MALMESBURY
TOWN COUNCIL

PL/2023/04996 – Land West of Milbourne, Malmesbury, Wilts

Malmesbury Town Council strongly objects to this application.

We join St Paul's and Malmesbury Without Parish Council (the Parish) in our extreme disappointment that in the face of the cogent arguments presented in WC's response to Miller Homes' pre-application request last year, the company has chosen to pursue a proposal for a substantial residential development on these two parcels of land in the open countryside that are clearly not supported in the plan led decision making process.

In the context of the Malmesbury Neighbourhood Plan, local involvement in place making and previous planning permissions in and around Malmesbury that will deliver significantly more houses than required in the current and Local Plan to 2026 and draft Local Plan to 2038, it is a speculative development of the worst kind.

Our objections include and add to the Parish's objections:

1. The site is in the open countryside outside of any defined settlement and is not allocated for development of any kind, especially not that proposed.
2. The proposal in this location is in direct conflict with the development strategy of the plan defined by policies CP1 CP2 and CP13 of the Wiltshire Core Strategy. Milbourne is designated as a 'small village' where development will be limited to infill within the existing built area. The proposed development is not of a form that would fit within one of the exception policies of the plan in this open countryside location.
3. Malmesbury and the Malmesbury Community Area has already substantially exceeded indicative housing requirements for the current plan period and over provided to address housing shortfalls in the wider Wiltshire area.
4. The current shortfall in the county's housing supply is limited and is improving and likely to improve further in the short term - WC's delivery record is significant at 141% of the target - in no small part because of the significant permissions already given in Malmesbury to meet the modest county wide shortfall.
5. There is therefore no overriding requirement to release and support further development at Malmesbury and in this Community Area.
6. Moreover in the emerging Wiltshire Local Plan to 2038, the section on the Malmesbury neighbourhood area identifies a housing requirement (2020 to 2038) of just 35 houses before inclusion of outline permissions more recently given for two large developments at Filands for over 140 houses. There is no local plan led requirement for this additional large development.
7. Any neighbourhood area requirement that does emerge from the emerging Wiltshire Local Plan to 2038 should be considered in combination with other evidence of local needs as determined by the neighbourhood planning group and can be delivered over one or more iterations of the neighbourhood plan during this plan period.
8. There is no evidence from any existing site assessments in and around Malmesbury that in the unlikely event a further large scale development is required before 2038 this site would be preferred. Indeed, it is explicitly not preferred in the contingency elements of the emerging Wiltshire Local Plan to 2038.
9. The rural landscape boundary of Malmesbury is an important part of its overall historical setting and the location of this proposed development opposite open land inside the town boundary would cut across and block one of the important angles

allowing this relationship to be appreciated and enjoyed. The proposed development would undermine the functioning of the conservation area it borders and the open space it protects within the town boundary.

10. The proposed development would clearly be an incongruous addition to the village of Milbourne and would not accord with existing Core Policy 57 i. and Core Policy 57 ii.
11. Further, the proposal would critically undermine the existing character and distinctiveness of Milbourne in relation to Malmesbury and the boundary of Malmesbury in relation to its rural surrounding and the local hamlets and villages around it.
12. Neither would the proposed development be an obviously identified part of Malmesbury. It would be isolated by its location and sit as an urban island out of context in a rural setting and outside of any existing community.
13. The proposed vehicular ingress/egress traffic scheme is of grave concern. The A429 at this point has a 60mph speed restriction, and given the local experience of a similar traffic arrangement further south in the 30 mph section of the bypass by Waitrose, the council believes it would be extremely dangerous to replicate a similar scheme in this location. In addition the proposed improvements to the crossing of the A429 at Blicks Hill are totally inadequate.
14. While the proposed mitigation of providing a cycleway and footpath to connect to Malmesbury via Baskerville has some broader merit – the track by the by-pass is already well used – it only offers a long and circuitous route to Malmesbury town centre and comes no where near to delivering adequate or meaningful alternative access or connection to the town centre. The crossing at Blicks Hill will clearly be a preferred route, particularly in relation to school pedestrian and cycling access. The current development proposals must be considered as not integrated with Malmesbury or good enough.
15. Primary schooling in Malmesbury currently relies on children being allocated to the village school at Lea. While this remains the case the proposed development will increase traffic flows through Milbourne. If Malmesbury Primary School is expanded as proposed by the School the inadequate link between the proposed development and the town has extra weight.
16. The proposed development obviously fails many of the basic requirements of the Malmesbury Neighbourhood Plan, notably Tasks 8.1, 8.3, 8.4, 8.5, 8.19 and 8.12.
17. If there is a prospect this proposed application may be approved we would strongly support the ‘call in’ that has already be made.

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