

Dilton Marsh Parish Council

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Mr R Brown
Senior Planning Officer
Wiltshire Council
Bythesea Road
Trowbridge
WILTSHIRE
BA13 3NY

24th October 2024

Dear Mr Brown

PL/2024/06523 - Land South of Clivey, Dilton Marsh – Erection of up to 85no dwellings, access, open space, landscaping, supporting infrastructure and associated works (Outline application relating to access – Resubmission of PL/2023/01047).

The above listed planning application was considered at a meeting of the Parish Council held on Wednesday 23rd October 2024 and I am directed by the Chair and members to lodge the Parish Council's **OBJECTION** to the application.

The Parish Council objects to the application as being contrary to Wiltshire Council planning policy as evidenced below:

The proposed development is contrary to Wiltshire Council's Spatial Strategy, in that:

1. CP1 states that Development at Large and Small Villages will be limited to that needed to help meet the housing needs of settlements and to improve employment opportunities, services and facilities. Dilton Marsh is defined as a 'Large Village' within CP32 and forms part of the Westbury Community Area (WCA). There is no evidenced local housing need to justify this excessively large development of 85 dwellings and the proposals contain no improvements to local opportunities, services and facilities, which are already inadequate and will be further challenged by a development of this size. The application therefore runs contrary to the adopted spatial strategy, which focuses the bulk of new housing in the more sustainable market towns and local service centres.
2. In accordance with CP1 the scope for expansion in large and small villages is limited, with settlement boundaries drawn relatively tightly around the settlement. The proposed development is for a greenfield site which is outside the settlement boundary for Dilton Marsh and lies in open countryside.
3. The proposed development represents almost the entirety of the housing requirement for the WCA for the 20-year plan period in a single development and the size of the development is therefore disproportionate. The scale of the development is also disproportionate having regard to the size of Dilton Marsh.
4. CP2 states that outside of the defined limits of development, development will not be permitted save for exceptions in respect of additional employment land, military establishments, development related to tourism, rural exception sites, specialist accommodation and in respect of the conversion of rural buildings.

The proposed development meets none of these criteria.

5. The proposed development of 85 houses is contrary to the Spatial Strategy in that it does not represent a sustainable development (the PC's comments relating to travel, infrastructure and services evidence this). The Parish Council is therefore of the view that the 'tilted balance' resulting from the lack of a 5 year housing land supply should not apply in determining this application.

The proposed development represents significant harm to the character and appearance of the area and is contrary to Core Strategy policies CP51, CP52 and CP57 in that:

1. The application site has a very strong rural character; the open fields are currently used for pasture and are little affected by built form with housing being set back both from Clivey and Stormore. The site therefore has a locally distinctive character and landscape and the proposed development would have a devastating impact on local character and appearance.
2. The application site has important views and provides an important visual amenity for the area, both of which would be significantly harmed by the development.
3. The tranquil nature of the site and its landscape setting should be protected against light pollution, noise and motion; all of which would be generated by the proposed development and cause irretrievable harm to the field. The application site is a dark environment but would, following development, lose its dark skies and the light pollution generated would further emphasise the incongruity of the location as outside of the settlement of Dilton Marsh.
4. The proposed development is contrary to CP57 in that it is not complementary to the locality; the application site is large, has steep topography and the surrounding development is of a sporadic, organic nature. The site does not have the appearance of forming part of the local settlement and appears as a group of fields quite clearly outside of the settlement. It therefore does not appear, or feel, to be part of the village of Dilton Marsh.
5. In addition, the proposals do not respond to the linear nature of the village and seek to provide a housing estate into the open countryside, which is out of keeping with the nature and character of the development along surrounding roads. The layout, building heights and plot size are incompatible with the local character and would fail to create a sense of place, meaning that the development will fail to integrate into its setting.
6. The proposals, if approved, would completely transform the character and appearance of the site. The large, visually attractive setting to the village would be replaced by an urban, residential development.
7. The development, if approved, would have significant harm on the loss of distinctiveness and identity for the historic hamlet of Stormore, which is distinct from the village of Dilton Marsh and its large, open, rural setting would be replaced with an urbanised, residential estate developed at high density. This would be completely at odds with, and disconnected from, the ribbon type developments of Stormore and Clearwood.
8. Overall, the proposal would generate an urban intrusion which would significantly harm the character, appearance and setting of the ancient, rural hamlets which would neighbour the estate.

The proposed development is contrary to CP60 and CP61 in that it does not minimise the need to travel and ensure that homes are provided in the most accessible locations, particularly by public transport:

1. The application site lies outside of the settlement in open countryside and proposes up to 85 houses in a location at a significant distance from the village, remote from local facilities and services. This distance and

the limited availability of public transport links will ensure that the development has poor levels of active travel. The vast majority of journeys would therefore need to be undertaken by private car, leading to unsustainable travel patterns and increased congestion on local roads.

2. The Parish Council notes that the applicant has indicated measures to promote active travel will be incorporated into the development however, members feel strongly that these are unlikely to be effective and the site will therefore struggle to effectively integrate into the village.
3. The proposed pedestrian links are inadequate and unsafe; directing pedestrians to a busy road at the far end of the site via an unlit park and do not provide linkage to the south, east or west of the site thereby providing no incentive to walk or cycle.

The proposed development is contrary to CP57 in that it fails to protect the amenities of both present and future occupants and close neighbours in that:

1. The application site is, in part, covered by a sewage treatment works buffer zone. The proposed development is therefore in an area which is at risk from odour and flies from treatment works and the proposed park, recreational spaces and orchard are proposed in close proximity to it.
2. The sloping nature of the site will impact on neighbour's amenity and visual amenity in that the new buildings and their rear gardens are positioned in close proximity to the existing properties. This will result in overlooking, loss of privacy and an overbearing impact with loss of outlook. The scale and dominance of the buildings are out of keeping with the local area.

The Parish Council further objects to the application on the following material grounds:

1. Highway safety
 - a. The proposed development would result in significant traffic generation adding to already busy and congested roads. The route through Dilton Marsh is already heavily used as a commuter route and the Parish Council has been working with Wiltshire Council to identify measures to combat speeding issues. The Speed Indicator Device installed in the parish records between 100,000 and 120,000 vehicle movements per month and the traffic generated by the proposed development would significantly add to this already high figure.
 - b. The Parish Council is already extremely concerned over highway safety along the B3099 and particularly its junction with the A36. There have been frequent accidents and a number of fatalities. The B3099 is a relatively straight piece of highway where vehicles tend to accelerate. The proposed site is located outside of the existing 30 mph speed limit.
 - c. The long queues to join the A36 are of significant concern and this will be exacerbated by vehicle movements from the proposed development, particularly given that, due to the location of the site, most residents will be commuters.
 - d. The Parish Council notes the measures proposed by the developer to mitigate the highway safety issues however, it feels these are vastly inadequate for the issues at hand comprising of limited visual measures only. The PC holds the view that physical highway measures are required in order to address the issues, given the straight nature of the B3099 and the speed and volume of traffic. The PC also notes and supports the objections submitted by National Highways.
2. Drainage and flood risk
 - a. The Parish Council is aware of localised flooding in Stormore and Clearwood and is concerned that the water run off from the site will add to the existing problem.
 - b. The Parish Council is also aware of localised flooding in the Red Pit area. Given that these properties

sit below the level of the proposed housing the development therefore represents an increase to the flooding and flood risk in this area. Furthermore, the application makes no mention of this risk and contains no measures to mitigate it.

3. Effect on wildlife and nature

- a. The Parish Council is greatly concerned at the negative impact of the proposed development on wildlife and nature.
- b. The LPA is asked to note that the development, if approved, will displace deer, otters and newts.
- c. The presence of rare, internationally important species of bats in significant numbers is also noted.
- d. The LPA is asked to request a further, more detailed Environmental Impact Assessment and Ecological Survey from the developer.

4. Impact on services

- a. The impact of the development on already stretched local services and facilities is of concern to the Parish Council.
- b. The capacity of local infrastructure, such as electricity supply and drainage, is also of concern and is not felt to be sufficient to handle a potential development of this size.
- c. The Parish Council also asks for the LPA to note the significant number of inaccurate comments within the application documents relating to the infrastructure in the village; the parish no longer has a village shop or post office and Fairfield College no longer provides services to the public. The sustainability of the development is therefore in question given that there are no local services which residents can access within the village.

The Parish Council requests that the Local Planning Authority also give regard to the following non-material considerations:

1. The Parish Council is currently developing a Neighbourhood Plan for Dilton Marsh. A 'call for sites' has been undertaken and the results analysed. A consultation was held on 18th March 2023 to seek residents' views of where new housing should be provided within the village. The applicants have not sought to promote their site as part of this process and have therefore sought to bypass the plan making process through a planning application. The neighbourhood planning process would therefore be undermined if this application were to be approved.
2. A number of the developer's submitted reports contain inaccuracies and refer to towns and villages other than Dilton Marsh; the Parish Council is concerned at this 'cut and paste' approach and the lack of attention to detail evidenced in the planning application's supporting documents.
3. In addition, the applicants Air Quality Report proposes no mitigation measures; there is no Visual Appraisal Report and the Transport Plan is inaccurate in its comment that there have been no fatalities on the B3099 and/or A36.
4. The Parish Council notes that the developer has provided limited on-site open spaces and recreational areas however, given the location of the site these are unlikely to be accessed externally from the site. In addition, the parish already has well used and well-loved recreational play areas adequately connected by safe footpaths. The provision of on-site facilities and the lack of appropriate footpaths to link the site to the village is therefore likely to further isolate the new development from the community.
5. The Parish Council meeting convened specifically to consider the first application in 2023 was attended by 80 residents, and a meeting convened specifically to consider this current application was attended by over 30 residents. The LPA is asked to note the strong level of public feeling against the proposals contained in this application.

6. The Parish Council is disappointed at the lack of meaningful public consultation carried out by the applicant. Both the PC and the Ethandune Ward councillor have requested on a number of occasions that the applicant arrange an in-person consultation event however, the applicant has only arranged an online survey and carried out a partial leaflet drop. The applicant did attend the Parish Council meeting on 16th March 2023 however, due to the nature of it being a formal council meeting there was no opportunity for a meaningful consultation with residents. The applicant was also invited to attend the meeting held on 23rd October 2024 but declined the invitation.

In conclusion, the Parish Council registers its **OBJECTION** to the application.

Yours sincerely



Nicola Duke B.A (Hons), FSLCC
Parish Clerk
For and on behalf of
Dilton Marsh Parish Council