

Artis Farm – draft response to planning application S/OUT/26/0719

Wroughton and Wichelstowe Parish Council objects to this planning application.

Material considerations for objection

We believe the material considerations for objecting to this planning application are as follows.

- 1. Incapable of determination:** The application is incapable of proper determination. Two of Swindon Borough Council's own consultees — the County Archaeologist and the Environmental Health Officer — have objected or advised that insufficient information has been supplied.

The archaeological potential of the site has not been assessed, no Heritage Statement has been submitted and the results of the geophysical survey undertaken for a previous application have not been provided. The archaeologist states that he is “left with no option but to object” because “insufficient information has been provided” with which to assess the impact of the development on the archaeological resource.

This is a clear breach of national policy. NPPF Chapter 16 (in particular paragraphs 200 and 207) requires an applicant to describe the significance of any heritage assets affected, including the contribution made by their setting, and, where a site has the potential to include heritage assets with archaeological interest, to submit an appropriate desk-based assessment and, where necessary, a field evaluation.

The Environmental Health Officer has advised that “there has not been enough information supplied to make an informed decision” and that a Noise Impact Assessment is required, taking account of the proximity of the M4, Swindon Road, Wroughton Business Park and the residential receptors on the edge of the site. No noise assessment has been submitted. This is a classic “agent of change” situation engaging NPPF paragraphs 191–193, and the absence of evidence means compliance with Local Plan Policy DE1(c) (amenity — noise, disturbance and pollution) cannot be demonstrated, contrary to the applicant's unsupported assertion of compliance.

- 2. Overdevelopment and the loss of a determined boundary between Wroughton and Swindon:** The North Wessex Downs National Landscape adjoins the southern edge of the village. The applicant's own Landscape and Visual Impact Assessment concedes “unavoidable adverse effects.”

Great weight should be given to conserving and enhancing the National Landscape and its setting (NPPF paragraphs 182–183) and to Local Plan Policy EN5. Tellingly, Balmoral's adjoining land to the north is itself being promoted as a “non-coalescence” buffer, confirming that erosion of the gap between Swindon and Wroughton is a live and material concern.

- 3. The impact of cumulative developments, particularly in the North Wroughton area:** Every infrastructure impact in this application has been scoped to 185 dwellings in isolation. Because the site is one parcel of the wider East Wroughton allocation (emerging Policy SGL05 in the Regulation 18 Local Plan, around 1,031 homes), assessing it parcel-by-parcel systematically understates demand and allows

mitigation to be waived or minimised. Assessed at the scale at which the land is actually being planned, vital infrastructure such as the highway network and local schools fall short. This is not a matter of local opinion: it emerges from the Swindon Borough Council's own consultee responses and the applicant's own scoping.

4. **Traffic and the impact on the local road network:** The Transport Assessment models the 185 dwellings together with two committed sites (Wichelstowe and the 120 homes at North Wroughton), but not the remaining circa 846 homes in SGL05, because they are emerging rather than committed. The conclusion that the residual cumulative impact would "not be severe" (NPPF paragraph 115) is therefore true only for this parcel in isolation.

The application's own Transport Assessment modelling shows the Croft Road/Pipers Way/East Wichel Way junction has very little spare capacity left before any additional traffic from other omitted developments is included. While we welcome improvements to the Listers roundabout, the absence of any accompanying upgrades to the wider road network will likely result in unmanageable levels of traffic congestion.

The application also does nothing to improve road safety, with no provision included for any additional pedestrian crossings on Swindon Road, despite the anticipated increase in traffic movements.

Furthermore, the Transport Assessment assesses journeys by using 2011 census data, which by now is almost 15 years out of date. And the assumption is made that the M4 bridge in North Wroughton is currently, and will continue to be, a dual carriageway road. In fact, the bridge has been a single carriageway road for the past few years and, as National Highways recently confirmed, will likely remain a single carriageway road for the foreseeable future.

With these two matters added into the consideration, the Transport Assessment is hopelessly out of date and inaccurate.

5. **The application is premature and would undermine the plan-led approach to the wider East Wroughton allocation:** The site is not allocated in the current adopted development plan. It is greenfield agricultural land. The applicant relies on the emerging Swindon Local Plan, in which the land forms part of the wider East Wroughton Strategic Growth Location (emerging Policy SGL05). However, the emerging plan has only just reached the Regulation 19 stage and therefore carries very limited weight under NPPF paragraph 48.

Critically, SGL05 is a strategic allocation for around 1,031 homes across several different ownerships (including Berkeley Farm and Akers Land), expressly requiring a joined-up, masterplan-led approach with co-ordinated pedestrian links and a bus-transit-corridor contribution. The present application is a single-ownership scheme of 185 dwellings brought forward in isolation, deferring master planning, connectivity and contributions to conditions and reserved matters. Granting permission now would predetermine and prejudice the comprehensive planning of the wider allocation and undermine the plan-making process, contrary to the prematurity guidance in the Planning Practice Guidance (Reference ID: 21b-014).

- 6. The housing benefit relied upon by the applicant is overstated and the “tilted balance” is, at most, finely balanced:** The applicant’s case depends on the “tilted balance” in NPPF paragraph 11d. The shortfall relied upon is marginal. The applicant’s own figure is 4.90 years against the five-year requirement, and the most recent Housing Delivery Test result (96–97%) is comfortably above the 75% that would independently engage paragraph 11d. The weight to be given to delivering these particular homes now is therefore modest, especially as the emerging plan will bring the same land forward comprehensively.

The affordable housing offer should also be treated with caution: the Planning Statement only “anticipates” 30% and Policy HA2 makes that figure expressly subject to an economic viability assessment. The parish council asks that 30% affordable housing be fixed and secured through the section 106 agreement and not left to be eroded on viability grounds. That, consistent with Wroughton Neighbourhood Plan Policy RH1, any off-site contribution be applied within the Parish, and that the local-connection cascade under Policy RH2 be secured by section 106. The Wroughton Neighbourhood Plan is also clear that the affordable housing requirement should be 30%, with a suitable range of different types of housing to cater for the various needs of the population.

- 7. Supporting concerns arise on landscape, loss of agricultural land and education provision:** The proposal would develop 10.2 hectares of greenfield agricultural land, yet no Agricultural Land Classification assessment has been submitted. NPPF paragraph 180 requires the economic and other benefits of the best and most versatile agricultural land to be recognised; the absence of any classification is a further evidential gap.

The Education response waives both primary and secondary contributions, but each waiver is expressly conditional on assessing this application alone, and each is immediately qualified by the warning that the authority must “be mindful of other applications that may come in within the area.” The primary waiver rests on fragile assumptions — that Wroughton Infants and Juniors will re-admit at its former PAN of 90 (its intake has in fact been lowered), that completion will fall after September 2026, and that no competing development arises — while the same response notes that births in Wroughton are rising. The secondary waiver depends on the nearest, walkable secondary (The Ridgeway) already full, with the resulting pupils displaced 1.5 miles to The Deanery and its finite spare capacity. Furthermore, as highlighted above under road safety issues, no extra provision has been included ensure school children are able to cross Swindon Road safely.

Wroughton and Wichelstowe Parish Council asks Swindon Borough Council to consider these material planning objections and refuse the application.

We also wish to highlight the fact that residents are concerned about matters relating to flooding. Residents have informed us about flooding issues on the site, which contradicts the flood risk assessment in the application. We therefore request that Swindon Borough Council revisits this issue.

Finally, the parish council also recognises that the inclusion of the site in the new Swindon Local Plan 2023-2043 will mean that, in all likelihood, it will ultimately succeed. While we

recognise this probable outcome it is nevertheless vital to note the weaknesses in the application and the negative impacts we believe it will have on Wroughton.

Residents in Wroughton understandably feel that the village has had more than its fair share of development in recent years and that further allocations are simply unsustainable.