

# Great Bedwyn Parish Council comments on the Wiltshire Local Plan

Nov 20 2023

## 1. Background

This is an important detailed document produced by Wilts Council and which shape our communities up to 2038.

We need to submit GBPC comments online or by email by the 22 November. See: <https://www.wiltshire.gov.uk/article/8048/Current-consultation-Reg-19-autumn-2023>

*When the Plan is examined by the Planning Inspector, they decide whether:*

- *the Plan is based on a strategy that looks to meet Wiltshire's development need and whether sufficient infrastructure is being provided.*
- *the Plan is justified; the Plan should be the most appropriate strategy for Wiltshire, when considered against the reasonable alternatives.*
- *the Plan is effective; the Plan should be deliverable during the Plan period, up until 2038*
- *the Plan is consistent with national planning policy; do you think there are parts of the plan that don't accord with government policy?"*

*To have the greatest impact, comments should focus on the need to comply with any legal requirements and meets the 'tests of soundness'.*

## 2. Comments on the Wiltshire Council Consultation process.

The range and the amount of detailed work that has gone into preparing this draft is appreciated and the result, with suitable amendments, will produce a workable plan for the period to 2038. The fact that draft Local Plan gathers up all saved policies from a variety of other (old) plans and includes them in this draft is sensible and will save time and trouble for users.

However, for a member of the public or a Parish Councillor to read and digest the entire Draft plan and all its supporting documents runs into some hundreds if not thousands of pages and is not an easy task for the average person to undertake. Not everyone will have a computer or the time to spend in a library ploughing through these papers to try and find the passages that apply to them or their community. Clear references and indexing to make such tasks easier for the layman is therefore essential.

Cllr Wyatt attended the 'Drop In' consultation event held at Marlborough Library that was intended to inform anyone living in the Swindon HMA. This was not intended to be exclusively for those living in Marlborough, but it was disappointing that there was no specific information about Great Bedwyn as one of the area's Service Centres. Neither was there a copy of the Rural Housing Requirement paper dated Sept 23 (See below). Officers attending were unable to offer any information apart from that pertaining to Marlborough. This was a poor way to inform those living in other (smaller) settlements in the area.

The paper entitled Rural Housing Requirements Sept 2023, which gave essential information was not cross referenced to the Draft Local Plan. This has made understanding future planning policy for villages both large and small in rural areas unnecessarily difficult. There are two specific comments about Great Bedwyn which is classified as a large village and has a railway Station; to London

Great Bedwyn is strangely included in the Swindon Hinterland as a large village, probably because of sharing a postcode. However, Great Bedwyn, and other villages, have very few common characteristics with Swindon – size, urban, facilities, transport. To combine consideration of it with Swindon seems at best misleading, and at worst can lead to policies being applied to Great Bedwyn which are inappropriate to Great Bedwyn and other small rural communities.

There are only about 1.5 pages specific to Great Bedwyn in the Local Plan This seems minimal consideration for a large village with a train station; large villages (as group) deserve more thoughtful consideration in the Local Plan, if only to help village maintain ‘balanced’ communities with affordable houses and recognition of their important role in increasing biodiversity.

**Recommendation 1: The categorisation of Great Bedwyn (a large village) with a large urban conurbation is inappropriate. There is a large cross over with the Local Nature Recovery Strategy which is being developed by Wiltshire Council for 2024/25. More importance need to be given to the key roles that small rural communities role in relation to farming, food supply and biodiversity which characterise Wiltshire.**

### **3. GBPC vision for future**

Great Bedwyn Parish Council is working on a formal written version of its vision for Great Bedwyn but in summary we want our village to be:

**A vibrant, busy, ‘balanced’ greener community, reflecting our society’s diversity and local core needs and resilient to climate change.**

In practice, this means that a key part to achieving this vision which will future proof our essential infrastructure (the school, GP surgery, pub, railway station, garages and shops), we need a wide range of people to be able to live in the village. So housing and facilities must match local needs for health, education, shopping, communication, recreation, access to employment. School, business, station, are all economically dependent on our mix of residents and families of all ages being able to find local houses in which to live. We don’t want just to attract better-off professionals from elsewhere who can afford the ever higher local property prices, but also members of less wealthy income groups such as key workers and descendants of longstanding village families who are gradually being forced out by high house prices and have to drive here every day (eg existing school staff,) adding commuting costs, stress and road traffic pollution

So to future proof Great Bedwyn’s and ensure that the school, GP surgery, pub, railway station, garages and shops thrive, we need old and young, rich and less wealthy: the school wants to build a preschool and attract more pupils, the station, pub & café and shops need more foot fall and the village needs to be as self-sufficient as possible in supporting older and vulnerable people to stay in their own homes through organisations like the Bedwyns’ Link. This means that more people need to be able to afford to live and work in Great Bedwyn.

In July Wiltshire Council Housing Needs Survey confirmed that we needed a couple of dozen additional new homes of various sizes for local families then, including 14 affordable homes. Since then, about 10 market value houses have been built in the village on 'windfall sites'. However, the stock of affordable rented Housing Association homes has actually been reduced by sales under "Right to Buy" since then. The Housing Needs Survey therefore needs to be updated soon to reflect these substantial changes over the last 6 years **to confirm how many more affordable houses we need in Great Bedwyn.**

Below, comments from the Great Bedwyn Parish Council (GBPC) have been collated in 3 areas below:

- On affordable housing and its sustainability from GBPC's Planning Committee
- From GBPC's Green Group which is working closely with Great Green Bedwyn a Local Climate action group <https://www.greatgreenbedwyn.org.uk/> .
- On train infrastructure - passenger and freight

### **3. GBPC comments on our housing needs**

#### **Housing numbers for Great Bedwyn (and in all large/small villages).**

We believe Wiltshire's Local plan used a crude method of assessing local housing needs based on proportional allocation of national housing needs according to local population, so the figure of 16 new houses needs independent verification and consultation.

**Recommendation 2: GBPC needs an independent Housing Needs Assessment using a housing needs survey (last done in July 2017) to show what different types of housing. We have a shortage of affordable housing and find it difficult to attract and retain key workers. We should update.**

#### **Affordable homes.**

GBPC disagrees with Local needs and concerns Policy 76 allowing 10 or 5 houses to be built without the provision of affordable housing (AH). Developers will, naturally, apply to build only this number of houses or less to avoid the need to build affordable homes on small sites. This has actually happened at least twice in this parish on sites that could easily have accommodated more dwellings, so no affordable homes were forthcoming. A development of 5 houses is a large development for a small village. Even small numbers (1 or 2) of affordable homes in rural communities are very useful. Developers should not be given the opportunity to avoid providing this contribution.

**Recommendation 3: the Local Plan should require that affordable home are built as part of all housing developments on small villages and developers should not be given the opportunity to avoid providing this contribution.**

Unlike the statement about small villages ("which should be geared towards meeting local affordable needs through exception sites"), there is no comment in the draft Local Plan on how many of the 16 homes needed in Great Bedwyn should be affordable or starter homes provided by housing associations, rather than at market rate.

With the high cost of open market homes in Great Bedwyn, many young people (even those with a strong local connection eg. children of Great Bedwyn residents) are forced to either continue living with their parents well into their thirties or to move some distance away to seek affordable housing. This disrupts families, adversely affects the demographic balance of our village, reduces the number of children in the catchment area for our school and increases car journeys. The distance that lower paid key workers need to travel to the village also makes it hard for the GP surgery to recruit admin and support staff and for the school to recruit teachers, teaching assistants and admin staff. It also makes it harder for current village residents to find essential workers eg trades people, carers, gardeners etc.

**Recommendation 4: the Local Plan should require the majority of new homes built in all villages to be affordable to maintain balanced communities. This supports increasing the overall number of affordable homes in villages to ensure the viability of their essential infrastructure.**

#### **Exceptions to housing policy.**

The Core Strategy rule on Rural Exception sites allowed up to 10 houses outside a settlement boundary as long as most were affordable allowing one house to be at market value to ensure viability. Judicial review results later increased that figure to two market value homes. The current draft Local Plan greatly increases the ratio of affordable homes to market value ones which will significantly encourage developers to make applications for building developments outside the Limit of Development (LoD). No reasons are given for this change of policy, which will exacerbate bids to build outside boundaries set in the LP and Neighbourhood Development Plans.

**Recommendation 5: The Core Strategy policy must be retained, allowing a small settlement of up to 10 houses outside the boundary with only one or two to be at market value to ensure viability. The number of such settlements should be limited and controlled.**

#### **Windfall sites**

Paragraphs 3.36 – 3.39 concern Great Bedwyn. Windfall Sites are those that appear within existing developments, for example the house that has been recently completed on Forest Hill, and one in progress in Farm Lane, both in Great Bedwyn. These are referred to in the Local Plan as ‘significant components of land supply’ and will continue to ‘come forward’ in years to come. The Local Plan confirmed that past evidence shows a certain consistency in the number supplied so it would seem entirely possible to calculate an average and so predict future supply. It is therefore suggested that this is done, as in other Local Plans in the country, thus providing significant additional numbers to the future housing numbers forecast. Bedwyn has already built 10 windfall houses.

**Recommendation 6: The planning projects in the Local plan should incorporate assumptions about windfall sites as well as additional large housing developments.**

#### **Cross boundary working:**

The Local Plan makes no mention of working cross boundary with other parishes - linking proposals for affordable housing with those from neighbouring parishes where there is a common interest in doing so, for mutual benefit.

**Recommendation 7: The planning projects in the Local plan should not treat villages or towns as isolated communities but encourage cross boundary developments where these make local sense.**

**Other Comments by paragraph:**

Fig 3.1 These maps omit Bedwyn station by name so should be amended.

3.47 It is appreciated that planning language is not always easily understood especially in this paragraph and in particularly the last sentence. Suggest rewrite.

**4. GBPC Comments on resilience to climate change.**

The Wiltshire Council declared a Climate Emergency in 2019. Great Bedwyn is supporting this and GBPC has set up a Green Group that has been working with Great Green Bedwyn to develop resilience to climate change <https://www.greatgreenbedwyn.org.uk/>

GBPC is focusing on community climate change priorities agreed after undertaking a Parish-wide survey in 2021 which are:

- Reducing flooding risk and water pollution
- Improving energy use efficiency and reducing the carbon footprint of the village
- Supporting nature and increasing biodiversity working with our local Farm Cluster, Southern Streams

As part of this Wiltshire Council needs to ensure sustainable building methods and standards affordability of running new houses, avoiding fuel poverty.

**Flooding risk and adaptation to climate change.**

No comments were identified in the Local Plan about not building on land that currently floods or might flood in the future - with the increased rainfall expected with climate change. For example, the flooding in Great Bedwyn particularly in the Brook St area has got worse in the last 4 years and there have been **very recent significant problems during 2 flooding events in October/November 2023**

**Recommendation 8: The Local Plan should recommend independent flooding assessments for new buildings where a potential flood risk has been identified and new house should not be built in these areas..**

**Sustainable building materials**

No comment in the Local Plan were identified about how to make new buildings more sustainable and reduce the embedded carbon. All new homes to be built incorporating super insulation, low energy heating systems and energy generation measures to minimise or eliminate the risks of fuel poverty and help the UK achieve Net Zero by 2050.

For the past 3 years, GBPC have added recommendations about the use of a net carbon zero approach to house building and adaption as part of the comments on each Planning Proposal considered.

**Recommendation 9: That the Local Plan should agree and ensure that all new buildings in Wiltshire meet minimum embedded carbon building and meet high sustainability standards.**

#### **Sustainable living and reducing heating costs**

There is no strategic direction given in the Local Plan about how to reduce/eliminate fossil fuel use in new buildings or existing buildings. Energy prices are rising globally and yet current building regulations allow new houses to be built without the maximum amount of green technology to be required. Wiltshire Building Regulations could require super insulation, photo voltaic panels on roofs, heat pumps, MVHR etc.

Most of Great Bedwyn houses are old, and some are listed. While there is some investment by Swindon council into retro-fitting existing houses, much more needs to be done urgently. This will reduce carbon emission as well as reducing heating costs - a win win!

**Recommendation 10: The Local Plan should ensure that all new homes must be built incorporating super insulation, low energy heating systems and energy generation measures to minimise or eliminate the risks of fuel poverty and help the UK achieve Net Zero by 2050, for example using PassivHaus standards<sup>1</sup>**

**Recommendation 11: Remove the blanket bar on putting double glazing and photo voltaic cells on listed buildings and allow this where it can be achieved sensitively and appropriately.**

#### **Community led approach to energy generation, distribution and use**

There is no comment in the Local plan on the need for a community-based approach to the generation, distribution and use of energy. The Local Plan should encourage local emergency generation to be included in all new housing developments. Examples could include:

- Small district heating system to decarbonise new and existing buildings (such as schools, with ageing, unreliable oil-fired boilers), based on an array of boreholes and ground source heat pumps to efficiently extract heat from the ground.
- A network of private or community-owned roof-based solar panel arrays modelled on [Solar Streets](#) in Walthamstow, with a commitment to reselling the electricity at cost price to neighbours, or at market price other local consumers – In Great Bedwyn this could be the two energy-intensive Thames Water processing plants in the village
- Small community-owned solar farm located on low productivity farmland out of sight of the village, with profits directed towards supporting community organisations.
- EV car clubs with on-street chargers to support residents without access to a car or charger.

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<sup>1</sup> Passivhaus Standards: New houses should be designed to and require little more than the energy generated by appliances and the occupants to heat them throughout the year, as at [Seend](#). Houses built to PassivHaus standards not only reduce rates of fuel poverty but also of antisocial behaviour. A decade ago the capital cost was 20% more than other building regulation compliant housing, has now dropped to 3-5% due to the wider availability of key components eg heat pumps

**Recommendation 12: The Local Plan should support measures to encourage community-led energy generation and usage as part of reducing carbon footprints in villages and help meet Wiltshire council's commitment to reaching Net Zero by 2030.**

## **5. Comments on train infrastructure - passenger and freight**

### **Great Bedwyn Station – and sustainable passenger travel**

The station at Great Bedwyn is an important asset and is the reason that many people live in the village. We are lucky to have a very active Bedwyn Train Group <http://bedwyntrains.org.uk/> which has worked very hard to maintain and improve our passenger service. There is quite dangerous pedestrian access to the station from Jockey Green side of the bridges, there is no bike rack, not enough station carparking (many cars are park in the rest of the village, much to the annoyance of other residents). and no EV charging at the station. All these would encourage more passengers to use the train and therefore sustainable travel.

**Recommendation 13 : The Local Plan include a review of Great Bedwyn station facilities to increase its ability to support more sustainable travel**

### **Freight Transport strategy**

The draft Wiltshire Local Plan refers to and is advised by several other plans for example the Energy Plan and Transport Plan but not the Freight Strategy. This is an omission.

The movement of freight around Wiltshire is an important part of future spatial planning which a local plan would be expected to address. It is not easy to understand how Policy 70, bullet point five can be achieved without an up-to-date Freight Plan/Strategy. It might be claimed that the plan's soundness could be jeopardised if it does not refer to current and future movement of freight.

Although much of the WC freight strategy will mainly concern freight carried by lorries, but freight carried by the railway is also important, particularly for stone and gravel, which travels in large quantities along the Bedwyn line. This is key to the future of the train line in Bedwyn and the station.

There is a Wiltshire Strategic Rail Study currently in progress, headed by Network Rail. Rail freight features a lot in this study. The number of freight trains to and from the Mendip quarries is likely to rise significantly over the coming years. These may impact on possible improvements to passenger services, so Network Rail are looking to standardise the train paths and also speed up freight trains where possible.

**Recommendation 14: The Local Plan should include appropriate reference to the Wiltshire freight policy and describe how this may impact rail transport, particularly along the Bedwyn Line**

## Appendix 1: Extracts from consultation materials that relate specifically to Great Bedwyn to both housing

There are two key documents that have been used to develop these comments:

a. Wiltshire Local Plan review Reg 19 (376 pages)

**Great Bedwyn:** see Table 4-12, Page 157, Distribution of housing growth for the Swindon rural area. The requirement for Great Bedwyn recommends that 16 homes should be built during the period April 2022 up to 2038. This figure is reduced from a calculated 26 homes [for details of how this figure was calculated, see Wiltshire Rural Housing Requirements document page 252] because 10 houses have already been built during the period April 2020-March 2022. There is no requirement to delay the building of these 16 homes to the end of the plan period due either to NHS capacity constraints (as is the case for Pewsey and Purton) or because of nutrient management issues (cf. Pewsey & Burbage).

b. Wiltshire Rural Housing requirements document (253 pages):

Little Bedwyn is not mentioned, but Great Bedwyn is mentioned in three places:

Page 165, Appendix C: Table listing overall and residual housing requirement [same as Table 4.12 in Local Plan review document]

Page 184-186: Map and lengthy discussion of constraints on local housing in Great Bedwyn, with the conclusion:

*“Overall, while there are some environmental constraints at Great Bedwyn, there are some less constrained areas within and around the settlement which may be capable of accommodating further development over the Local Plan period to 2038”*

Page 252: Table detailing the basis of the calculation of 16 homes required for Great Bedwyn