

Comment

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To which part of the Holt Neighbourhood Plan Proposal does your comment relate?	Section 1 - Housing

Comment:

Background

David Glasson Planning Limited (DGP) represent Mr and Mrs Tucker of Manor Farm, Bradford Road, Holt BA14 6PL. Also representing Mr and Mrs Tucker are *Thrings Solicitors*.

We welcome the opportunity to comment on the Holt Neighbourhood Plan (NP) Final Draft (July 2015).

Manor Farm is a former dairy farm located on the south-western fringes of Holt. The farm comprises a farmhouse and a range of traditional and post-war farm buildings. The more modern buildings are of a large, portal frame type and tend to appear as stark utilitarian structures in a number of local and longer distance views across the Bristol and Bath Green Belt. Part of the farm is within the designated Holt Conservation Area.

With the downturn in farming, Mr and Mrs Tucker secured planning permission in 2008 for the conversion of the post-war barns to Class B2 and B8 uses together with layout of internal access ways with parking and servicing areas and improvements to the existing access. The farm and barns (in separate lots) were subsequently marketed by Carter Jonas but without success.

Given the lack of any commercial interest in either the farm or the barns and the close proximity of the farmstead to the village, Mr and Mrs Tucker made an initial approach to Wiltshire Council in 2014 to redevelop the redundant yard and farm buildings for a small residential scheme extending to approximately 0.8ha (site plan attached). Wiltshire Council suggested the scheme be pursued through the ongoing Holt NP process. DGP and Thrings subsequently submitted a proposal to the Parish Council to contribute towards the local housing requirement and by way of compensation for the site being within a corner of the Green Belt, the modern farm buildings would be demolished and a public open space/community space provided for the benefit of the village.

Overview:

We have concerns as to whether the NP meets the basic conditions necessary for it to be put to a referendum. In particular, we do not consider it demonstrates it has had sufficient regard to the National Planning Policy Framework (NPPF) or the Local Plan, in this case the Wiltshire Core Strategy Development Plan. Paragraph 14 of the NPPF sets out a clear requirement for local planning authorities to "**positively** seek opportunities to meet the development needs of their area" [our emphasis] and Paragraph 16 requires that those producing NPs or Orders should support the strategic development needs set out in Local Plans including policies for housing and economic development. There is no obvious evidence of the NP having followed the over-arching policy hierarchy or that it meets the requirement in paragraph 16 to "**plan positively** to support local development, shaping and directing development in their area that is outside the strategic elements of the Local Plan" . [our emphasis].

The NP does not in our view sufficiently embrace the positive ethos of the NPPF and its implicit growth agenda in achieving sustainable development and neither does it advance the strategic policies of the Core Strategy in responding to housing requirements in a flexible manner. We are not convinced the NP sets out a suitably robust approach in its basic conditions statement and we are equally concerned that the vision in Section 1 *inter alia* Housing Objective 3 of retaining the same settlement boundary as now is neither a positive or sustainable approach to meeting future housing requirements.

We have a fundamental concern at the NP's reliance on housing delivery from brownfield sites and its perpetuation of a historic allocation covering the former J & T Beavan's leather factory known as the "Tannery" as a housing site without any reassurance or evidence of its deliverability in the short-term. If the Tannery site does not come forward the NP loses a key component in its housing strategy and it then becomes vulnerable to speculative planning applications which have not evolved through the plan-led system.

Page 17 – Paragraph 1.5

We object to the inclusion of the Tannery as a deliverable site within five years and suggest Manor Farm as an alternative.

While the Tannery site has been long designated as an 'Area of Opportunity' and clearly offers potential as a brownfield site, the long delay to date in any plans coming forward is symptomatic in our opinion of probable underlying issues of whatever kind and so it cannot be regarded as deliverable in the short-term. This is borne out in the latest Wiltshire Council Strategic Housing Land Availability Assessment (SHLAA) which shows the Tannery (Site Reference 180) is not deliverable within five years. It cannot therefore be regarded as capable of providing towards the five years worth of housing supply. The NPPF makes it clear that to be considered deliverable, sites should be available now, offer a suitable location for development now, and be achievable with a realistic prospect that housing will be delivered on the site within five years and in particular that development of the site is viable. Despite the evolution of plans over the years, including we understand an exhibition of concepts for the Tannery site in 2011 there is no apparent prospect of any development coming forward. Notwithstanding any potential it might have in the future as a mixed use development, in the absence of any firm plans or planning application and the site not being deliverable within five years, it plainly cannot meet the housing requirements of the Bradford on Avon Community Area and the Core Strategy. The NP should regard the site as deliverable in 6-10 years or longer in line with the SHLAA's

assessment. Without the Tannery site, the NP cannot rely on other brownfield land and infill housing alone to deliver its housing requirements.

By way of an alternative, Manor Farm can be delivered within five years and the site has a close affinity with the existing built up area in adjoining the existing settlement boundary. The site is currently occupied by various unsightly agricultural buildings which detract from the openness of the Green Belt and which do not present an attractive setting at the western entrance of the village. The site which is south-facing has no known physical constraints and enjoys good access points on to Bradford Road. It is within easy walking and cycling distance to all village facilities and amenities. The site is of scale which relates well to the organic growth of Holt over the years and the site would provide a rational and defined settlement boundary to the south-western edge of the village. The quantum of units (c.25 of market and affordable) is also capable of being assimilated into the village fabric and highway network without adverse harm.

The negligible incursion into the Green Belt is far outweighed in our opinion by, primarily the removal of an unsightly farmyard and associated buildings such that the openness of the Green Belt will be considerably enhanced, but also the ease of accessibility by foot from the site to village services. While the site is within the Conservation Area the proposed development presents a similar opportunity to enhance its character and appearance and the resulting development will pay close attention to the treatment of the built environment and associated open space to ensure the site respects and complements the surrounding townscape. The site was presented to the Parish Council on 24th September 2015 and a public exhibition was held in the URC Hall on 26th October 2015. At the exhibition there was clear support expressed by local residents for a housing development on the site allied to the removal of the existing farm buildings. It is intended reporting back to the Parish Council with the results of the public consultation exercise and making refinements to the scheme as appropriate.

In contrast to the Tannery site, Manor Farm has no deliverability issues and subject to normal planning requirements, including a safe and adequate means of access to Bradford Road, it is capable of providing towards the housing requirements in the Core Strategy.

Page 21 – Policy H3.2: This Plan does not support new housing on greenfield sites....

The veto on greenfield sites is contrary to the NPPF and the Core Strategy and places an unrealistic expectation on Holt to provide sufficient housing land on brownfield sites. Given the apparent deliverability issue with the Tannery site, the dearth generally of brownfield sites in Holt and few opportunities for sites within the current settlement boundary this policy leaves very limited options for new housing given Holt's status as a large village in the Bradford on Avon Community Area and the housing requirement of 76 homes in the Site Allocations Development Plan Document. The capability for Holt to provide suitable housing sites within the existing settlement boundary is further constrained by the proposed green spaces in the NP which inevitably means that other greenfield sites including edge of village greenfield sites such as Manor Farm must at least be considered in the hierarchy of sites. In accordance with national and local planning policy which does not prohibit greenfield sites the NP should follow likewise and Policy H3.2 should be amended to accommodate greenfield sites (subject to appropriate criteria). The need for this change is exemplified by the lack of existing brownfield sites and the limited quantum of housing likely to come from infill housing in Policy H3.1.

We respectfully request that our comments are passed to the appointed Inspector and that we might appear at any Public Examination.

I wish to be notified of the decision on the Holt Area Neighbourhood Plan Proposal. Yes