

Local Plan Review - Preferred Options

Land off Himley Lane, Swindon – Site Reference 313

December 2021

**Representations by AddisonRees Planning
Consultancy on behalf of Harry Wolton Ltd**

1. Introduction:

- 1.1 AddisonRees Planning Consultancy have been instructed to submit representations on behalf of Harry Wolton Ltd for the Council's Local Plan Review - Preferred Options Consultation.
- 1.2 The Preferred Options stage of the Local Plan review sets out proposed sites for housing, employment and includes new policies and policy direction.
- 1.3 This representation will focus on the South Staffordshire Site Allocations document and in particular Policy SA5: Housing Allocations Site Reference 313 - Residential Land off Himley Lane

2. Consultation Comments:

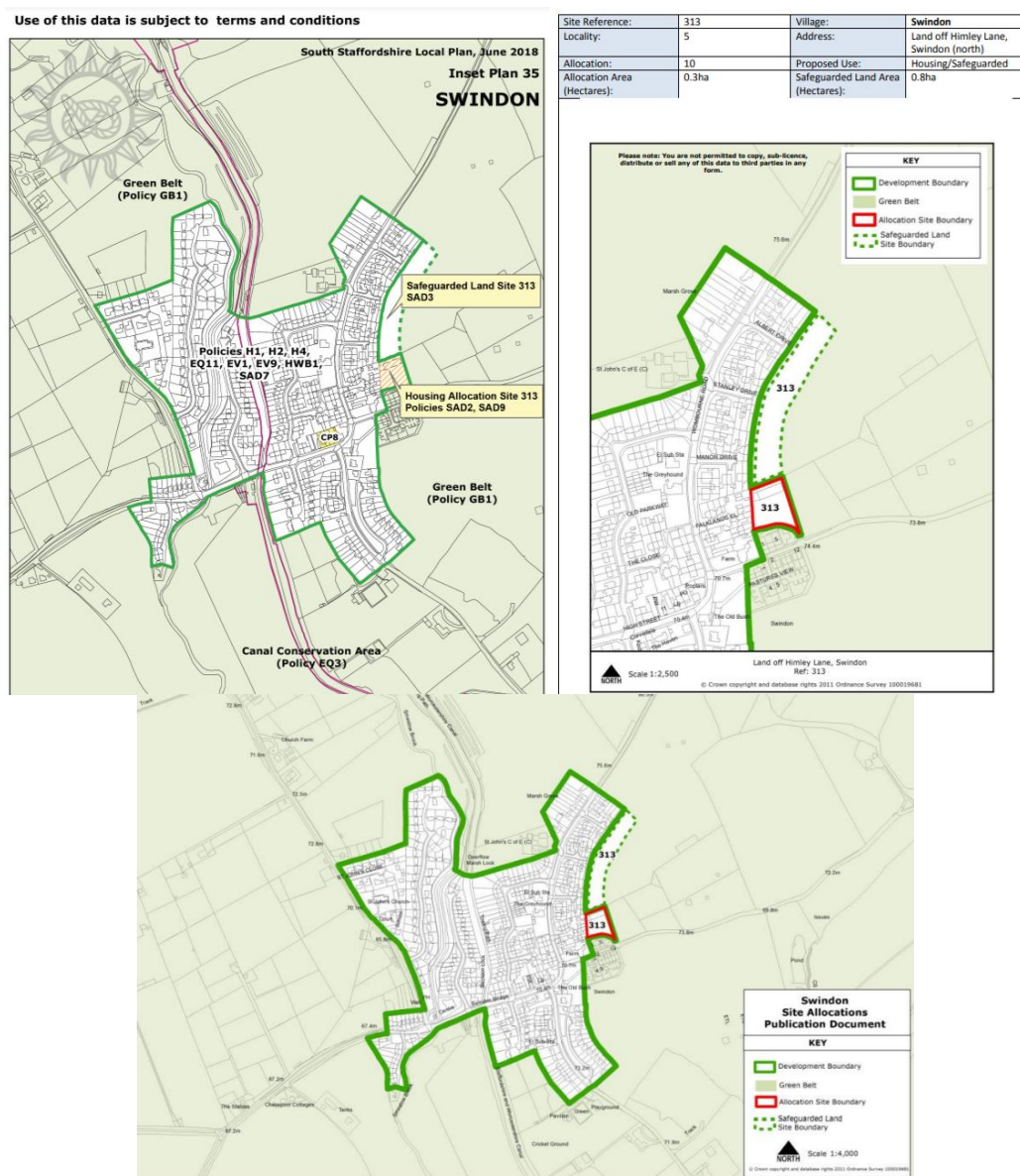
- 2.1 Policy SA5: Housing Allocations Site sets out that *"Alongside the strategic development locations identified in Policies SA1, SA2, SA3 and SA4, the following housing allocations will be delivered to meet the district's housing target up to 2038"*. These allocations have been split into Tier 1, 2 and 3 Settlements.
- 2.2 This representation seeks to address Question 8 of the Preferred Options Consultation, which states the following:

Do you support the proposed housing allocations in Policy SA5? Yes/No

- 2.3 We fully endorse and support the proposed housing allocation in Policy SA5 Site Reference 313 - Residential Land off Himley Lane in Swindon (22 units) Tier 3. The site is shown below.



2.4 Part of the site (0.3ha) is currently allocated in the South Staffordshire Local Plan Site Allocations document under the same reference 313 for 10 units. This land was taken out of the Green Belt. The below images show the current allocation.



2.5 The current Local Plan also allocated land directly north of the residential allocation as Safe Guarded Land (0.8ha).

2.6 The preferred options seek to enlarge the previous allocation to cover 1ha in area with an indicative allocation of 22 units. The proposed increase in site area would therefore

- accord with the Council's Spatial Housing Strategy to deliver 10% of allocations on small sites of 1 hectare or less.
- 2.7 Whilst the previous allocation did not fall within the Green Belt, this allocation requires some land to be released to accommodate the additional area.
- 2.8 Some of the proposed allocation will also lie within the previously allocated safeguarded land. The Council note in their submissions that this area needs to be proactively explored for its potential to assist in meeting the District's proposed housing target. The inclusion of this land is therefore justified in support of the Spatial Housing Strategy.
- 2.9 The proposed allocation requires a small area of land to be released from the Green Belt.
- 2.10 Paragraphs 140-142 of the updated Framework consider the exceptional circumstances for revising Green Belt boundaries and how this should be fully justified through updating Local Plans.
- 2.11 The Council have undertaken a Green Belt Review (2019). This assessed any proposed areas of land to be released from the Green Belt.
- 2.12 For the settlement of Swindon, the Council set out in their Preferred Options Housing Site Selection Topic Paper the following:
- "Of the Green Belt site options, some have significant issues that affect their ability to be allocated (e.g. lack of availability, Flood Zones constraining layout, Highways Authority concerns, unlikely to deliver affordable housing due to site size). Of the other Green Belt site options around the village, the majority are in similar areas of landscape sensitivity and in terms of the outcomes of the Sustainability Appraisal, but vary in terms of their Green Belt harm. Site 313 is in the lowest area of Green Belt harm without being affected by other constraints such as those set out above".*
- 2.13 It is clear from the Council's assessment that all other potential sites considered for residential use would have significantly greater impacts upon the Green Belt than the proposed allocation.
- 2.14 A large portion of the site is already outside of the Green Belt. Therefore, this proposed allocation requires only a small amount of Green Belt land to be released. The land would be immediately around the existing site and would not significantly encroach out into the openness of the Green Belt.
- 2.15 This would be in stark contrast to all other alternative shortlisted sites. The vast majority of the alternative sites would be substantial in area and in excess of 1ha. Therefore, they would not only result in a far greater impact upon the five purposes of

the Green Belt (defined in paragraph 138 of the Framework) and fail to contribute to the Council's Spatial Housing Strategy of allocating 10% of sites on land of 1ha or less.

2.16 The proposed site also lies immediately to the north of the safeguarded land. This land could be used to help meet the Council's future housing needs. The land is under the same ownership of the proposed allocation. Therefore, these two sites could be easily linked in terms of development, which would negate the need for further Green Belt land to be released in the short-medium term.

2.17 The Council as part of their Local Plan Review, have fully justified the release of land from the Green Belt to form part of the proposed allocation in Swindon. This accords with guidance contained in the updated Framework.

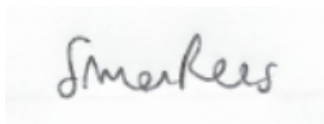
2.18 There are a number of other planning benefits associated with the proposed allocation. These are as follows:

- The site can deliver up to 22 high quality designed homes.
- The proposed allocation is available now and deliverable within 5 years.
- The site can deliver a wide mix of housing to meet local needs.
- The site can deliver 30% affordable housing on site. This can include the following ratio - 50% social rent, 25% shared ownership and 25% first homes.
- The site can deliver other planning contributions including open space.
- The site is locationally sustainable with the future occupiers having good access to local services and facilities without reliance of the private car. The vehicular and pedestrian access will be provided off Himley Lane. This includes a new footpath on to the High Street. There are two bus stops less than 100m away on the High Street. St Johns Primary School, the Old Bush Inn and local fish and chip shop lies in very close proximity to the site. Other facilities such as the Community Centre, Green Man Inn, Bowling and Cricket Club are also within walking distance from the site.
- The site can deliver a significant amount of new green infrastructure, which will be protected as Green Space in perpetuity.
- The site will have a safe access point onto Himley Lane and would not cause an unacceptable impact upon highway safety or the surrounding road network.
- The site is in flood zone 1, which is low risk. Any surface water flood risk can be dealt with on site and would not have any greater impact upon the surrounding area than current conditions.
- The site can be comprehensively landscaped to reduce its visual impact.
- The development will aim to achieve at least a 31% carbon reduction improvement upon the requirements within Building Regulations Approved Document Part L 2013. The development would also aim to exceed the carbon emission targets set by current UK Building Regulations through fabric and energy efficiency measures.
- The site is not identified as an internationally, nationally or locally important ecological area. A biodiversity net gain approach will be used for mitigation and enhancement.

- This site can deliver a policy compliant development and there are no planning constraints affecting the development coming forwards immediately.

2.19 Drawing together the above, we fully support Policy SA5: Housing Allocations Site in terms of the proposed allocation under Ref. 313 Land off Himley Lane, Swindon.

Yours sincerely



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(AddisonRees Planning Consultancy)