

Wiltshire Council Development control

For the attention of Jonathan James

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Dear Mr James,

Ref. PL/2025/09192. Penn Hill Calne.

Outline planning application with all matters reserved (except for access into the site) for the proposed development of up to 210 residential dwellings, and 0.75ha of employment land and ancillary uses, open space, vehicular and pedestrian accesses, landscaping, drainage measures and all other associated works including the demolition existing buildings and structures.

This application should be considered in conjunction with PI/2025/02426 (undetermined) and with aspects of PI/2022/07893 (permission granted). It should also be considered in the light of the Planning for Calne 2023 document, prepared for the current Local Plan review.

The MasterPlan document in Planning for Calne indicates, and the text reinforces, the importance of considering all the implications arising from the development area as a whole. The text reads *"A single comprehensive masterplan, phasing and delivery strategy for the development, must be prepared and approved by the local planning authority in advance of any planning application being submitted for the whole or part of the allocated site."*

The area granted permission by the conjoined appeal of applications 2022/07893 and 2023/10421, an area not included in the MasterPlan and not an allocation, must now be included in all considerations.

Moreover, the session at the Local Plan Inquiry for the Examination of proposed allocation sites has not been reached, and given the significant transport and sustainability issues for both sites, the current downplaying of important landscape issues and the economic growth predictions for Calne (Hardisty Jones Employment Land Review and Economic FEMA assessment papers 2023 prepared for the Local Plan review), this process is significant and should be completed before any applications are decided.

Our areas of concern are set out below, many of which were set out in our letter of 17th April 2025 in response to application 2025/02426 but apply to the present application.

1. Growth/Jobs.

The town has rapidly become less sustainable as the imbalance between homes and jobs has steeply risen.

The low level of economic self-containment in Calne leading to the clear imbalance of housing growth to employment growth, made clear in the Planning for Calne assessments, must be addressed by Wiltshire Council policies and economic growth strategies before further residential development can be justified as sustainable and necessary to meet CP 1 strategy for market towns such as Calne.

Those would need to be delivered in balance with the parallel growth of local economic, social, medical and educational facilities over the next decade based on population growth and demographic figures.

Unplanned growth brings no economic benefit in the long term.

The Hardisty Jones economic assessments show Calne as the worst town for growth in Wiltshire, -49%, with manufacturing and office space requirement in decline. Only Business Administration and Support Services show small rise.

2. Growth/Housing

With a cumulative total of up to 600 dwellings from three sites, we do not believe that a sustainable pattern of development based on the three sustainability objectives can be achieved according to NPPF 11 a) as Growth and Infrastructure are not aligned

Sustainability

a) The economic objective has failed to deliver over the past decade and shows no evidence of recovery. Ref Hardisty Jones.

b) The social objective fails as the health facilities diminish, evidenced by comment letters from the RUH Bath on recent large applications and the failure to progress a Local Health Centre at Silver Street, the reduction of width and breadth of retail choice in the town centre. Cultural well-being has seen no significant change other than greater use of the surrounding countryside for exercise and enjoyment alongside the Beversbrook Sports Centre. Dependence on the car still dominates.

c) The environmental objective is downgraded. See our comments on Landscape and Natural environment below.

We term the present application Phase 2 Penn Hill with pl/2025/02426 as Phase 1.

3. Landscape

The proposed urban development of this site will result in a permanent change in land use and to the character of the site and its immediate environs, resulting in change from agricultural use with a small industrial centre, to that of a character of urban development. The harm to landscape character and visual amenity of this elevated site has not been sufficiently considered. The proposed development, as shown on the Illustrative Framework Masterplan, would result in the introduction of built development on the brow of the hill to the northeast of Calne, which would break the rural tree skyline and would be conspicuous and intrusive on the rural landscape setting.

The proposed urban development of this site will result in a permanent change in land use and to the character of the site and its immediate environs, resulting in change from agricultural use and character to that of urban development. The harm to landscape character and visual amenity of this elevated site in combination with the proposed eastern development area would be unacceptable.

The Landscape Visual Appraisal. The Representative Viewpoint pictures.

These require close examination and comparison to the set submitted for withdrawn application PL/23/07216, dated July 2023 taken 22/10/2022, sent as attachments. Of particular note are viewpoints 6, 7 and 10. Picture 10, now omitted from the new 2025 set, shows that the site is a hilltop skyline and seen from the approach to Calne on the A3102 from the west as well as the high visibility on the eastern side

The new set, particularly Picture 3 with the housing imposed clearly demonstrates visual mitigation is not possible.

These pictures combine to demonstrate that this open hilltop is visible both to the east and to the west, and major development would result in a permanent change to the character and setting of Calne.

The applicant in their Design and Access statement admit that the ridgeline is visually prominent.

The Framework Masterplan submitted with the application shows dwellings to the east of **M** and to the north of **N**. On the Landscape Strategy Plan, they would be east and southeast of **D** and north and northeast of **E**. The lights and roofs of these would show clearly through any tree line.

4. Transport

Amendments have been made to the proposed access arrangements contained in the withdrawn application. These propose that vehicular access is now to be directly to and from Oxford Road.

However, until it is clear what the intentions are for the current employment site (referred to as Site 3 in the Calne MasterPlan) adjacent to High Penn farmhouse, it is not possible to model a future for the current track, part of which runs through a housing estate. This will be dependent on the nature of the vehicular use in future.

No clear evidence is given of the pedestrian/cycle tracks connecting Phase 1 and Phase 2. On this application there are 5 indicative arrows to the east but in application 2025/02426 no such corresponding links are shown.

Will cyclists and pedestrians of Phase 1 access Sandpit Road through the eastern paths towards Abberd Lane or the inter-development paths towards the western end of Sandpit Lane. This would appear to go through a proposed community orchard and woodland copse planting. How would the delivery of these paths be achieved without damage to the planting schemes, will they be of a uniform standard and the junction/road crossings they link to be of uniform type? (See Landscape Strategy Plan)

Any proposed increased use by cyclists and pedestrians of Abberd Lane and Sandpit Lane must see a 3m wide mixed-use path created for their safety.

Traffic generation and impact.

The comments made by the Highways Development department on 2025/02426 Phase 1 application are surprising.

Under the section on Transport sustainability, it is clear that the distance of the site from meaningful local facilities fails to meet the criteria for a sustainable location.

With regard to this Phase 2 application, the distances are lessened but only if the access is on to Oxford Road.

Many relevant points were raised in the comments made by Chris Mead for Sustainable Transport on the withdrawn application and still apply.

The cumulative impact of 600 new houses on the A3102 and A4 should be re-assessed.

Has the combination of very large amounts of new housing in Lyneham with the proposals in Calne, all using the A3102 to access Swindon or the M4, been taken into consideration? Has the effect of a new retail unit and goods vehicle site on the junction of Oxford Road and the A3102 combined with 600 new houses been assessed?

A traffic assessment on local roundabouts will just show traffic dispersing onto the road network and claim 'nothing to see here' ignoring the wider implications.

We note that in the comment from Highways on application 2025/02426 it is stated that there is no significant impact at the A3102/Curzon Street/Chilvester Roundabout. Clearly the writer is unaware of the queues every day during school time affecting this roundabout due to the Springfield school drop off and collection times and the effect of the 55 bus stops at Curzon Park.

We object to this application and ask for it to be refused.

Kind Regards

Anne Henshaw