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18/04/2024

Olivia Tresise
Wiltshire Council
VIA EMAIL ONLY

Dear Olivia

PLANNING APPLICATION PL/2023/09595

Good to speak to you last month and as promised, I set out our position on the current consultation responses received, as a means of helping you understand the progress of the application.

By way of context, the key point is that this is a site allocated in the Crudwell Neighbourhood Plan and that we have worked extensively with the Parish Council in explaining the approach to the site and that the site would not have been allocated without its obvious support and understanding of the development.

This letter is structured as follows to cover the various consultation responses:

- Urban Design
- Highways
- Climate Team
- Refuse
- Drainage
- Archaeology
- Parish Council
- Amended Plans

Each is addressed in turn below

Urban Design

I address the UD comments in turn below:

Point 1

From the consultation response, the Officer is asking for the parking area to the rear of units 5 and 6 to be removed from the public realm. In response, the attached layout has repositioned the parking courts behind a 1.8 metre high brick wall screened with landscaping.

I note the suggestion about re-orientating units 5 and 6 to face the public open space. I'm afraid this will not be possible as the Parish Council has made it clear that it wants a terrace of properties fronting onto Tuners Lane and we do have windows on the side elevation of unit 6 at both ground floor and first-floor levels (kitchen and bedroom respectively).

Point 2

Concerning blank elevations on Units 9 and 22, the attached revised elevations show windows being inserted into Units 9 and 22 at ground floor level. Defendable landscape space is provided between the Units and the footpath.

Point 3

The cut gable roofs are designed to minimise the overall height and bulk of the houses. Also, the fact that they are cut will not be immediately obvious from views of the houses from the front and rear.

Point 4

Concerns about material chose are noted and we see no reason why this cannot be a condition matter.

Point 5

Noted and the elevations for the units has been adjusted accordingly.

Point 6

Noted and the plans addressed accordingly.

Highways

In terms of the highways comments, please see the attached vehicle tracking diagrams as requested along with details of the pedestrian links to the village.

Our consultant is currently in the process of discussing with the Parish Council the visibility splays at the A429 junction.

Turning to the TRO, at this point we would be supportive of a TRO, but this process and delivering a TRO is effectively outside of our control. As a result, we would object to any proposals which would make it mandatory for us to secure a TRO as part of any planning permission, however, would work positively with the LPA and LHA to secure one for the benefit of the village.

Climate Team

The starting point is that the site is an allocation in the development plan and in so doing, decisions about the location and the relative sustainability and transport choices arsing from it have already been made and do not require revisiting.

Turning to the matter of energy consumption and embedded carbon, DBLP has extensive experience in providing affordable housing on rural exception sites, providing housing for those who can least afford it. At the heart of that is the construction of highly energy efficient homes, which take a 'fabric first' approach, exceeding building regulations requirements. This includes making use of timber construction. This means that PV is not necessary as part of the development. We appreciate the point that PV may be installed on houses in the future, but there is no policy requirement to ensure that properties are future-proofed or designed with this in mind. In addition, the need for PV may conflict with other policy objectives, such as landscape impact as well as design and layout. It is a balancing exercise.

Turning to biodiversity, the Officer is quite right to highlight the point that the hedgerow is outside of the current red-line boundary. This was an error on our part and the red-line

has been amended accordingly to include the hedgerow within the site area. From an ownership point of view, the additional land in question is owned by the same landowner and he is aware of the adjustment having been made. The benefit of this approach is that it simplifies the provision of the hedgerow, which is a key part of the development in any event, and it now can be conditioned as such.

In dealing with EV charging points, and just to make clear (as set out in the DAS) all units will be provided with a charging point. Where that relates to parking courts, a discreet upstand will be provided, drawing on common practice elsewhere.

On a final point, I do wish to draw attention to the Local Energy Efficiency Standards Update dated 13-12-23. This makes it clear that a further upgrade in efficiency standards is due in 2025 and that the government is committed to avoiding a proliferation of multiple local standards as this can add further cost and complexity to building new homes. Therefore, in terms of environmental performance, the proposals will have to meet building regs at the time of construction, which may well make concerns raised in the climate change response somewhat moot.

Refuse

Refuse comments are noted and the revised layout pan shows the location of the bin store/collection points, which the RCV swept path plans confirm are accessible by the appropriate size and type of vehicle. The details of these can be conditioned.

Drainage

Comments are noted and accepted as conditions.

Archaeology

Comments are noted and a geophysical survey is being undertaken. This will inform the next steps.

Parish Council Comments

Parish Council comments are noted regarding the flooding and streets scenes A-A and C-C.

In terms of the commentary on street scenes B-B and D-D, the main thrust of the Parish Council's commentary is that the proposed dwellings should be more agricultural in appearance, replicating a farmstead.

In response, we consider such an approach cannot be accommodated by either planning policy (in both the Neighbourhood Plan and Wiltshire Core Strategy) or the overriding characteristics of the area.

The detailed policy starting point is Policy DD1 of the NP. This requires a number of things including:

"The mix of housing types and sizes should meet identified local needs."

In this regard, there are no concerns expressed regarding the mix and size of the units. The immediate concern with a more agricultural vernacular is that it would compromise this policy objective. Agricultural buildings, by their very nature, are larger than residential dwellings and this would lead to an awkward mix of building styles across the site and it is not seen how this policy requirement could be met in any way.

In working with the Parish Council in allocating the site, we have canvassed the Council on the design approach which should be adopted and this led to many different housing styles being put forward from traditional to contemporary. We have consistently raised concerns with the Parish about an agricultural approach as it would not fit the site and the wider policy objectives to deliver a mix of housing and the number of units proposed.

In addition, there is also an issue as to whether the site would be a suitable location for a series of replica agricultural buildings. Looking at the overall form of Crudwell, traditional farmsteads are located on the main road running through the village, on flat areas of land. In contrast, the application site is elevated with a change of levels across it, making it impractical from a historical perspective for farming. Also, when read in context with the street scenes which are acceptable to the Parish Council, the quasi-agricultural buildings would appear out of place in a residential estate.
Instead, we have adopted a design approach which better reflects the wider traditional vernacular and given the lack of comments on this point, we are taking it that the proposals are acceptable in this regard.

Amended Plans

In light of the above comments, we have amended various Plans, to this end please see the attached revised Plans which I would like you to substitute in place of the submitted plans.

BM3 Plans

- D10 – Site Layout Revision T
- D110A – Plots 5 and 6 Rev G
- D113 – Plots 9 and 10 Rev E
- D115 – Plots 12 and 25 with garages Rev E
- D117 Plots 22 and 24 with garages Rev C

Please note that the Red Line in D10 replaces the submitted Red-Line plan also.

CTC Plans

- 2024-F-006-001-A3: Pedestrian Infrastructure Scheme Overview
- 2024-F-006-003-A3: Pedestrian Infrastructure Scheme Northern Detail
- 2024-F-006-004-A3: Pedestrian Infrastructure Scheme Southern Detail
- 2024-F-006-005-A3: Swept Path Analysis

These will be added to once discussions with the Parish in regard to the visibility splays at the A429 junction reach a conclusion. I trust that the above and the attached plans set out DBLP's position with respect to the various comments to date and I look forward to discussing these with you in due course.

Yours sincerely

Nathan McLoughlin BSc (Hons) DipTP MRTPI
Managing Director