



Calne Without Parish Council Comments to PL/2023/07216 - Land at Penn Hill, Calne, Wiltshire, SN11 8RR

Calne Without Parish Council would like to object to this planning application on the following grounds:

Site Allocation

This proposed development is on a greenfield site in open countryside, outside Calne's settlement and parish boundaries; it is within the rural parish of Calne Without. Key infrastructure, employment opportunities and sustainable transport links will not be provided with this development. This is all in contravention of Wiltshire Core Strategy (WCS) Core Policies 1: Settlement Strategy and 2: Delivery Strategy.

Further, Calne has exceeded its allocation in the Wiltshire Core Strategy and the site it is not allocated for housing within the Calne Community Neighbourhood Plan (Policy H1). The application relies on the allocation of the site for housing and employment use within the draft Wiltshire Local Plan Policy 11 (Land to the North of Spitfire Road, Calne). If this is to be taken as the basis of planning application, then the development should comply with further provisions of the draft Wiltshire Local Plan, including:

- **Affordable Housing.** Affordable housing provision of at least 40%, as detailed in Policy 76 (Providing affordable homes).
- **Sustainability.** Development to achieve a net-zero operational carbon standard, as detailed in Policy 85 (Sustainable construction and low carbon energy).
- **Biodiversity Net Gain.** Development to deliver a +20% biodiversity net gain, as detailed in Policy 89 (Biodiversity net gain).

Impact on traffic and air quality.

The proposed development is a long way from the town centre. It is extremely probable that the majority of journeys, either into Calne, or to other destinations, will be by car, adding additional pressure on congestion in the town centre, particularly along the Oxford Road and the Curzon Street "give and take" bottleneck. This will, in turn, impact on air quality within the Calne Air Quality Management Area. The application is therefore in contravention of WCS Core Policy 55 and Calne Community Neighbourhood Plan (CCNP) Policy GA2, which both require that "*development proposals, which.....are likely to exacerbate existing areas of poor air quality, will need to demonstrate that measures can be taken to effectively mitigate emission levels in order to protect public health, environmental quality and amenity.*". These policies are in addition to Wiltshire Council's statutory obligation (Environment Act 1995 as amended by the Environment Act 2021) to produce updated plans to reduce air pollution, which in the case of Calne is caused by traffic.

Walking, Cycling and Public Transport.

WCS Core Policy 55 and CCNP Policy GA1 both require developments to maximise the opportunities for the use of sustainable modes of travel. Measures are suggested in the application's Transport Assessment but nothing definitive is proposed. We would like to see measures to positively support walking, cycling and public transport use between the site and Calne town centre, as set out in Draft

Local Plan Review Policy 11 (Land to the North of Spitfire Road, Calne). This should include provision for a bus stop and turning area in the centre of the new estate (to allow buses to turn off Oxford Road to drop off and collect passengers), provision for a pedestrian/cycle crossing across Spitfire Road and enhancements to cycle routes into Calne town centre.

Design Quality and Place Shaping

The design of the proposed houses is very generic and unimaginative. The Design and Access Statement included within the planning application recognises the historic heart of Calne but chooses materials and a colour palette which are more aligned with the featureless, generic houses that have been built in recent years rather than picking up design and layout features from the heart of Calne, or indeed to propose innovative modern design. There are several recent examples of good design in Calne, for example modern design near this proposed site, or more traditional design linking in with Calne's historic heart as demonstrated with the new development near the Kingsbury Green Academy. This approach is therefore in contravention with all aspects of WCS Core Policy 57, the draft Wiltshire Design Guide, the draft Calne Community Neighbourhood Plan Design Guide.

Local Infrastructure

No local infrastructure is planned to be delivered with this development. WCS Core Policy 3 requires new developments to "provide for the necessary on-site and, where appropriate, off-site infrastructure requirements arising from the proposal" including essential infrastructure and place shaping infrastructure. The policy goes on to say that this must be "*timely delivered*". This proposal is therefore in contravention of this policy.

Impact on Landscape and North Wessex Downs AONB

Because of its proposed setting on the side of a hill, the development will be highly visible both from within, and from around, Calne, detracting from the distinctive landscape setting of this market town. The application is therefore in conflict with WCS Core Policy 51, WCS Core Policy 57 and CCNP Policy NE2.

The proposed site currently provides a green buffer between Calne town and the North Wessex Downs AONB just over 1km beyond. Under the CROW Act 2000, Wiltshire Council has a statutory obligation and permissive power "*to take action to conserve and enhance the natural beauty of the AONBs in their areas*". Building a high-density hillside development would significantly decrease natural beauty of the views into and out of the AONB, and adversely impact the setting of the AONB.

Building Density

Well established building best practices dictate that the density of housing should diminish between built-up areas, such as Calne, and open countryside. Wiltshire's draft Design Guide reflects this. There is no such diminution proposed in this plan, with over 200 properties squeezed on the side of a hill next to open countryside.

Archaeology

The application includes an archaeological desk study only. Although this identifies a low potential for archaeological features, we nevertheless consider that a full geophysical survey should be undertaken followed by evaluation trenching as considered appropriate by the County

Archaeologist. The site is just over 600m from a scheduled monument, list number 1018392, on an area of land which could conceivably have a rich archaeological heritage.

Flooding

Anecdotal evidence of flooding exists from the residents who live in the new development at the bottom of the hill on which this development is proposed (in Calne Marsh – the clue is in the name!). The geology under the proposed site is predominately clay and as such does not drain well. The developers own flood risk assessment identifies the risk of groundwater flooding as high for parts of the site. This high risk could make the flooding at the bottom of the hill worse or result in flooding within the new development. Climate change will make this existing risk higher. This is in contravention of WCS strategic objective 2 to address climate change – para 6.32 *“reducing the risk of flooding by ensuring that new development is neither vulnerable to flooding nor increases the risk of flooding elsewhere.”*