

**Land North of Wychurch Farm and
west of Crudwell Road, Malmesbury**

Statement of Community Involvement

Gleeson Land
February 2025

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Issue / revision	Prepared by	Imogen Wall
Reference	Signature	227612
This document is issued for	Date	February 2025
☐ Information	Checked by	Harvey Wingfield MRTPI
☐ Approval	Signature	
☐ Comment	Date	February 2025
☐ Submission	Authorised by	Amar Benkreira
Comments	Signature	
	Date	February 2025
	Please return by	

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Executive Summary

1. This Statement of Community Involvement (SCI) has been prepared on behalf of Gleeson Land (Gleeson) in support of a new outline planning application for up to 149 homes on land situated north of Whychurch Farm and west of Crudwell Road.
2. The proposal presented to the local community for consultation was for up to 200 homes, including 71 homes that previously received outline planning permission in 2022 (Phase 3) and an additional 129 new homes located further south (Phase 4).
3. Following public consultation, Gleeson has reduced the proposal to up to 149 homes, including 71 homes that previously received outline planning permission in 2022 (Phase 3) and an additional 78 new homes located further south (Phase 4).
4. This document outlines the pre-application consultation process undertaken by the applicant with the local community. It includes a summary of the key issues raised by the public and provides an overview of the applicant's responses to these concerns.
5. Consultation commenced with the distribution of an informative postcard to 851 properties surrounding the site on 21st November 2024. The consultation period lasted for two weeks, concluding on 6th December 2024.
6. Feedback was collected through a range of methods, including email correspondence and telephone conversations.
7. This statement details the feedback received during the consultation process and includes copies of all relevant consultation materials in the appendices.

1.0 Introduction

1.1 This Statement of Community Involvement (SCI) is submitted on behalf of Gleeson Land (Gleeson) in support of an outline planning application for up to 149 homes on land situated north of Whychurch Farm and west of Crudwell Road.

1.2 The proposed development is described as follows:

“Outline planning application (with all matters reserved except access) for residential development, including the construction of up to 149 dwellings, new vehicular access with footways and cycleways, public open space, landscape and associated infrastructure.”

1.3 This document outlines the applicant’s approach to community consultation in Malmesbury, in accordance with the requirements of the National Planning Policy Framework (NPPF), and Wiltshire Council’s (WC) SCI. It also summarises the responses and feedback gathered during the consultation process.

1.4 The proposal presented to the local community was for up to 200 homes, including 71 homes that previously received outline planning permission in 2022 (Phase 3) and an additional 129 new homes located further south (Phase 4).

1.5 Following public consultation, Gleeson has reduced the proposal to up to 149 homes, including 71 homes that previously received outline planning permission in 2022 (Phase 3) and an additional 77 new homes located further south (Phase 4).

1.6 The SCI is one of several documents submitted to WC as part of the application. A full list of the accompanying documents is provided in the covering letter included with the submission.

2.0 Requirements for public consultation

Statutory requirements for residential consultation

- 2.1 Community engagement is a core value in the NPPF (Dec 2024), as highlighted by paragraph 137 which states that applicants *“should work closely with those affected by their proposals to evolve designs that take account of the views of the community”*. It is acknowledged as essential that this engagement commences early in the process, and as such, *“applications that can demonstrate early, proactive and effective engagement with the community should be looked on more favourably than those that cannot”*.

Local requirements for residential consultation

- 2.2 WC published a Statement of Community Involvement (SCI) in July 2020, which details local guidance on pre-application public consultation for major developments, such as that of the proposed. It outlines how developers should engage with local communities to ensure their involvement in the decision-making process.
- 2.3 Paragraph 8.11 demonstrates how WC *“encourage developers and applicants to engage with local people and communities including Town and Parish Councils and with neighbours, when appropriate, before submission of a planning application.”* Whilst it is recognised that such engagement is not mandatory, it is *“strongly encouraged prior to the submission of applications for ten or more houses, or other large development on sites of 1 hectare or more.”*
- 2.4 Paragraph 8.13 reiterates the importance of this community engagement to be actioned early in the development of the planning application.
- 2.5 A ‘Major Applications Guidance’ note has been prepared by WC (publication date unknown), stating that *“the applicants will be expected to provide evidence of how the community have been involved at the pre application stage. This should take the form of a statement of community involvement, outlining what has taken place and how the results of consultation have been taken into account in the submitted plans”*. As such, this SCI has been prepared in accordance with local requirements.

3.0 Public consultation strategy

- 3.1 This section outlines the methods used to invite the local community to provide feedback and actively participate in the development of the application.

Public engagement postcard notice

- 3.2 On 21st November 2024, an informative postcard was distributed to 851 properties within approximately 800m of the site via Royal Mail (see Appendix A for the distribution area).
- 3.3 The postcard included a summary of the proposed development and a visual of the proposed masterplan. It aimed to inform local residents about the upcoming planning application and invite their initial feedback. A copy of this postcard can be found at Appendix B.
- 3.4 The primary objective of this consultation was to gather community feedback, address any concerns raised, and refine the development proposal prior to the formal submission of the planning application.
- 3.5 The postcard provided several options for residents to share their feedback, including:
- A project email address
 - tor&co direct phone number
 - A postal option for written responses
- 3.6 By offering both online and physical feedback methods, the consultation ensured a process that was convenient, accessible and inclusive for all participants.
- 3.7 The inclusion of a phone number allowed for opportunities for the local community to correspond with the project team to discuss the development proposal. This method was frequently used and proved to be an effective channel during the consultation period.

4.0 Summary of feedback received

- 4.1 A total of nineteen responses were received from members of the public, out of the 851 properties consulted, demonstrating a response rate of 2.23%. Most responses (fifteen) were submitted via the project email, while four residents engaged directly with members of the project team by telephone. One resident adopted both methods. No written responses were received via post.
- 4.2 The majority of comments (68%) were negative in nature, whilst 21% of responses were requests for further information on the development proposal or clarification on the site plan provided within the postcard.
- 4.3 Some respondents (11%) expressed positive feedback, particularly about the proposed enhancements to pedestrian connectivity from the site to Malmesbury Town Centre, the existing residential in the west, and the wider footpath network to the east. Suggestions were made to further improve pedestrian links to the north, and create new routes south to the existing primary school, which local residents would view positively.
- 4.4 Several concerns about the proposal were raised. These are set out below under key themes, accompanied by the applicant's response to each issue.

Impact on existing infrastructure

- 4.5 The most commonly raised concern, highlighted by nine residents, was the inadequacy of existing infrastructure (including doctors, dentists, schools, nurseries, youth facilities, available parking) and local job opportunities to support an increased population in the local area.
- 4.6 Residents emphasised that the services in Malmesbury have already reached capacity. They expressed concern that accommodating an extra 200 dwellings (now reduced to 71) would place significant pressure on the existing resources, particularly when considered alongside the cumulative impacts of other approved residential developments in the surrounding area.
- 4.7 A few respondents also questioned the demand in Malmesbury for additional housing, given the abundance of other residential planning applications in the surrounding development pipeline.

Applicant's response

- 4.8 If approved, the proposed development would generate substantial financial contributions through Wiltshire Council's Community Infrastructure Levy (CIL), to help fund and support infrastructure in Malmesbury. Additional financial contributions are anticipated to be secured through a S106 agreement, to mitigate any impacts of the development on the services in the local area.
- 4.9 The Council is experiencing an ongoing housing land supply shortfall, and can only currently demonstrate a 2.03 year supply against the updated Standard Method for calculating housing need. The proposed development would contribute towards that recognised need for homes.

Landscape and local character

- 4.10 One respondent raised concerns about the impact of the proposed development on the area's heritage assets and surrounding landscape. This concern was echoed by the owners of a property to the east of the site, who were concerned about how the development might impact their views of the landscape from their property.
- 4.11 A few respondents suggested the proposed development would be out of character with the adjacent built environment, including Reeds Farm, and would conflict with the wider rural setting of the historic town of Malmesbury.

Applicant's response

- 4.12 Malmesbury is identified by WC as a market town that is a sustainable location capable of facilitating growth. The town has witnessed rapid change over the last few years and continues to develop to meet local needs. As outlined in the Planning Statement accompanying this application, the phase 3 element had already received consent in October 2022 under the original application ref. APP/Y3940/W/22/3290305, demonstrating the site was deemed appropriate for development. The phase 4 land parcel is designed similarly to sensitively integrate with the existing townscape and surrounding landscape.
- 4.13 The application is supported by a Landscape and Visual Assessment (LVA), which concludes that the site is adequately screened by existing vegetation with minimal impact on surrounding views or visual effects.

Ecology

- 4.14 One respondent noted the presence of Peregrine falcons nesting in Whychurch water tower to the east, and raised their concern over the impact of development on their breeding and feeding grounds.
- 4.15 Another respondent requested clarification on the term 'ecology corridor', and sought more details about how this element of the proposal would be implemented.

Applicant's response

- 4.16 Breeding bird surveys have been carried out, which have not identified the presence of Peregrine, and as such specific mitigation measures for this species are not proposed. The water tower is adjacent to the eastern boundary of the site. Our ecologist has advised that any residing Peregrine would be habituated to background noise and visual disturbance from the adjacent A429 and service station. As such, it is considered unlikely that the development would cause any harm or impact to bird species nesting in the water tower.

Drainage

- 4.17 Several respondents raised concerns about the existing drainage issues on the phase 4 land parcel, and questioned how these challenges would be addressed to accommodate the proposed development. Specific concerns were expressed regarding the potential exacerbation of water discharge into the lower areas of the Worthies development.

- 4.18 One respondent queried the necessity of the four proposed ponds within the site and requested clarification on their function.

Applicant's response

- 4.19 A Flood Risk Assessment and Surface and Foul Water Drainage Assessment has been submitted with the application. The assessment confirms that all of the site is within Flood Zone 1 (lowest risk of flooding).
- 4.20 To mitigate potential flood risks, a Sustainable Urban Drainage Systems (SuDs) strategy has been designed with the inclusion of four attenuation basins, or "ponds," within the site. These features are integral to managing the flow and attenuation of water on site. The discharge of water off site will be maintained at greenfield runoff rates, ensuring the development does not lead to an increased flood risk off site.

Environmental impacts

- 4.21 Several residents expressed concerns about the potential impact of the development on the local amenity value of the site and the surrounding area. Key concerns included increased noise, general disturbance, heightened pollution levels, and traffic congestion.
- 4.22 One respondent raised concerns about the potential impacts on the existing 'dark sky' setting in and around the site, particularly in relation to the installation of street lighting within the development.
- 4.23 Several respondents objected to the loss of open green space in Malmesbury, emphasising the importance of preserving such areas for the enjoyment of local residents. Concerns were also raised about the lack of green space provision within the masterplan to offset the loss.

Applicant's response

- 4.24 The proposed development includes areas of landscaping to and new planting that will help integrate the new homes with the surrounding area. The exact details of the new planting will be determined at the reserved matters stage. The site is not in a dark skies area and there is existing light pollution from the adjacent residential estate to the west and street lights along the A429 to the east. Given the site's proximity to the A429, it is not currently considered an area of tranquillity, and as such, it is not anticipated that the development will lead to an unacceptable noise impact.
- 4.25 No air quality management zones exist in Malmesbury, and as such, the town is not in exceedance of annual average nitrogen dioxide. The proposed enhancements to the local pedestrian footpath network will encourage active travel, helping to reduce vehicle journeys and, in turn, lower air pollution levels.
- 4.26 The development will deliver a biodiversity net gain (BNG) of at least 10% through new planting, the creation of drainage features, and areas of ecological enhancement. This will contribute positively to the local environment. Further details on soft landscaping and planting will be provided at the reserved matters stage. As the site is currently agricultural land with limited pedestrian access, the development will enhance public accessibility to open green spaces in Malmesbury, which is a key benefit of the proposal.

Layout

- 4.27 A respondent expressed concern about the proposed location of the children's play area in the northern part of the site, citing its potentially hazardous proximity to the proposed internal access road immediately east.

Applicant's response

- 4.28 The play spaces have been carefully positioned to maintain an appropriate distance from residential properties, while also allowing for natural surveillance from these homes. While the concern regarding the location of the northern play area's proximity to a proposed road is acknowledged, a boundary will be implemented around the play area to ensure the safety of its users.

Transport

- 4.29 Several residents expressed concerns about the adequacy of the existing road infrastructure in Malmesbury and around the site to accommodate the increased traffic that the development would generate. They feared the development would lead to significant traffic congestion in the area.
- 4.30 A respondent also highlighted the lack of public transport options, in particular the poor existing bus service provided within the local area.
- 4.31 Another resident requested clarification on the proposed entrance and exit roads to the site to better understand their potential impact on traffic flow around the development.

Applicant's response

- 4.32 As previously approved in outline application PL/2021/08453, access to the site will be provided via the new access point on Filands (B4104) that has recently been constructed. A new internal road will run south into phase 3 and curve east into phase 4.
- 4.33 The Transport Assessment accompanying this application includes a comprehensive traffic impact assessment and an assessment of the wider highway network. The highway authority will be consulted during the planning application process and will need to be satisfied that the proposed transport arrangements, access points, and public transport options are appropriate.

Public Rights of Way (PRoWs)

- 4.34 Concerns were raised regarding a potential error with the site plan, specifically the inclusion of Public Right of Way (PRoW) path no. 7, which was believed to have been partially extinguished in August 2019.
- 4.35 Some respondents also suggested that the proposed development missed opportunities to better connect with the surrounding footpath network, particularly to create a route south to connect the development with the local primary school.
- 4.36 On the other hand, several respondents praised the proposal for its improved connectivity of the site to the surrounding area, particularly through the proposed PRoW routes.

Applicant's response

- 4.37 WC's Rights of Way Officer has confirmed that whilst an application to extinguish a section of PRoW MALM7 has been made it has not been determined. Therefore, the masterplan proposes to retain the footpath on its current alignment through the site.
- 4.38 Several recreational routes are proposed to intersect the site, connecting to PRoW MALM7 and MALM8, as well as providing links to paths leading to the town centre and surrounding residential developments. This ensures multiple opportunities for connectivity between the site and the wider network.
- 4.39 In response to the above comments, the applicant and project team are exploring the possibility of creating a pedestrian footpath that would extend south from the site to connect with the local primary school.

Affordability, sustainability and BNG

- 4.40 Several respondents highlighted the subjectivity of 'affordability'. and raised concerns that the prices of the new homes could be out of reach for local residents.
- 4.41 Some residents expressed apprehension about the delivery of affordable housing, the proposed energy-efficient measures, and the on-site biodiversity net gain (BNG). They requested further details on how these aspects would be secured and achieved.

Applicant's response

- 4.42 The provision of affordable homes and BNG on-site will be secured through a section 106 agreement, providing assurance to local residents.
- 4.43 While the specific mix and type of housing to be delivered will be determined at the reserved matters stage, the housing mix will take into account local market conditions at that time to ensure an appropriate balance for the site.

Wiltshire Local Plan

- 4.44 One respondent argued that the application should not proceed, as the proposal has not been allocated within the Local Plan. They questioned the need for a further 200 homes (now reduced to 71) when the Local Plan has already allocated land to meet the housing need in Malmesbury up to 2038.

Applicant's response

- 4.45 While the site is not currently allocated in the adopted Wiltshire Local Plan or the submitted Local Plan Review, WC is unable to demonstrate a five year housing land supply. Therefore, it is considered unallocated sustainable sites should be brought forward for housing development to ensure a continuous supply of land is maintained to meet Wiltshire's housing needs.

Consultation process

- 4.46 Six respondents expressed difficulties in interpreting the masterplan provided on the postcard. They struggled to locate the site within the wider context and, in some cases, found the text too small to read.
- 4.47 Three respondents felt the consultation period was too short, citing delays in the delivery of the postcards and the busy time of year (December). One respondent stated the consultation had intentionally been made difficult to respond to.

Applicant's response

- 4.48 Larger copies of the masterplan were made available upon request, and team members provided clarifications regarding the site's location during telephone discussions with residents.
- 4.49 The applicant considers the two-week response period reasonable, with postcards sent via first-class postage to ensure timely delivery. To facilitate ease of participation, three different contact methods were offered, maximising the opportunity for residents to provide feedback. Responses received after the requested response date were also taken into consideration.

5.0 Changes to the proposal following the consultation

5.1 This section provides a summary of how the proposals have responded to feedback from the local community. These changes are as follows:

- A significant reduction in the overall development units from 200 dwellings to 149 dwellings with a reduced net developable area across the site, including the removal of the development parcel to the SW corner
- Additional space provided for drainage basins to assist with the flood mitigation strategy
- Additional space provided around existing hedgerows to ensure ecological habitats are protected
- Updates to the development framework to ensure the successful integration of adopted PRowS across the site
- Additional informal footpath link to the southern boundary which connects to the PRow outside of the application boundary
- Introduction of landscape mitigation, including appropriate planting locations
- Revisions to the location of community allotments and play area in order to improve accessibility
- Review of the placemaking strategy in further detail with supporting illustrative masterplan

5.2 As evidenced, the applicant has taken into consideration the responses received from the local residents of Malmesbury, and the final application now includes a number of changes, significantly including a reduction in the total number of homes proposed from 200 to 149. This has resulted from further discussions between the design team and reflects the applicant's aim to actively respond to comments made by the wider public throughout the progress of the scheme.

6.0 Conclusion

- 6.1 This statement documents the pre-application public engagement undertaken by Gleeson to inform the development of their residential proposal on land at Whychurch Farm, Malmesbury.
- 6.2 The applicant employed a consultation approach designed to reach the maximum number of local residents and encourage feedback. This was achieved through the wide distribution of informative postcard-style letters outlining the proposed development to properties surrounding or close to the site.
- 6.3 While the majority of responses received oppose the proposed development (68%), the total response rate was 2.23% (19 responses) of local properties consulted (851). The key concern raised by local residents was the perceived lack of existing infrastructure to support the additional housing in Malmesbury.
- 6.4 It is also important to note that a small number of positive comments were received, particularly in support of the proposed improvements to pedestrian connectivity from the site to surrounding areas.
- 6.5 The applicant has reviewed the feedback received during the consultation process and has considered adjustments to the proposal where appropriate. These considerations are reflected in Section 5.0 of this statement, demonstrating that the local community has had a meaningful influence on the development.

7.0 Appendices

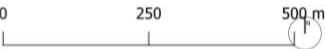
Appendix A: Postcard distribution area



Address invitation area - up to 800m from site
Site boundary

Notes/Revision

Finlands, Malmesbury
Gleeson Land



Address data

Status:	Drawn by: JC	Checked by: AB
Project number: 227612	Scale @A3: 1:7,500	Date created: 2024/12/16
Drawing number: TOR-P002	Revision: =	

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Everdene House
Deansleigh Road
Bournemouth BH7 7DU
0202 3664 6755
enquiries@torandco.com
torandco.com

Appendix B: Postcard to local residents

IF UNDELIVERED PLEASE RETURN TO:
TOR&CO LTD, EVERDENE HOUSE, DEANSLEIGH ROAD, BOURNEMOUTH
BH7 7DU

Dear Sir/Madam,

**Proposed development of land to the north of
Whychurch Farm, Malmesbury**

Gleeson Land intends to submit a new outline planning application for up to 200 homes on land situated south of Filands and north of Whychurch Farm in Malmesbury.

The application will include 71 homes that previously received outline planning permission in 2022 (Phase 3) and an additional 129 new homes located further south (Phase 4).

The site is well located adjoining Malmesbury and within walking distance of local amenities. The proposals will aim to complement the already consented development adjacent, and no significant technical constraints have been identified. The site offers a positive opportunity to address Wiltshire's housing needs in a sustainable location.

gleesonland

Address line 1
Address line 2
Address line 3
Address line 4
Address line 5

This development will provide a policy compliant mix of market and affordable housing to meet local needs, along with necessary infrastructure and green spaces.

The new homes will be energy efficient meeting the latest standards and offer a range of sizes, from 1 bed to 5 bed dwellings. 40% of these homes will be affordable tenure, potentially including First Homes, affordable/social rent, and shared ownership. The exact mix of affordable housing will be determined in agreement with the council and secured legally. The proposals would also deliver a net gain in biodiversity, through new planting, creating drainage features, and areas of ecological enhancement.

We have attached a plan illustrating the draft proposals and we would like to seek your feedback before a planning application is submitted to Wiltshire Council later this year.

Please respond by **Friday 6 December 2024** via:

email malmesbury@torandco.com

telephone **020 3664 6755**

writing **tor&co, Everdene House, Deansleigh Road, Bournemouth, Dorset BH7 7DU**

gleeson land



London
Birmingham
Bournemouth
Bristol

0203 664 6755
enquiries@torandco.com
torandco.com

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