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# Representations to Joint Melksham Neighbourhood Plan Reg. 14 Consultation

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Prepared by Savills on behalf of Neston Park  
Estate

## 1. Introduction

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These representations have been prepared by Savills on behalf of Neston Park Estate, in response to the Joint Melksham Neighbourhood Plan (JMNP) (2020 – 2026) (herein referred to as ‘the draft Plan’) Regulation 14 stage of consultation. It also follows discussions with the Neighbourhood Plan Steering Group (NPSG).

The representations specifically focus on Whitley Farm, referred to as ‘Site 17’ in the draft Plan, which falls under the ownership of Neston Park Estate (NPE). A copy of the Site Location Plan is attached at **Appendix 1**.

Since November 2016, on behalf of the Estate, Savills have been in discussions and attended a number of meetings with the NPSG regarding the potential residential allocation of Whitley Farm. The representations comment upon the suitability of the site and propose a regeneration policy to be incorporated into the draft Plan. The suggested broad policy supports the principle of regeneration, however it enables the details of any proposals to be agreed through detailed discussions with Wiltshire Council and relevant statutory consultees via a planning application. The proposed wording of the policy is set out in Section 5.

## 2. Site Context

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This section outlines the background to the site and the rationale for its redevelopment.

Whitley is classified in the Wiltshire Core Strategy as a 'Large Village' within the Melksham Community Area. Whitley Farm, (herein referred to as 'the site') is located in a sustainable location on First Lane, within the existing built up area of Whitley. It is bounded by residential dwellings to the south, north and east and within close proximity to village facilities and services. The site, circa 1.2 ha, is predominantly level, and comprises a cluster of agricultural buildings, three Grade II listed buildings, and a significant area of hardstanding and grassland.

The existing site comprises circa 4,285 sq. m of built floorspace, of which the majority (3,475 sq. m) comprises modern agricultural buildings. An aerial map is provided in Appendix 2 and it shows the significant amount of existing floorspace and the large footprint of modern agricultural buildings on the site, which are not considered of any merit nor fit for modern agricultural purpose.

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### 3. Previous Neighbourhood Plan Feedback

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There has been ongoing support during the preparation of the neighbourhood plan for the residential redevelopment of the site. An assessment of the site is provided in the consultation document 'Site Assessment Appendix A', whereby it acknowledges the site has minor constraints to development, and development *'has the potential to be sympathetic to surrounding residential areas and capitalise on the underutilised nature of the site. Although there are three Grade II listed buildings within the locality of the site, development has the potential to enhance the setting of these historic features.'*

It is acknowledged in the independent Heritage Assessment (titled 'Heritage Assessment – Site 17') that the removal of these modern buildings would enhance the setting of the heritage assets and better reveal their significance, in accordance with paragraph 200 of the National Planning Policy Framework (NPPF). In this instance, proposals which better reveal the significance of a heritage asset should be treated favourably.

Whilst the Site Assessment Portfolio and independent Heritage Assessment consider the entire site isn't suitable for development, it recognises there is potential for a modest scheme and the removal of these large modern agricultural buildings would help to enhance the setting of the listed buildings.

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## 4. Alternative Uses

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We have previously provided rationale on why agricultural or employment use of the buildings / site are not considered appropriate and/or deliverable at the site. However, for reference, this, along with further justification, is provided below.

### Agricultural Use

Modern agricultural operations have moved away from small holdings associated with traditional farming methods, with the number of small holdings rationalised in response to advances in mechanisation and wider technology. The NPE is also responding to these changes to ensure that its agricultural operations remain competitive, and like many other major landowners is reducing the number of small agricultural complexes in favour of consolidating farm management/operations into larger sites.

As part of the Estate's review of its farming business it identified difficulties with modernising and/or sustaining certain complexes of buildings, including Whitley Farm, and has instead focused on the main farm complexes, particularly at Neston itself. The principle issues for Whitley Farm are as follows:

- The site is located within the centre of the village where the road network is not conducive to catering for large agricultural machinery/HGVs which conflict with movements of pedestrians/cyclists and residential traffic.
- The condition/layout of the buildings means that they are not appropriate for modern agricultural requirements and significant investment would be required to renovate/replace the buildings to bring the complex up to a suitable modern standard.

Based on these constraints the Estate considered the alternative uses that may be appropriate at this location, focusing on employment and then residential.

### Employment Use

As outlined above, the buildings at the site are not suitable for modern agricultural operations, and equally they are limited in their scope for employment uses to low rental returns which deliver few jobs for the local community. For example, higher yield Class B2 and B8 buildings would expect to be temperature controlled premises and a high energy performance, which the current buildings are not and cannot be easily/cost effectively made to be so.

We have reviewed rental values for employment uses at the site with input from a commercial valuation surveyor. To redevelop/replace the site for a more significant employment use (for example B1 uses) would require significant investment which would outweigh the values that an employment use within this rural location could achieve, therefore making such development unviable. This is the case for both the Listed Building and the more modern agricultural buildings and takes into account the significant costs of clearing the site, including the slurry store and site servicing.

Furthermore, the site's location falls outside traditional employment locations and there are existing employment sites and allocations currently available within the local area which should be the focus for directing new employment development. Many of these locations offer better access by roads which is often of key importance when businesses are considering where to locate. Furthermore, the use of the site for employment would result in traffic/transport issues, and would result in greater numbers of vehicle movements which is unsuitable for the village location and rural roads.

In addition, if the Whitley Farm site was developed for a business use the lower development values would limit the level of community benefit that can be secured, with employment development not liable to Community Infrastructure Levy (CIL) or the same level of planning obligations as residential development.

In summary, employment redevelopment of the site is not financially viable due to the state of the buildings and the low rental values they would achieve. Instead, employment should be directed towards alternative, more suitably located sites and allocations with sufficient infrastructure, and therefore this use was not explored further.

It is proposed a sensitive redevelopment of the site, which involves the removal of the modern agricultural buildings and conversion of the listed buildings and single storey historic agricultural buildings could be accommodated on the site. It is on this basis, and the previous consultation feedback, that the following section outlines a proposed redevelopment policy to be included in the draft Plan which provides a broad extent of the development.

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## 5. Draft Regeneration Policy for the redevelopment of Whitley Farm, Whitley

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Paragraph 185 of the NPPF requires plans to set out a positive strategy for the conservation and enjoyment of the historic environment, including heritage assets most at risk. This strategy should take into account, among other things, *'the desirability of sustaining and enhancing the significance of heritage assets'* *'the wider social, cultural, economic and environmental benefits that conservation can bring'* and *'the desirability of new development making a positive contribution to local character and distinctiveness.'*

Therefore, with this and the site's heritage assets in mind, we propose a regeneration policy to be incorporated into the draft Plan, to enable the heritage assets to be safeguarded and detail of the proposed development to be agreed at a later stage through a planning application. This approach has been accepted by Wiltshire Council in previous 'made' Neighbourhood Plans, with Holt Neighbourhood Plan (2016 – 2026) incorporating the Tannery site as a regeneration policy (Policy H1.1).

The full Policy H1.1 text is outlined in Appendix 3, but in summary, the policy supports the redevelopment of the site, subject to meeting a set criteria. The policy sets the broad principles for development and outlines a developable area, which the development proposal must not exceed *'unless the benefits of an enabling development that might otherwise be in conflict with planning policies would secure the future conservation of the heritage assets and the proper planning of the site as a whole'*. It is proposed that a similar approach is adopted here, with a developable area outlined in Appendix 4. This area has been based on the footprint of the existing modern agricultural buildings and where these extend to the south.

### Draft Policy Wording:

Giving consideration to Historic England's guidance *'The Historic Environment and Site Allocations in Local Plans'* and the Tannery site example, we propose the following site specific regeneration policy for Whitley Farm:

*'This Plan supports the development of the Whitley Farm site provided it meets the following criteria:*

- a) *The development will occupy the area outlined within the map and not exceed these boundaries unless the benefits of an enabling development that might otherwise be in conflict with planning policies would secure the future conservation of the heritage assets and the proper planning of the site as a whole;*
- b) *The site will be for residential development use;*
- c) *The development will propose an appropriate housing mix, type and tenure in line with Draft Policy 6 and Core Policy 45 of the Wiltshire Core Strategy;*
- d) *The development will conserve, and where possible, enhance the listed buildings on site, in line with Core Policy 58 and Draft Policy 19;*
- e) *Provision of an appropriate level of community benefits and affordable housing in accordance with Core Policy 43 of the Wiltshire Core Strategy and based on the most up to date local housing needs information available;*

- f) *The development will meet the design standards set out in Draft Policy 18 and Core Policy 57;*
- g) *The developers will undertake the relevant technical surveys and ensure that associated infrastructure is delivered alongside any new housing and is in progress before the building is finished;*
- h) *The development will include new planting along site boundaries, in line with Draft Policy 16;'*

During the preparation of the draft Plan we have discussed with the NPSG the principle of the redevelopment of the site for residential use and there has been ongoing support from them. However, the detail of the site should be properly and fully explored through a planning application. This enables detailed discussions with key stakeholders, including the Parish Council, Historic England and Wiltshire Council to be undertaken to agree the layout and detail of the community gain package. A site specific regeneration policy ensures there is sufficient certainty on the deliverability of the site, which allows the Estate to invest sufficient time and money undertaking technical work, with the knowledge there is support for the principle of development.

It is acknowledged there has been ongoing community support for the residential redevelopment of the site. A housing sites survey was undertaken by Lemon Gazelle in November – December 2017 where comments were made in support of the site and the need to prioritise the re-use of land rather than developing greenfield sites. Consultation comments also included 'sympathetic development of derelict farmsteads in keeping with village can do no harm'.

Alongside the draft Plan process we propose to undertake pre-application discussions with Wiltshire Council to enable us to reach an agreement on the scope of the detailed proposal, including the level of community gain deliverable. We have already liaised with Wiltshire Council officers regarding the pre-application process, and any discussions, including those with the NPSG, would be undertaken in line with Draft Policy 5 (Pre-application Community Engagement). We aim to undertake this shortly, with the intention to progress this before the draft Plan goes to Referendum, which due to covid-19, the government has delayed until May 2021.

When reviewing the site context and progressing the proposed plans, consideration will continue to be given to Historic England's guidance, with particular regard to '*Farmstead Assessment Framework*' and '*Adapting Traditional Farm Buildings*'.



## 6. Conclusion

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Overall, we are supportive of the production of a neighbourhood plan and acknowledge the work undertaken to date on the draft Plan to date.

The site is available, achievable and deliverable and has previously gained support from the NPSG for the principle of the residential redevelopment of the site. We understand there is support from the community for further development, and encourage the NPSG to plan proactively through the inclusion of this site specific policy.

The inclusion of a site specific regeneration policy within the draft Plan enables the Estate to undertake detailed design work and extensive consultation with the NPSG, Wiltshire Council, Historic England and any other stakeholders through the planning application route, including pre-application discussions. A policy within the draft Plan provides the Estate with sufficient certainty on the deliverability of the site in the knowledge that the principle of development is supported. This in turn enables them to invest money and time to undertake the required detailed work to deliver a sensitively designed residential scheme which gives consideration to the listed buildings.

We would welcome the opportunity to discuss the draft policy with you further.

Should further information on the site be required please contact Geraint Jones ([gajones@savills.com](mailto:gajones@savills.com)) or Victoria Button ([victoria.button@savills.com](mailto:victoria.button@savills.com)).

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## Appendix 1: Site Location Plan

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## Appendix 2: Overview of existing floorspace

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Total floorspace: 4,285 sq m

Description	Size (sq m)
1 Grade II Listed Tithe Barn	398
2 Grade II Listed Farmhouse	250
3 Single storey outbuilding	256
4 Curtilage listed outbuilding	22
5 Single storey garage outbuilding	48



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## Appendix 3: Policy H.1 – Holt Neighbourhood Plan

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**Policy H1.1:** This Plan supports the development of the Tannery site provided it meets the following criteria:

- a) the development will occupy the shaded area within the AoO (as shown on the map on p18) and not exceed these boundaries unless the benefits of an enabling development that might otherwise be in conflict with planning policies would secure the future conservation of the heritage assets and the proper planning of the site as a whole;
- b) the site will be a mixed-use development, comprising both housing and commercial uses;
- c) the development will as far as possible and subject to viability and other considerations reflect the village's preferred options for the types of housing which are, in order of preference:
  - smaller starter homes
  - family houses
  - retirement housing
  - apartments/flats;
- d) affordable housing in accordance with Core Policy 43 of the Wiltshire Core Strategy and based on the most up to date local housing needs information available will be provided;
- e) the development is encouraged to reflect the village's wishes on terms of ownership, with a clear majority (58%) wanting a mix of properties to buy and to rent;
- f) the development will meet the design standards set out below in Policy H2.1;
- g) the developers will address concern about possible contamination on this site by undertaking a thorough environmental survey and analysis and making public the full results of this before any development work takes place; and
- h) the developers will ensure that concomitant infrastructure development takes place alongside any new housing and is in progress before the build is finished. Specific concerns include:
  - Road access – see Traffic Policy T.1 and T2.
  - Developers will undertake any surveys as necessary to ensure that the development will have an acceptable impact on flooding, drainage and sewage and ensure that any necessary measures or mitigation are carried out.
  - Village school – the developers will engage in discussion with WC, the Head teacher and Governors of the village school to ensure there will be adequate capacity for new pupils so all village children have the option to attend their local school.
- i) A bat survey should be undertaken and any appropriate mitigation measures be provided as necessary, having regard to Wiltshire Council's Habitats Regulations Assessment guidance document for the Bath and Bradford on Avon Bats Special Area of Conservation.



## Appendix 4: Outline of developable area





