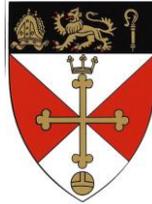


Malmesbury Town Council

(ENGLAND'S OLDEST BOROUGH - CHARTER GRANTED 880)



THE TOWN HALL
MALMESBURY
WILTSHIRE
SN16 9BZ

Telephone: (01666) 822143
Facsimile: (01666) 826166
Town Clerk: jeff.penfold@malmesbury.gov.uk

Alex Smith
Development Services
Monkton Park
Chippenham
Wiltshire, SN15 1ER

14th September 2016

Land at Backbridge Farm Malmesbury – 16/06401/FUL

Dear Mr Smith,

Malmesbury Town Council Planning and Environment Committee met last night to discuss this application. The Committee resolved the following.

Malmesbury Town Council was involved in drawing up the Malmesbury Neighbourhood Plan which allocated the application site for residential development. Accordingly it accepts the principle of development on this site. The Town Council offers qualified support for the application with the following concerns.

1. Housing numbers, mix and tenures

The Malmesbury Neighbourhood Plan (MNP) Policy 1 allocated the application site for development of "approximately 170 dwellings of mixed types and tenures". That Plan was approved by 90% of a 32% turnout of voters in the Malmesbury Neighbourhood Area. Thus that figure of 170 has received very strong local democratic endorsement, perhaps stronger than any other similar local planning quantity. Hence, without the sight of incontrovertible evidence from the developer to explain why this large increase is necessary, the Committee objected to the number of dwellings in excess of "approximately 170". Moreover the Committee could not understand the rationale for the need for additional dwellings above the 170 figure, as this figure is part of the MNP provision of over 1000 houses to satisfy the minimum housing requirement for Malmesbury of 885 required until 2026 by the Wiltshire Core Strategy.

MNP Policies 4 and 5 require that housing mix and tenures be agreed with Wiltshire Council on the basis of the latest evidence of need. The Committee saw no evidence of any such pre-application discussion. The Committee therefore objects to the proposed housing mix (dwelling types) and tenures (market, social rent and shared ownership). The Committee looks forward to commenting on the proposed housing mix and tenures once the necessary discussions have taken place.

2. Malmesbury C of E Primary School Extension

The Committee very strongly supported the comments, concerns and reservations expressed by Malmesbury C of E Primary School. MNP Policies 1 and 11 require the allocation of land to allow for the extension of this school. A binding and unambiguous agreement between the school and the developer regarding the adequacy of land provision must be a prerequisite for the approval of this application.

Only half of the land designated as "Site 15" in the MNP is allocated for the Primary School extension. The school is asking for additional land to enable it to continue to provide the first class educational product that it presently provides, and the Committee was therefore concerned that what is being offered will not achieve this. It was also apprehensive that the lack of information about the use of the northern half of "Site 15" will be in due course be the subject of a further development application further adding to the infrastructure pressures in the town.

3. Connectivity

MNP Policy 1 requires "pedestrian and cycle links to Tetbury Hill and the town centre by way of the school access and public footpath MALM 24." Malmesbury C of E Primary School has expressed its concern at the absence of any proposal to take a footpath link to and across the school's land. The Committee considered that the application should not be approved until spatial and financial plans for an adequate (3m wide) foot-and-cyclepath are agreed with the school and Wiltshire Council. Development should not begin before the agreed foot-and-cyclepath is delivered.

The Committee considered that financial provision for an extension of the local bus service to the centre of the application site was a necessary condition of any future permission

4. Design

The Committee did not find an adequate response in the Design and Access Statement to the following Design Tasks from Volume II of the MNP:

- Task 8.5: The visual impact of new development on the countryside, and on views from the countryside, must be enhancing. *No response.*
- Task 8.6: Streets within new development must be designed as pleasant places to be, recognising that they can be social spaces in their own right, as well as channels for movement. Task 8.11: Within new residential development proposals opportunities for creating public space(s) should be identified. *Response that " The provision of distinct and usable public open spaces has been key to the development of the layout." Questionable especially if the "Market Square" is proposed as meeting this requirement.*
- Task 8.8: The selection of street furniture within new development must be considered in a comprehensive manner to ensure that a common language of elements is maintained across the public realm ... *No response.*
- Task 8.15: The design of boundaries between private gardens and public areas must be considered with the design of the dwelling and shown on the submitted plans, elevations and site sections. *No response.*
- Task 8.22: A private outdoor garden amenity space or a shared amenity area must be provided for all new dwellings, including Extra Care housing. *Questionable in relation to the blocks of flats.*
- Task 8.23: *No adequate response, see below.*

- Task 8.24: Design in the 'forgotten' elements from the start of the design process (= bin stores, cycle boxes, meter boxes, grit bins). *No response nor any such designs seen.*

5. Sustainability

The Committee found no adequate response to Design Task 8.23 from Volume II of the MNP: "The design of new development should reflect the increasing importance of the principles of sustainable development." The Energy Statement presents options for energy-saving measures but does not present firm proposals and relies on an unsubstantiated "standard Persimmon specification." There is no statement regarding water saving or recycling. The Committee could see no reason for this development not to showcase the highest standards of sustainable development, especially as it is sited beside an internationally renowned engineering leadership firm and many of its residents are likely to work for that firm.

6. Layout and amenity

6a. Road width

Measurements from the applicant's Planning Layout show the road width throughout the development to be 5.5m. If this is the proposed width then the Committee considered it far too narrow. The Bloor development site plan has its entry road 15m wide then 12m with minor roads 9-11m. In Reeds Farm road widths of 11-13m predominate.

There is concern that with on-street parking likely (see below) such narrow roads will lead to widespread obstruction for residents and difficulty for Emergency Vehicles.

6b. Parking density

Whilst the application proposes the delivery of the necessary number of parking spaces required by Wiltshire Council's parking policy, the Committee was concerned at the lack of visitor (= unallocated off-road) spaces in the densely populated northern part of the residential development. The area north of the "Market Square" holds only roughly one-third of the required forty-seven visitor spaces although that area holds approximately two-thirds of the proposed total dwellings. The Committee predicted particular parking pressure around the blocks of one-bedroomed flats on the northern road, leading to excessive on-street parking, diminished living conditions and potential obstructions for emergency vehicles.

6c. New parking area

The Committee considered that there was a need for a new parking area at the south-east tip of the residential development, connecting to the footpath to the school. This would provide (a) additional parking for those dropping off their children at the school, relieving the problem in Poole Road, (c) parking for those wishing to enjoy the green area at the south of the site.

6d. The "Market Square"

The Committee did not consider that the "Market Square" is at all adequate as "the heart of the scheme" in creating a sense of place or for interaction amongst residents. It is a triangular road junction with trees in the middle bordered on two sides by (no doubt continuously-used) parking spaces. Its local reference is stated as "the Triangle in Malmesbury" and the layout is similar but the Triangle is not a place where people interact and neither of these is a "Square". The Committee considered that a complete re-design is required, creating a larger, squarer space with attractive community amenities including a public garden, benches and covered area (cf. Malmesbury's Market Cross).

The Committee considered that a public space similar to an improved "Market Square" is required in the densely-populated northern half of the residential development.

6e. Community facilities

The Committee considered that the site would benefit greatly from a community centre / café / community hall which could be located within a radically-redesigned "Market Square".

7. Conclusions

Malmesbury Town Council offers qualified support for the application with the following concerns:

- Housing numbers are in excess of those allocated in the MNP and the housing mix including affordable housing has yet to be made visible.
- Matters regarding the extension of the primary school and the connectivity of the site to the town through the school grounds are not secure and are matters of great concern.
- Responses are required to detailed design tasks from the MNP. The sustainability proposals are weak when this could be a showcase site.
- A number of concerns exist with layout and amenity of the site.

Overall, the Council would like to see a development of fewer dwellings with the resulting space used for wider roads, more parking in the northern half of the residential area, a redesigned "Market Square", including community facilities, with a second in the northern half, and a new parking area to the south-east.

Yours Sincerely
James Whittleton
Deputy Town Clerk
Malmesbury Town Council