

## **Blunsdon Parish Council response to the Swindon Local Plan Review.**

### **4 Planning for New Housing**

#### **Option H1 - A strategic scale expansion site at St Andrews/Blunsdon**

*Strategic scale (greater than 500 houses on a single site) expansion at St Andrews/Blunsdon potentially combined with the allocation of land for some additional housing at the higher tier rural settlements of Highworth or Wroughton or with a dispersal approach. Such development would be expected to deliver towards the end of the Plan period.*

This would be very long-term in planning and would be a detriment to maintaining the 5 year housing land supply as housing would not be built in significant numbers without a strategic access to the SRN A419. It would allow a further experience of 'land banking' which would enable land owners and developers to remain in control of planning policy.

Given its situation surrounded by the 3 NCAs, 107 Cotswolds, 108 Upper Thames Clay Vale and 109 the Midvale Ridge, on a major Roman thoroughfare and set in the Thames Valley, would make it extremely sensitive in terms of conservation and heritage.

The Lower Widhill Farm potential Employment Area and 'Tadpole II' should become a strategic allocation and a special case, not just random development with no associated protection of valued assets, no planned infrastructure, no associated core services or education, health, and recreation/sport.

It would need a new and separate access to the SRN A419 as the nearby infrastructure can't cope with existing traffic. It would also need an area of separation, a rural buffer, from Lower Blunsdon to protect its Conservation Area as outlined in Policy 3 of the BENP.

The lower village part of Blunsdon was originally a farming area, with its origins dating back 400 years. Today this area is a tiny hamlet surrounded by open countryside. This open country side is an important focal point for the whole area from all vantage points, and is a primary view that identifies the village as you approach on the A419

Although development has taken place over the years, this has been done in sympathy with its existing structures & heritage, and with the conservation area status since 1992

Because of topography and existing separation this part of the village would effectively be annexed from the main village if it was incorporated into the new development area of North Swindon, and it would potentially completely lose the identity and value that it currently has to people who live and visit there.

This part of the village would be particularly adversely affected by any development beyond the border with Ermin Street (old Blunsdon Hill)

Because of its ancient rural identity this area lacks modern infrastructure and has a single-track access road, with no passing places, and is very narrow in places. It could not take any additional traffic from development without adversely affecting the community. In addition, there are no pavements or street lighting.

The following bullet points are some extracts from the conservation area appraisal for this area, that articulates the above points, and demonstrate the unsuitability for this area to be developed nearby:

- Lower Blunsdon is a small conservation area, sensitive to change, and further development could adversely affect its characteristic un-crowded settlement pattern
- The open countryside around the hamlet is an intrinsic part of its character and the space between Lower Blunsdon and Broad Blunsdon is an important long-standing local feature

- Development proposals which affect the conservation area will be judged for their effect on the area's character and appearance as identified in this conservation area appraisal.
- Narrow meandering lanes affirm the 400-year-old origins of the hamlet and its architectural character remains predominantly historic. Conservation area designation aims to help Lower Blunsdon retain its special historic identity in the face of pressure for change

Even with a substantial land buffer, the lower village area would be very adversely affected by nearby development, including additional detrimental effects including light pollution, increased traffic, ambient noise & increased flood risk from the numerous open ditches in and around the area

Taking the above into account, and reflecting the fact that this area was not identified in the neighbourhood plan as an area for development and, is in an area of non-coalescence and a local rural buffer, it is not appropriate for inclusion the SBC local plan 2036.

Also the potential for significant negative air quality effects are identified for option H1, in terms of potential impact on the Lower Village also upon the significant Lower Blunsdon Conservation Area.

### **Option H2 – Graduated Dispersal**

*The residual housing requirement could be delivered by allocating housing at the largest rural settlements of Highworth and Wroughton and at some or all of the other villages in the Borough.*

Agreed that this solution is the most sustainable and allows a steady flow of smaller developments that will maintain the 5 year housing land supply and keep planning controls where they should be within the Borough Planning Department.

### **Option H3 - Broad Blunsdon focus**

*Significant volumes of new housing are planned at Broad Blunsdon and further land is promoted for development, south, east and north of the village. This creates the option for a more significant but still non-strategic planned expansion to the village.*

Blunsdon is a tier 3 development with few amenities unlike Highworth and Wroughton which are tier 2 and have the range of services to sustain significant levels of development.

The key issues with this option are:

- The destruction of the fabric of the village in terms of:
  - Landscape setting
  - Conservation
  - Destruction of green infrastructure
  - The lack of core services to support this quantum of development
    - No significant employment
    - No space in St Leonard's Primary School
    - No capacity in the local surgery
    - A single community shop run by volunteers
    - Overstretched sports and recreation spaces
  - The necessity to travel out from and in to the village for those core services
  - A poor bus service
  - The incapability of the road network to cope with the current flow of traffic
  - There are still 370 houses consented that are not yet built
  - There are still 465 houses pending or awaiting decision
  - The addition of 1,650 houses at the Kingsdown development

- Also the potential for significant negative air quality effects are identified for option H3, in terms of potential impact on the Village.

#### **Option H4 - Wroughton focus**

*Wroughton has the high number of sites promoted for non-strategic growth. As with Broad Blunsdon, this means that focussing on Wroughton is a potentially reasonable and deliverable housing distribution option.*

This proposal is not as sustainable as the Option H2, but together with the Highworth, the other tier 2 settlement provides a better opportunity to grow the Borough significantly. It would be in a controlled way over the plan period rather than pushing the allocations towards the end of the plan period and risk losing control of the land supply, thereby putting developers back in control and building where they want to build and not what is most sustainable or suitable.

**Figure 3 – S0055 and 56 and S00374 are listed twice.**

### **5 Planning for Employment Land**

#### **Employment Land Options**

##### Option E1 – Consolidation

Sensible approach.

##### Option E2 – Small Sites Only

Not really sustainable.

##### Option E3 – Small and Large Sites

S0030 Lower Widhill Farm Blunsdon 26.46ha.

This would make a very good Education, Science and Technology Park (as per Cheltenham). A Tertiary Education/university campus and combined technology or engineering facility that would supersede New College and Swindon College and would free up large areas of land in the town centre for much needed housing.

As such, the site is undeliverable unless capacity improvements over and above those planned to the SCR, A419 and M4 J15 are secured. Additionally the site is unsuitable due to landscape and heritage constraints

S0048 Land North of Blunsdon (as part of strategic allocation) 140.6ha

As such, the site is undeliverable unless capacity improvements over and above those planned to the SCR, A419 and M4 J15 are secured. Additionally the site is unsuitable due to landscape and heritage constraints

#### **Development Management Policies**

##### **SA2 Kingsdown**

**There is a great opportunity to revise this ‘hurried’ policy along the lines of the NEV New Community policy by including the same sub-sections:**

- **Housing**
- **Sustainable Transport**
- **Employment and Centres**
- **Community Facilities**
- **Design, Green Infrastructure and Public Realm**
- **Landscape and Biodiversity**
- **Blunsdon Village – Expansion and Protection**

**Density has been removed from the NC5 Policy, in this policy can you confirm that the density will be that described as 'sub-urban' at 30 DPH?**

**The Children' Centre has been removed – what will take it's place?**

**Plans for - 'temporary accommodation to manage the demographic peak at the primary school' has also been removed, how will this be accommodated?**

### **1.2.1 Primary Access**

In Policy NC5 a secondary access was identified from the B4019 into Kingsdown to take traffic from Broadbush to the new vehicular bridge into Groundwell, there is no mention of this in this policy. In order that the congestion already experienced at the Coldharbour/Turnpike is not exacerbated, then the bridge needs to be built prior to construction beginning on Kingsdown (as reported by C2M Hill at the Hearing for the Local Plan 2026). Broadbush, Kingsdown Lane and Turnpike do not have sufficient capacity to deal with construction and resident traffic from potentially up to 200 dwellings, and the junction definitely won't withstand that volume of traffic and the associated degradation of the air quality. If plots S0036, S0460, S0050 and S0429 are also considered and consented, this will bring the junction to a standstill.

Highways England are already concerned about adding further traffic to this junction and there are still around 370 dwellings already consented around the village which will add significant traffic before you consider these further sites.

1.2.2 There is no 'plan below' as quoted for this policy so it is not clear what changes have been made including access from the east.

### **Development Management Policies**

DM5 – See Employment Option 3.

DM9 – Designation of Local Centres – One required for Blunsdon if options to expand in the Blunsdon area are taken forward.

DM15 – Affordable Housing – Densities of affordable housing should be set in proportion to the proximity of employment. i.e. where developments incorporate employment or are adjacent to or near employment areas the densities of affordable housing should be higher. Also where there is little or no employment and poor transport connectivity, in or near a new development then the densities should be lower to avoid the necessity to travel long distances to services/work.

DM20 – Good revision

DM22 – Why have assessments become guidance and not policy? Why have we lost control of transport assessments? The cumulative impact of transport movements is not successfully demonstrated at the moment except to demonstrate additional traffic movements to the existing situation. However nobody assesses what the existing situation is.

If you examine the impact in places like Blunsdon, the cumulative impact is horrific. The table below examines the trip information from the Transport Statements for all the consented and proposed developments in the Parish at am peak, pm peak and daily. Including estimates of existing trips (from 2016 data), this produces an estimate of 12 vehicles per minute through the village When you consider that the lights at the Cold Harbour junction are phased to cycle every 2 minutes and allows on average 6 vehicles through the mini roundabout and lights at each change the build-up of traffic is massive during those peaks.

Development	Dwellings	Return Trips AM Peak	Return Trips PM Peak	Cumulative impact AM	Cumulative impact PM	Daily Impact
Evidence base 2016		396	361			3217
Blunsdon Heights	57	28	35	424	396	263
Hillside	76	45	52	469	448	350
Fortuna Drive	69	38	43	507	491	350
Reservoir Site	52	31	32	538	523	280
Holdcroft Site	54	28	29	566	552	252
Hill Cottage	100	67	77	633	629	620
Sams Lane 1	70	60	63	693	692	580
Blunsdon Land	43	22	23	715	715	201
<b>Totals</b>	<b>521</b>	<b>409</b>	<b>427</b>	<b>12vpm</b>	<b>12vpm</b>	<b>6113</b>
Pending decision						<b>470vph</b>
Cold Harbour	90	62	73	777	788	600
Sams Lane 2	115	75	85	852	873	630
Turnpike	60	29	36	881	909	270
East of Sams Lane	200	135	154	1016	1063	1240
Kingsdown, before bridge	200	135	154	1151vph	1217vph	1240
<b>Totals</b>	<b>1186</b>			<b>19.2vpm</b>	<b>20.3vpm</b>	<b>8853</b>
06:00-19:00						<b>681vph</b>

These figures are extracted from Transport Management reports created by developers' agents for each of the consented developments. Figures for the pending developments have been calculated on a pro-rata basis. (vpm=vehicles per minute and vph=vehicles per hour)

#### DM 23 – Infrastructure requirements

We perceive this policy as a catch 22. CIL is designed to support infrastructure across the Borough with 75/85% and then support local needs with 15% or 25% depending on whether there is a NP. CIL can't be applied to **cumulative** generic local infrastructure needs so how is it planned and funded? Does the local Parish Council decide the local infrastructure required to support the **cumulative** development or the planning authority? Our understanding is that unless it is a strategic allocation, generic infrastructure can't be imposed on a smaller (50-100 dwelling) development and the local CIL payment is not enough to fund it either. Hence no cumulative infrastructure requirements are sufficiently funded. The parishes have a list of local priorities for CIL expenditure but cannot plan for the situation demonstrated in Blunsdon. Therefore treating Blunsdon, for example, as a local community (LA8) would allow SBC to put policy in place to deal with those issues here that will arise as dwellings are built – i.e. employment, core services, traffic mitigation, health, education, GI and recreation/sport, pollution control etc.

#### DM 26 – ICT and Telecommunications

Blunsdon has an overall poor provision of broadband with the Lower Village down as little as 2 MBps in some areas. What provision is planned for existing residents where new developments are provided with high speed fibre?

#### DM31 – open Space in new developments

There is no policy to help local councils take effective and funded control of new open space.

New residents are conscious of the extra cost that they must bear if the delegated responsibility of the maintenance of this LOS is not viable for local councils. There is no policy control on who these appointed management companies are or what they charge residents or delegate to residents. There are some areas of new developments that are wholly owned by residents who are not obliged to keep that area up to the standard that the Borough would adopt and who can prevent services accessing if they wish. It needs resolving with a standard practice policy that everyone understands.

## Historic Environment Policy Options

Firstly it is vital that policy is applied and enforced. National policy gives generic protection but nothing surpasses local policy to tailor needs to local situations. Much of the local policy is vastly out of date and needs revising, for example Conservation Area Appraisal - Management Action Plans. These could be updated in collaboration with Parish Councils and Borough experts to ensure adequate protection and definition of appropriate sites.

### DM35 – Pollution

There is no reference to SUDS plans to ensure there is no water pollution in areas, for example, where there is no mains sewage disposal (septic tanks and klargesters). Does a planner examine the cumulative effect of run-off and processed effluent into local streams and ditches? The answer is 'no' and there needs to be a policy to protect the environment from cumulative 'pollution' through lack of mains sewers. (e.g. Broadbush, Turnpike and Kingsdown Lane).

### DM36 – Development in the Countryside

This is a good policy and will help in rural areas, to support family continuations in an area like Blunsdon where house prices are out of reach of local young people.

### **Sites suggested as Suitable within or close to Blunsdon Parish**

S0048 St Leonard's Farm – suggested 4,298 dwellings – landowner suggests 1,000

- See Option H1 response
- New junction on A419 required no access to Ermin St/Blunsdon Hill
- If adopted it should be made a new community as per NEV/TGV
- Rural buffers to protect conservation and heritage assets
- Protect ROWs
- Concerns about Flooding
- Significant impact on traffic, congestion and air quality

S0403 Blunsdon Land – suggested 33 dwellings - Permission granted for 43 dwellings

S0036 Cold Harbour - suggested 119 dwellings – application in for 90

- Land set as rural buffer in BENP to ensure non-coalescence with Kingsdown/Swindon
- Coldharbour Pub is an asset of community value
- Access onto Turnpike too close to existing dwellings
- Access to Turnpike Junction on A419 already over capacity
- Significant impact on traffic, congestion and air quality

S0460 Turnpike – suggested 60 dwellings – pre app requested of PC

S0050 – Sams Lane II – suggested 196 dwellings – application in for 115

- This area identified as a rural buffer in BENP policy 3
- This area will coalesce with Kingsdown
- Despite application for 115 houses, landowners have been requested to reconsider and offer land as sports pitches to supplement the overuse of the Recreation Ground and the lack of suitable parking
- Significant impact on traffic, congestion and air quality

S0429 – Land East of Sams Lane Development – suggested 150-200 dwellings – pre app requested of PC

- This area is part of the rural buffer set out in BENP policy 3
- There are 2 public rights of way across the site, which also contains ancient monument – Castle Hill Fort.
- The views from the East will be significantly affected.
- There should be no coalescence with NC5 Kingsdown.
- Escarpment slope should be indicative rural buffer.
- Village separation is vital,
- Existing woodland should be enhanced to provide greater screening and buffer to Village.
- Stubbs Hill ACC should also be enhanced.
- Significant impact on traffic, congestion and air quality

S032/S0379 – Tadpole II – suggested 1,360 dwellings – St Andrews Parish

- See option H1 response
- Long term solution that would not protect the 5 year housing land supply
- Built in conjunction with Lower Widhill Farm employment area would provide a great opportunity for an education, technology and engineering campus

S0030 – Lower Widhill Farm – Employment Site – St Andrews Parish

- See above

S0401/2 – Groundwell - Employment Site – St Andrews Parish

- Good opportunity for further employment and retail to support the St Andrews Ridge and Abbey Farm developments

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