration with a further c. 30 dwellings into a newly drawn site area for Plot B. Ample space can be included within the allocation for a landscaped buffer to the north, south and east of the site to ensure a soft transitional edge with the surrounding countryside and screening of the electricity substation to the east.

For the purposes of clarity, this is a suggestion only and my clients would support the proposal as currently set out in the draft JMNP2 if the Steering Group consider that to be the preferred option.

Proposed Amendments to emerging policies 7.4 and 7.5

In addition to a potential reduction in the size of Plot B, there are a number of other proposed amendments to policies 7.4 and 7.5 in the emerging JMNP2 having regard to the evidence base which has informed the document.

1. It is noted in the Housing Needs Assessment (2022) that Shaw and Whitley lack smaller, more affordable properties. There was also local feedback from the community which reflected a need for bungalows. We propose that a housing mix could be incorporated into the policy wording to allow for a mix of 2, 3 and 4 bedroom properties incorporating bungalows. It is suggested that the bungalows be located on the western edge of the site adjacent to Corsham Road. This would have a two fold benefit: firstly, it would reduce any possible impact on views from the listed building to the north west (as mentioned in the AECOM report); and secondly, they would be located within close proximity to the road and proposed pedestrian crossing.
2. We support the policy wording which requires 40% of the proposed dwellings to be affordable in line with the emerging Wiltshire Local Plan policy 76. As it stands currently, Plot A is only required to provide 30% to be in line with adopted policy so by requiring 40% across both Plots A and B, there would be an increase in the total amount of affordable housing provided.
3. It is understood that a need for smaller homes in Whitley results from local people wishing to downsize. It is therefore considered that a proportion of the dwellings should be designed for wheelchair access. The emerging Wiltshire Local Plan policy 45 seeks to require 7% of housing to be built to this standard, but we propose that this is increased for 10% for the purposes of JMNP policies 7.4 and 7.5.

To conclude, we support the continued allocation of Plot A, and commit to organising a pre-application meeting with the Parish Council in May 2024 for an increased level of provision to in turn reduce the scale of the emerging allocation (Plot B). The presented masterplan will clearly illustrate a co-ordinated approach to both sites. We support this proposed allocation and set out a series of suggested minor amendments to the policy to reflect local needs and reduce possible impact on the local landscape character.

We trust that the Steering Committee will take this into due consideration at the upcoming meeting on 3rd April. We encourage any questions or clarification in the meantime.

Yours sincerely

[Redacted signature line]

[Redacted signature line]

[Redacted signature line]