

Lydiard Tregoze Parish Council Response to the draft Wiltshire Local Plan

Lydiard Tregoze Parish Council finds the draft Wiltshire Local Plan to be unsound, as laid out in the reasons below. Throughout the response we will use the following abbreviations: Lydiard Tregoze Parish (LT Parish) and Royal Wootton Bassett (RWB).

Wiltshire Local Plan Pre-Submission Draft 2020 – 2038 (Regulation 19)

*As it is already 2023, the target end date for the draft plan should be adjusted to 2041 or later.

A. Introduction – What is this Plan?

1. Paragraph 1.1 – *“The policies and proposals contained within this Local Plan will provide for the needs of existing communities, safeguarding the ability of future generations to meet their own needs.”*

1. The draft Local Plan DOES NOT provide for the needs of existing communities, as will be shown throughout this representation statement.

2. Paragraph 1.4 – As pertains to the Wiltshire Core Strategy Core Policy 47 (Meeting the needs of gypsies and travellers) and the up-to-date Gypsy and Traveller Accommodation Assessment - It is not clear whether current or future applications for Gypsy and Traveller sites within the RWB area have been considered within the Local Plan. This potentially increases the land use beyond the 4 chosen development sites, as well as increases the population numbers, affecting traffic, education, and NHS facilities (essential infrastructure).

3. Paragraph 1.5 - *“The Plan seeks to guide future development to ensure that communities have a balance of jobs, services, facilities and homes. This Plan ensures that housing needs are met and identifies land for jobs and services to ensure that Wiltshire remains strong and prosperous.”* (emphasis added)

1. The plan ensures housing needs, while only proposing that essential and place-shaping infrastructure is contributed to by potential developers. The plan must also ensure essential infrastructure be delivered for the existing communities BEFORE new development takes place, and ensure that continued essential infrastructure will be delivered with new developments. This will deliver a sustainable pattern of growth, keeping in line with paragraph 7 of the National Planning Policy Framework.

B. Policy 1 – Settlement Strategy

~Market Towns have the potential for significant development that will increase the jobs and homes in each town in order to help sustain and where necessary enhance their services and facilities and promote better levels of self-containment and viable sustainable communities.~

1. RWB and surrounding communities/parishes are already NOT self-contained, as doctors surgeries, dentists and other amenities are shared among RWB, Purton and Swindon; and LT Parish and Lydiard Millicent already struggle with “through traffic” from RWB and Swindon.
2. Policy 1 fails to ensure that delivery of infrastructure needs will be met by developers for the population of proposed new developments, much less provide for the existing communities already under strain.

Current infrastructure needs must be delivered BEFORE new developments are considered.

C. Policy 2 – Delivery Strategy

1. Paragraph 3.26 - *“At Small Villages, infill proposals will be supported consistent with their character and will support their vitality. To further support these communities, policies allow for housing that meets a settlement's identified housing need or will support appropriate employment, services and facilities.”*

- I. The plan proposes to annex land from LT Parish, and bring large settlements close to the boundary of Hook village. By annexing land, it removes the possibility of NHS services, schools, parks/open space, cemetery provision for LT Parish, and still no bus route through the village.
 - II. Smaller infill developments are still a possibility within the Hook settlement area. With no essential or place-shaping services within LT Parish and Hook, the communities within the parish boundary continue to be left reliant on neighbouring services (but no bus).
2. The Local Plan contravenes the Small Villages statements of Policy 2:
 ~...*provided that the development respects the existing character and form of the settlement and its setting.*~(emphasis added)
- I. Part of the character and form of LT Parish and the village of Hook has been its greenbelt area surrounding Hook and buffer zone between RWB and Swindon. The Marsh Farm and Midge Hall developments remove large areas of greenbelt, with the Marsh Farm development leading all the way up the M4 with Hook village just on the other side. This directly affects the character and form of the ruralness of Hook.
 - II. Dark Skies - There are no street lights in Hook, creating an unofficial “dark skies” area, to preserve its rural identity which is listed as a small village within the Local Plan. The proposed developments will remove the buffer between town and rural community, leading to an increase in light pollution. Hook already faces increased glow from the new care home and future Lidl supermarket.
 - III. Marsh Farm and Midge Hall Farm are within Lydiard Tregoze, a small parish with a population of 495 (2011 census). Circa 600 new houses in this parish will effectively increase the population threefold, changing the nature of the parish beyond recognition. Within a short 10 year time period, 4 out of 5 parishioners will be new to the community.

D. Policy 4 – Addressing climate change

~A. *Minimising carbon emissions, including by:*

- i. *Being located to reduce the need to travel and optimise the opportunities to access services and make trips by sustainable and active modes of transport (in accordance with Policies 70 and 71 (Sustainable transport, and Transport and new development))~*

1. Policy 4 and Policies 70/71 have not been delivered for existing communities through ensuring adequate bus routes connecting Hook, Purton, Lydiard Millicent and RWB.

Current infrastructure needs must be delivered BEFORE new developments are considered.

~C. *Mitigating and adapting to the impacts of climate change, including by:*

i. *managing flood risk from all sources associated with higher peak river flows, groundwater fluctuations and surface water associated with more extreme weather events (in accordance with Policy 95 – Flood risk)*

iv. *providing comprehensive and multi-functional sustainable drainage systems (i.e. incorporating the four pillars of SuDS design) to serve all new development, including grey water harvesting and use (in accordance with Policy 95 – Flood risk)~*

2. Policies 4 and 95 do not address the recent flooding impacts of Storms Babet and Ciaran. *Potential* infrastructure in new developments does not address the lack of infrastructure in existing communities. Unmaintained gullies, drains, ditches, and lack of adequate ground soak mean traditional Flood Zones should no longer be the only areas of concern.

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E. Policy 5 - Infrastructure delivery

1. None of the proposed development sites were included as ‘key sites’ in the Local Plan Viability Assessment (September 2023, para 3.3.2), and therefore not subject to viability testing.

2. The Infrastructure Delivery Plan (September 2023) (IDP) has identified the two proposed education facilities at Sites 2 (Midge Hall) and 8 (Woodshaw) as **required** “to accommodate growth” (IDP, p22), but the sites have not been assessed for viability.
3. Policy 5 cannot deliver essential infrastructure (education) due to the lack of proper assessment of viability of the land.

F. Policy 47 – Royal Wootton Bassett Market Town

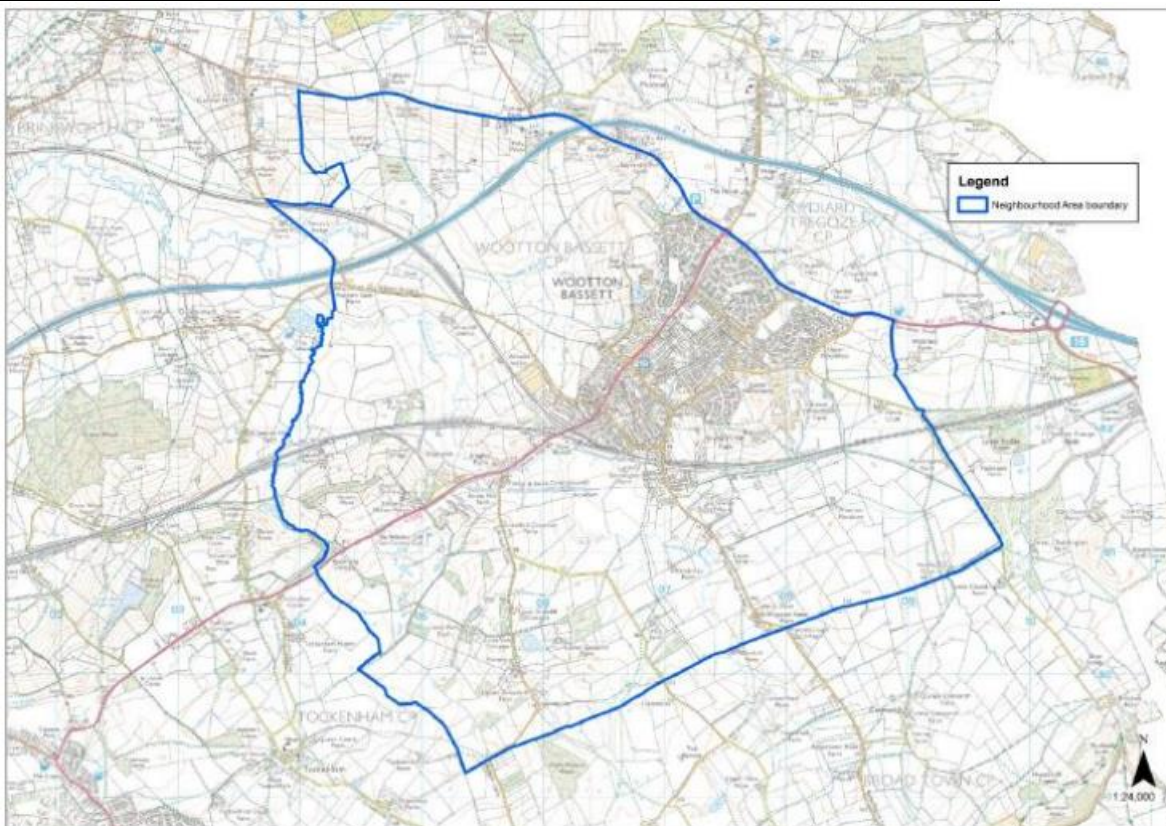
1. Regarding the Marsh Farm and Midge Hall developments, the plan clearly states boundary changes and annexation of land away from LT Parish.

~this area forms an extension to the town that establishes a permanent northern boundary~
 (Policy 47, para 4.244; Policy 48, para 4.246)

2. IF the plan is implemented the above statement renders Lydiard Tregoze Parish Council and the Lydiard Tregoze community irrelevant in the eyes of Wiltshire Council.
 - I. We are already a civil parish without a parish church, as this was annexed by Swindon. The community no longer worships together since Lydiard Park and the parish church (St Mary’s) became Swindon. The church yard and Hook Cemetery have been filled with Swindon residents, leaving residents of Lydiard Tregoze unable to have full burials for their loved ones within the parish. Hook Cemetery (under control of St Mary’s) will soon close, and there will be nowhere for residents to be laid to rest.
 - II. The current LT Parish boundary is already roughly 40% smaller than its historical boundary. More annexed land would be detrimental to the existing community.

We site the map below of Royal Wootton Bassett’s Neighbourhood Plan, which respects the established parish and town boundary down the middle of the A3102 and B4042.

Figure 1 – Royal Wootton Bassett Neighbourhood Plan extract form RWBTC website.



3. Policy 47 – “Development at Royal Wootton Bassett will: (5) deliver development that protects the distinct character and identity of the town and recognizes, and is sensitive to, its proximity to Swindon;”

- I. The Local Plan does not justify why it chose Sites 1 (Marsh Farm), 2 (Midge Hall Farm), and 8 (Woodshaw) over Site 5 (Land South of RWB) when Sites 1, 2, and 3 deteriorate the separation of RWB and Hook from Swindon AND takes land from LT Parish, while Site 5 is entirely within the RWB Neighbourhood Plan boundary and does not encroach on Swindon.

G. Policy 48 (Land at Marsh Farm) and Policy 49 (Land at Midge Hall Farm)

1. As pertains to Education:

- I. There is only one *proposed* primary school in the concept plans within LT Parish, at Site 2 (Midge Hall Farm). IF the school is ever built, children within the Midge Hall Farm development could potentially fully subscribe/over subscribe the school before consideration of children outside of LT Parish is given. Any children within the LT Parish developments that find space in the existing RWB primary schools would have to be driven (more traffic) or attempt to cross the dangerous A3102 on foot.
- II. Unlike the concept plan provided by Wiltshire Council, the current David Wilson plan at Site 8 (Woodshaw) places emphasis on the housing, with the land set aside for a *possible* primary school already deemed unsafe for such purpose. **The plan does not guarantee developers deliver essential infrastructure.**
- III. Policies 48 (Land at Marsh Farm), 49 (Land at Midge Hall Farm), 50 (Land West of Maple Drive) and 51 (Land at Woodshaw) state “*funding contributions for additional early years, primary and secondary education places and healthcare provision*” but the piecemeal developments within the local plan cannot guarantee any land for further education and healthcare provisions (Infrastructure delivery – Essential infrastructure, para 3.69), nor do the concept plans for any site address cemetery space - not in LT Parish or RWB (Infrastructure delivery – Place-shaping, para 3.70).

2. As pertains to Healthcare:

- I. None of the proposed plans provide new health care facilities. There are no doctors’ surgeries or dentists within Lydiard Tregoze’s boundary and surgeries in RWB and Purton already struggle to support the existing population (as noted on page 191 of the Rural Housing Requirements document).
- II. The introduction of over 1,300 new homes, as well as the recently opened residential home at Marsh Farm (66 elderly residents when fully occupied) and smaller developments of 2-10 houses here and there, will make this situation much worse and be detrimental to the well-being of the existing local residents, as well as new residents of the developments.

Current infrastructure needs must be delivered BEFORE new developments are considered.

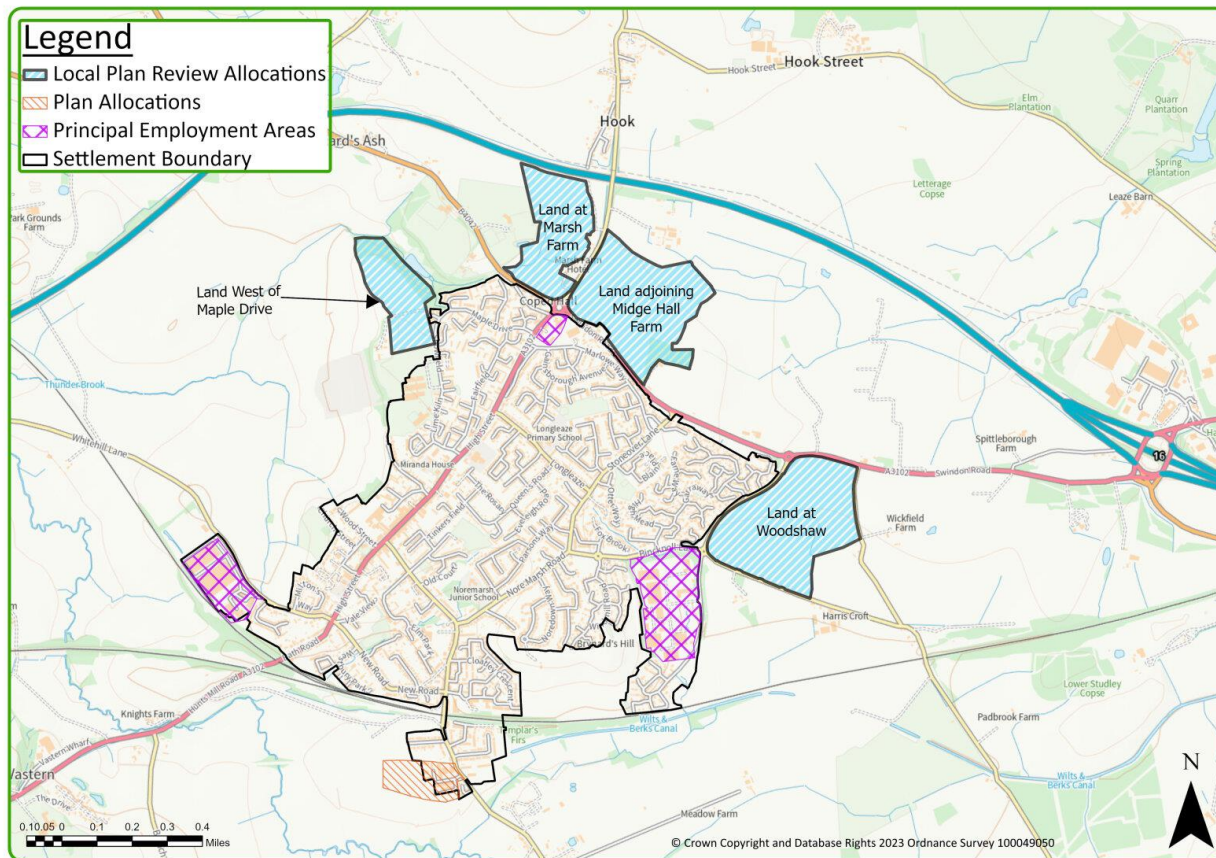
3. As pertains to Employment and Traffic:

The Plan states that any development at RWB should:

“provide additional employment opportunities to enable people to live and work locally”

- I. Although the plan lists a requirement of 6.9ha of employment land, only 1.8ha of additional employment land is identified in the Concept Plan at Midge Hall Farm, while all the existing Principle Employment Areas are to the south of RWB. It naturally follows that residents of the new developments will most likely have to travel outside the area for employment, leading to increased traffic through LT Parish. Those that do find employment within the Principle Employment Areas will have to travel by car from the housing developments planned north of the town to the employment areas south of the town, further congesting RWB High Street.
- II. It seems logical, then, that the housing developments would be better suited south of RWB where new road infrastructure could make travel for employment easier as its closer to the Principle Employment Areas and the existing employment allocation at Templars Way, thereby lessening the burden on RWB High Street, Coped Hall Roundabout, Hook Street, and Lydiard Green. We sight Figure 4.33 Royal Wootton Bassett Policies Map below (as Figure 2), showing distance from the northern 3 Review Allocations to the southern employments allocations.

Figure 2 - Local Plan extract showing proposed developments and Principal Employment Areas in RWB



H. Policy 70 – Sustainable Transport

“promoting walking, cycling and public transport to be the natural first choice for shorter and single journeys in urban areas;”

1. This policy focuses mainly on new development in urban areas. Where planned development occurs on the edge of rural areas, the need and desire for public transport in the rural communities is still ignored.
2. Paragraph 5.36: *“Planning development in locations that are, or can be made accessible, means that new and existing communities can access their needs (e.g. shops, schools and employment) easily and without always needing a car. Providing functional accessibility between new development proposals and existing communities can also change people’s travel behaviour towards more sustainable transport alternatives such as walking, cycling and public transport.”*(emphasis added)
3. Paragraph 5.37: *“Therefore, as part of a required transport assessment, it must be demonstrated that the needs of all transport users (where relevant) have been considered.”*
4. Policy 70 does not provide for the place-shaping infrastructure stated in paragraphs 5.36 and 5.37 of a bus route through Hook and Hook Street, despite demand from the community. Previous plans by Wiltshire Council members to run a bi-weekly bus route connecting Purton, Lydiard Millicent, Hook, and other outlying communities to RWB for a shopping day dematerialized with no explanation, despite widespread support from the relevant councils and the community.
5. Also relevant - **Policy 71 – Transport and new development:** *“In rural areas, it will be recognised that access to sustainable transport options will be limited but opportunities should be taken to allow people to travel by a choice of transport options.”* (emphasis added)

Current infrastructure needs must be delivered BEFORE new developments are considered.

I. Policy 83 – Health and wellbeing

“Proposals should demonstrate that development will contribute positively to health and wellbeing by enabling and promoting healthy lifestyles and minimizing any negative health and wellbeing impacts.”

1. This policy seems to focus mainly on physical wellbeing with no clear emphasis on mental wellbeing. With no guaranteed essential infrastructure to address NHS constraints, traffic congestion, or education constraints, the increased pressure on the existing communities affected by the draft Local Plan DOES NOT improve the health and wellbeing of said communities OR the population of the new developments.

Current infrastructure needs must be delivered BEFORE new developments are considered.

J. Policy 95 – Flood risk

1. 1 in 100-year storm events are happening every year. Policy 95 is unsound because it does not take into account the following flooding issues:
 - I. How the proposed flood retention ponds at Marsh Farm will affect the headwater of Thunder Brook watercourse, restricting water flow into the Brook, how water will be forced to travel through LT Parish, and impacts of nutrient run off.
 - II. LT Parish and RWB sit on a ridge of clay and limestone, leading to the occurrence of springs, mud springs, and waterlogged gardens and fields.
 - III. How the springs in the Maple Drive area will impact proposed housing, or how the housing will impact local biodiversity.
 - IV. The plan does not address the recent flooding caused by Storms Babet and Ciaran. Existing gardens and houses in Hook were flooded, and the sites at Woodshaw and Midge Hall were flooded, remaining waterlogged. There is no evidence of how future flooding will affect the new housing developments nor how the housing developments will contribute to flooding/run off due to less soak away land.
 - V. The plan does not address the issue with unmaintained gullies and drainage ditches.
 - VI. The plan does not take account of how smaller developments of 2-10 houses may also contribute to flooding issues.
2. Also see **D. Policy 4 – Addressing climate** change above.

Current infrastructure needs must be delivered BEFORE new developments are considered

K. Policy 96 – Water resources

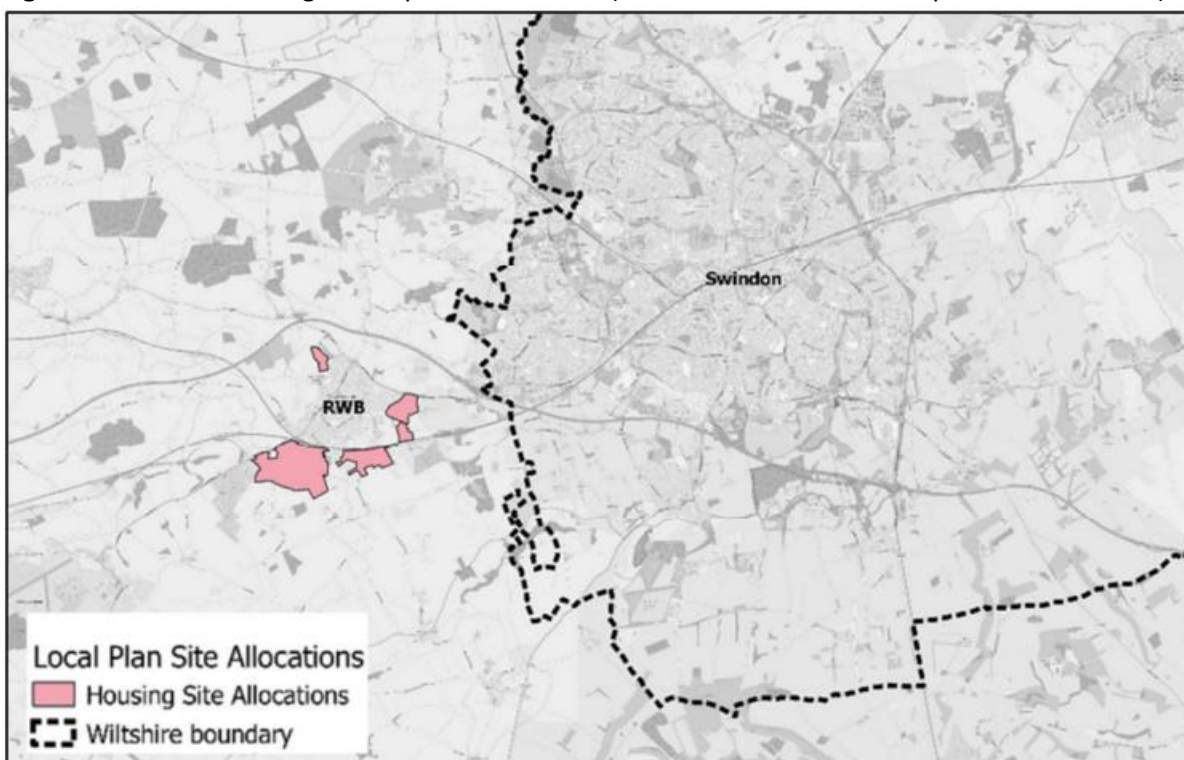
1. *“Wiltshire has been identified as a seriously water stressed area”* (Water resources, para 5.213). The Local Plan admits water capacity in the area is constrained (Policy 47 - RWB Market Town, para 4.241).
2. The Local Plan does not address these issues properly. Any resident of Hook will tell the council that water pressure within current homes is regularly only 0.8 to 1.2 bar when it should be 1.5 bar.
3. The ancient water main through Hook was scheduled for replacement but was not implemented due to the redevelopment of M4 J16 and the fact the C414 is a diversion route for the M4. Since then, the local water provider has declined to replace the water mains.
4. The water supply has been constrained for decades, but the Local Plan seems to think the local water provider can magically produce “a major infrastructure development project” within “3-5 years from commencement” (RWB Market Town, para 4.241).
5. *Proposed* measures for funding and promises that Water Resources Management Plans will address the issues do not equate to concrete plans with a verifiable timeline of commencement. Therefore, Policy 96 cannot be delivered as written.

Current infrastructure needs must be delivered BEFORE new developments are considered.

L. Addressing the impact of increased traffic in LT Parish, RWB and neighbouring parishes.

1. The Local Plan proposes no less than 1,230 additional houses for RWB and LT Parish between now and 2038. This number does not include current builds taking place or approved planning applications, which bring the number of houses above 1300. The Plan states that this is an increased target for the area compared to the previous plan (Strategy for Swindon Housing Market Area, para 4.218), but does not give consideration to the road infrastructure in and around RWB, which already struggles to support the current number of residents in RWB (including recent housing developments), LT Parish, and through-traffic between Swindon/M4 to Lyneham and beyond.
2. The plan is unsound/ineffective as the Traffic Evidence Review from Atkins appears to use outdated information starting in 2019 with different development sites listed (see map below), nor does it account for M4 Junction 16 traffic, a recent motor services application at the junction and the continued development at Witchlestowe. A current traffic review properly reflecting existing congestion levels, the proper proposed site locations, the M4 J16 traffic levels, and the properly measured impact of Swindon traffic should be used, in accordance with the National Planning Policy Framework (para 31) that requires relevant, adequate, up-to-date and proportionate evidence for the preparation of policies.

Figure 3 – RWBTC Housing Development Locations (As taken from Atkins Transport Evidence Base)



3. All 4 proposed development sites are just off the A3102. The A3102 is an already heavily trafficked road. Alternative routes in and out of Swindon via the C414 are well-known, heavily trafficked “rat runs”. The size of the proposed housing could potentially bring 600 – 1100+ extra cars just in LT Parish, all requiring access to the A3102 and C414 near the overburdened Coped Hall Roundabout.
4. The first commuter rat run is through Hook Street, a problematic partially single track road with passing places; it is already susceptible to long delays and traffic stand stills, cars parking in the passing places, and very large farming equipment squeezing down the lane. The second rat run is via Greenhill Crossroads and Lydiard Green, cutting through Lydiard Millicent. The Greatfield and Greenhill Crossroads have been flagged as problem areas by Royal Wootton Bassett & Cricklade Area Board LHFIFG. Any increase in traffic on these existing rat runs will exacerbate the problems and be detrimental to the well-being of the existing local residents.
5. The Maple Drive development adds traffic to the existing side roads, exacerbating congestion in the local estate and around the secondary school.

Conclusion

~The Settlement Strategy identifies the settlements where sustainable development will take place to improve the lives of all those who live and work in Wiltshire.~ Policy 1 - Settlement Strategy

1. The Royal Wootton Bassett Market Town portion of the Local Plan is unsound and ineffective from the start in its current form, as it does not improve the lives of all those who live and work there or provide for the needs of existing communities. The only thing guaranteed by the Local Plan is housing. There are no guarantees for schools, traffic relief, alleviation of water constraints, surgeries/dentists, or cemeteries. There is no proper plan to mitigate flooding issues. A lack of any cohesive plan for local infrastructure is detrimental to the wellbeing of existing residents and that of those living in the proposed homes.
2. Furthermore, it does not respect the Parish of Lydiard Tregoze or its people by cutting away large swaths of its land through annexation. Wiltshire Council, through predetermination of annexation of land from Lydiard Tregoze without attempting to directly consult Lydiard Tregoze Parish Council or the existing community, diminishes the legitimacy of LT Parish Council, the people of the community, and the existing parish boundaries.
3. **We object to the plan on the grounds that the projected housing requirements are for Royal Wootton Bassett, therefore they should be IN Royal Wootton Bassett, and NOT in Lydiard Tregoze.**
4. We as a parish council are not against building new homes, but we **Object** to piecemeal developments without a cohesive plan that enhances the quality of life of the existing and new residents of the parish. This plan does not provide proper community building in regard to Lydiard Tregoze.
5. These smaller, piecemeal developments do not trigger any requirements on the developers to build schools, surgeries, or provide land for cemeteries. Local Plan Site 5 (Land South of RWB) could support the larger builds that could guarantee the infrastructure that RWB, LT Parish and surrounding communities desperately require, including a potential bypass to alleviate the burden of traffic through Coped Hall and the High Street, with the added benefit that it sits within RWB.
6. Wiltshire Council should address essential infrastructure and place-shaping in existing communities BEFORE considering new developments. Surgeries/NHS agreements, traffic sustainability, water demands/pressure, flooding caused by climate change, and cemetery land delivered for the current population demands should be First Priorities over new housing.
7. Regarding place-shaping infrastructure, Wiltshire Council has been unable/unwilling to enforce the S106 Agreement concerning the Country Park at Brynard's Hill in RWB, as the developer continues to submit applications for new developments on Country Park land and not relinquishing control of the park to the Town Council. *Proposals* and promises of "contributions" from developers to fund essential and place-shaping infrastructure needs should be changed to REQUIRED, and Wiltshire Council must be REQUIRED to follow through.

As a result of all the concerns previously listed in this representation, we request that the following changes be made to draft Local Plan:

1. The Local Plan be redesigned, moving the developments at Midge Hall, Marsh Farm, and Woodshaw to Site 5 (Land South of RWB).
2. The overall housing target be reduced unless traffic, health care, employment, and water capacity/flooding infrastructure are made a first priority with deliverable concrete plans in place BEFORE any development is approved.
3. **IF** land in LT Parish must be allocated, that it be earmarked for education, medical facilities, play parks, and cemetery development (based on ground suitability) only.

Lydiard Tregoze Parish Council thanks you for considering our representation.