



# **Crudwell Neighbourhood Plan**

## **Regulation 14 Draft**

### **Sustainability Appraisal and Evidence Base**



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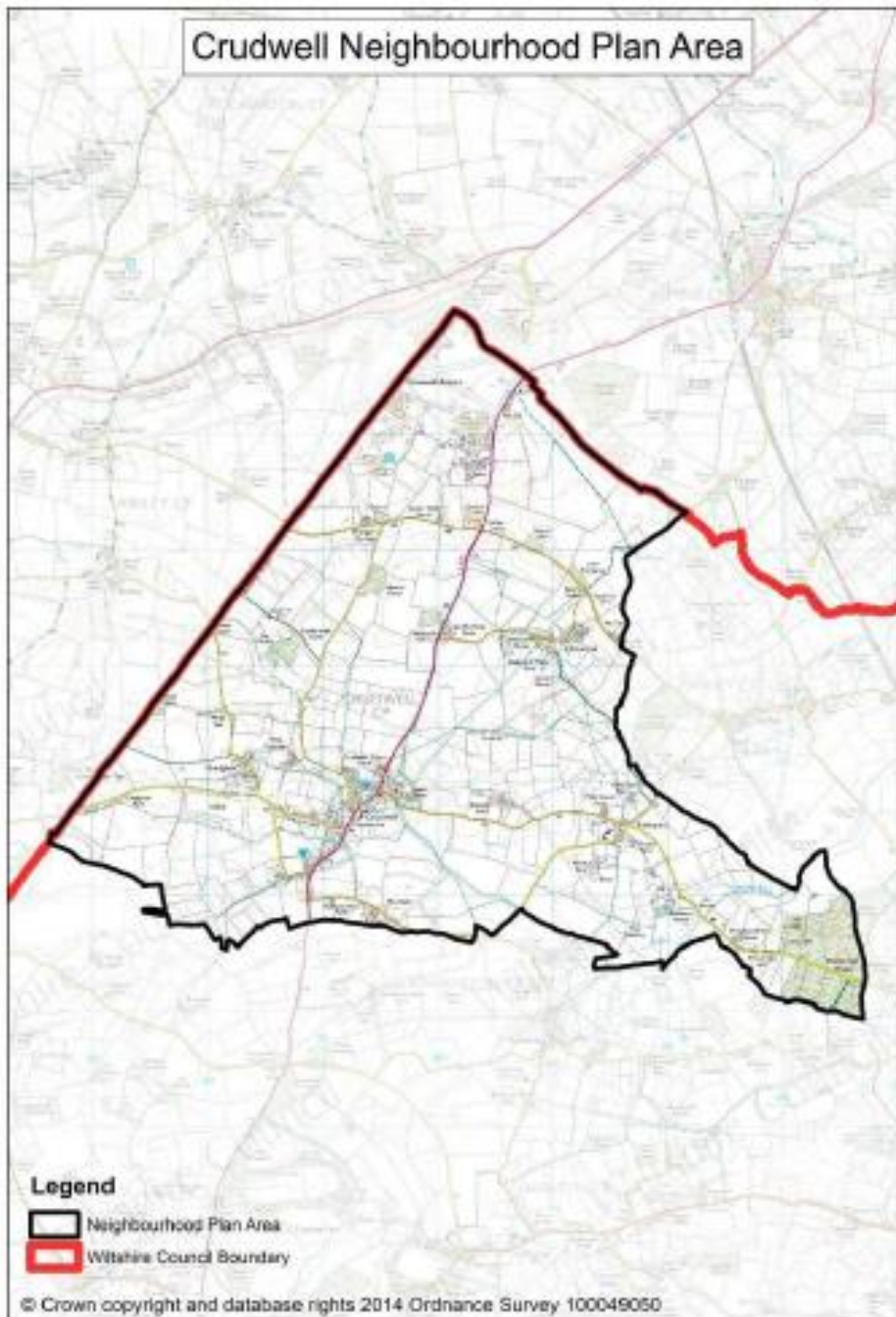
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## 1. Introduction

### Background

The designated Crudwell Neighbourhood Plan area coincides with the Crudwell Parish boundary, as shown in Figure 1.1 below.

**Figure 1.1: Crudwell Neighbourhood Plan Area**



Source: Crudwell Neighbourhood Area Designation Report, March 2015

This Sustainability Appraisal and Evidence Base is a background document to the draft Crudwell Neighbourhood Plan released for public consultation in November 2018.



The Neighbourhood Plan must be screened to determine whether environmental impacts are likely to be significant enough to warrant a Strategic Environmental Assessment (SEA) being produced as part of the Plan.

A SEA Screening Report was produced at an early stage in the Neighbourhood Plan process. After consulting with Natural England, Historic England and the Environment Agency, Wiltshire Council concluded, in November 2018, that a SEA was not required (see Appendix 11).

While a SEA is not required, the Neighbourhood Plan must meet a list of “basic conditions” set out in paragraph 8(2) of Schedule 4B to the Town and Country Planning Act 1990. These include that “the making of the order (or neighbourhood plan) contributes to the achievement of sustainable development.”

The Steering Group felt that the simplest way to demonstrate this was to produce a sustainability appraisal using the SEA process as a basis. There is no statutory requirement to do so.

### Report Structure

Section 2 of this report sets out relevant policies, plans and programmes relating to the neighbourhood plan.

Section 3 explains the themes used throughout the appraisal, and uses these themes to describe the baseline of Crudwell parish, to inform this Sustainability Appraisal.

Section 4 sets out the draft Vision and Objectives for information and context.

Section 5 sets out the key issues, and explains how the sustainability appraisal themes in section 3 have been turned into a series of sustainability appraisal objectives.

Section 6 sets out the appraisal of reasonable alternatives, focussing on housing numbers and the location of housing.

Section 7 is an appraisal of all the proposed plan policies against the sustainability appraisal objectives. This section finishes with a brief conclusion summarising the outcome of the sustainability appraisal.



## 2. Relevant Policies, Plans and Programmes

The SEA Directive 2001/42/EC requires consideration of:

- “the relationship with other relevant plans and programmes”
- “the environmental protection objectives, established at international, Community or Member State level, which are relevant to the plan or programme and the way those objectives and any environmental considerations have been taken into account during its preparation”

The Crudwell Neighbourhood Plan may be influenced by a range of other plans or programmes, or by external environmental protection objectives such as those laid down in policies or legislation.

The SEA Directive specifically requires environmental protection objectives established at international, European Community or national levels to be taken into account during the development of a plan.

Table 3.1 of the Wiltshire Core Strategy Sustainability Appraisal, April 2010, sets out a long list of policies, plans and programmes reviewed as part of the preparation of that document.

The most relevant of these to the Crudwell Neighbourhood Plan are listed below:

- National Planning Policy Framework
- Wiltshire Core Strategy, January 2015
- Joint Strategic Assessment for the Malmesbury Community Area, 2011
- Wiltshire Infrastructure Delivery Plan 3 2011 – 2026 Appendix 1: Malmesbury Community Area, December 2016
- Crudwell Parish Housing Needs Survey Report, January 2015
- Wiltshire Landscape Character Assessment, December 2005
- North Wiltshire Landscape Character Assessment, June 2004
- Wiltshire Strategic Land Availability Assessment, 2017

### National Planning Policy Framework

The National Planning Policy Framework sets out how sustainable development can be achieved through the planning system.

In relation to the Crudwell Neighbourhood Plan it explains the importance of meeting necessary development needs whilst protecting important local assets.



The topics most relevant to the Crudwell Neighbourhood Plan are:

- Delivering a sufficient supply of homes
- Building a strong, competitive economy
- Promoting healthy and safe communities
- Promoting sustainable transport
- Supporting high quality communications
- Achieving well-designed places
- Meeting the challenge of climate change, flooding and coastal change
- Conserving and enhancing the natural environment
- Conserving and enhancing the historic environment.

### Wiltshire Core Strategy

The Wiltshire Core Strategy sets out the strategic planning policies for the whole of Wiltshire and therefore for Crudwell parish.

It divides Wiltshire into Community Areas. Crudwell Parish is included in the Malmesbury Community Area. Paragraph 5.73 sets out issues and considerations for the Malmesbury Community Area. These tend to focus on Malmesbury town itself but give a steer as to the strategic direction that the Crudwell Neighbourhood Plan should take.

- “providing appropriate levels of housing in the town. Malmesbury has a high quality historic environment with few opportunities to bring forward new affordable homes on previously developed land. It is possible that a greenfield site may need to be identified to provide for housing need in the Community Area and enable the local economic base to diversify. Such opportunities should be identified through a community-led neighbourhood plan or in accordance with Core Policy 2
- consideration for primary school places, as the existing schools in the town are close to capacity. Collaborative work to prepare a neighbourhood plan should also carefully consider how primary school capacity can be satisfactorily resolved in a timely manner and integrated with any future housing growth
- all development within the Community Area must conserve the designated landscape of the Cotswold Area of Outstanding Natural Beauty and its setting, and where possible enhance its locally distinctive characteristics
- developer contributions from future housing growth should also help to deliver other infrastructure necessary in the town. This may include contributing to the



relocation of Malmesbury fire station from the town centre to the northern part of Tetbury Hill

- diversification of the employment base, which will help to strengthen the local economy and reduce out-commuting. A more flexible approach to allow economic development on the edge of the town will be considered, providing the scale of development is appropriate and sensitive to the historic environment, as described below
- there is little capacity for additional convenience retail provision in Malmesbury. However, there has been market interest and as many residents from the town travel outside of the Community Area to shop, there may be scope for an appropriate scale of supermarket development at Malmesbury during the plan period, providing this contributes towards strengthening the town centre, be of high quality design and sensitive to the historic environment
- future development will be carefully managed to ensure the high quality built environment, including the important historic assets, such as Malmesbury Abbey and Conservation Area, are protected. Future development should be of high quality design and well integrated with the existing built form and landscape setting of the town, including using local materials where appropriate
- all development within the Community Area must conserve the designated landscape of the Cotswold Area of Outstanding Natural Beauty and its setting, and where possible enhance its locally distinctive characteristics
- The Cotswold Water Park is a changing landscape and expanding recreational resource for the county and its visitors. Development in the Cotswold Water Park should contribute towards the objectives of the Vision and Implementation Plan for the area
- work is currently underway to prepare neighbourhood plans in the Malmesbury Community Area, and these should also inform future planning decisions."

### Joint Strategic Assessment for the Malmesbury Community Area

This document sets out the strategic issues for the Malmesbury Community Area from a public services viewpoint. The report is produced with input from Wiltshire Council, Wiltshire Police, NHS Wiltshire, Wiltshire Probation, Wiltshire and Swindon Fire Authority and the Ministry of Defence.

It includes a range of information, the most important of which is set out in the relevant parts of section 3 below.

### Wiltshire Infrastructure Delivery Plan 2011 – 2026

This document provides an infrastructure delivery schedule for the entire Malmesbury Community Area and sets out the infrastructure requirements identified by service





providers as being necessary to support development as outlined in the Pre-Submission Wiltshire Core Strategy Feb 2012.

### **Crudwell Parish Housing Needs Survey Report**

This document determined the local housing need in Crudwell Parish. It has been used to inform the Crudwell Housing Needs Assessment which, in turn, informs the neighbourhood plan.

### **Wiltshire and North Wiltshire Landscape Character Assessments**

These two reports defined the landscape character across Wiltshire, and for the Crudwell Parish. They set management objectives for the local landscape which will inform the neighbourhood plan.

### **Wiltshire Strategic Housing Land Availability Assessment**

The Wiltshire Strategic Housing Land Availability Assessment sets out sites which have been proposed to Wiltshire Council through its call for sites process.

The document assesses the suitability of each site for development, and forms a basis for future housing allocations.

### 3. Scope and Baseline Characteristics

The SEA Directive 2001/42/EC requires an assessment of:

*"the likely significant effects on the environment, including on issues such as biodiversity, population, human health, fauna, flora, soil, water, air, climatic factors, material assets, cultural heritage including architectural and archaeological heritage, landscape and the inter-relationship between the above factors."*

A "Screening Report" was prepared to enable Wiltshire Council to determine whether or not a SEA was required for the Crudwell Neighbourhood Plan, advised by Natural England, Historic England and the Environment Agency. These agencies concluded that "the draft Crudwell Neighbourhood Plan (NP) is not likely to have significant environmental effects and accordingly a Strategic Environmental Assessment is not required." (see Appendix 11)

Nevertheless, the Neighbourhood Plan Steering Group considered that the best way to demonstrate that the Neighbourhood Plan contributes to sustainable development was to prepare this Sustainability Appraisal to assess environmental, social and economic effects.

The Wiltshire Core Strategy Sustainability Appraisal merges some of the SEA factors and separates others to create 13 sustainability appraisal themes. The sustainability appraisal for the Crudwell Neighbourhood Plan will use the same process. For completeness, the table below also groups these into sustainable development themes referred to in the NPPF and elsewhere.

**Table 3.1: Translation of SEA Directive Considerations into Wiltshire Sustainability Appraisal Themes**

SEA Directive consideration	Wiltshire Sustainability Appraisal Themes	Sustainable Development Dimension
Biodiversity	Biodiversity	Environmental
Fauna		
Flora		
Soil	Land and soil resources	
Water	Water resources and flood risk	
Air	Air quality and environmental pollution	
Climatic factors	Climatic factors	
Cultural heritage including architectural and archaeological heritage	Historic Environment	
Landscape	Landscape	
Population	Population and housing	Social
Human Health	Healthy communities	
	Inclusive communities	

SEA Directive consideration	Wiltshire Sustainability Appraisal Themes	Sustainable Development Dimension
	Education and skills	Economic
	Transport	
	Economy and enterprise	
Material Assets	Covered by other topic areas	All
Inter-relationships	Referred to where relevant	

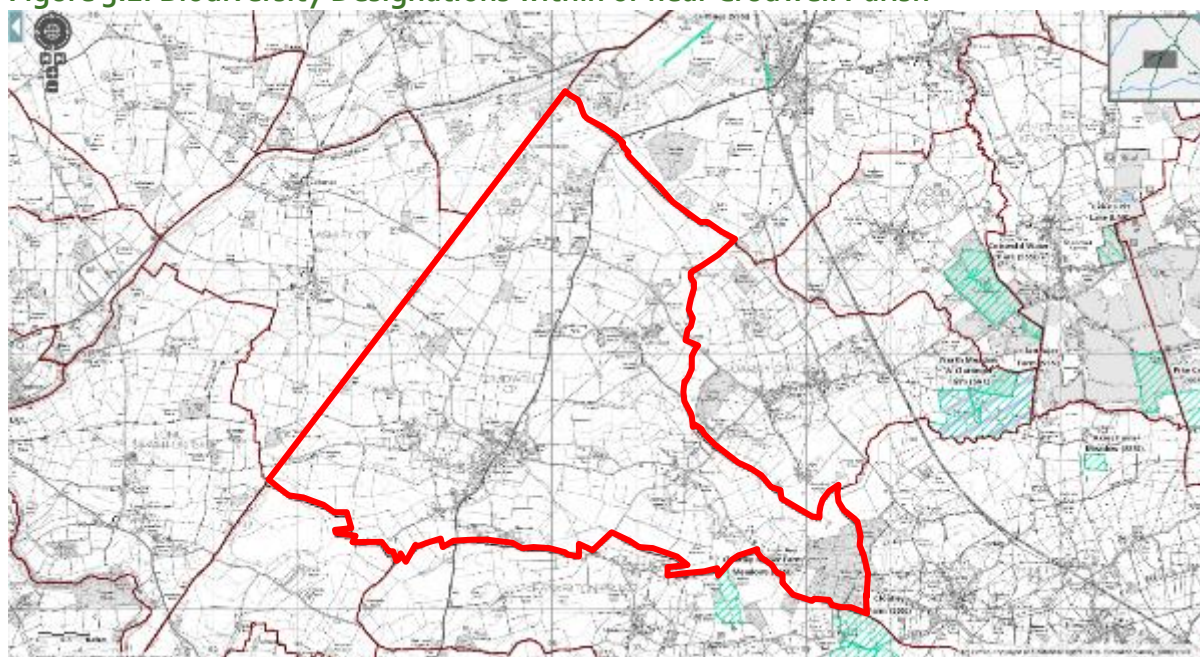
The Wiltshire Sustainability Appraisal Themes are used to categorise the baseline of the Crudwell Parish below.

## Biodiversity

The image below, from Magic Maps<sup>1</sup>, shows that there are no land based statutory biodiversity designations within Crudwell Parish.

Cloatley Manor Farm Meadows SSSI adjoins the parish boundary, but lies within Hankerton Parish. See Figure 3.2.

**Figure 3.2: Biodiversity Designations within or near Crudwell Parish**

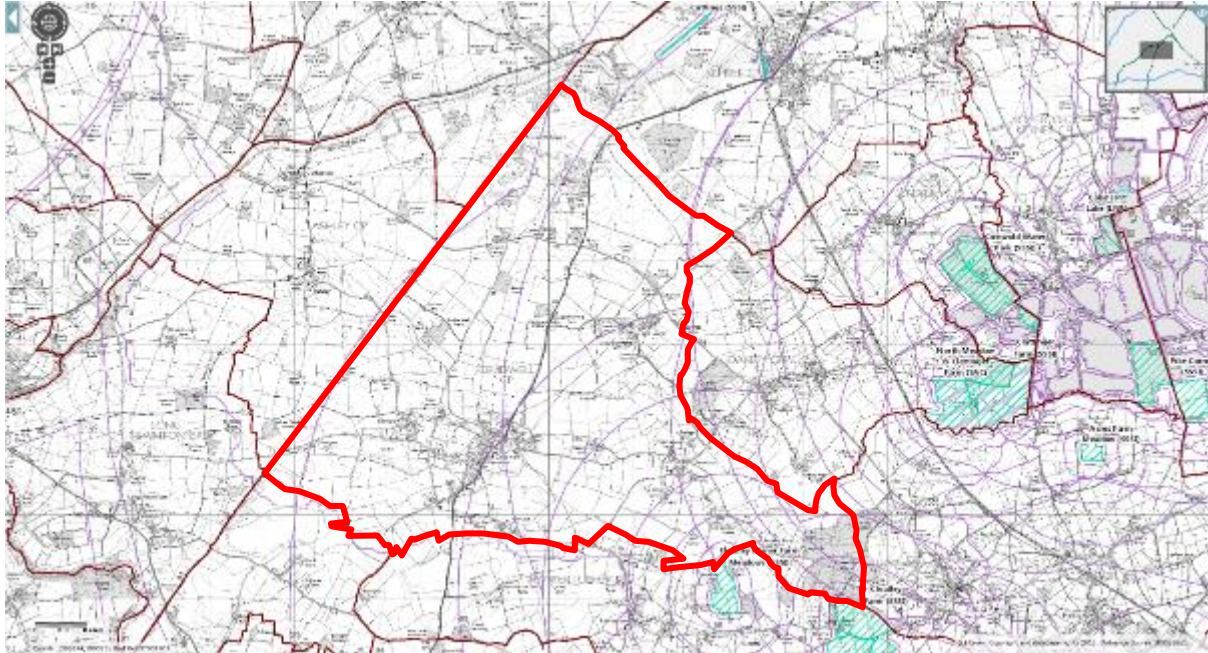


Source: Magic Maps with Parish boundary added

Figure 3.3 shows the Impact Risk Zones specified on Magic Maps. The village of Crudwell, where any growth is proposed to be focussed, is 3 kilometres from the SSSI. Eastcourt, a smaller hamlet within the Parish where growth is not proposed, is 1.1 kilometres from the SSSI.

<sup>1</sup> <http://natureonthemap.naturalengland.org.uk/MagicMap.aspx>

**Figure 3.3: Biodiversity Designations within or near Crudwell Parish – Impact Risk Zones**

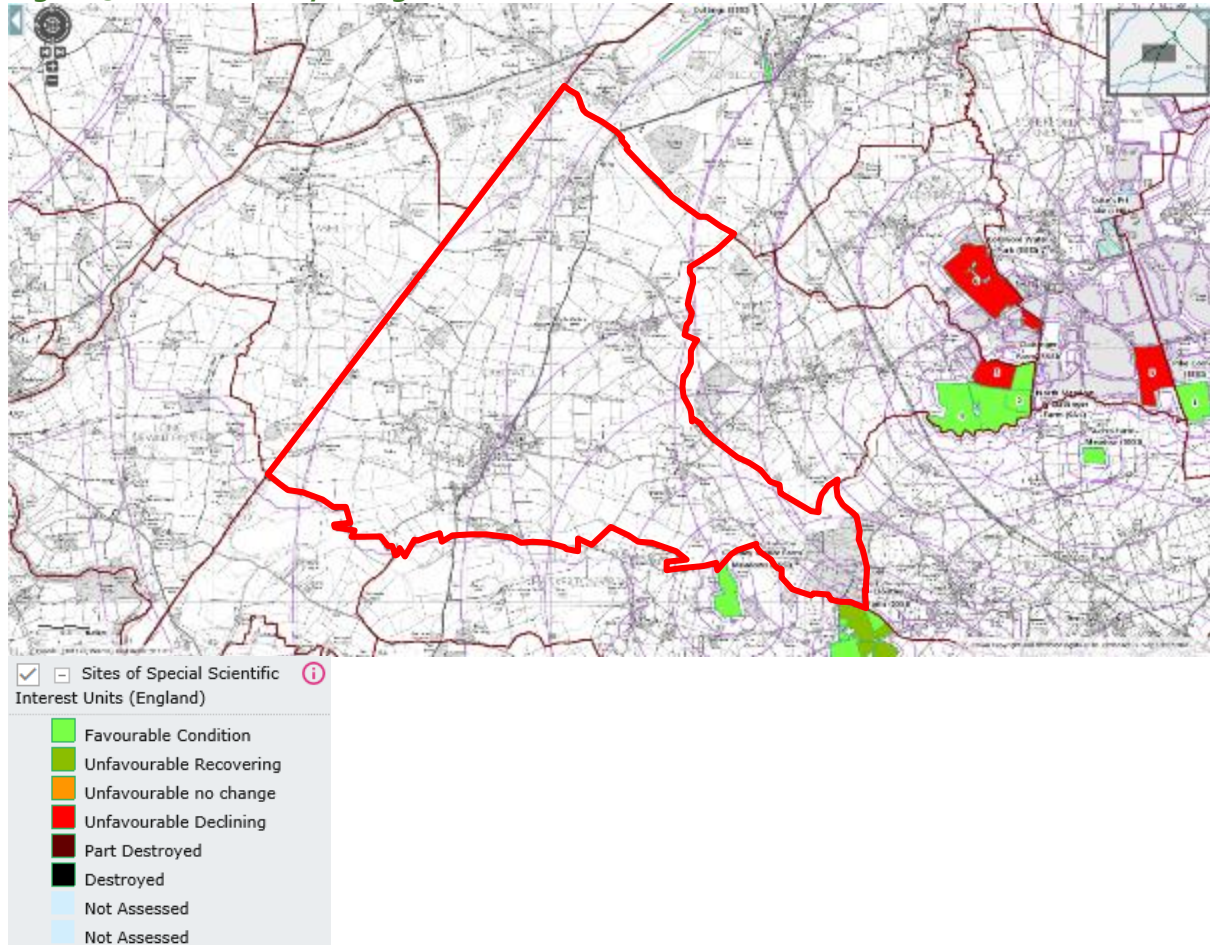


Source: Magic Maps with Parish boundary added

Figure 3.4 shows that the SSSI is in a “favourable condition” according to Magic Maps.



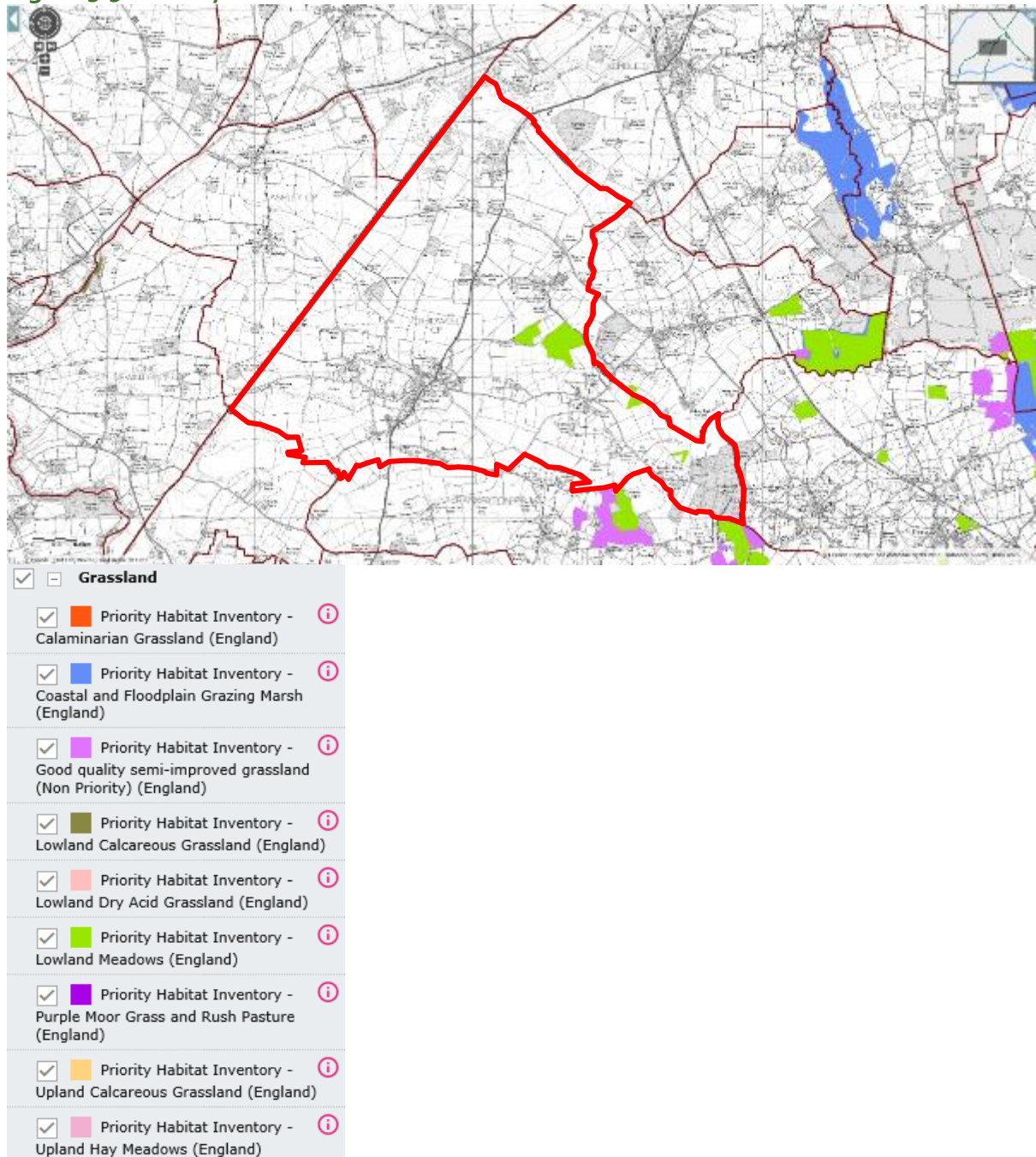
Figure 3.4: Biodiversity Designations within or near Crudwell Parish - Condition



Source: Magic Maps with Parish boundary added

The online Priority Habitat Inventory includes grassland and woodland entries in the parish. These are shown on Figures 3.5 and 3.6 respectively.

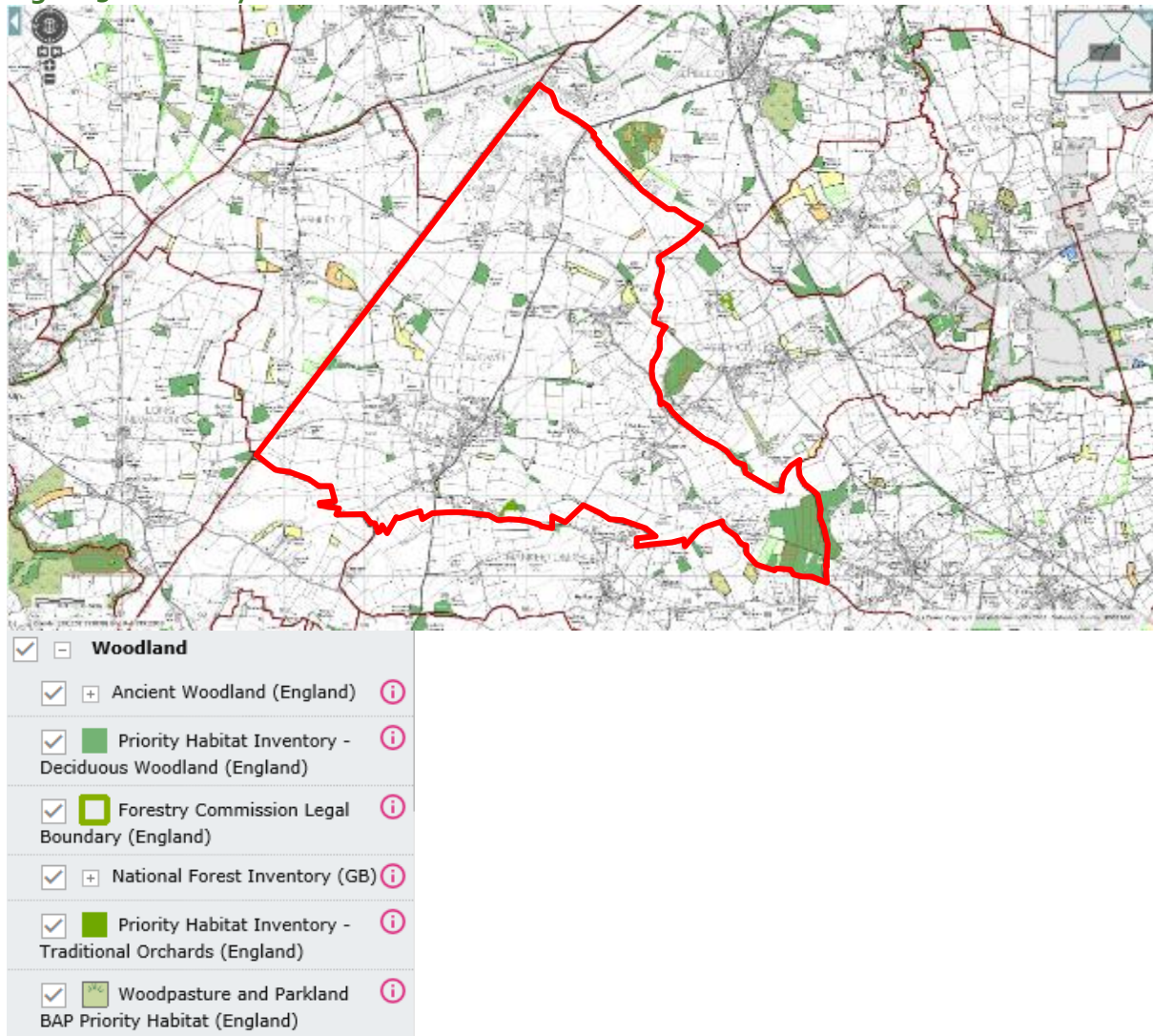
**Figure 3.5: Priority Habitats - Grassland**



Source: Magic Maps with Parish boundary added



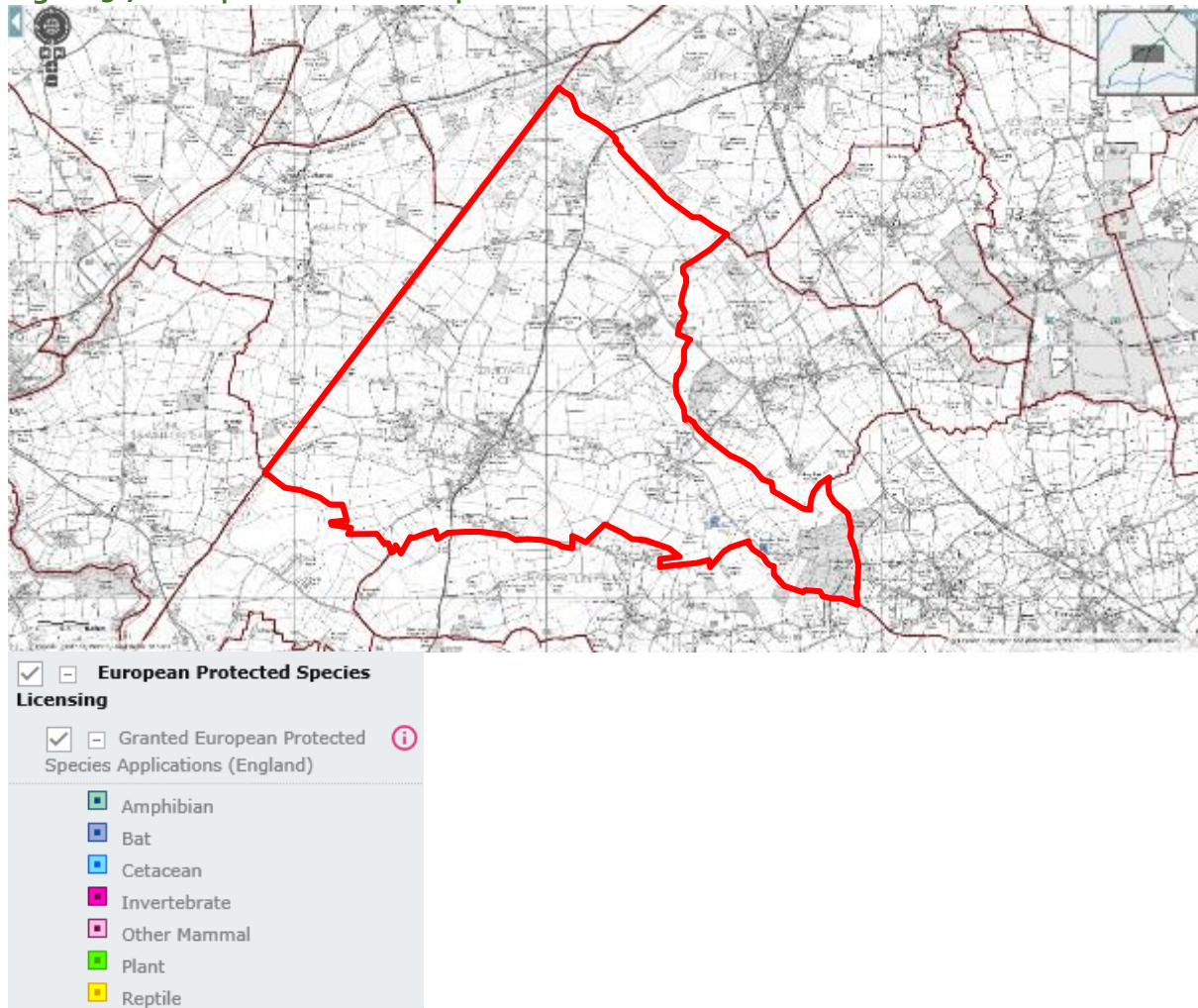
Figure 3.6: Priority Habitats - Woodland



Source: Magic Maps with Parish boundary added

The online mapping shows two European protected species licenses granted, both relating to bats. See Figure 3.7.

Figure 3.7: European Protected Species Licenses Granted



Source: Magic Maps with Parish boundary added

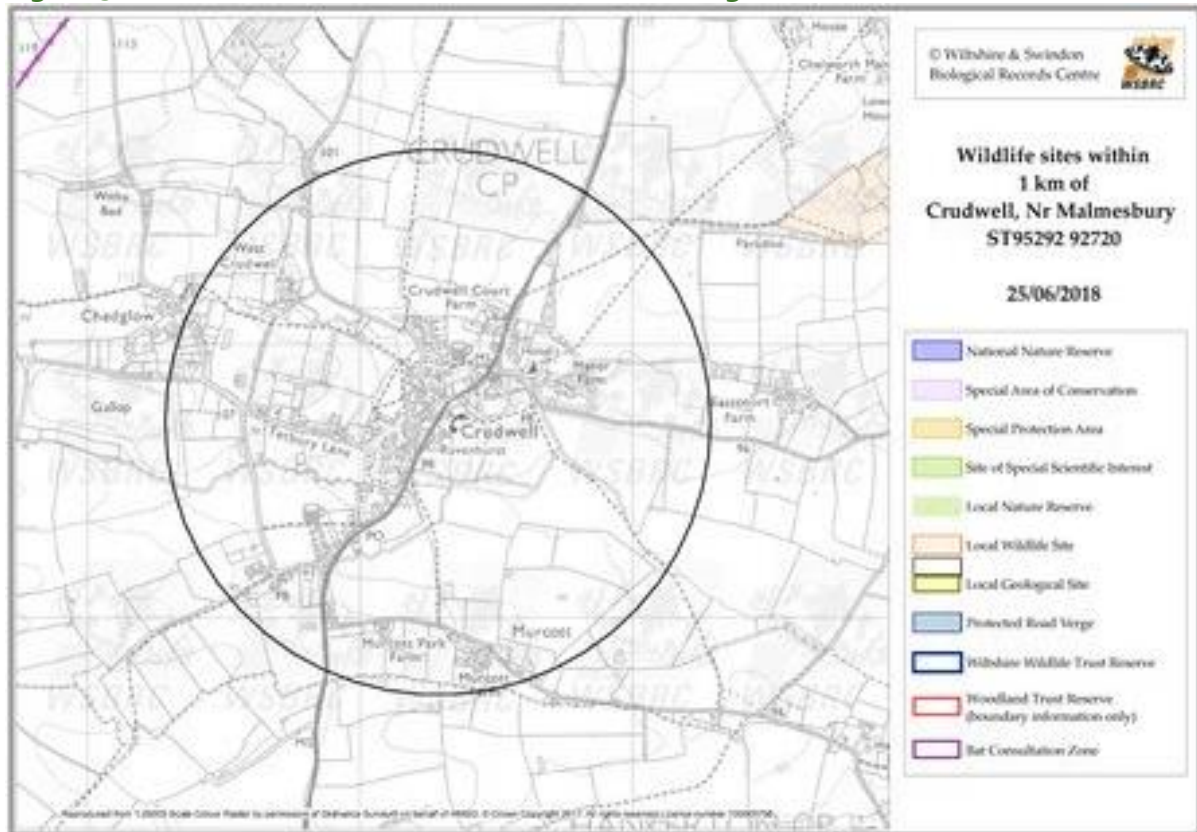
Figures 3.8 and 3.9 show mapping obtained from the Wiltshire and Swindon Biodiversity Records Centre showing wildlife sites and mapped habitats around Crudwell village.

A list of protected and notable species has also been obtained from the Biodiversity Records Office. In terms of red list globally threatened and scheduled European protected species, this shows:

1. Great Crested Newt (*Triturus cristatus*) – 4 records – 1 in a pond east of the A429 and north of Crudwell village; 1 in a pond at Manor Farm; 1 in the drain that runs south of and parallel with Tetbury Lane; and 1 near Tetbury Lane
2. Various bats – 9 records – to the east and south east of Crudwell Village

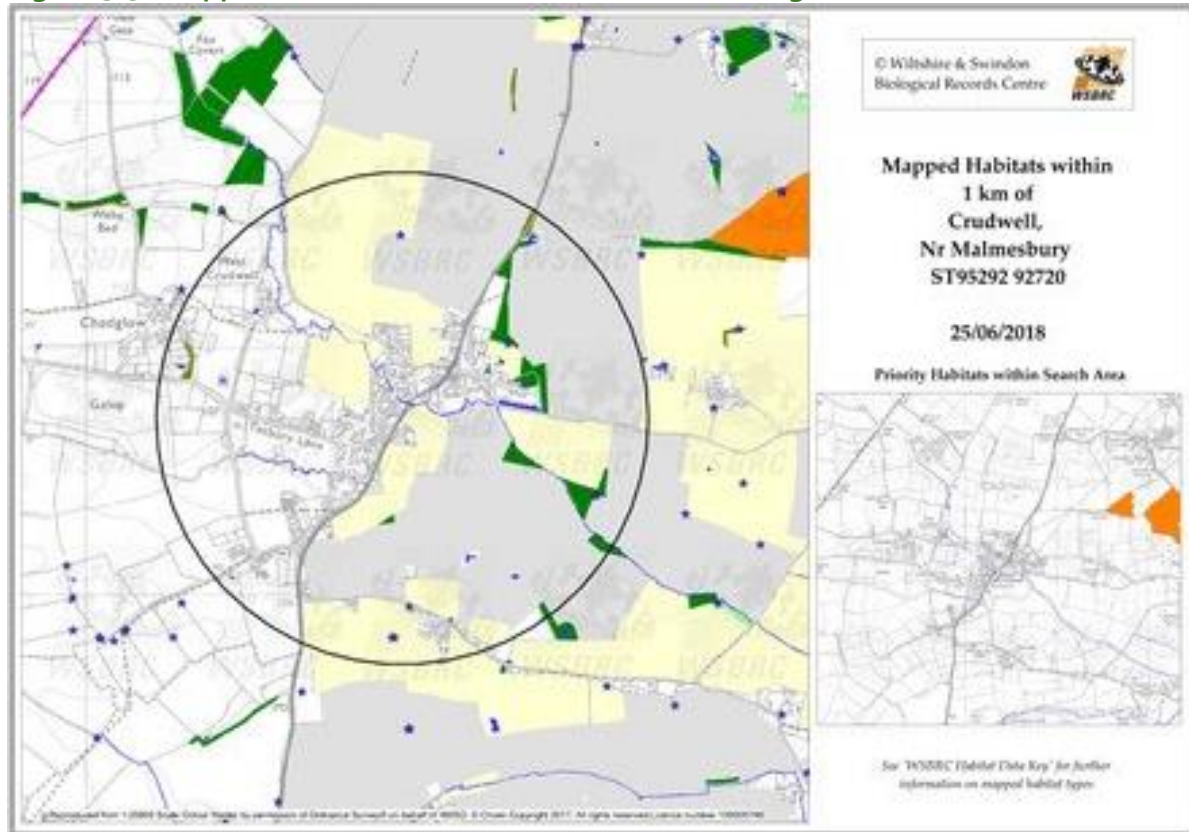


**Figure 3.8: Wildlife sites within 1km of Crudwell Village (as at June 2018)**



Source: Wiltshire and Swindon Biodiversity Records Centre

Figure 3.9: Mapped Habitats within 1km of Crudwell Village (as at June 2018)



	Acid grassland
	Arable
	Bracken
	Broadleaved, mixed & Yew woodland
	Built-up areas & gardens
	Calcareous grassland
	Conifer woodland
	Dense scrub
	Fen, marsh & swamp
	Heathland
	Improved grassland
	Neutral grassland
	Possibly unimproved grassland
	Probably improved grassland
	Rock exposures
	Running water
	Standing open water

Source: Wiltshire and Swindon Biodiversity Records Centre

More localised biodiversity which is not subject to any particular protection, such as hedgerows, water courses and green spaces, is valued locally.

## Land and Soil Resources

Natural England's Agricultural Land Classification Map South West Region (ALCoo6)<sup>2</sup> shows that the majority of the parish is grade 3 (good to moderate) agricultural land, with an area west of the A429 generally between Tetbury Lane and Tuners Lane being grade 2 (very good) and an area in the eastern tip of the Parish being grade 4 (poor). See Figure 3.10.

**Figure 3.10: Agricultural Land Classification**



<b>Grade</b>	<b>Description</b>
1	Excellent
2	Very Good
3	Good to Moderate
4	Poor
5	Very Poor

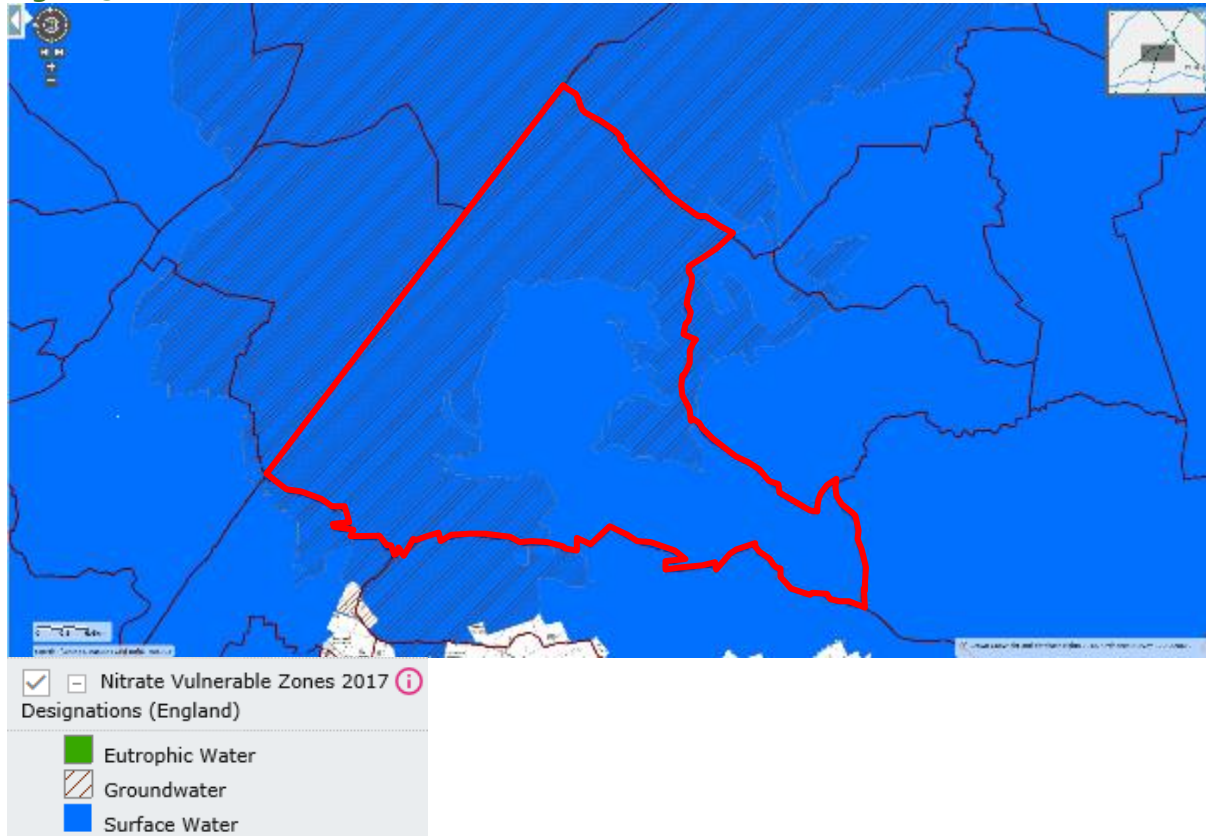
Source: Agricultural Land Classification Map South West Region, Natural England with Parish boundary added

Figure 3.11 shows that all of the Parish has nitrate vulnerable soils based on Natural England's online Magic Map dataset.

<sup>2</sup> <http://publications.naturalengland.org.uk/publication/144017?category=5954148537204736>



**Figure 3.11: Nitrate Vulnerable Zones**



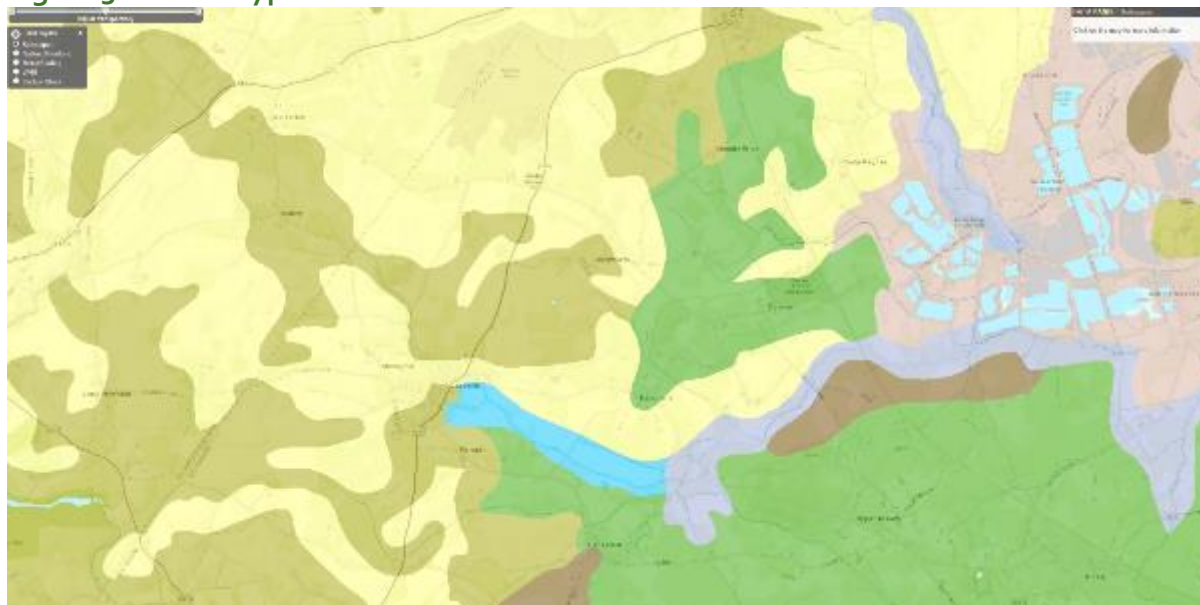
Source: Magic Maps with Parish boundary added

Figure 3.12 overleaf,, from [www.landis.org.uk](http://www.landis.org.uk), shows that Crudwell Parish is underlain by four soil types.

The northern and southern areas of Crudwell village are underlain by lime-rich loamy and clayey soils with impeded drainage; the central section of Crudwell village is underlain with Shallow lime-rich soils over chalk or limestone; and an area generally east of the A429 is underlain with Loamy and clayey floodplain soils with naturally high groundwater.

The hamlet of Eastcourt, and the area to the north are underlain with Slowly permeable seasonally wet slightly acid but base-rich loamy and clayey soils.

**Figure 3.12: Soil Types**



Source: Landis.org.uk

## Water Resources and Flood Risk

Flooding is a particular problem in Crudwell. Heavy rainfall events cause the Swill Brook and other drainage channels to overflow, and surface flows also enter the sewerage system and cause these to overflow.

Inevitably, both of these sources of flooding cause safety and health risks.

Figure 3.13 shows the Environment Agency's fluvial flood zones. The Swill Brook runs west to east through Crudwell village, along the southern boundary of the primary school playing fields, under the A429 and then generally along the southern side of Tuners Lane. Parts of this are zone 2 and parts zone 3.

A number of drainage channels cross the A429 in the village, further south. Land within and immediately adjacent to these channels is generally in flood zone 2.

Figure 3.14 shows surface water flooding through the village. Some of these areas are in high or medium risk zones.

In 2016, Wessex Water completed a major scheme to remove a large amount of roof and paved area at Crudwell Primary School from the foul sewer network. The scheme included construction of an attenuation pond to reduce the impact of run-off into the Swill Brook. In the past, the school has flooded as a result of overland flows from the highways, and this scheme allows for this floodwater to be diverted into the Swill Brook. The scheme reduces the amount of flow arriving at Ridgeway pumping station and therefore reduces the level of surcharging in the foul drainage system (see email from Wessex Water at Appendix 1).

**Figure 3.13: Fluvial Flood Risk**



Source: Environment Agency

**Figure 3.14: Surface Water Flood Risk**



Source: Environment Agency

These works to the school's drainage provides additional capacity in the sewer network to accommodate the scale of development envisaged in the neighbourhood plan. However, Wessex Water also advises that the surface water flows from new developments should not be discharged into the foul sewers and that these flows should be attenuated on site "to replicate the natural runoff rates, before being discharged into a local watercourse or soakaway to ground" (see email from Wessex Water at Appendix 2). This further reduces the impact that the new development will have on the sewerage network.

Based on Magic Maps data, the whole of the neighbourhood plan area lies within source protection zone 1.



## Air Quality and Environmental Pollution

Being a rural parish, the air quality across the area is likely to be good.

However the A429 runs through Crudwell village, and this has an annual average daily flow of almost 8,000 vehicles, of which about 350 are HGVs, over 1,000 are light goods vehicles and about 30 are buses and coaches (see <http://www.dft.gov.uk/traffic-counts/cp.php?la=Wiltshire>; count point id 73527). This traffic has an effect on air quality through the village, particularly during peak times. Traffic is referred to in more detail in the Transport section below.

Surface and water heating in Crudwell will be achieved largely through the use of fossil fuels. The parish is not served by gas so heating is primarily from oil and electricity. A high pressure gas pipeline runs generally along the alignment of the Fosse Way which forms the parish's western boundary.

Heating by fossil fuels is known to result in CO<sub>2</sub> and particulate emissions with the potential to cause health effects in some circumstances.

The Government has made a commitment to reduce CO<sub>2</sub> emissions. This can be achieved through the electrification of heating, particularly where renewable energy is used to generate the electricity. There is the potential for solar photovoltaics and solar thermal heating solutions in new development in appropriate locations.

The installation of solar panels on existing properties may impact on the character and appearance of the area, particularly the conservation area.

The village of Crudwell is the main source of light pollution in the parish. Crudwell village's streets are generally lit by street lights. The smaller hamlets in the parish do not generally have street lighting.

Modern street light designs, using LED light sources and including cowls, can substantially reduce light pollution.

## Climatic Factors

Climatic factors resulting from development include the use of energy, and fossil fuels in particular, in the construction process and then in the use of the buildings once constructed. This includes transport and energy use.

Crudwell is affected by flooding resulting from heavy rainfall. Climate change is forecast to increase the frequency and severity of rainfall events, so it will be necessary for the neighbourhood plan to take this into account when determining the location and design of new developments.

## Historic Environment

A relatively large proportion of Crudwell village is protected by a conservation area, as shown on Figure 3.15, taken from Wiltshire Council's online mapping system.



There is no Conservation Area Statement of Appraisal available.

**Figure 3.15: Crudwell Conservation Area**



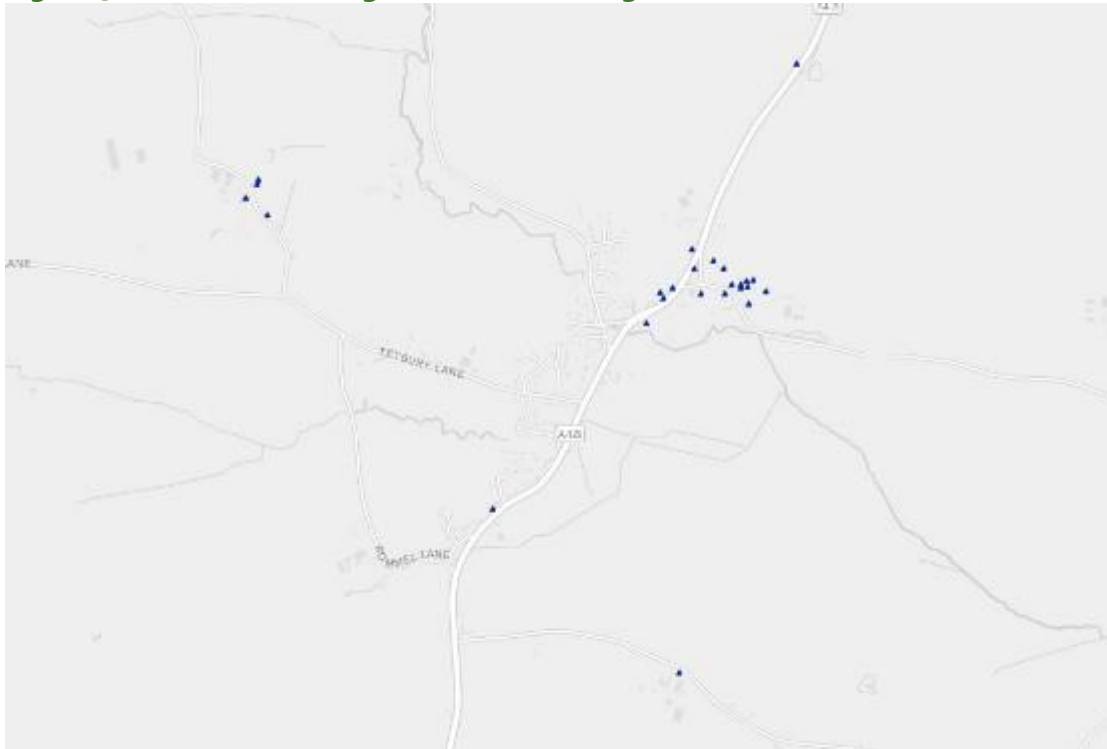
Source: Wiltshire Council

Historic England's online mapping shows that the parish includes a number of listed buildings, the main cluster being at the northern end of Crudwell village, around the school and church.

As any new development will need to be focussed on Crudwell village, Figure 3.16 shows the listed buildings in the vicinity of Crudwell village only.



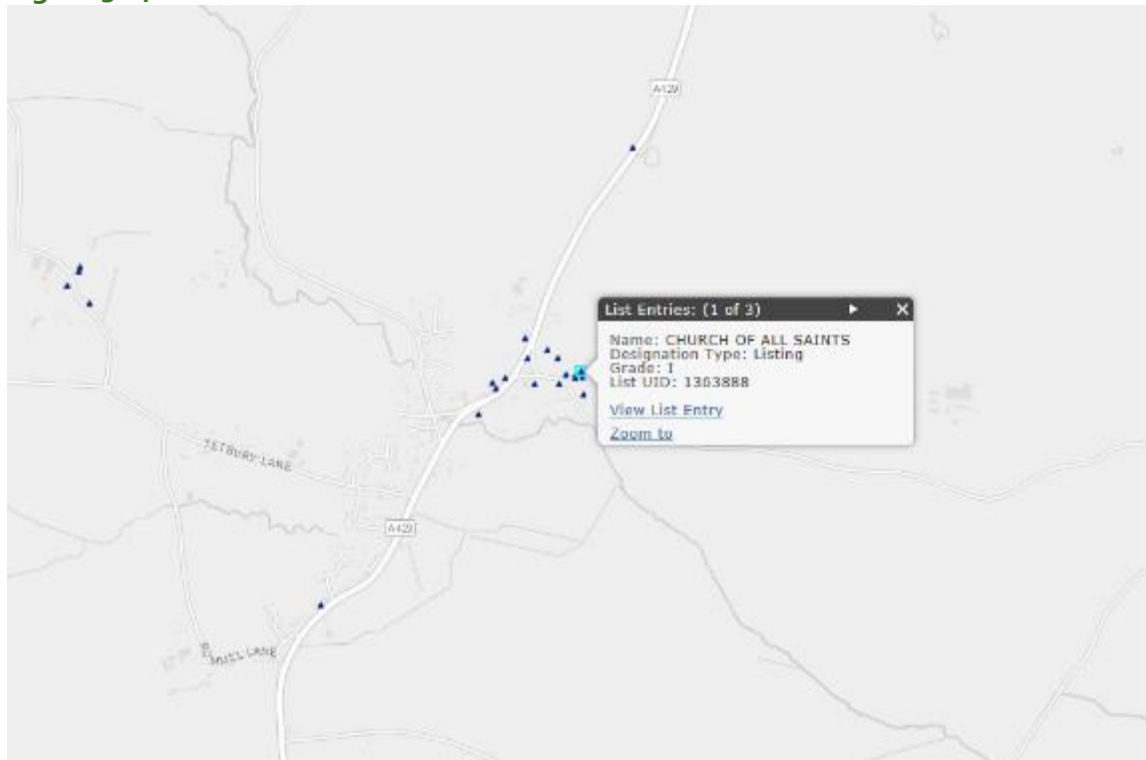
**Figure 3.16: Listed Buildings in Crudwell Village**



Source: Historic England

The Church of All Saints (located on Figure 3.17) is Crudwell village's only grade I listed building. The listing description explains that the church is probably of Saxon origin, with much of it being built between the 12th and 15th Centuries. Some restoration has occurred since.

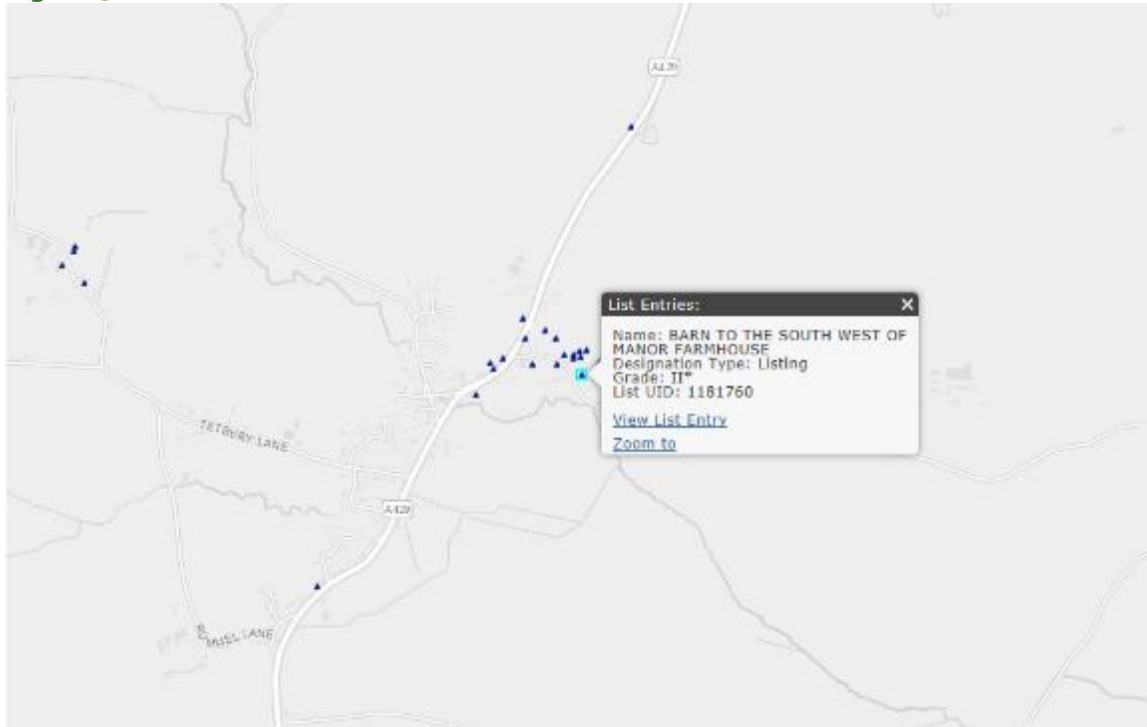
**Figure 3.17: Location of Grade I Listed Church of All Saints**



Source: Historic England

The barn to the south west of Manor Farmhouse is Crudwell Village's only grade II\* listed building (see Figure 3.18). The listing description describes it as a "fine manorial barn, part of the original manorial complex" and notes that it is probably of 15th Century origin with 20th Century additions.

**Figure 3.18: Location of Grade II\* Listed Manor Farmhouse Barn**



Source: Historic England

Crudwell village's heritage will need to be taken into account in determining the location of new development and measures to mitigate any potential harm to heritage assets.

## Landscape

Crudwell parish does not include any statutory landscape designations, although the Cotswolds AONB borders its western boundary.

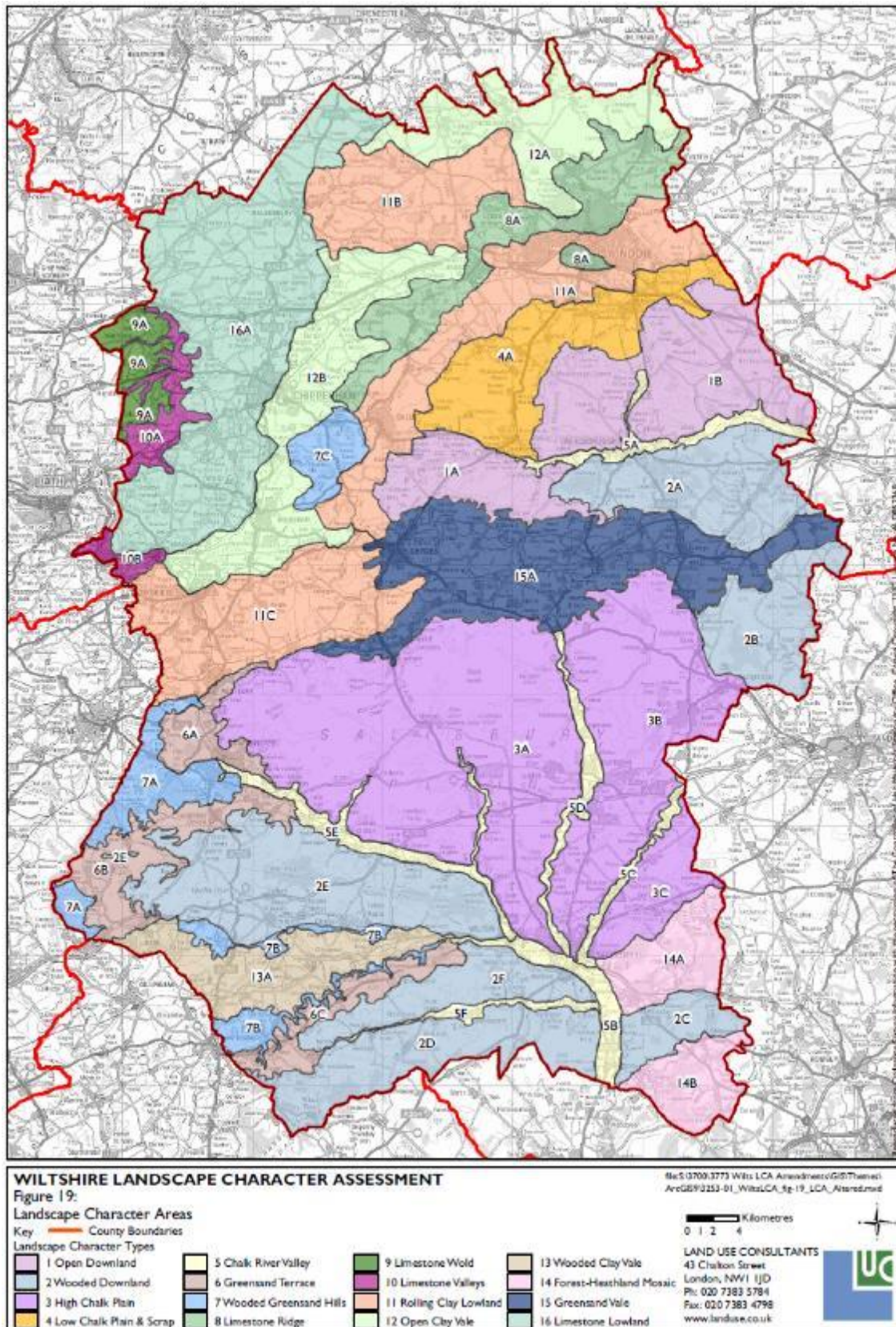
The area is covered by two landscape character assessments:

- Wiltshire Landscape Character Assessment, December 2005
- North Wiltshire Landscape Character Assessment, June 2004

The 2005 Wiltshire report defines the following landscape character areas shown in Figure 3.19. The majority of the parish, and the village of Crudwell itself where growth is planned, lies within character area 16A – limestone lowland.

Figure 3.20 shows the landscape character areas as defined in the 2006 North Wiltshire report. This classifies the landscape character area of the majority of the parish, and the village of Crudwell, as Sherston dipslope lowland, and the character type as lowland limestone (forest marble) farmland.

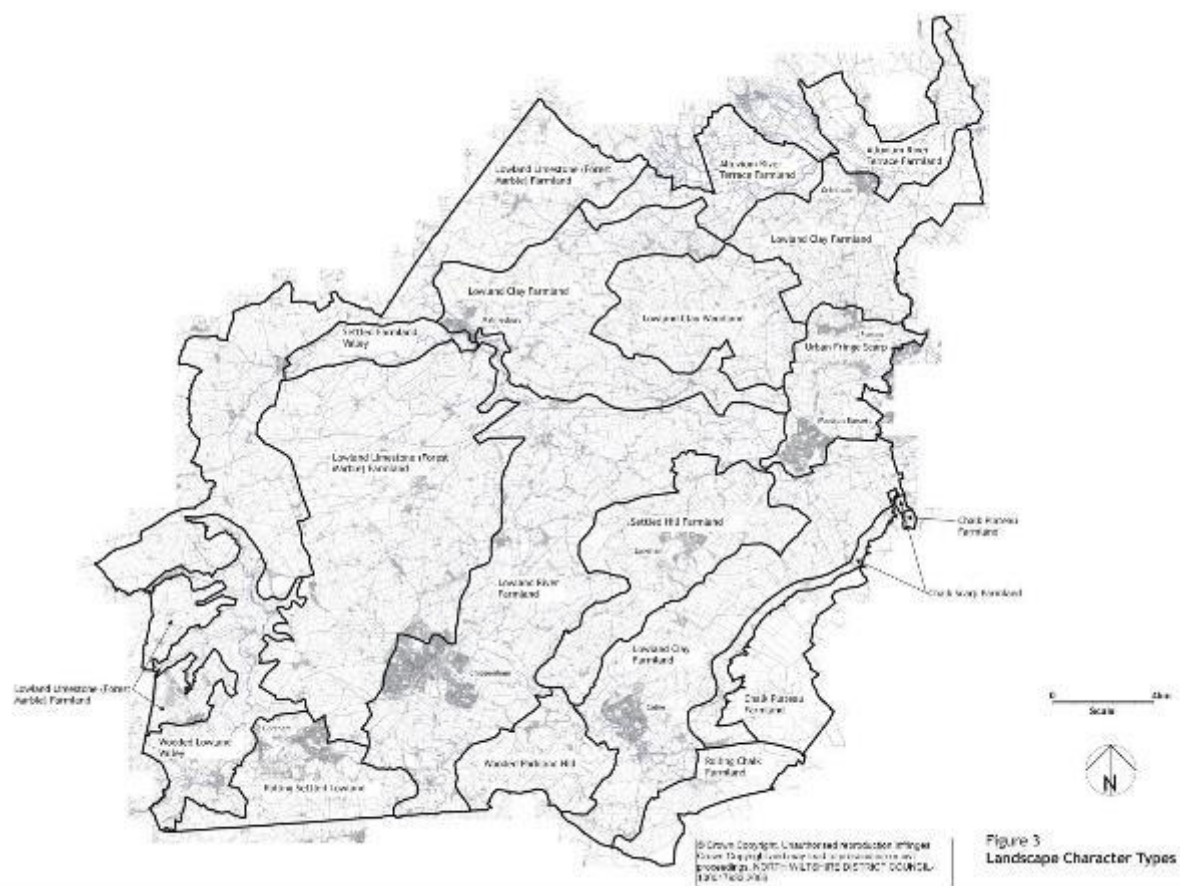
**Figure 3.19: Landscape Character Areas - Wiltshire**



Source: Wiltshire Landscape Character Assessment, December 2005



**Figure 3.20: Landscape Character Areas – North Wiltshire**



Source: North Wiltshire Landscape Character Assessment, June 2004

Each report describes the key features of the area and concludes with a strategy for the future management of the area which will inform the content of the neighbourhood plan. In combination, these can be summarised as follows:

1. Conserve the existing network of vegetation, including hedgerows, trees and copses, and plant new vegetation where it strengthens local character, but not where it will affect open views;
2. Encourage conservation and rebuilding of dry stone wall field boundaries, particularly close to settlements, as part of a strategy to maintain a variety of boundary treatments from hedgerows to dry stone walls;
3. Conserve and enhance biodiversity, particularly through good woodland management practices and by encouraging good environmental management in farming practices;
4. Retain the distinctive character of the villages, ensuring any change respects the traditional stone-built character and vernacular form.

The location of public footpaths and other rights of way affects the way that the landscape is perceived. Public rights of way are shown on figure 3.21 below.

**Figure 3.21: Public Rights of Way**



Source: Wiltshire Council online mapping

## Population and housing

Crudwell parish lies within the North and West Wiltshire Housing Market Area and the Malmesbury Community Area.

The Crudwell Housing Needs Assessment, March 2018, produced to inform the Crudwell Neighbourhood Plan, assesses the parish's housing need using a variety of datasets, as set out in figure 3.22 below, and concludes that the residual parish requirement up to 2026 is 20 to 25 dwellings, primarily to enable the delivery of eight affordable homes for which a local need exists.

**Figure 3.22 Summary of Housing Requirement Analysis**

Method	Residual Housing Requirement for Crudwell Parish – 2006 to 2026
DCLG Household Projections for Wiltshire (2014 base)	58
Past Dwelling Completion Rates	4 or 25
Wiltshire Core Strategy: Proportion of Community Area dwellings in Crudwell	0
Wiltshire Core Strategy: Proportion of Community Area Remainder dwellings in Crudwell	14
Joint SHMA 2017 (untested)	48
Parish Housing Needs Survey 2015	20

Wiltshire Housing Register	10 (in order to provide any affordable housing)
----------------------------	-------------------------------------------------

Source: Crudwell Housing Needs Assessment, March 2018

The Housing Needs Assessment also notes that Crudwell parish has the following characteristics, when compared with Wiltshire, the South West and England:

1. a larger proportion of children;
2. a lower proportion of 16 to 44 year olds;
3. a higher proportion of 45 to 74 year olds;
4. a lower proportion of people aged 75+;
5. a larger proportion of detached homes;
6. relatively high house prices compared to south west averages;
7. a greater proportion of owner occupied homes;
8. a smaller proportion of affordable housing stock;
9. a smaller proportion of one person households;
10. a greater proportion of one family households, with or without children; and
11. a lower proportion of lone parents.

## Healthy Communities

The Joint Strategic Assessment for Malmesbury Community Area, 2011 indicates (using data from 2006 to 2008) that the average life expectancy of the Malmesbury community area is higher than average, as summarised in Figure 3.23 below.

**Figure 3.23: Average Life Expectancy (2006 to 2008 data)**

	Malmesbury Community Area	Wiltshire	South West	England
Males	80.4	79.4	79.0	77.9
Females	84.1	83.3	83.1	82.0

Source: Joint Strategic Assessment for Malmesbury Community Area, 2011

The nearest primary care facilities are in Malmesbury, and the nearest hospital is at Tetbury. This provides non-emergency care only. The nearest larger hospital, with accident and emergency services is Great Western Hospital in Swindon.

The health of the Crudwell parish population will be influenced by lifestyle factors, potentially more than the proximity of healthcare provision. Factors such as exercise, for

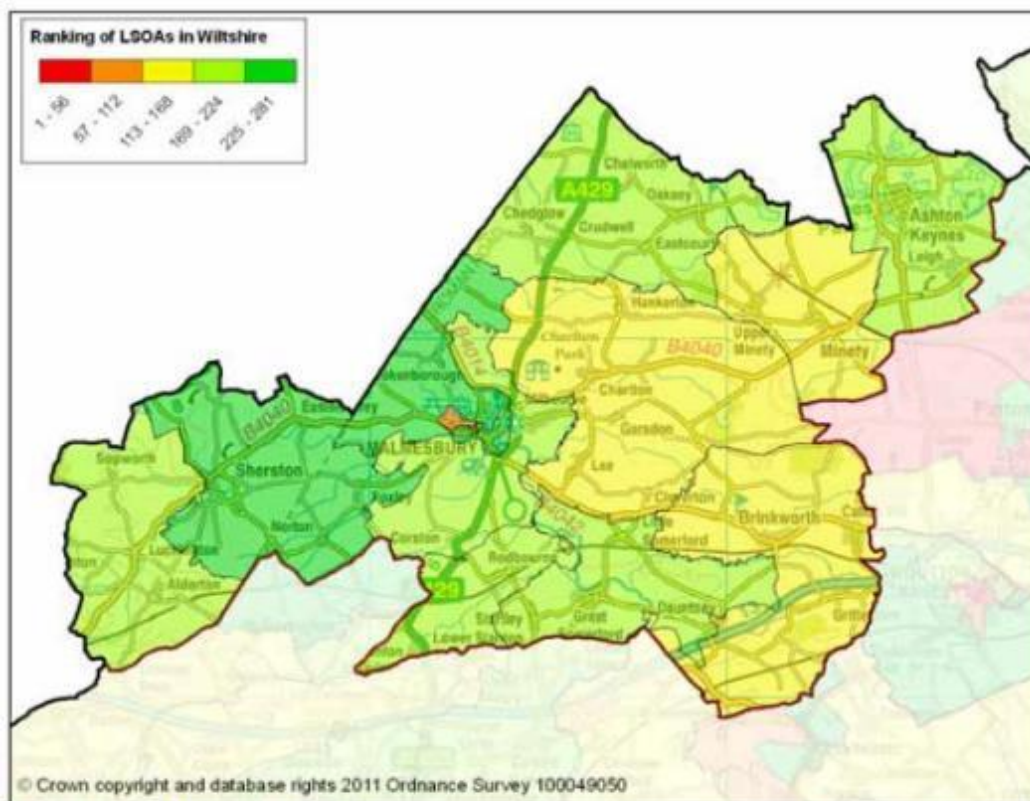
example walking or cycling whether for exercise or for practical reasons, will help to improve the health of the local community, as will the provision of exercise facilities and clubs.

## Inclusive Communities

Indications are that the parish of Crudwell is not particularly deprived economically. Life expectancy is high and, as Figure 3.24 below shows, Crudwell ranks low down on the Index of Multiple Deprivation ranking.

The Community Area has a low proportion of children in poverty compared to other community areas across Wiltshire, as shown in Figure 3.25.

**Figure 3.24: Index of Multiple Deprivation, 2010**

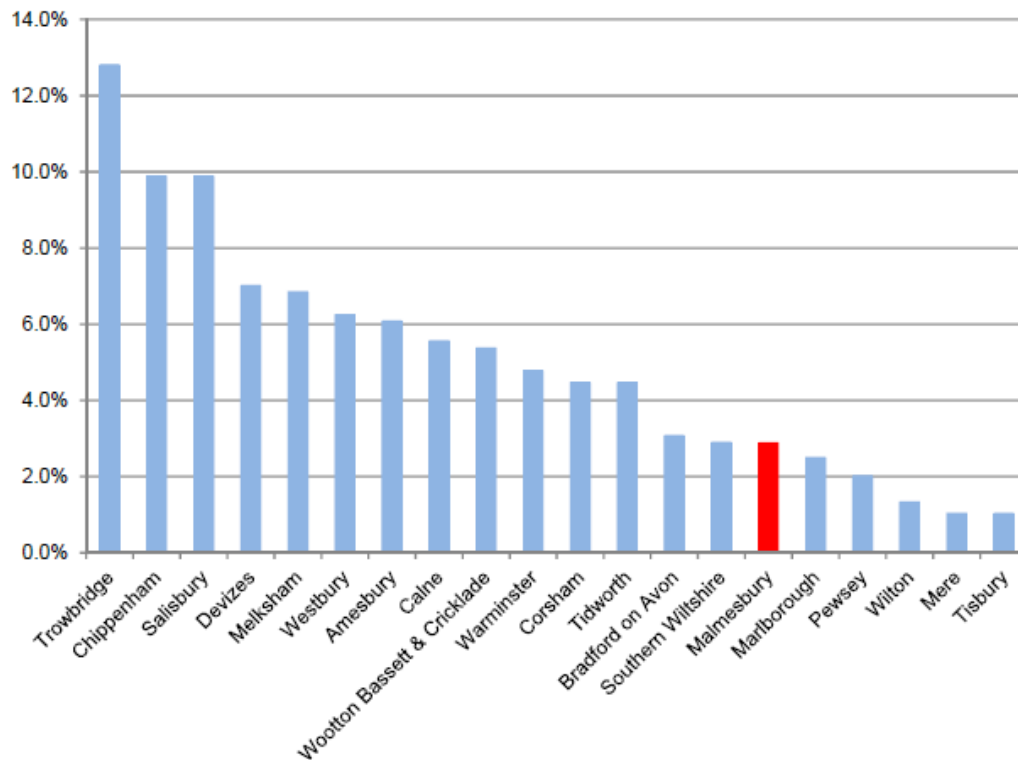


Source: Index of Multiple Deprivation 2010

Source: Joint Strategic Assessment for Malmesbury Community Area, 2011



**Figure 3.25: Percentage of Children in Poverty by Community Area, 2008**



Source: Joint Strategic Assessment for Malmesbury Community Area, 2011

The Joint Strategic Assessment notes that: "In Malmesbury Community Area, the percentages of the population who: feel that they belong to their immediate neighbourhood; participate in volunteering; and feel that they can influence decisions affecting their local area, are significantly higher than the Wiltshire averages."

A larger than average proportion of the parish population is white British, as indicated in Figure 3.26.



**Figure 3.26: Ethnicity, 2011**

## Ethnic group

	Persons	
	Crudwell Parish	
	count	%
All usual residents	1,057	100.0
White	1,043	98.7
English/Welsh/Scottish/Northern Irish/British	1,012	95.7
Irish	7	0.7
Gypsy or Irish Traveller	0	0.0
Other White	24	2.3
Mixed/multiple ethnic groups	10	0.9
White and Black Caribbean	5	0.5
White and Black African	0	0.0
White and Asian	2	0.2
Other Mixed	3	0.3
Asian/Asian British	4	0.4
Indian	3	0.3
Pakistani	0	0.0
Bangladeshi	0	0.0
Chinese	1	0.1
Other Asian	0	0.0
Black/African/Caribbean/Black British	0	0.0
African	0	0.0
Caribbean	0	0.0
Other Black	0	0.0
Other ethnic group	0	0.0
Arab	0	0.0
Any other ethnic group	0	0.0

In order to protect against disclosure of personal information, records have been swapped between different geographic areas. Some counts will be affected, particularly small counts at the lowest geographies

Source: ONS - 2011 Census (KS201EW)

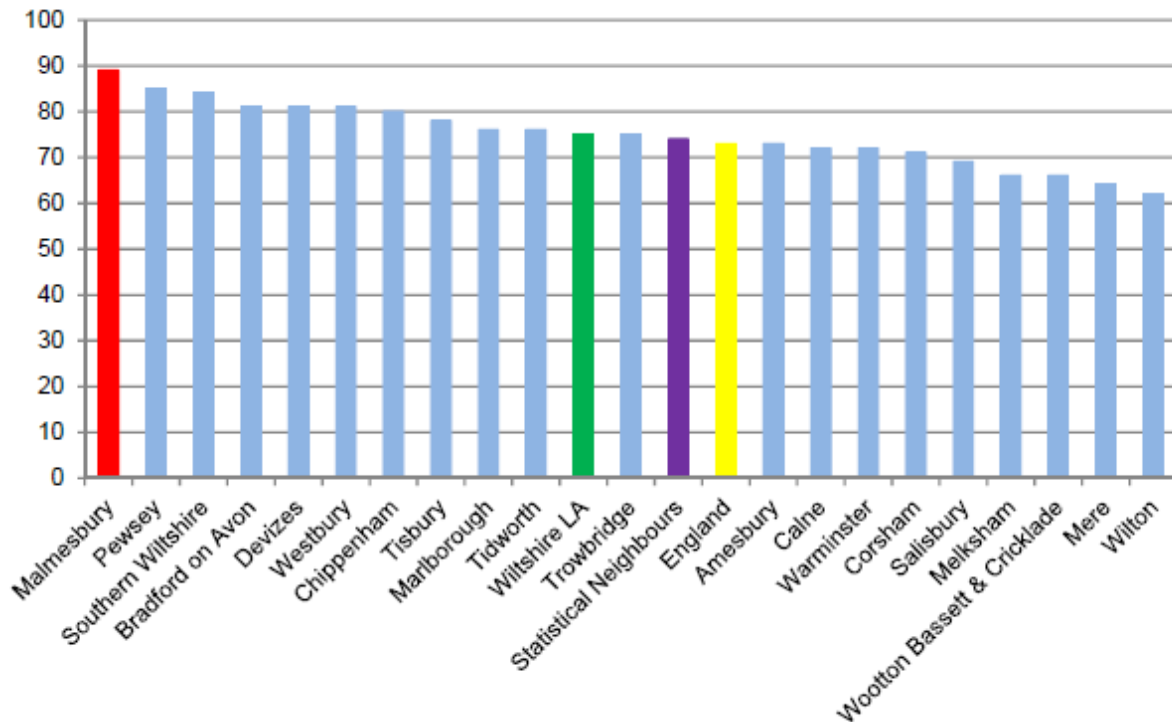
Source: 2011 Census, NOMIS

With regard to ethnicity as well as the needs of other minority groups, the Joint Strategic Assessment notes that: "There is a strong need for communities to be aware of cultural and religious diversity and to the needs of ethnic minority groups, disabled and lesbian, gay, bisexual and transgender groups. This can be challenging as the county is a largely rural area, therefore these people in minority groups are often isolated or not present in sufficient numbers to form organised groups."

## Education and Skills

Educational attainment in the Malmesbury Community Area generally is very high. The Community Area has the highest proportion of pupils achieving key stage 2 levels 4 and 5 at Year 6 of any community area in Wiltshire, and Wiltshire's performance overall is above the national average.

**Figure 3.27: Percentage of pupils achieving key stage 2, L4+ English and maths, 2010**



Source: Joint Strategic Assessment for Malmesbury Community Area, 2011

Crudwell village includes a primary school. The nearest secondary schools are at Malmesbury and Tetbury. Crudwell pre-school is located at the Village Hall.

Crudwell Church of England Primary School is located towards the northern end of Crudwell Village.

It was judged as Good in the March 2017 OFSTED inspection, and Outstanding for personal development, behaviour and welfare.

The school is currently operating at capacity, and expansion is an ongoing consideration. However, the school is in two ownerships, with the majority of the site being owned by Wiltshire Council while most of the buildings is owned by the Lord Lucas Trust.

Just under half of the school's pupils are from outside its catchment. This provides the opportunity for additional local children to be accommodated without necessarily needing to expand the school.

Parking at the school, particularly at school drop-off and pick-up times, is a long-standing issue that the Neighbourhood Plan is likely to need to consider regardless of other expansion plans.

## Transport

Crudwell is a rural parish so private car journeys will form the bulk of transport journeys, certainly for trips beyond the village.

Car ownership is high, as indicated in Figure 3.28.

**Figure 3.28: Car/Van Availability, 2011**

### Car or van availability

	Households	
	Crudwell Parish	
	count	%
All households	415	100.0
No cars or vans in household	15	3.6
1 car or van in household	115	27.7
2 cars or vans in household	196	47.2
3 cars or vans in household	63	15.2
4 or more cars or vans in household	26	6.3
sum of all cars or vans in the area	812	-

- These figures are missing.

Source: ONS - 2011 Census (KS404EW)

In order to protect against disclosure of personal information, records have been swapped between different geographic areas. Some counts will be affected, particularly small counts at the lowest geographies

Source: 2011 Census, NOMIS

Public transport is not a viable option for most journeys beginning or ending at Crudwell parish. Figure 3.29 shows that 22% of Crudwell's population live within 800m of an hourly weekday bus service compared to 47% for Wiltshire as a whole.

From Crudwell, five bus services run to Cirencester at roughly 2 hr intervals from 0745 till 1623 hrs. The return service from Cirencester runs seven times daily from 0701 to 1740 hrs but with no Sunday service. Bus services are also not timetabled to meet trains at Kemble station.

The provision of school bus services from outlying settlements has also been found to be poor.

Figure 3.29: Various transport related indicators

Indicator	Malmesbury Community Area	Wiltshire	England
<b>School travel</b>			
Mode share for travel to school by car/taxi (ages 5-10)	40%	41%	38.1%
Mode share for travel to school by car/taxi (ages 11-15)	12%	21%	20.5%
<b>Carriageway maintenance</b>			
Proportion of principal roads requiring maintenance †	16%	6%	n/a
Proportion of non-principal classified roads requiring maintenance †	12%	7%	n/a
<b>Bus services</b>			
Proportion of rural addresses within 800m of buses running hourly or better on weekdays 0900-1700 §	22%	47%	n/a
Passengers per hour boarding or alighting at Malmesbury Cross Hayes‡	16-29		
Bus punctuality: proportion of buses no more than 5 minutes late.	87%	81%	Not comparable with national indicator.

¶ Pupil-level survey January 2010, via DfT publication. Includes car-share

† Wiltshire Council condition survey data 2010/11

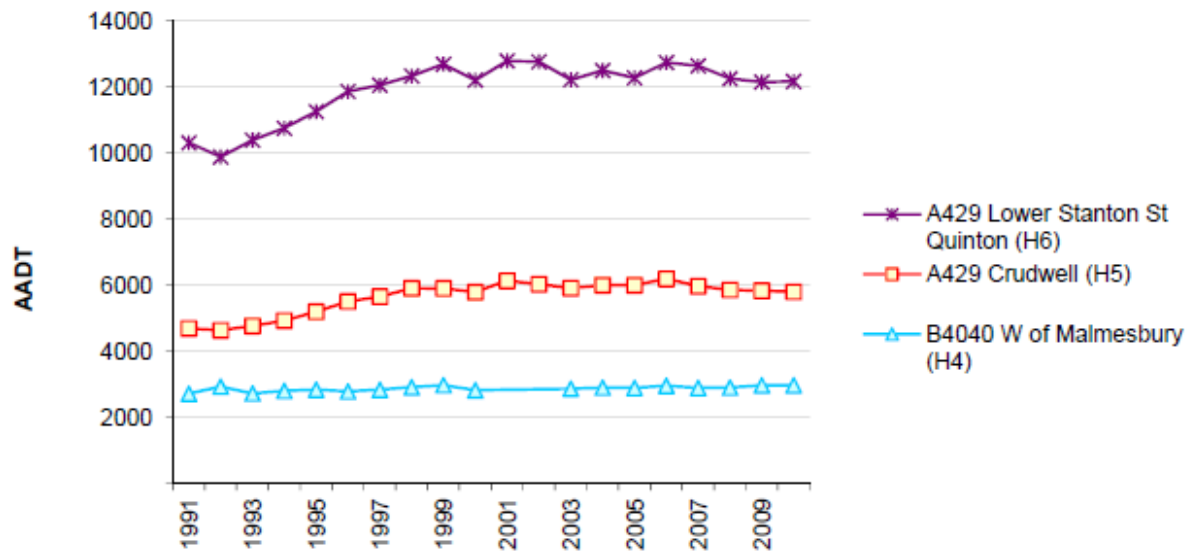
§ Electronic timetable data for October 2010

‡ Weekdays. Average per hour includes peak and off-peak times. Range of counts on different days. Data provides a rough guide only of bus use.

Source: Joint Strategic Assessment for Malmesbury Community Area, 2011

The A429 through Crudwell carries approximately 8,000 vehicles per day. This has multiple impacts that will need to be considered by the Neighbourhood Plan, including health and safety impacts, and community severance, particularly of the school and the majority of the village.

Figure 3.30: Average Annual Daily Traffic



Source: Joint Strategic Assessment for Malmesbury Community Area, 2011

## Economy and Enterprise

Figure 3.31 shows that 71.7% of Crudwell's population is economically active, compared with 69.9% nationally. 17.6% of Crudwell's population is retired compared with 13.7% nationally.

Figure 3.32 shows that the industries within which Crudwell's population work are generally reflective of the national situation. The most noticeable variations are that a greater proportion of Crudwell's population is in agriculture, professional, scientific and technical activities, and education than the national average, and a lower proportion is in wholesale and retail, and human health and social work activities.

Figure 3.33 shows that a greater proportion of Crudwell's population are managers, directors and senior officials or in professional, associate professional and technical occupations than the national average.



**Figure 3.31: Economic Activity**

## Economic activity

		Persons		Persons	
		Crudwell Parish		England Country	
		count	%		%
All usual residents aged 16 to 74		761	100.0		100.0
Economically active		546	71.7		69.9
In employment		514	67.5		62.1
Employee: Part-time		127	16.7		13.7
Employee: Full-time		257	33.8		38.6
Self-employed		130	17.1		9.8
Unemployed		20	2.6		4.4
Full-time student		12	1.6		3.4
Economically Inactive		215	28.3		30.1
Retired		134	17.6		13.7
Student (including full-time students)		32	4.2		5.8
Looking after home or family		32	4.2		4.4
Long-term sick or disabled		8	1.1		4.0
Other		9	1.2		2.2
Unemployed: Age 16 to 24		2	0.3		1.2
Unemployed: Age 50 to 74		8	1.1		0.8
Unemployed: Never worked		0	0.0		0.7
Long-term unemployed		6	0.8		1.7

In order to protect against disclosure of personal information, records have been swapped between different geographic areas. Some counts will be affected, particularly small counts at the lowest geographies

Source: ONS - 2011 Census (KS601EW)

(KS601EW)

geographies

Source: 2011 Census, NOMIS



**Figure 3.32: Industry**

**Industry**

		Persons		Persons
		Crudwell Parish		England Country
	count	%	%	
All usual residents aged 16 to 74 in employment the week before the census	524	100.0	100.0	
A Agriculture, forestry and fishing	13	2.5	0.8	
B Mining and quarrying	0	0.0	0.2	
C Manufacturing	43	8.2	8.8	
D Electricity, gas, steam and air conditioning supply	5	1.0	0.6	
E Water supply; sewerage, waste management and remediation activities	4	0.8	0.7	
F Construction	33	6.3	7.7	
G Wholesale and retail trade; repair of motor vehicles and motor cycles	64	12.2	15.9	
H Transport and storage	33	6.3	5.0	
I Accommodation and food service activities	34	6.5	5.6	
J Information and communication	34	6.5	4.1	
K Financial and insurance activities	26	5.0	4.4	
L Real estate activities	8	1.5	1.5	
M Professional, scientific and technical activities	47	9.0	6.7	
N Administrative and support service activities	24	4.6	4.9	
O Public administration and defence; compulsory social security	21	4.0	5.9	
P Education	65	12.4	9.9	
Q Human health and social work activities	45	8.6	12.4	
R, S, T, U Other	25	4.8	5.0	

In order to protect against disclosure of personal information, records have been swapped between different geographic areas. Some counts will be affected, particularly small counts at the lowest geographies

Source: ONS - 2011 Census (KS605EW) (KS605EW)

Source: 2011 Census, NOMIS

**Figure 3.33: Occupation**

**Occupation**

		Persons		Persons
		Crudwell Parish		England Country
	count	%	%	
All usual residents aged 16 to 74 in employment the week before the census	524	100.0	100.0	
1. Managers, directors and senior officials	105	20.0	10.9	
2. Professional occupations	144	27.5	17.5	
3. Associate professional and technical occupations	62	11.8	12.8	
4. Administrative and secretarial occupations	59	11.3	11.5	
5. Skilled trades occupations	53	10.1	11.4	
6. Caring, leisure and other service occupations	32	6.1	9.3	
7. Sales and customer service occupations	17	3.2	8.4	
8. Process plant and machine operatives	15	2.9	7.2	
9. Elementary occupations	37	7.1	11.1	

In order to protect against disclosure of personal information, records have been swapped between different geographic areas. Some counts will be affected, particularly small counts at the lowest geographies

Source: ONS - 2011 Census (KS608EW) (KS608EW)

Source: 2011 Census, NOMIS





### 4. Draft Vision and Objectives

A Vision and Objectives have been developed based on an initial round of public consultation undertaken in November/December 2017. These have been refined based on consultation in April and May 2018.

#### Draft Vision

"In 2026, the Parish of Crudwell will remain a vibrant, inclusive, rural community, which is home to residents of all generations.

The parish will ensure the facilities and infrastructure needed are in place to enable the community to remain vibrant and inclusive, and that the school, church, local businesses, village hall and recreation facilities will have been protected and enhanced where possible.

Any new residential development will meet the needs of those within the Parish, with a focus on enabling young adults to remain. Any development will have taken into account the views of the local community, and will be sensitively designed to reflect the attractive rural location and to protect the conservation area.

Public transport connections to Malmesbury and Kemble station will have been improved, as will the safety of road users around the parish."

The work on the neighbourhood plan to date has been based on four main chapters:

1. Development and Design
2. Infrastructure and Transport
3. Community and Leisure
4. Environment

These are reflected in the draft objectives below.

#### Draft Design and Development Objectives

1. To deliver new housing that meets local needs and is community led.
2. To ensure that the delivery of new homes is part of an overall plan to enhance infrastructure and community resources appropriately.
3. To protect and enhance our natural, built and historic environment, as a rural and agricultural community on the edge of the Cotswolds, by ensuring any new development is appropriately located and of a scale and design sympathetic to its surroundings.



### Draft Infrastructure and Transport Objectives

1. To deal with flooding and sewage issues, upgrading the systems in order to meet the current and future needs of our community.
2. To ensure a free and safe flow of traffic in our community, with any new development contributing towards this objective, and to ensure minimum impact on existing roads system, especially at junctions and in relation to the issue of parking around the primary school.
3. To ensure any development encourages sustainable forms of transport and specifically includes adequate and safe routes for walking, cycling and horse riding.
4. To nurture and protect Crudwell School.
5. To secure faster broadband speeds and better mobile phone coverage in the Parish, especially in the outlying areas and smaller villages.
6. To improve local bus services, adopting a more integrated approach to links with Malmesbury, Cirencester and Kemble railway station and with connecting services, to improve commuter connections and local journeys in line with the needs of the community.

### Draft Community and Leisure Objectives

1. To maintain, protect and enhance existing community facilities, especially school, church, local businesses, village hall and open spaces.
2. To protect and foster our vibrant and inclusive community by encouraging new facilities and small businesses in keeping with our growing community.
3. To improve recreation facilities and opportunities, especially for teenagers

### Draft Environment Objectives

1. To protect our local landscape to reflect its rural setting and its farming community
2. To protect and maintain our green spaces and natural environment
3. To protect our Conservation area
4. To preserve and improve our recreational open spaces
5. To improve promotion and enablement of recycling and waste reduction
6. To explore and exploit opportunities for green build standards, renewable energy

The draft policies and proposals set out in the draft neighbourhood plan were informed by a number of rounds of public consultation as well as discussions with statutory consultees and utilities providers.

## 5. Key Issues and Sustainability Objectives

The Sustainability Appraisal is based on a series of sustainability objectives which enable the neighbourhood plan to be described, analysed and compared. While not specifically required by the SEA Directive, objectives are a recognised way of considering the effects of a plan and comparing the effects of alternatives.

Sustainability appraisal objectives are different in concept and purpose from the objectives of the neighbourhood plan, though there is a degree of overlap. They provide a methodological framework against which to assess likely effects on the baseline set out above.

The Wiltshire Core Strategy Sustainability Objectives are as follows:

**Table 5.1: Sustainability Themes and Sustainability Appraisal Objectives from Wiltshire Core Strategy**

Sustainability theme	Sustainability appraisal objective
Biodiversity	1. Protect and enhance all biodiversity and geological features and avoid irreversible losses
Land and Soil Resources	2. Ensure efficient and effective use of land and the use of suitably located previously developed land and buildings
	3. Promote sustainable waste management solutions that encourage the reduction, re-use and recycling of waste
Water Resources and Flood Risk	4. Use and manage water resources in a sustainable manner
	5. Protect people and property from the risk of flooding
Air Quality and Environmental Pollution	6. Improve air quality throughout Wiltshire and minimise all sources of environmental pollution
Climatic Factors	7. Minimise our impacts on climate change and reduce our vulnerability to future climate change effects
Historic environment	8. Protect, maintain and enhance the historic environment
Landscapes	9. Conserve and enhance the character and quality of Wiltshire's rural and urban landscapes, maintaining and strengthening local distinctiveness and sense of place
Population and housing	10. Provide everyone with the opportunity to live in good quality, affordable housing, and ensure an appropriate mix of dwelling sizes, types and tenures
Healthy communities	11. Provide a safe and healthy environment in which to live
Inclusive Communities	12. Reduce poverty and deprivation and promote more inclusive and self-contained communities
	13. Improve equality of access to, and engagement in local, high-quality community services and facilities
Education and skills	14. Raise educational attainment levels across the authority and provide opportunities for people to improve their workplace skills
Transport	15. Reduce the need to travel and promote more sustainable transport choices
Economy and enterprise	16. Encourage a vibrant and diversified economy and provide for long-term sustainable economic growth
	17. Ensure adequate provision of high-quality employment land and diverse employment opportunities to meet the needs of local businesses and a changing workforce



As aspirational objectives, these also work for the Crudwell Neighbourhood Plan, although the baseline set out above suggests some additions and amendments. These are reflected in the Crudwell Neighbourhood Plan Sustainability Appraisal Objectives set out in Table 5.2 below.

**Table 5.2: Crudwell Neighbourhood Plan Sustainability Themes and Sustainability Appraisal Objectives**

<b>Sustainability Theme</b>	<b>Sustainability Appraisal Objective</b>
<b>Biodiversity</b>	1. Protect and enhance all biodiversity and geological features, whether protected via legislation or locally important, and avoid irreversible losses
<b>Land and Soil Resources</b>	2. Ensure efficient and effective use of land and the use of suitably located previously developed land and buildings
	3. Promote sustainable waste management solutions that encourage the reduction, re-use and recycling of waste
	4. Avoid the loss of Best and Most Versatile Agricultural Land
<b>Water Resources and Flood Risk</b>	5. Use and manage water resources in a sustainable manner
	6. Protect people and property from the risk of flooding and sewage overflow
<b>Air Quality and Environmental Pollution</b>	7. Improve air quality throughout Crudwell parish and minimise all sources of environmental pollution
<b>Climatic Factors</b>	8. Minimise the impacts on climate change and reduce Crudwell parish's vulnerability to future climate changes effects
<b>Historic Environment</b>	9. Protect, maintain and enhance Crudwell parish's historic environment
<b>Landscape</b>	10. Conserve and enhance the character and quality of the landscape in Crudwell parish's villages, hamlets and in the rural area, maintaining and strengthening local distinctiveness and sense of place
<b>Population and housing</b>	11. Provide good quality, affordable housing, and ensure an appropriate mix of dwelling sizes, types and tenures to meet local needs





Sustainability Theme	Sustainability Appraisal Objective
Healthy Communities	12. Provide a safe and healthy place in which to live
Inclusive Communities	13. Reduce poverty and deprivation and promote inclusiveness, and make Crudwell village in particular more self-contained
	14. Improve equality of access to, and engagement in local, high-quality community services and facilities
Education and Skills	15. Raise educational attainment levels across the parish and provide opportunities for children and adults to improve their education and skills locally
Transport	16. Reduce the need to travel and promote more sustainable transport choices for journeys within Crudwell village, within Crudwell parish and from the parish to elsewhere
Economy and Enterprise	17. Encourage a vibrant and diversified local economy which provides for long-term sustainable economic growth, and enable access to economic opportunities beyond the parish
	18. Ensure adequate provision of high-quality employment land and diverse employment opportunities to meet the needs of local businesses and a changing workforce
	19. Protect the long-term viability of local businesses and farming enterprises

## 6. Assessment of Reasonable Alternatives

A key element of the sustainability appraisal process is the appraisal of reasonable alternatives to the policies proposed.

In this context a number of reasonable alternatives have been considered in relation to the scale and location of housing proposed in the draft Crudwell Neighbourhood Plan. These are explained below.

### Dwelling Numbers

The adopted Wiltshire Core Strategy Core Policy 2 requires the delivery of 42,000 new dwellings between 2006 and 2026, of which 24,740 are to be delivered in the North and West Wilts Housing Market Area in which Crudwell is located.

Core Strategy Table 1 breaks this requirement down further into community areas and requires 885 dwellings to be delivered in Malmesbury and 510 in the rest of the Malmesbury Community Area (in which Crudwell is located), also by 2026.

Core Strategy Core Policy 1 notes 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.”

A Housing Needs Assessment (March 2018) has determined that the local housing need in Crudwell Parish is 20 to 25 dwellings by 2026 on sites large enough to deliver affordable homes.

At the same time, Wiltshire Council’s emerging Housing Site Allocations Plan proposed to identify a site for 40 dwellings in Crudwell village.

To support decision making on this element of the Crudwell Neighbourhood Plan, the Sustainability Appraisal process considered a number of options relating to the number of dwellings for which land should be identified in the neighbourhood plan.

The options are as follows:

1. Option 1: Delivery of fewer than 20 dwellings;
2. Option 2: Delivery of 20 to 25 dwellings to meet the identified local housing need.
3. Option 3: Delivery of more than 25 dwellings.

Table 6.1 below appraises these three options against the Sustainability Appraisal themes set out in section 3. Each option has been ranked to indicate how well they perform against the identified themes. Commentary is provided to explain the rankings.



**Table 6.1: Dwellings Numbers Sustainability Appraisal**

Sustainability Appraisal Theme	Commentary	Ranking		
		Option 1	Option 2	Option 3
<b>Biodiversity</b>	<p>Effects on biodiversity are likely to increase as housing numbers increase. Effects are likely to include habitat loss and direct and indirect effects on species.</p> <p>In this context, option 3 is likely to have the greatest magnitude of effect, while option 1 would have the least.</p> <p>On the other hand, a larger scale of housing delivery may increase opportunities for enhancements such as green infrastructure provision and enhancement of existing biodiversity networks and net gains in biodiversity value.</p> <p>On balance however, it was felt that any enhancements are unlikely to deliver a net enhancement to biodiversity, so the least number of homes was felt to perform best against this theme.</p>	1	2	3
<b>Land and soil resources</b>	<p>Effects on land and soil resources are expected to increase as more greenfield land is developed for housing or any other use. As dwelling numbers and development scale increases, this is more likely to impact on the best and most versatile agricultural land to be found generally between Tetbury Lane and Tuners Lane (see figure 8), and potentially elsewhere within the good to moderate agricultural land surrounding Crudwell Village.</p>	1	2	3
<b>Water resources and flood risk</b>	<p>The effect of new development on fluvial, surface water and groundwater flooding depends on their location and on the implementation of sustainable urban drainage systems.</p> <p>Some of the land around Crudwell Village is in flood zones 2 and 3, and local and national planning policy requires development in these areas to be avoided if possible.</p> <p>Core Strategy Policy 67 requires the implementation of Sustainable Urban Drainage (SUDs) to, firstly, reduce the quantity of surface water run-off, then slow it down to reduce its impact.</p> <p><u>If</u> the implementation of SUDs (as required by Wessex Water) is successful then this can be expected to reduce the rate at which surface water from the new development enters the existing sewerage network and thereby reduce the chance of any additional sewage flooding.</p> <p>To reduce existing flooding and sewage overflow problems would require substantial funding which could, in principle, be provided by a larger development.</p>	1	2	3



Sustainability Appraisal Theme	Commentary	Ranking		
		Option 1	Option 2	Option 3
	<p>However, in reality, the scale of development required to viably fund improvements to the existing waterways and sewage networks is likely to be so large that it would not conform with the overall settlement hierarchy set out in Core Strategy Policy 1.</p> <p>On balance therefore, it was felt that the larger the development, the greater the risk of harmful effects on water resources and flood risk.</p>			
<b>Air quality and environmental pollution</b>	<p>Existing air quality issues in the parish relates primarily to vehicle emissions, particularly on the A429, and other roads that can become congested in peak hours.</p> <p>The impact that any new development would have on vehicle emissions depends on the number of vehicle movements generated and the existing level of congestion that new development would add to.</p> <p>The number of vehicle movements generated is likely to increase as the scale of new development increases. Sustainable transport modes can be funded by new development but, in this rural location, new development is likely to lead to at least some additional vehicle traffic regardless of the sustainable transport measures put in place.</p> <p>There is likely to come a point where the development is large enough to be more self-contained, with the inclusion of employment, community facilities etc. However, this scale of development would be contrary to the settlement hierarchy set out in Core Strategy Policy 1.</p> <p>The location of new development is likely to impact on vehicle emissions in that it could exacerbate existing congestion problems. This is assessed later.</p> <p>On balance, it was felt that the larger the development, the greater the likelihood of harm in relation to air quality and environmental pollution.</p>	1	2	3
<b>Climatic factors</b>	<p>Climate change impacts include traffic generation, which is explained above, and energy generation.</p> <p>In both cases the impact increases with the size of development.</p> <p>The harm that results from energy generation can be mitigated if localised renewable energy generation is provided, and this is more likely to be viable on a larger development. In reality, the scale of development required to enable localised energy generation is likely to be beyond the scale of development implied by the Core Strategy settlement hierarchy so would conflict with Core Policy 1.</p> <p>It was felt, therefore, that climatic impacts would</p>	1	2	3



Sustainability Appraisal Theme	Commentary	Ranking		
		Option 1	Option 2	Option 3
	increase as development scale increased.			
<b>Historic Environment</b>	<p>The impact of development on Crudwell's environment depends on its scale, its location, particularly in relation to listed buildings and the conservation area, and its design.</p> <p>Development with no control over design can be assumed to be harmful, and the harm would increase with the scale of development. However, design is controlled by Core Policy 57, which explains the importance of locally distinctive design. A design guide is proposed as part of the neighbourhood plan to explain what this means in Crudwell parish.</p> <p>Development close to listed buildings or the conservation area can be assumed to be harmful unless its design is in keeping with those heritage assets. Harm can be mitigated by locating developments away from heritage assets.</p> <p>If we assume that design will be controlled by both the Core Strategy and the neighbourhood plan, then options 1 and 2 are unlikely to be large enough to "swamp" existing heritage assets. Option 3 starts to become of a scale where it might.</p>	1 =	1 =	3
<b>Landscape</b>	<p>As with the historic environment, the impact of development on the landscape depends on its location, scale and design.</p> <p>The effects of each of the three options are likely to be similar.</p>	1 =	1 =	3
<b>Population and housing</b>	<p>A local need exists for eight affordable homes.</p> <p>Based on Core Strategy Policy 43, affordable homes are to be provided on sites of five or more dwellings at a rate of 40%. Changes to Planning Practice Guidance explain that affordable housing can, in fact, only be required on sites of 10 or more.</p> <p>On that basis, the eight local affordable homes are best provided as part of an overall development of 20 homes, each on sites of 10 dwellings or more. Option 2 reflects this position, so is ranked 1<sup>st</sup>.</p> <p>Option 2 is unlikely to deliver the eight affordable homes on the waiting list but, in principle, these affordable homes could be provided on one or more exception sites instead, based on Core Strategy policy 44.</p> <p>Option 3 is likely to deliver more than the eight affordable homes required to meet local needs and would also result in a greater level of other effects on the basis that Crudwell is a rural parish. These are</p>	2	1	3





Sustainability Appraisal Theme	Commentary	Ranking		
		Option 1	Option 2	Option 3
	likely to include traffic increases and increases in demand for school places etc.  On that basis, the effects of option 1 are likely to be better than option 3.			
<b>Healthy communities</b>	Crudwell residents have a relatively long life expectancy. This could be attributed partly to the rural environment with relatively low levels of pollutants and good opportunities for rural recreation.  Equally, the rural nature of the parish makes walking to community facilities beyond those provided within Crudwell, which include the nearest primary care facilities, difficult.  In general, the larger the development, the greater the level of CIL that would be provided. Beyond a certain threshold, on site provision of additional health facilities would be required as part of any new development but that level of development would conflict with the Core Strategy settlement hierarchy.	3	2	1
<b>Inclusive communities</b>	As with healthy communities, the larger the development the greater the amount of CIL that would be provided and the greater the opportunity to fund inclusivity measures.  However, as a rural community, the identity of the community is likely to be harmed by a development that is larger than necessary. On that basis, option 2 is favoured over option 3.	3	1	2
<b>Education and skills</b>	Crudwell Primary School is currently operating at capacity.  It is assumed that new development would be required to make a contribution towards the impact of the additional children it generates, and this could be used to fund school expansion. However, space for expansion at the school is limited and might impact on heritage assets or traffic volumes.  Just under half of the school's pupils are from outside its catchment so, as long as the scale of growth in Crudwell's school age population is not too great, this provides the opportunity for additional local children to be accommodated without necessarily needing to expand the school.  On that basis, option 2 is favoured, with option 1 being 2 <sup>nd</sup> .	2	1	3
<b>Transport</b>	Transport impacts have been dealt with in various places above, particularly in the air quality section.  The effects can be assumed to increase as the scale of	1	2	3



Sustainability Appraisal Theme	Commentary	Ranking		
		Option 1	Option 2	Option 3
	development increases.  It could be argued that larger developments provide the opportunity to increase sustainable transport alternatives but, in reality, any development is likely to lead to some increase in vehicular traffic movements even if a large proportion of new movements are on foot, bicycle or public transport.			
<b>Economy and enterprise</b>	In general, the larger a housing development the greater the likelihood of also including some level of provision for employment.  Equally, new developments have the potential to provide additional employees to work in existing businesses.	3	2	1
<b>Totals</b>		21	21	34

On the basis of the above analysis, options 1 and 2 performed better than option 3. Option 2 was preferred because it provided a balance between the benefits of new housing provision, i.e. meeting local housing need (as long as the sites are each ten dwellings or more) with any potential harm, particularly in terms of flooding and impacts on heritage, landscape and biodiversity assets.

There is the potential to mitigate any harm further through the appropriate location of new development, and this is examined below.

## Housing Site Location

As set out above, on the basis of the principles set out in this sustainability appraisal the most sustainable approach to delivering new homes is for the Neighbourhood Plan to identify a housing site or sites to meet the identified local need for 20 to 25 dwellings on sites large enough for affordable housing to be provided, i.e. ten dwellings or more.

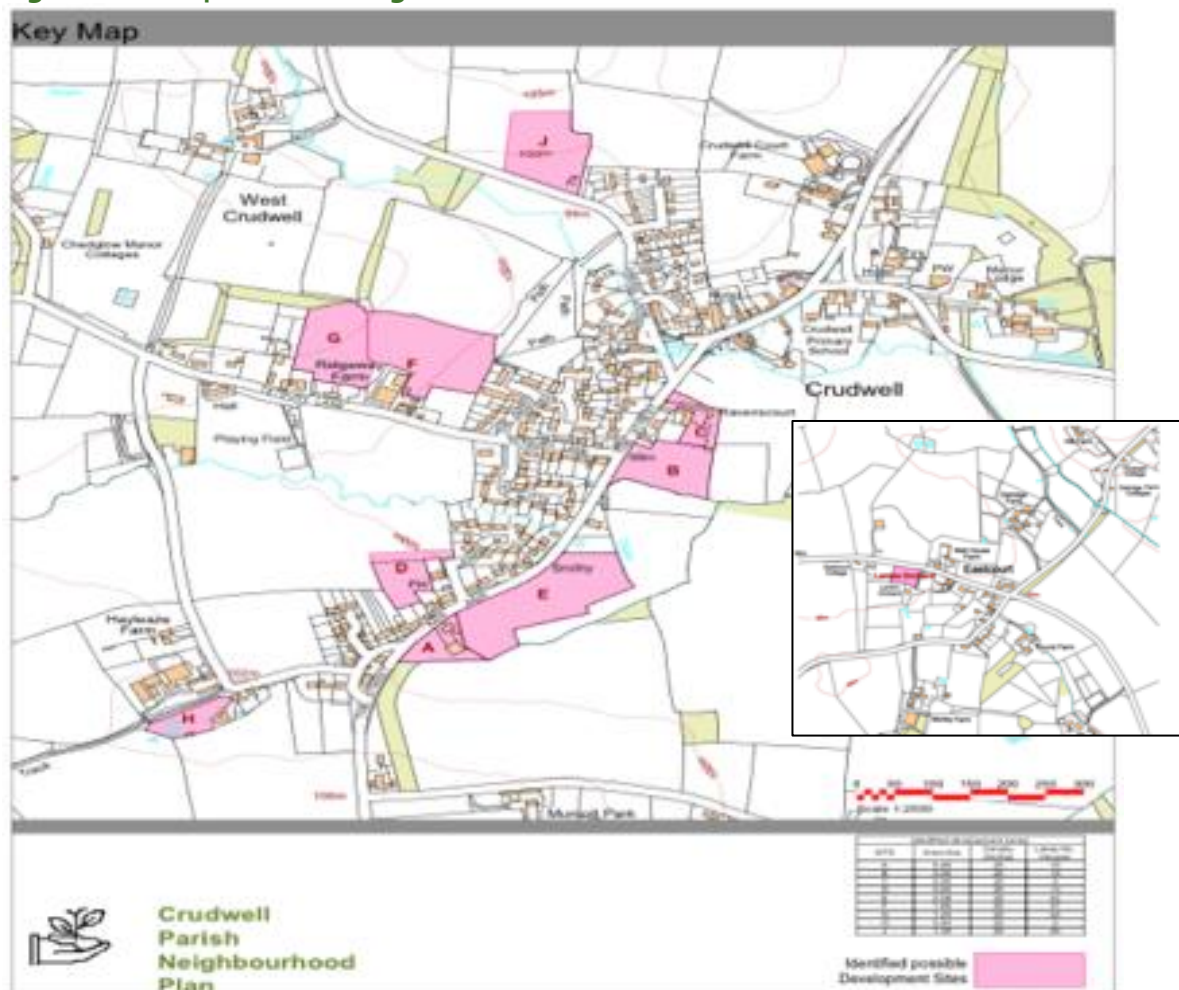
Potential housing sites were called for. A total of ten sites were proposed. These were:

1. Site A: Carpenters Yard
2. Site B: Coach House
3. Site C: Ravenscourt
4. Site D: West of Kings Meadow
5. Site E: Land adjacent Carpenters Yard
6. Site F: Ridgeway Farm Phase 2

7. Site G: Ridgeway Farm Phase 3
8. Site H: 4 Rommel Cottages
9. Site J: Tuners Lane
10. Site K: Eastcourt

These proposed sites are shown on Figure 6.2. More detail is included in the Design and Development Focus Group Final Report attached as an Appendix to the Consultation Statement.

**Figure 6.2: Proposed Housing Sites**



A number of sites were discounted before any more detailed assessment was undertaken. The reasons for doing so are set out below.

- Site K does not adjoin Crudwell Village. Crudwell Village is the only “large village” in the parish as defined by Core Strategy Policy 1, so its allocation above other sites that adjoin Crudwell Village would not accord with the Core Strategy.

- Sites A and B are not deliverable before 2026 according to the site owners. The delivery of site E before 2026 is not certain, so this site is also discounted at this stage.
- Site D cannot be accessed without acquiring third party land, and the third party has expressed an unwillingness to develop, so this site is not deliverable.
- Sites C and H have a capacity of fewer than ten dwellings, so the delivery of affordable housing on these sites is considered unlikely. As the sustainability appraisal focussing on dwelling numbers concluded that the most sustainable housing requirement was 20 to 25 dwellings on the basis that this would deliver eight affordable homes, these sites would not accord with the strategic sustainability assessment.
- Site G has also be discounted at this stage on the basis that its delivery relies on Ridgeway Farm Phase 2 (site F) being developed first in order to achieve access. The capacity of Ridgeway Farm phase 2 is greater than 25 dwellings, so to develop both phases 2 and 3 before 2026 would deliver an unsustainable number of homes at Crudwell before 2026 according to the dwelling numbers sustainability appraisal above.

On that basis, the more detailed sustainability appraisal below deals only with the following two sites:

1. Site F: Ridgeway Farm Phase 2
2. Site J: Tuners Lane

Each site was assessed against the sustainability appraisal themes. This appraisal is set out below. It includes an assessment of the likely effect, as follows:

Likely adverse effect	-
No/neutral effect	0
Uncertain effect	?
Likely positive effect	+

Commentary is provided to explain the appraisal against each theme.

**Table 6.3: Site F – Ridgeway Farm Phase 2**

Sustainability Appraisal Theme	Commentary	Likely effect
Biodiversity	According to data obtained from the Wiltshire and Swindon Biodiversity Records Centre (see data at Appendix 3), Great Crested Newt has been sighted in the waterway to the south of	-



Sustainability Appraisal Theme	Commentary	Likely effect
	<p>and parallel with Tetbury Lane, and near Tetbury Lane to the south west of the site (see map at Appendix 4).</p> <p>The site's development, including accessing it, would not appear to require the removal of any hedgerows, although provision of a footpath along Tetbury Lane is likely to lead to hedgerow removal.</p> <p>On the basis of both of these factors, the site's development is assumed to have an adverse effect on biodiversity.</p>	
Land and soil resources	<p>The site is greenfield.</p> <p>The Agricultural Land Classification Map South West Region (see Figure 3.10) suggests that the site is grade 2 – very good quality. On the basis that this suggests that it is best and most versatile agricultural land, its development is likely to have an adverse effect on land and soil resources.</p>	-
Water resources and flood risk	<p>This site lies entirely within flood zone 1, in which the risk of flooding is low.</p> <p>The drainage solution implemented for the phase 1 development, and proposed as part of the phase 2 planning application (18/05429/FUL) which coincides with site F, drains to the Swill Brook, which is the main source of fluvial flooding in the village. The Flood Risk Assessment and Drainage Strategy (June 2018) produced in support of the planning application proposes to restrict surface water discharge from the site to 15l/s.</p> <p>Regardless of this, if the site were to be allocated in this Neighbourhood Plan it would need to accord with draft policy IT1: Surface Water Drainage, which ensures that pre-development surface water flows are not exceeded and that, if possible, a 20% reduction is achieved. This would mean that, if the site was developed in accordance with the draft Neighbourhood Plan, it should not exacerbate existing surface water flooding problems. Nevertheless, this remains a risk.</p> <p>Wessex Water advises that there is sufficient capacity in the sewerage network to accommodate the scale of development envisaged by the neighbourhood plan, particularly following the removal of surface water run off flows from the school into the sewerage system (see Appendix 2).</p> <p>The site lies within Source Protection Zone 1 (see page 23) and potential adverse effects on water quality could arise from development. Any discharge into the local watercourses would need to be at a controlled rate.</p>	-
Air quality and environmental pollution	<p>The main air quality and environmental pollution issue in Crudwell results from vehicle movements and congestion. All developments can be expected to generate the same number of</p>	-





Sustainability Appraisal Theme	Commentary	Likely effect
	<p>movements per new dwelling.</p> <p>This site would need to access the road network via Tetbury Lane and then to the strategic road network via the existing Tetbury Lane/A429 junction. As set out in the transport effects section below, this junction is already congested at peak hours. On that basis, this site's development can be expected to exacerbate that existing congestion.</p>	
Climatic factors	<p>The impacts of climate change resulting from new development are similar regardless of their location. The construction process itself generates carbon emissions and the use of the homes once constructed generates carbon emissions both in terms of energy generation and transport. At a parish scale, the difference between the sites is likely to be imperceptible however.</p> <p>The risk of flooding and perceptions of flood risk are an issue in the parish, and some sites perform worse against this than others. Nevertheless, it was felt that each site should be described as having the same likely adverse effect.</p>	-
Historic Environment	<p>The Crudwell Neighbourhood Plan Heritage Appraisal, JME Conservation Ltd (Appendix 5) concludes:</p> <p><b>"Heritage Impacts Conclusion</b></p> <p>The recently constructed Phase 1 housing at Ridgeway Farm is clearly visible, because it is sited on a ridge and the upper parts of the buildings are seen against the skyline in views south and west across the village. The development of the second phase of this site will consequently impact upon the setting of the Crudwell Conservation Area boundary which skirts the adjacent meadow c&gt;120m from the nearest point of the proposed development site. There will be direct inter-visibility between the Ridgeway Farm Phase 2 site and the Conservation Area boundary and because the proposed development will be located on higher ground it will be more prominent within views to and from the Conservation Area.</p> <p>It is considered that without mitigation, the impact on these views would cause localised low-moderate harm to the setting of this part of the Conservation Area; however in the context of the Conservation Area as a whole any localised harm here would result in only minimal harm to the special significance of the Crudwell Conservation Area as a whole...</p> <p><b>Non-designated heritage assets</b></p> <p>The development will affect and potentially cause harm to the settings of two potential non-designated heritage assets... These are Malt House Cottage and April Cottage however these buildings are primarily of architectural and historic interest and the contribution made by the rural village edge setting to this</p>	-



Sustainability Appraisal Theme	Commentary	Likely effect
	<p>interest is small. Whilst the change to a slightly more developed setting would cause some harm it is considered that the impact on their overall significance would be negligible.</p> <p>There will however be a direct impact on part of the surviving area of ridge and furrow within the development site although the earthwork remains within the intervening field containing the public rights of way on the east side of this site will remain undisturbed. Surviving earthwork remains have the potential to be recognised as non-designated heritage assets, and the loss of part of the surviving area of these earthworks through development will result in harm to their significance. Because these remains would, if identified as non-designated heritage assets by the Council, have only low significance, their partial loss through development would only result in minor adverse environmental effect."</p>	
Landscape	<p>This site is situated to the rear of the recently developed Ridgeway Farm phase 1 site and is screened from views from Tetbury Lane by this development.</p> <p>The site is visible from nearby public views on public footpath CRUD9 and from more distant views from footpaths CRUD8, CRUD10 and from Tuners Lane (see Appendix C of Design and Development Focus Group Report).</p> <p>The site is visible from the conservation area, as described in the historic environment section above.</p> <p>In this context the site's development would cause some level of adverse landscape effect.</p>	-
Population and housing	This site is of a sufficient size to meet the identified local need for market and affordable homes.	+
Healthy communities	<p>Any development at Crudwell village of a given size is likely to have the same impact in terms of this theme.</p> <p>On that basis, each site is given a neutral effect rating.</p>	o
Inclusive communities	<p>Any development at Crudwell village of a given size is likely to have the same impact in terms of this theme.</p> <p>On that basis, each site is given a neutral effect rating.</p>	o
Education and skills	<p>Any development at Crudwell village of a given size is likely to have the same impact in terms of this theme.</p> <p>On that basis, each site is given a neutral effect rating.</p>	o
Transport	A traffic survey was undertaken on 6 <sup>th</sup> June, between 7.30am and 9.30am (see Appendix 6). During this time, a total of 214 vehicles were observed entering or leaving Tetbury Lane into or from the A429. This included queues of traffic up to a maximum of 6 cars long on 6 separate occasions attempting to turn into the A429.	-



Sustainability Appraisal Theme	Commentary	Likely effect
	<p>On that basis, any additional vehicles will be exacerbating existing traffic congestion issues.</p> <p>The maintainable highway on Tetbury Lane is shown in Appendix 7. There is no footpath along the first approximately 70 metres of Tetbury Lane from the A429, and again for approximately 75 metres from the western edge of The Dawneys to Ridgeway Cottage. Both of these stretches of Tetbury Lane have a minimum maintainable highway width of 4.0 metres. The first stretch is edged by private gardens bordered by walls, fences and hedges; the second stretch is bordered by a tall, dense hedgerow. This means that widening to enable the provision of a footpath would result in the loss of gardens and of important features including hedgerows.</p> <p>A new footpath has been provided as part of the Ridgeway Farm phase 1 from the western edge of Ridgeway Cottage. An alternative public footpath from the site to the north east runs across a field. This might replace journeys by foot in the dry summer months but is unlikely to be a realistic alternative in the winter.</p> <p>On the basis that this suggests both that traffic from this development would be entering an already sometimes congested road, and that it would appear not to be possible to provide a footpath alongside the entire length of Tetbury Road from the site to the A429, this site is considered to have a negative transport effect.</p>	
Economy and enterprise	<p>Any development at Crudwell village of a given size is likely to have the same impact in terms of improving the viability of local facilities and services and increasing the local workforce.</p> <p>On that basis, each site is likely to have a positive effect on this theme.</p>	+

**Table 6.4: Site J – Tuners Lane**

Sustainability Appraisal Theme	Commentary	Likely effect
Biodiversity	<p>Data obtained from the Wiltshire and Swindon Biodiversity Records Centre (see data at Appendix 3) and the baseline data set out above indicates that no protected habitats or species would be affected by this site's development.</p> <p>The site's development would, however, require the removal of at least a short stretch of the frontage hedgerow. Depending on the extent of hedgerow removal, this effect is likely to be adverse, although the impact is mitigated by a policy</p>	-



Sustainability Appraisal Theme	Commentary	Likely effect
	requirement to reprovide the hedgerow to the rear of the visibility splay.	
Land and soil resources	<p>The site is greenfield.</p> <p>The Agricultural Land Classification Map South West Region (see Figure 3.10) suggests that the site is grade 3 – good to moderate quality.</p> <p>It is therefore not known at this stage whether the site should be categorised 3a or 3b, and therefore whether the site is best and most versatile agricultural land. Nevertheless, the mapping suggests that the agricultural land quality is lower than the Ridgeway Farm site.</p>	o
Water resources and flood risk	<p>This site lies entirely within flood zone 1, in which the risk of flooding is low.</p> <p>A Drainage Strategy produced for the landowner by Quad Consult (see Appendix 8) proposes to drain the site to the Swill Brook, as it does now.</p> <p>If the site were to be allocated in this Neighbourhood Plan it would need to accord with draft policy IT1: Surface Water Drainage, which ensures that pre-development surface water flows are not exceeded and that, if possible, a 20% reduction is achieved. This would mean that, if the site was developed in accordance with the draft Neighbourhood Plan, it should not exacerbate existing surface water flooding problems. Nevertheless, this remains a risk.</p> <p>Wessex Water advises that there is sufficient capacity in the sewerage network to accommodate the scale of development envisaged by the neighbourhood plan, particularly following the removal of surface water run off flows from the school into the sewerage system (see Appendix 2).</p> <p>The site lies within Source Protection Zone 1 (see page 23) and potential adverse effects on water quality could arise from development. Any discharge into the local watercourses would need to be at a controlled rate.</p>	-
Air quality and environmental pollution	<p>The main air quality and environmental pollution issue in Crudwell results from vehicle movements and congestion. All developments can be expected to generate the same number of movements per new dwelling.</p> <p>This site would need to access the road network via Tuners Lane and then to the strategic road network via the existing Tuners Lane/A429 junction. As set out in the transport effects section below, this junction does not experience congestion currently. On that basis, this site's development would have a neutral effect.</p>	o



Sustainability Appraisal Theme	Commentary	Likely effect
Climatic factors	<p>The impacts of climate change resulting from new development are similar regardless of their location. The construction process itself generates carbon emissions and the use of the homes once constructed generates carbon emissions both in terms of energy generation and transport. At a parish scale, the difference between the sites is likely to be imperceptible however.</p> <p>The risk of flooding and perceptions of flood risk are an issue in the parish, and some sites perform worse against this than others. Nevertheless, it was felt that each site should be described as having the same likely adverse effect.</p>	-
Historic Environment	<p>The Crudwell Neighbourhood Plan Heritage Appraisal, JME Conservation Ltd (Appendix 5) concludes:</p> <p><b>"Heritage Impacts Conclusion</b></p> <p>... development of this site will not affect the settings or special significance of any heritage assets. Whilst the boundary of the Conservation Area is distantly visible from the site within is an area of modern housing and it is not considered that these views will affect the special significance of this part of the Crudwell Conservation Area.</p> <p>No Strategic Environmental Assessment would therefore be required in respect of development on this site."</p>	o
Landscape	<p>This site is situated at the eastern end of Tuners Lane. It slopes upwards from Tuners Lane itself.</p> <p>The site is visible from nearby public views on public footpaths CRUD8 and CRUD10, as well as from Tuners Lane, and in more distance views from footpath CRUD9 (see Appendix C of Design and Development Focus Group Report).</p> <p>The site is visible from the conservation area, as described in the historic environment above.</p> <p>In this context the site's development would cause some level of adverse landscape effect.</p>	-
Population and housing	<p>This site is of a sufficient size to meet the identified local need for market and affordable homes.</p>	+
Healthy communities	<p>Any development at Crudwell village of a given size is likely to have the same impact in terms of this theme.</p> <p>On that basis, each site is given a neutral effect rating.</p>	o
Inclusive communities	<p>Any development at Crudwell village of a given size is likely to have the same impact in terms of this theme.</p> <p>On that basis, each site is given a neutral effect rating.</p>	o
Education and skills	<p>Any development at Crudwell village of a given size is likely to have the same impact in terms of this theme. This primary</p>	o





Sustainability Appraisal Theme	Commentary	Likely effect
	<p>school is a little easier to access from this site than from the other two because of the existence of, or ability to provide, a public footpath along the length of Tuners Lane where this appears not to be possible from the other two sites, but this advantage is only small.</p> <p>On that basis, each site is given a neutral effect rating.</p>	
Transport	<p>A traffic survey was undertaken on 6<sup>th</sup> June, between 7.30am and 9.30am (see Appendix 6). During this time, a total of 84 vehicles were observed entering or leaving Tuners Lane into or from the A429. No queues of traffic were observed during this time. On the basis that traffic congestion is not an issue on Tuners Lane, this additional traffic is assumed to be acceptable.</p> <p>The maintainable highway on Tetbury Lane is shown in Appendix 7. A footpath exists along one or other side of Tuners Lane from the A429 for the first 300 metres approximately. The footpath stops at a parallel parking area before the road narrows with a verge in front of 17 Tuners Lane. This verge is part of the maintainable highway, and is approximately 6.0 metres wide at its narrowest point, so a footpath can be provided for this missing section. The site then begins, so the frontage is controlled by the landowner. On that basis, a footpath can be provided along the length of Tuners Lane.</p> <p>On the basis that this site would be accessing a road that does not currently experience congestion and that a footpath can be provided along the entire length of Tuners Lane from the site to the A429 this site is considered to have a neutral transport effect.</p>	o
Economy and enterprise	<p>Any development at Crudwell village of a given size is likely to have the same impact in terms of improving the viability of local facilities and services and increasing the local workforce.</p> <p>On that basis, each site is likely to have a positive effect on this theme.</p>	+

The above sustainability appraisal of the three deliverable sites is summarised in table 6.5 below.



**Table 6.5: Site Appraisal Summary**

Site	Sustainability Appraisal Theme												
	Biodiversity	Land & Soil Resource	Water Res & Flood Risk	Air Quality & Env	Climatic Factors	Historic Environment	Landscape	Population & Housing	Healthy Communities	Inclusive Communities	Education & Skills	Transport	Economy & Enterprise
Site F: Ridgeway Farm Phase 2	-	-	-	-	-	-	-	+	o	o	o	-	+
Site J: Tuners Lane	-	o	-	o	-	o	-	+	o	o	o	o	+

On this basis, the sustainability appraisal concludes that the Tuners Lane site is the most sustainable, and it is therefore proposed to allocate this site for 20 to 25 dwellings.

In order to mitigate the negative impacts of the development harm set out above, the policy includes a number of conditions described below:

1. Provide for the completion of the footpath along Tuners Lane from the site to the A429 – this ensures that residents of the Tuners Lane site will have the opportunity to walk on a footpath from the A429 to the site, and are therefore more easily able to access the village's facilities by foot.
2. Demonstrate that as much of the hedgerow fronting Tuners Lane is retained as is practicable, in relation to both the location of the access and visibility splays. Where any hedgerow is lost as a result of visibility splays, it must be reprovided immediately outside the splay – this ensures that biodiversity and landscape harm is minimised by reproviding as much hedgerow as possible.
3. Provide a landscaped boundary to the site on its western and northern boundary – this ensures that any landscape harm of developing the site is minimised, particularly when viewed from outside the village.
4. Provide for improved play facilities, particularly for older children/teenagers, at the village hall site
5. Demonstrate compliance with policies IT1 and IT2 – this cross references proposed policies relating to surface water and foul water drainage, to ensure that the development does not exacerbate existing problems.
6. Demonstrate compliance with the Crudwell Design guide (Policy DD3) – this cross references the proposed design policy to ensure that the design of the housing development is in keeping with the local Crudwell vernacular.



## 7. Appraisal of the Regulation 14 Draft Neighbourhood Plan

The Sustainability Appraisal is structured into the twelve sustainability appraisal themes set out in section 3. For each theme, the relevant sustainability appraisal objectives from section 5 are listed. The draft neighbourhood plan policies are assessed against these objectives. Where clear alternative approaches exist, these are described and appraised.

Every effort is made to predict effects accurately, although this is inherently challenging given the high level nature of the plan. It must be noted that there is no requirement to assess all alternatives, and this has not been done; the purpose of this sustainability appraisal is to demonstrate that the plan contributes to the achievement of sustainable development as required by law.

### Biodiversity

The sustainability appraisal objectives relating to the biodiversity theme are set out below.

Sustainability Theme	Sustainability Appraisal Objective
Biodiversity	1. Protect and enhance all biodiversity and geological features, whether protected via legislation or locally important, and avoid irreversible losses

There are no land based statutory biodiversity designations in Crudwell parish. The Cloatley Manor Farm Meadows SSSI adjoins the parish boundary, 3 kilometres from Crudwell village.

The parish includes a number of Priority Habitats, the most significant of which in terms of likely development is the deciduous woodland generally to the north east of Crudwell village, around the church and Manor Farm. The neighbourhood plan does not propose any development which would affect these Habitats.

Various protected species including bats and Great Crested Newt are known to inhabit parts of the parish, and data obtained from the Biodiversity Records Centre includes a Great Crested Newt sighting on Tetbury Lane, and another in a waterway further south. The proposed allocation of the site at Tuners Lane over Ridgeway Farm keeps development these sightings.

On that basis, the proposed allocation of the Tuners Lane site for housing best meets this sustainability appraisal objective.

More localised biodiversity which is not subject to any particular protection, such as hedgerows, water courses and green spaces, is valued locally.



The two deliverable development sites at Tuners Lane and Ridgeway Farm considered above are both likely to affect existing hedgerows. However, development of the Ridgeway Farm site is likely to require the removal of hedgerow off-site in order to deliver safe pedestrian access from the site to the A429, whereas the Tuners Lane site's development is likely to require the removal of hedgerow on-site in order to provide access and visibility. This latter impact is easier to mitigate, via the inclusion of a criterion requiring the re-provision of the hedgerow to the rear of the visibility splay.

More generally, proposed policy ENV1 is intended to emphasise the importance of these linear hedgerows and waterways from a biodiversity point of view by requiring the protection, enhancement and provision of these "corridors".

On that basis, the proposed policy helps to meet the above sustainability appraisal objective and therefore contributes to the achievement of sustainable development.

## Land and Soil Resources

The sustainability appraisal objectives relating to the land and soil resources theme are set out below.

Sustainability Theme	Sustainability Appraisal Objective
<b>Land and Soil Resources</b>	2. Ensure efficient and effective use of land and the use of suitably located previously developed land and buildings
	3. Promote sustainable waste management solutions that encourage the reduction, re-use and recycling of waste
	4. Avoid the loss of Best and Most Versatile Agricultural Land

According to Natural England's Agricultural Land Classification Map South West Region (ALCoo6), a roughly triangular area of land bordered approximately by Tetbury/Crudwell Lane, Fosse Way and Tuners Lane/Swill Brook is classified as grade 2 (very good) agricultural land.

The remaining land around Crudwell village is classified as grade 3 (good to moderate) agricultural land.

All other things being equal, it would be more sustainable to develop grade 3 land than grade 2 land. This is partly why the Tuners Lane site is proposed for allocation over the Ridgeway Farm site, the only other realistically deliverable site available.

At this stage the other land and soil issues set out in the baseline are not considered to influence the location of new development.



More generally, proposed policy ENV2 encourages renewable energy measures on existing homes and new renewable energy infrastructure, subject to a number of provisos relating to landscape and visual impacts, and amenity concerns.

To encourage renewable energy meets the sustainability appraisal objectives, and the conditions aimed at limiting harm meet other sustainability appraisal objectives, particularly those relating to the historic environment, landscape and healthy communities.

## Water Resources and Flood Risk

The sustainability appraisal objectives relating to the water resources and flood risk theme are set out below.

Sustainability Theme	Sustainability Appraisal Objective
Water Resources and Flood Risk	5. Use and manage water resources in a sustainable manner
	6. Protect people and property from the risk of flooding and sewage overflow

The baseline section of this Sustainability Appraisal explains that flooding from surface water and drains and waterways, including the Swill Brook, and from sewage overflow, is a particular problem in Crudwell.

Draft policy IT1 ensures that any development does not exacerbate this existing problem by limiting the rate of surface water run off from the developed site to no more than the run off from the site before it is developed and, ideally, for post development run off to be 20% less than pre development run off.

Draft policy IT2 ensures that new development discharges to the public sewer and that flow rates to the sewer are agreed, and therefore controlled, by Wessex Water.

In combination, these policies meet Sustainability Appraisal objective 6 in particular, to protect people and property from the risk of flooding and sewage overflow.

Any development will need to adhere to these policies, including the proposed allocation at Tuners Lane, and a specific criterion is included in draft policy DD1 to avoid any doubt about this.

## Air Quality and Environmental Pollution

The sustainability appraisal objectives relating to the air quality and environmental pollution theme are set out below.

Sustainability Theme	Sustainability Appraisal Objective
----------------------	------------------------------------





**Air Quality and  
Environmental  
Pollution**

7. Improve air quality throughout Crudwell parish and minimise all sources of environmental pollution

One of the most noticeable sources of pollution in Crudwell results from traffic using, and joining, the A429.

The Transport section below explains how the objective of reducing the need to travel and promoting more sustainable transport choices is being met.

Air quality is a function of traffic congestion. The two potentially deliverable housing sites considered for allocation, at Ridgeway Farm and Tuners Lane, were considered in the context of existing traffic levels.

The traffic surveys at appendix 6 show that existing levels of congestion are greater at the Tetbury Lane/A429 junction than at the Tuners Lane/A429 junction.

On the basis that a given size of housing development will create a given volume of additional traffic at a given time, development that results in additional traffic joining a more congested road will result in a greater ultimate level of congestion than development that results in additional traffic joining a less congested road.

As Tuners Lane is less congested than Tetbury Lane, additional housing development on Tuners Lane will lead to less long traffic queues than additional housing development on Tetbury Lane.

Additionally, environmental pollution can be minimised by ensuring that residents of new developments are encouraged to walk for short journeys around the village. One of the ways to do this is to provide safe access routes from the development to the village's facilities, and one of the ways to do this is to provide a footpath along the road.

It is easier to provide a footpath along the length of Tuners Lane from the site to the A429, than it is to provide a footpath along the length of Tetbury Lane from the Ridgeway Farm site to the A429. This means that it is easier to provide the infrastructure needed to encourage potential residents of the Tuners Lane development to walk for short journeys than it is to do the same for a potential residents at Ridgeway Farm.

The Tuners Lane site therefore meets the above Sustainability Appraisal objective better, and this is partly why the Tuners Lane site has been proposed for housing development over the Tetbury Lane site.

More generally, policy IT2 requires any proposals for new development to demonstrate how pedestrians can safely access the parish's facilities, with particular consideration to be given to the adequacy of the local footpath network, and policy DD2, dealing with windfall housing, requires the provision of safe pedestrian access to the village's facilities. These proposed policies are intended to encourage people to walk and thereby help to achieve the above sustainability appraisal objective.



Crudwell parish's impact on air quality includes its use of energy and fuel, particularly fossil fuels, and the way that waste is disposed of.

Proposed policy ENV2 encourages the introduction of renewable energy infrastructure both domestically and on a larger scale, subject to a number of caveats to minimise harm.

On that basis, the proposed policy helps to meet the above sustainability appraisal objective and therefore contributes to the achievement of sustainable development.

### Climatic Factors

The sustainability appraisal objectives relating to the climatic factors theme are set out below.

Sustainability Theme	Sustainability Appraisal Objective
Climatic Factors	8. Minimise the impacts on climate change and reduce Crudwell parish's vulnerability to future climate changes effects

Climatic factors resulting from development include the use of energy, and fossil fuels in particular, in the construction process and then in the use of the buildings once constructed. This includes transport and energy use.

Crudwell is affected by flooding resulting from heavy rainfall. Climate change is forecast to increase the frequency and severity of rainfall events, so the neighbourhood plan needs to take this into account if the above sustainability appraisal objective is to be met.

The potential impacts of flood risk are appraised in the Water Resources and Flood Risk section above, and the potential air quality and environmental pollution impacts are appraised in that section.

### Historic Environment

The sustainability appraisal objectives relating to the historic environment theme are set out below.

Sustainability Theme	Sustainability Appraisal Objective
Historic Environment	9. Protect, maintain and enhance Crudwell parish's historic environment



The attached Heritage Appraisal (Appendix 5) produced as part of the SEA screening process considered the potential for the two potentially deliverable housing sites at Tuners Lane and Ridgeway Farm to affect heritage assets,

This report concluded that development “at Ridgeway Farm has the greater potential to affect the setting and significance of both designated and non-designated heritage assets” when compared with the Tuners Lane site.

This is why the Tuners Lane site is considered to meet the above sustainability appraisal objective better, and partly why the Tuners Lane site is proposed to be allocated.

More generally, a number of proposed policies require the historic environment to be considered in determining planning applications. These include policy DD2 (windfall housing), policy DD3 (design), policy IT5 (mobile communications) and policy ENV2 (renewable energy).

This ensures that the impact of any proposals on the historic environment is minimised and that, where the harm is too great, the application can be refused.

## Landscape

The sustainability appraisal objectives relating to the landscape theme are set out below.

Sustainability Theme	Sustainability Appraisal Objective
Landscape	10. Conserve and enhance the character and quality of the landscape in Crudwell parish’s villages, hamlets and in the rural area, maintaining and strengthening local distinctiveness and sense of place

Crudwell parish does not include any statutory landscape designations, although the Cotswolds AONB borders its western boundary.

The analysis of the two potentially deliverable housing sites considered for allocation set out above indicates that there is little difference between the two sites in terms of landscape impact.

The Tuners Lane site is recommended for allocation for reasons relating to other sustainability themes, but the policy proposes to mitigate landscape harm by requiring the site’s outer boundaries to be landscaped, and by requiring the hedgerow on the site’s frontage to be reprovided if it needs to be removed to enable safe viability at the access.

More generally, proposed policy DD3 requires new developments to be locally distinctive, and the associated design guide sets out what this means in the context of Crudwell parish.



Furthermore, policy IT5 ensures that harm to the rural and village character that might otherwise be caused by proposals for mobile communication can be minimised, policy ENV2 requires similar consideration for renewable energy proposals and DD2 requires similar for windfall housing.

All these measures help to meet the above sustainability appraisal objective and ensure that the plan contributes to the achievement of sustainable development.

### Population and Housing

The sustainability appraisal objectives relating to the population and housing theme are set out below.

Sustainability Theme	Sustainability Appraisal Objective
Population and housing	11. Provide good quality, affordable housing, and ensure an appropriate mix of dwelling sizes, types and tenures to meet local needs

This sustainability appraisal objective is about providing the right number and type of home to meet local needs.

The assessment of reasonable alternatives in section 6 appraises the proposed dwelling numbers and the proposed housing site location, and these two appraisals in combination conclude that identifying a site at Tuners Lane for 20 to 25 dwellings is the most sustainable option, and therefore the best option for meeting the above sustainability appraisal objective.

Additionally, proposed policy DD2 supports proposals for new housing within the settlement boundary in certain circumstances. The policy requires the applicant to demonstrate that the proposal meets an identified need for homes in Crudwell, and lists some examples of the type of housing that the baseline analysis above suggests is needed.

This will help to meet the above sustainability appraisal objective further.

### Healthy Communities

The sustainability appraisal objectives relating to the healthy communities theme are set out below.

Sustainability Theme	Sustainability Appraisal Objective
Healthy Communities	12. Provide a safe and healthy place in which to live



As explained in the baseline section, the average life expectancy in the local area is higher than average.

In a parish with a relatively small and dispersed population, it would not be reasonable to expect significant health care provision within the parish, but we can provide people with the opportunity to exercise more.

One of the factors that led the Steering Group to choose to propose the allocation of the Tuners Lane site for housing over the Ridgeway Farm site was the relative ease with which a footpath can be provided from the site to the village's facilities. This means that it is easier to provide residents of the new housing site with at least the opportunity to walk safely to the school, church, the pubs, the village hall and the bus stop.

Policy DD1 also requires the site's developer to fund improvements to recreation provision for older children and teenagers at the village hall field.

Policy IT3 focusses on enabling pedestrians to walk safely from any new development to the village's facilities, and policy DD2, which enables the delivery of windfall housing, requires any new housing in the parish to provide safe vehicular access to the highway network and safe pedestrian access to the village's facilities.

These measures all enable safe movement around the village, and encourage people to walk, and this helps to improved safety and health and achieve this sustainability appraisal objective.

## Inclusive Communities

The sustainability appraisal objectives relating to the inclusive communities theme are set out below.

Sustainability Theme	Sustainability Appraisal Objective
Inclusive Communities	13. Reduce poverty and deprivation and promote inclusiveness, and make Crudwell village in particular more self-contained
	14. Improve equality of access to, and engagement in local, high-quality community services and facilities

The Housing Needs Assessment notes that Crudwell parish has a larger proportion of children and 45 to 74 year olds than Wiltshire, the South West or England as a whole, but a lower proportion of people over 75.

This is probably partly a function of the size of Crudwell village mainly, and the facilities available. Crudwell has a good school, which would encourage families with school aged





children, but very little sheltered housing or local primary medical care, which might discourage the elderly from living here.

Policy DD1 proposes to allocate a site for 20 to 25 new homes at Tuners Lane. Based on Wiltshire's Core Strategy, 40% of these homes will be affordable, to help to meet the needs of people who cannot afford to buy a house in Crudwell. This helps reduce deprivation and promotes inclusiveness.

Policy DD2 supports new housing with the settlement boundary, and encourages the provision of homes to meet local needs, for example for the elderly, again to promote inclusiveness.

Policy CL1 protects the primary school, an existing high quality community service, to ensure that access to it is maintained.

Policies IT4 and IT5 promote the provision of high quality internet access to new homes and businesses, and the provision of new telecommunications infrastructure in certain circumstances. Amongst many other advantages, high quality internet access allows people to find out easily what is going on in Crudwell, and it allows those less able to move about to continue to be involved.

On that basis the proposed Neighbourhood Plan policies help to achieve the above objectives.

The Steering Group has other ideas about the protection of community facilities and the provision of new facilities which will take some time to develop, so these are set out in the non-statutory projects section in the Plan.

## Education and Skills

The sustainability appraisal objectives relating to the education and skills theme are set out below.

Sustainability Theme	Sustainability Appraisal Objective
Education and Skills	15. Raise educational attainment levels across the parish and provide opportunities for children and adults to improve their education and skills locally

Pre-school education in Crudwell is provided at the Village Hall. Various policies in the draft Neighbourhood Plan aim to make it easier for people to access the pre-school safely and easily.

Crudwell Church of England Primary School provides high quality education and is an important community facility for the parish. The educational attainment of Crudwell parish's population is already high and this is partly as a result of the primary school.



Draft policy CL1 proposes to protect the school for educational uses to ensure that the parish continues to benefit from the primary school and that the parish's children continue to have the opportunity to receive good education.

The nearest secondary schools are at Malmesbury and Tetbury. Students need to be provided with the opportunity to get from Crudwell to these schools independently, and this means public transport. The Steering Group has begun to discuss ways to improve public transport provision to a number of key locations, including the secondary schools. This will take some time so this issue is covered in the non-statutory projects section of the neighbourhood plan.

The Steering Group is also aware of the need to enable improved adult education locally, and is in the early stages of looking into the provision of a community hub to provide the opportunity for adult education classes amongst other things. This is also a longer term project that is referred to in the non-statutory section of the neighbourhood plan.

### Transport

The sustainability appraisal objectives relating to the transport theme are set out below.

Sustainability Theme	Sustainability Appraisal Objective
Transport	16. Reduce the need to travel and promote more sustainable transport choices for journeys within Crudwell village, within Crudwell parish and from the parish to elsewhere

In a rural parish such as Crudwell, reducing the need to travel is primarily about ensuring that the village has a good range of facilities locally, ideally within walking distance.

Protecting the school for educational uses, as proposed in draft policy CL1 ensures that primary education is available nearby, which has the advantage in the context of this objective of providing some parents with the opportunity to walk their children to school rather than them needing to drive.

The protection of other facilities and the potential provision of a community hub are referred to in the non-statutory part of the neighbourhood plan, because these are aspirations that the Steering Group want to deliver but that will take a while to resolve.

Policies aimed at improving broadband (IT4) and mobile communications (IT5) have the advantage of enabling people to work from home, which reduces the need to commute.

Promoting more sustainable transport choices is partly about providing people with a safe and convenient walking route from home to the village's facilities.

As explained in the Air Quality and Environmental Pollution section above, the Tuners Lane site is proposed for allocation over others partly because the Steering Group concluded that



it is relatively easy to provide a footpath along the length of Tuners Lane. This provides the residents of the proposed homes with the opportunity, at least, of walking along a safe route to the village's facilities, and avoids them needing to drive. Proposed policy IT2 does similar.

Promoting more sustainable transport choices is also about improving public transport provision, in terms of routes, frequency of service and joined up timetabling, with trains at Kemble for example.

This is an issue that will take some time to resolve, but it is an aspiration of the neighbourhood plan, and is referred to in the non-statutory section.

These measures help to meet this sustainability objective and ensure that the plan contributes to the achievement of sustainable development.

## Economy and Enterprise

The sustainability appraisal objectives relating to the economy and enterprise theme are set out below.

Sustainability Theme	Sustainability Appraisal Objective
<b>Economy and Enterprise</b>	17. Encourage a vibrant and diversified local economy which provides for long-term sustainable economic growth, and enable access to economic opportunities beyond the parish
	18. Ensure adequate provision of high-quality employment land and diverse employment opportunities to meet the needs of local businesses and a changing workforce
	19. Protect the long-term viability of local businesses and farming enterprises

As far as employment is concerned, existing employment land is protected by the Wiltshire Core Strategy (although there is a need to investigate whether the Kemble Business Park is covered), so the focus of work on the neighbourhood plan so far has been to enable and encourage home-working via the provision of improved broadband (draft policy IT4) and mobile communications networks (draft policy IT5).

Policy DD2, which generally supports the provision of new homes within the settlement boundary, requires the new homes to meet an identified need. The list of potential types of home includes holiday accommodation because this provides the opportunity to grow local tourism.

The protection of the school in draft policy CL1 also helps to protect the jobs of the people employed at the school.



On that basis, the draft neighbourhood plan meets the sustainability appraisal objectives set out above.

## Appraisal Conclusions at this Current Stage

The above sustainability appraisal demonstrates that the draft neighbourhood plan policies help the plan to contribute to the achievement of sustainable development.

The focus of the plan, inevitably, is on the amount and location of new housing proposed. There is an identified local need for additional homes up to 2026 which the neighbourhood plan proposes to meet via a site for 20 to 25 homes at Tuners Lane.

This appraisal shows that meeting the identified local need in Crudwell village has a positive effect in terms of sustainability appraisal objectives relating to Population and Housing and Inclusive Communities. The same is the case for the windfall housing policy (draft policy DD2).

The appraisal demonstrates that the Tuners Lane site (draft policy DD1) is the most sustainable of the deliverable sites proposed via the Call for Sites process because of its relatively positive effect (or less negative effect) on sustainability appraisal objectives relating to Transport, the Historic Environment, Land and Soil Resources, Air Quality and Environment Pollution, Biodiversity and Healthy Communities.

Inevitably, any housing site will result in some negative impacts, so proposed policy DD1 includes a series of requirements intended to minimise and mitigate those negative impacts. These mitigate harm primarily in terms of sustainability appraisal objectives relating to the Historic Environment, Landscape, Healthy Communities and Transport.

Beyond that the draft policies dealing with surface water (IT1) and foul water drainage (IT2) have positive effects in terms of sustainability appraisal objectives relating to Water Resources and Flood Risk, Climatic Factors and Healthy Communities.

The draft policy dealing with highway safety (IT3) has positive effects in terms of sustainability appraisal objectives relating to Transport and Healthy Communities.

Draft policies encouraging broadband provision (IT4) and improved mobile communications networks (IT5) encourages homeworking with positive effects in terms of Transport and Economy and Enterprise. The restrictions in the policy ensure that any negative effects in terms of sustainability appraisal objectives relating to Landscape and Historic Environment are minimised and mitigated.

The draft policy protecting the school (CL1) has positive effects in terms of sustainability appraisal objectives relating to Education and Skills, Inclusive Communities, Transport, and Economy and Enterprise.



## Appendices





## **Appendix 1: Email from Martin Tidman, Wessex Water, dated 25<sup>th</sup> January 2018**

On 25 Jan 2018, at 15:36, Martin Tidman wrote:

Dear Sian and Mike,

The foul sewer network in Crudwell drains by gravity to Ridgeway pumping station in the centre of the village. Here is a brief summary of the points discussed this morning:

- Going back to 2007, there has been a history of flooding in the village, with a combination of fluvial flooding, overland flows, highway flooding and foul sewer flooding.
- Crudwell Parish Council engaged with the North Wiltshire Flood Group and over the years there have been several improvements made to the drainage systems to reduce the risk of flooding in the village. Danny Everett of Wiltshire Council has been instrumental in instigating a lot of these improvements along with the Environment Agency, Wessex Water, the Parish Council and local landowners.
- In 2011, Wessex Water completed a full drainage investigation of the foul sewer network in Crudwell and produced a verified computer model of the system. The final report identified a strategic solution to the sewer problems which centred around construction of a new storage tank and pumped overflow to the river adjacent to the existing pumping station. This scheme was not progressed because of the high cost but also the difficulty in obtaining approval for new overflows to the river network.
- Crudwell is one of a daisy chain of pumping stations which connect to Charlton and ultimately Malmesbury Treatment Works. Increasing the pumping rate at Crudwell would simply move the problem down to Hankerton.
- The foul sewer suffers from groundwater ingress during prolonged periods of wet weather when the groundwater table is high. During periods of river flooding and overland and highway flooding, surface water also enters our system through manhole covers and house gullies.
- Foul drainage from properties is very small compared to any surface water and groundwater flows, and across our region, new properties are required to provide separate systems of drainage so the roofs and paved areas drain to surface water drainage systems.
- In recent years, Wessex Water have looked to address the problem at source by reducing the amount of surface water and groundwater entering the foul sewer.
- In 2016, we completed a major scheme to remove a large amount of roof and paved area at the School from the foul sewer network. The scheme included construction of an attenuation pond to reduce the impact of run-off into the Swill Brook. In the past, the school has flooded as a result of overland flows from the highways, and the scheme allows for this floodwater to be diverted into the Swill Brook. The scheme reduces the amount of flow arriving at Ridgeway pumping station and therefore reduces the level of surcharging in the foul drainage system.
- We are currently carrying out extensive CCTV surveys to identify infiltration into the foul sewer network. Any sewers or manholes found to be leaking will be included in our sewer sealing programme to reduce surcharging in our system.

Regards,

Martin Tidman  
Principal Engineer  
Sewerage Planning Team  
Wessex Water



### Appendix 2: Email from David Martin, Wessex Water, dated 22<sup>nd</sup> June 2018

**From:** David Martin  
**Subject:** RE: Crudwell Drainage  
**Date:** 22 June 2018 at 17:48:26 BST  
**To:** Sian Burke-Murphy, Gillian Sanders  
**Cc:** Martin Tidman

Dear Sian,  
Thank you for your email. I have copied Gillian, who is probably best placed to reply.  
However, I know she is also on leave, so I can comment as follows.

The foul only flows (ie flow flushed from toilets, sinks etc) from 25 properties are very small and the existing sewers will cope in normal conditions. During heavy rainfall, flooding can occur, but the foul only flow from these new developments are insignificant compared to existing flows in the sewers.

The surface water flows (ie rainfall runoff from roofs) from new developments site should not be discharged into the foul sewers. The surface water flows are normally attenuated on the development site, to a rate to replicate the natural runoff rates, before being discharged into a local watercourse or soakaway to ground.

Martin mentioned our scheme that disconnected the school roof and the potential removal of infiltration from the existing system. The disconnection of the school roof easily offsets the flows from hundreds (probably thousands) of new foul only connections from houses.

Hope this helps  
Best regards  
David



**Appendix 3: Data Search for 1km area around Crudwell, Wiltshire and Swindon Biodiversity Records Centre, as at 25<sup>th</sup> June 2018**

*WILTSHIRE & SWINDON BIOLOGICAL RECORDS CENTRE*



**Data Search for 1 km area around Crudwell, Nr Malmesbury ST95292 92720**

**The information provided in the following report is confidential and must at all times be treated in accordance with the WSBRC Terms and Conditions of Data Use**

**These are available on our website at [www.wsbrc.org.uk](http://www.wsbrc.org.uk) > Request a Data Search.**

Data held by WSBRC is validated as fully as possible to ensure such factors as geographical and temporal accuracy of each record as well as formatting or inputting errors. Validation is done by manual checking as well as by automated routines within our database system. In addition, WSBRC staff and County Recorders, in particular, undertake verification of records ensuring that notable species or new records for an area are correctly identified. However, errors cannot be completely eliminated.

Local Wildlife Sites

File code	Grid Ref.	Site name	Area (Ha)	Site Description	Selection criteria	Source	Main Habitat	Latest Recorded Habitats
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None found in search area.

Local Geological Sites

File code	Grid Ref.	Site name	Area (Ha)	Source
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None found in search area.

Protected Road Verges

File code	Grid Ref.	Site name	Area (Ha)	Source
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None found in search area.

Statutory Sites

Site Type	Grid Ref.	Site name	Area (Ha)	Designation status	Main Habitat
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None found in search area.



# Crudwell Neighbourhood Plan: Sustainability Appraisal

## Protected & Notable Species

Taxon group	Species Name	Common Name	Grid Ref	Location	Date	Abundance	Comment	Status
flowering plant	<u>Leucojum aestivum</u>	Summer Snowflake	ST957929	All Saints, Crudwell ; All Saints, Crudwell Churchyard	01/01/1999-31/12/1999		Introduced 1997	County
flowering plant	<u>Berberis vulgaris</u>	Barberry	ST9591	Location withheld	08/09/2008	1+ Count	Not trimmed late summer but looks as though may have been earlier in summer, plenty of young growth [GR reduced due to sensitivity (R6)]	County
flowering plant	<u>Berberis vulgaris</u>	Barberry	ST9492	Location withheld	10/04/1991		In hedgerow near small pond south side of hedge [GR reduced due to sensitivity (R6)]	County
flowering plant	<u>Rosa rubiginosa</u>	Sweet-briar	ST957929	All Saints, Crudwell ; All Saints, Crudwell Churchyard	01/01/1999-31/12/1999		Planted 1990	County
insect - moth	<u>Pareulype berberata</u>	Barberry Carpet	ST9591	Location withheld	08/09/2008	2 Count of Larvae	2 Larvae c.3rd instar. [GR reduced due to sensitivity (R6)]	Sect.41, UKBAP, WCA5/9.1k/l, WCA5/9.1t, WCA5/9.4c
insect - moth	<u>Pareulype berberata</u>	Barberry Carpet	ST9492	Location withheld	31/08/2001			Sect.41, UKBAP, WCA5/9.1k/l, WCA5/9.1t, WCA5/9.4c
insect - moth	<u>Pareulype berberata</u>	Barberry Carpet	ST9492	Location withheld	19/06/2000			Sect.41, UKBAP, WCA5/9.1k/l, WCA5/9.1t, WCA5/9.4c
bony fish (Actinopterygii)	<u>Cottus gobio</u>	Bullhead	ST95919247	Swill Brook, UTSWI19	06/10/2000	1 Count	Stretch from ST95749262 to ST96029230	HSD2p
amphibian	<u>Triturus cristatus</u>	Great Crested Newt	ST958934	Crudwell	05/06/2008		Pond Reference 45	HabRegs2, HSD2p, HSD4, Sect.41, UKBAP, WCA5/9.4c
amphibian	<u>Triturus cristatus</u>	Great Crested Newt	ST957928	Crudwell	30/05/2008		Pond Reference 161	HabRegs2, HSD2p, HSD4, Sect.41, UKBAP, WCA5/9.4c



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amphibian	<u>Triturus cristatus</u>	Great Crested Newt	ST947925	Crudwell	05/06/2008		Pond Reference 32	HabRegs2, HSD2p, HSD4, Sect.41, UKBAP, WCA5/9.4c
amphibian	<u>Triturus cristatus</u>	Great Crested Newt	ST94757927 05	Crudwell, Tetbury Lane	21/09/2017	1 Count		HabRegs2, HSD2p, HSD4, Sect.41, UKBAP, WCA5/9.4c
amphibian	<u>Rana temporaria</u>	Common Frog	ST952925	Tuners LA Crudwell	24/09/2016	2 Count of Adult		HSD5
amphibian	<u>Rana temporaria</u>	Common Frog	ST951926	Crudwell	07/02/2006	1 Count	In garden pond [Unverified Record]	HSD5
amphibian	<u>Rana temporaria</u>	Common Frog	ST951926	Crudwell	11/03/2006	1 Count of Egg	In garden pond [Unverified Record]	HSD5
amphibian	<u>Rana temporaria</u>	Common Frog	ST951926	Crudwell	02/04/2006	1+ Count of Tadpole	In garden pond [Unverified Record]	HSD5
amphibian	<u>Rana temporaria</u>	Common Frog	ST951926	<u>Figheledean area</u>	01/06/2005	1+ Count of Adult	[Unverified Record]	HSD5
amphibian	<u>Rana temporaria</u>	Common Frog	ST951926	<u>Figheledean area</u>	11/02/2005	1 Count of Egg	First record of spawn here for the year [Unverified Record]	HSD5
amphibian	<u>Rana temporaria</u>	Common Frog	ST951926	Malmesbury, Crudwell, The Dawneys	28/06/2006	1 Count	Juvenile	HSD5
amphibian	<u>Rana temporaria</u>	Common Frog	ST951926	Malmesbury, Crudwell, The Dawneys	10/06/2006		Seen frequently in garden.	HSD5
amphibian	<u>Rana temporaria</u>	Common Frog	ST951926	Crudwell, MALMESBURY, SN16	06/01/1999	+ Count	Numerous frogs mate in the pond annually leaving vast quantities of spawn.	HSD5
amphibian	<u>Rana temporaria</u>	Common Frog	ST951926	Crudwell, Pond: G-a12	June 1999		Spawn. Numerous frogs mate in the pond annually	HSD5
reptile	<u>Anguis fragilis</u>	Slow-worm	ST95665929 30	All Saints Churchyard, Crudwell	19/06/2015	4 Count of Juvenile		Sect.41, UKBAP, WCA5/9.1k/l
reptile	<u>Anguis fragilis</u>	Slow-worm	ST95674929 64	All Saints Churchyard, Crudwell	19/06/2015	1 Count of Juvenile		Sect.41, UKBAP, WCA5/9.1k/l
reptile	<u>Anguis fragilis</u>	Slow-worm	ST956929	Crudwell, Churchyard	29/06/2006	1 Count	Juvenile. Golden specimen, about 8" long.	Sect.41, UKBAP, WCA5/9.1k/l





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reptile	<u>Anguis fragilis</u>	Slow-worm	ST956929	Compost bin of Gt Somerford Free Gardens	Summer 2005	4 Count	[Unverified Record]	Sect.41, UKBAP, WCA5/9.1k/l
reptile	<u>Natrix helvetica</u>	Grass Snake	ST951926	Malmesbury, Crudwell, The Dawneys	07/06/2006			Sect.41, UKBAP, WCA5/9.1k/l
reptile	<u>Natrix helvetica</u>	Grass Snake	ST951926	Crudwell, Pond: G-a12	June 1999		Numerous frogs mate in the pond annually <u>leavin</u>	Sect.41, UKBAP, WCA5/9.1k/l
bird	<u>Cuculus canorus</u>	Cuckoo	ST951926	Malmesbury, Crudwell, The Dawneys	20/05/2006		Adults	<u>BRed</u> , Sect.41, UKBAP
bird	<u>Cuculus canorus</u>	Cuckoo	ST951926	Malmesbury, Crudwell, The Dawneys	17/05/2006		Adults. Heard calling 6-6.30 a.m.	<u>BRed</u> , Sect.41, UKBAP
bird	<u>Cuculus canorus</u>	Cuckoo	ST951926	Crudwell	15/04/2006	1 Count	[Unverified Record]	<u>BRed</u> , Sect.41, UKBAP
terrestrial mammal	<u>Erinaceus europaeus</u>	West European Hedgehog	ST9592		2005		[GR imprecisely recorded]	Sect.41, UKBAP
terrestrial mammal	<u>Erinaceus europaeus</u>	West European Hedgehog	ST9592		2006	1 Count of Adult	[GR imprecisely recorded]	Sect.41, UKBAP
terrestrial mammal	<u>Erinaceus europaeus</u>	West European Hedgehog	ST9592		2006	1 Count of Juvenile	[GR imprecisely recorded]	Sect.41, UKBAP
terrestrial mammal	<u>Erinaceus europaeus</u>	West European Hedgehog	ST9592		2006	1 Count of Adult	[GR imprecisely recorded]	Sect.41, UKBAP
terrestrial mammal	<u>Erinaceus europaeus</u>	West European Hedgehog	ST951926	Crudwell village	31/05/2005	1 Count of Juvenile	<u>Unusual</u> sighting for this area [Unverified Record]	Sect.41, UKBAP
terrestrial mammal	<u>Erinaceus europaeus</u>	West European Hedgehog	ST952925	Tuners LA Crudwell	24/09/2016			Sect.41, UKBAP
terrestrial mammal	<u>Erinaceus europaeus</u>	West European Hedgehog	ST95181927 90		01/01/2016-31/12/2016			Sect.41, UKBAP
terrestrial mammal	<u>Chiroptera</u>	Bats	ST9592	Location withheld	12/01/1993	Bat site: Roost	ID: Droppings (expert) [GR reduced due to sensitivity (R6)]	County, HabRegs2, HSD2p, HSD4, Sect.41, UKBAP, WCA5/9.4c
terrestrial mammal	<u>Chiroptera</u>	Bats	ST9592	Location withheld	12/01/1993	Bat site: Roost	[GR reduced due to sensitivity (R6)]	County, HabRegs2, HSD2p, HSD4, Sect.41, UKBAP, WCA5/9.4c



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terrestrial mammal	<u>Eptesicus serotinus</u>	Serotine	ST9592	Location withheld	08/09/2016	Bat site: roost	[GR reduced due to sensitivity (R6)]	County, HabRegs2, HSD4, WCA5/9.4c
terrestrial mammal	<u>Myotis</u>	Unidentified Bat	ST9492	Location withheld	09/07/2015	+ Count ; Bat site: Roost	By droppings.	County, HabRegs2, HSD2p, HSD4, Sect.41, UKBAP, WCA5/9.4c
terrestrial mammal	<u>Myotis</u>	Unidentified Bat	ST9592	Location withheld	08/09/2016	Bat site: roost	[GR reduced due to sensitivity (R6)]	County, HabRegs2, HSD2p, HSD4, Sect.41, UKBAP, WCA5/9.4c
terrestrial mammal	<u>Myotis mystacinus/brandtii</u>	Whiskered/Brandt's Bat	ST9492	Location withheld	09/07/2015	Bat site: roost	[GR reduced due to sensitivity (R6)]	County, HabRegs2, WCA5/9.4c
terrestrial mammal	<u>Pipistrellus pipistrellus</u>	Common Pipistrelle	ST9492	Location withheld	09/07/2015	Bat site: roost	[GR reduced due to sensitivity (R6)]	County, HabRegs2, HSD4, WCA5/9.4c
terrestrial mammal	<u>Pipistrellus pipistrellus</u>	Common Pipistrelle	ST9592	Location withheld	08/09/2016	Bat site: roost	[GR reduced due to sensitivity (R6)]	County, HabRegs2, HSD4, WCA5/9.4c
terrestrial mammal	<u>Pipistrellus pipistrellus</u>	Common Pipistrelle	ST9492	Location withheld	09/07/2015	+ Count ; Bat site: Roost	By droppings.	County, HabRegs2, HSD4, WCA5/9.4c
terrestrial mammal	<u>Plecotus</u>	Long-eared Bat species	ST9592	Location withheld	08/09/2016	Bat site: roost	[GR reduced due to sensitivity (R6)]	County, HabRegs2, HSD4, Sect.41, UKBAP, WCA5/9.4c
terrestrial mammal	<u>Plecotus auritus</u>	Brown Long-eared Bat	ST9592	Location withheld	10/06/1993	Bat site: Roost	[GR reduced due to sensitivity (R6)]	County, HabRegs2, HSD4, Sect.41, UKBAP, WCA5/9.4c
terrestrial mammal	<u>Plecotus auritus</u>	Brown Long-eared Bat	ST9592	Location withheld	29/10/1996	bat Count ; Bat site: Roost	ID: Signs (drops/roost) [GR reduced due to sensitivity (R6)]	County, HabRegs2, HSD4, Sect.41, UKBAP, WCA5/9.4c
terrestrial mammal	<u>Lutra lutra</u>	European Otter	ST948921	Crudwell	06/10/2014	1 Count ; Otter: sighting	Visually - crossing main road on approach to Crudwell	HabRegs2, HSD2p, HSD4, Sect.41, UKBAP, WCA5/9.4c
terrestrial mammal	<u>Meles meles</u>	Eurasian Badger	ST948917	A429, south of Crudwell	02/05/2014	1 Count		PBA
terrestrial mammal	<u>Meles meles</u>	Eurasian Badger	ST943928	Chedglow, near to	18/03/1985			PBA
terrestrial mammal	<u>Arvicola amphibius</u>	European Water Vole	ST95549277	Swill Brook, UTSWI20	06/10/2000	5 Count of Signs ; Water Vole: Feeding remains	Stretch from ST95329277 to ST95749262	Sect.41, UKBAP, WCA5/9.4c
terrestrial mammal	<u>Arvicola amphibius</u>	European Water Vole	ST95549277	Swill Brook, UTSWI20	06/10/2000	16 Count of Droppings ;	Stretch from ST95329277 to ST95749262	Sect.41, UKBAP, WCA5/9.4c



## Crudwell Neighbourhood Plan: Sustainability Appraisal

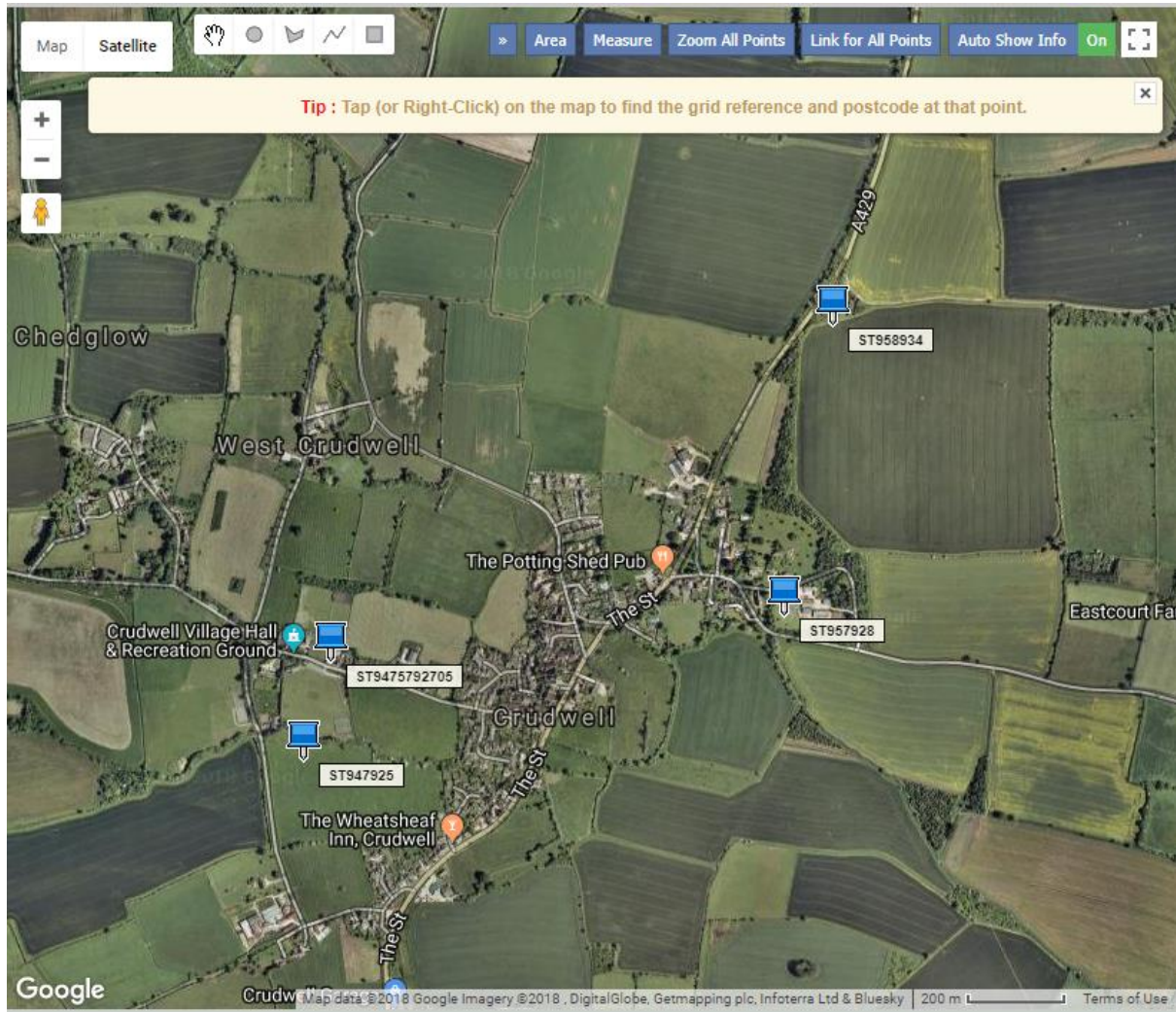
						Water Vole: Droppings		
terrestrial mammal	<u>Arvicola</u> <u>amphibius</u>	European Water Vole	ST95549277	Swill Brook, UTSWI20	06/10/2000	8 Count of Droppings ; Water Vole: Latrine	Stretch from ST95329277 to ST95749262	Sect.41, UKBAP, WCA5/9.4c
terrestrial mammal	<u>Arvicola</u> <u>amphibius</u>	European Water Vole	ST95549277	Swill Brook, UTSWI20	06/10/2000	1 Count of Burrow ; Water Vole: Burrow	Stretch from ST95329277 to ST95749262	Sect.41, UKBAP, WCA5/9.4c
terrestrial mammal	<u>Arvicola</u> <u>amphibius</u>	European Water Vole	ST95549277	Swill Brook, UTSWI20	06/10/2000	1 Count of Tracks ; Water Vole: Footprints	Stretch from ST95329277 to ST95749262	Sect.41, UKBAP, WCA5/9.4c
terrestrial mammal	<u>Arvicola</u> <u>amphibius</u>	European Water Vole	ST95919247	Swill Brook, UTSWI19	06/10/2000	24 Count of Signs ; Water Vole: Feeding remains	Stretch from ST95749262 to ST96029230	Sect.41, UKBAP, WCA5/9.4c
terrestrial mammal	<u>Arvicola</u> <u>amphibius</u>	European Water Vole	ST95919247	Swill Brook, UTSWI19	06/10/2000	80 Count of Droppings ; Water Vole: Droppings	Stretch from ST95749262 to ST96029230	Sect.41, UKBAP, WCA5/9.4c
terrestrial mammal	<u>Arvicola</u> <u>amphibius</u>	European Water Vole	ST95919247	Swill Brook, UTSWI19	06/10/2000	18 Count of Droppings ; Water Vole: Latrine	Stretch from ST95749262 to ST96029230	Sect.41, UKBAP, WCA5/9.4c
terrestrial mammal	<u>Arvicola</u> <u>amphibius</u>	European Water Vole	ST95919247	Swill Brook, UTSWI19	06/10/2000	1 Count of Burrow ; Water Vole: Burrow	Stretch from ST95749262 to ST96029230	Sect.41, UKBAP, WCA5/9.4c
terrestrial mammal	<u>Arvicola</u> <u>amphibius</u>	European Water Vole	ST95919247	Swill Brook, UTSWI19	06/10/2000	1 Count of Tracks ; Water Vole: Footprints	Stretch from ST95749262 to ST96029230	Sect.41, UKBAP, WCA5/9.4c
terrestrial mammal	<u>Arvicola</u> <u>amphibius</u>	European Water Vole	ST95919247	Swill Brook, UTSWI19	06/10/2000	1 Count of Tracks ; Water Vole: Pathway	Stretch from ST95749262 to ST96029230	Sect.41, UKBAP, WCA5/9.4c
terrestrial mammal	<u>Arvicola</u> <u>amphibius</u>	European Water Vole	ST955927	<u>Swillbrook</u>	2000	Water Vole: Latrine	2 Latrines	Sect.41, UKBAP, WCA5/9.4c



## Crudwell Neighbourhood Plan: Sustainability Appraisal

terrestrial mammal	<u>Arvicola amphibius</u>	European Water Vole	ST957926	<u>Swillbrook</u>	06/10/2000		Col & 8 <u>lats</u> bet 957926 & 953927	Sect.41, UKBAP, WCA5/9.4c
terrestrial mammal	<u>Arvicola amphibius</u>	European Water Vole	ST957927	<u>Swillbrook</u>	2000	Water Vole: Latrine	6 Latrines	Sect.41, UKBAP, WCA5/9.4c
terrestrial mammal	<u>Arvicola amphibius</u>	European Water Vole	ST958925	<u>Swillbrook</u>	2000	Water Vole: Latrine	9 Latrines	Sect.41, UKBAP, WCA5/9.4c
terrestrial mammal	<u>Arvicola amphibius</u>	European Water Vole	ST959924	<u>Swillbrook</u>	2000	Water Vole: Latrine	4 Latrines	Sect.41, UKBAP, WCA5/9.4c
terrestrial mammal	<u>Arvicola amphibius</u>	European Water Vole	ST960923	<u>Swillbrook</u>	06/10/2000		Col & 18 <u>lat</u> bet 960923 & 957926	Sect.41, UKBAP, WCA5/9.4c
terrestrial mammal	<u>Arvicola amphibius</u>	European Water Vole	ST960923	<u>Swillbrook</u>	2000	Water Vole: Latrine	4 Latrines	Sect.41, UKBAP, WCA5/9.4c
terrestrial mammal	<u>Arvicola amphibius</u>	European Water Vole	ST961923	<u>Swillbrook</u>	2000	Water Vole: Latrine	1 Latrines	Sect.41, UKBAP, WCA5/9.4c
terrestrial mammal	<u>Arvicola amphibius</u>	European Water Vole	ST9592	Crudwell + Swill Brook + T Feeder	1982	Water Vole: Sighting	Live Sight [GR imprecisely recorded]	Sect.41, UKBAP, WCA5/9.4c
terrestrial mammal	<u>Lepus europaeus</u>	Brown Hare	ST9493		11/06/2007		[GR imprecisely recorded]	Sect.41, UKBAP
terrestrial mammal	<u>Lepus europaeus</u>	Brown Hare	ST9493		06/05/2008		[GR imprecisely recorded]	Sect.41, UKBAP

## Appendix 4: Map showing location of Great Crested Newt sightings based on Biodiversity Records Centre data in Appendix 3







## Appendix 5: Crudwell Neighbourhood Plan Heritage Appraisal, JME Conservation Ltd, August 2018

# Crudwell Development Plan Heritage Appraisal.



JME Conservation Ltd.

August 2018

## Draft Crudwell Development Plan Heritage Appraisal

JME Conservation Ltd. has been commissioned during preparation of the draft Crudwell Neighbourhood Plan to undertake an assessment of two potential development sites in Crudwell to identify whether development would result in **Significant Environmental Effects** on heritage assets such that a **Strategic Environmental Assessment** would be required. The scope of this assessment was therefore to identify whether any heritage assets or their settings would be affected by development on the identified sites. This is in order to ensure that the plan will satisfy the requirements in respect of Sustainable Development set out in the NPPF (2018 edition) and those enshrined within Sections 66.(1) and 72.(1) of the 1990 Planning, (Listed Buildings and Conservation Areas) Act that development preserves from harm the settings of any affected listed buildings and the Crudwell Conservation Area.

### Summary:

Assessment of the two sites identified by Crudwell Parish Council has shown that there are no designated heritage assets (Listed buildings or Conservation Areas) directly affected by development on either site. Development on the Ridgeway Farm site will however potentially have a localised adverse effect on the setting of the Conservation Area because of its proximity and its prominence on higher ground. In the context of the Conservation Area as a whole this localised impact on setting will however result in only minimal harm to its overall significance as a designated heritage asset.

Whilst the Tuners Lane site will be locally prominent it is not considered that development on this site would affect the setting or significance of any Designated or Non-designated Heritage Assets.

Three potential non-designated heritage assets have been identified during assessment of the Ridgeway Farm site. These are sites that the Council may consider to be non-designated heritage assets on account of their architectural, historic or archaeological significance. Two of these site are buildings of potential local interest and the development will affect their settings whilst the third site is an area of medieval ridge and furrow earthworks, part of which will be destroyed should this site be developed.

However even if the Council recognizes these sites as non-designated heritage assets, the lower significance of non-designated heritage assets means that the impact of development of the Ridgeway site on these assets would not have a Significant Environmental Effect and it is our professional advice that a SEA would not be required on Heritage grounds.

JME Conservation Ltd

August 2018.

### **Background Planning information:**

Detailed guidance on the assessment of impacts of development on heritage assets-whether designated or not - has been provided by Historic England in three guidance notes in their Good Practice Advice in Planning Series. Planning Note 1 *The Historic Environment in Local Plans*, March 2015; Note 2: *Managing significance in decision taking*, (2015) and Note 3: *The setting of Heritage assets* (2<sup>nd</sup> edition Dec 2017). This assessment follows the Historic England guidance.

### **Definitions:**

A **Heritage Asset** is defined within the glossary of the NPPF as: “A building, monument, site, place, area or landscape identified as having a degree of significance meriting consideration in planning decisions, because of its heritage interest. Heritage asset includes designated heritage assets and assets identified by the local planning authority (including local listing).

**Designated heritage assets** include Listed Buildings, Conservation Areas, Scheduled Monuments, and Registered Parks and Gardens. With the exception of registered parks and gardens these are all statutorily protected and the courts have held that the statutory requirement to preserve the special character of listed buildings and their settings has to be given great weight.

As the definition of heritage assets set out in the NPPF makes clear, impacts of development upon non-designated heritage assets (assets identified by the local planning authority) and their settings is a material consideration. Examples of non-designated heritage assets include archaeological sites identified on the Council's Historic Environment Record and buildings which have been identified as locally important. Other unlisted historic buildings making a significant local contribution to the character of the area may also be identified as non-designated heritage assets and the value of these buildings to the local community is also a material consideration during the planning process and should be considered during preparation of this neighbourhood plan. Part of this assessment process has included identification of buildings that have the potential to be recognized as non-designated heritage assets.

Also important is the definition of significance set out in the NPPF because it is the impact of development upon the significance of a heritage asset that has to be considered when considering the effects of development.

**“Significance** (for heritage policy): *The value of a heritage asset to this and future generations because of its heritage interest. That interest may be archaeological, architectural, artistic or historic. Significance derives not only from a heritage asset's physical presence, but also from its setting.*”

**Setting of a heritage asset:** *The surroundings in which a heritage asset is experienced. Its extent is not fixed and may change as the asset and its surroundings evolve. Elements of a setting may make a positive or negative contribution to the*

*significance of an asset, may affect the ability to appreciate that significance or may be neutral.*

### **Relevant Planning Policies:**

Paragraphs 184-141 of the NPPF provide the national policy context which should be followed when Heritage Assets are affected by development proposals.

Paragraph 184 of the NPPF states that *“Heritage assets range from sites and buildings of local historic value to those of the highest significance, such as World Heritage Sites which are internationally recognised to be of Outstanding Universal Value<sup>61</sup>. These assets are an irreplaceable resource, and should be conserved in a manner appropriate to their significance, so that they can be enjoyed for their contribution to the quality of life of existing and future generations”*

Paragraph 185 of the NPPF states that *Plans should set out a positive strategy for the conservation and enjoyment of the historic environment, including heritage assets most at risk through neglect, decay or other threats. This strategy should take into account:*

- *the desirability of sustaining and enhancing the significance of heritage assets and putting them to viable uses consistent with their conservation;*
- *the wider social, cultural, economic and environmental benefits that conservation of the historic environment can bring;*
- *the desirability of new development making a positive contribution to local character and distinctiveness; and*
- *opportunities to draw on the contribution made by the historic environment to the character of a place.”*

Paragraph 189 of the NPPF states that *...local planning authorities should require an applicant to describe the significance of any heritage assets affected, including any contribution made by their setting.....*

Paragraph 190 of the NPPF states that *“Local planning authorities should identify and assess the particular significance of any heritage asset that may be affected by a proposal (including by development affecting the setting of a heritage asset) taking account of the available evidence and any necessary expertise. They should take this assessment into account when considering the impact of a proposal on a heritage asset, to avoid or minimise conflict between the heritage asset’s conservation and any aspect of the proposal.”*

Paragraph 193 of the NPPF states that *“When considering the impact of a proposed development on the significance of a designated heritage asset, great weight should be given to the asset’s conservation (and the more important the asset, the greater the weight should be). This is irrespective of whether any potential harm amounts to substantial harm, total loss or less than substantial harm to its significance.”*

Paragraph 194 of the NPPF states that *“Any harm to, or loss of, the significance of a designated heritage asset (from its alteration or destruction, or from development within its setting), should require clear and convincing justification.”*

Paragraph 196 of the NPPF planning states that *“Where a development proposal will lead to less than substantial harm to the significance of a designated heritage asset, this harm should be weighed against the public benefits of the proposal...”*

Paragraph 197 of the NPPF states that *“The effect of an application on the significance of a non-designated heritage asset should be taken into account in determining the application. In weighing applications that affect directly or indirectly non designated heritage assets, a balanced judgement will be required having regard to the scale of any harm or loss and the significance of the heritage asset.”*

Paragraph 197 of the NPPF states that *“Local planning authorities should look for opportunities for new development within Conservation Areas and World Heritage Sites, and within the setting of heritage assets, to enhance or better reveal their significance. Proposals that preserve those elements of the setting that make a positive contribution to the asset (or which better reveal its significance) should be treated favourably”.*

At local level, Wiltshire Council’s Core Strategy provides the framework for the determination of planning policy within the county. **Policy 58 Ensuring the conservation of the historic environment** states: *“Development should protect, conserve and where possible enhance the historic environment. Designated heritage assets and their settings will be conserved, and where appropriate enhanced in a manner appropriate to their significance.....Distinctive elements of Wiltshire’s historic environment, including non-designated heritage assets, which contribute to a sense of local character and identity will be conserved, and where possible enhanced. The potential contribution of these heritage assets towards wider social, cultural, economic and environmental benefits will also be utilised where this can be delivered in a sensitive and appropriate manner in accordance with Core Policy 57 (Ensuring High Quality Design and Place Shaping).”*

### **Crudwell Village history and development**

The historic core of Crudwell is round the medieval church and manor house, with subsequent expansion to the west along The Street. The first maps record this expansion during the 18<sup>th</sup> century. The *Victoria County History of Wiltshire* (vol 14 pp 55-61) records the development of the settlement noting that there was a cluster of buildings around the junction between Tuners Lane and The Street (shown on the 1773 edition of the Andrews and Drury map of Wiltshire). The village also expanded to the southwest along The Street at the end of the 18<sup>th</sup> century, when road improvements resulted in a better connection to the main Malmesbury-Cirencester road. These three areas all lie within the Crudwell Conservation Area which was designated on 24th January 1975. It lacks a formal Character Appraisal and its boundaries have not been subsequently reviewed.

Tuners Lane runs northwards from its junction with The Street, to the west of a small triangular village green. On either side of the lane is 20<sup>th</sup> century housing. On the west side at the start of the lane is a cul-de-sac (The Ridgeway); and beyond this is a more informal group of historic properties that front the green and a small un-named



access track which runs west into the adjacent fields. Beyond these is a crescent of houses that extends to the settlement boundary, adjacent to allotments. On the east side of the lane is a series of cul-de-sacs (including Days Court and Brookside) developed as three phases of council housing along this side of Tuners Lane.



Photo 1 Tuners Lane Site looking south with the adjacent housing estate on the east and the Ridgeway Site just visible on the skyline to the right.



Photo 2 Ridgeway Farm Site seen from the site boundary looking west towards the initial phase of development.

To the west of the development along Tuners Lane is a field of pasture enclosed by hedgerows which rises from Turners Lane southwards to The Dawneys housing estate off Tetbury Lane. A series of well-used footpaths cross this field which contains the earthwork remains of medieval ridge and furrow cultivation. The Conservation Area boundary follows the eastern boundary of this field, although it excludes The Dawneys housing estate.

The earliest development along Tetbury Lane dates from the latter half of the 19<sup>th</sup> century and is set on the crest of the ridge on the north side of the lane; although the majority of the development is mid-20<sup>th</sup> century housing estates- primarily bungalows within The Dawneys, with two storey houses in The Butts on the south side of the street.

A separate hamlet of West Crudwell was recorded from the 13th century, and historic maps show three farms on the lane connecting Tuners and Tetbury Lanes, although by 1875 (the date of the 1st edition large scale Ordnance Survey map) only the rebuilt West Crudwell Farm remained, and the lane had become its access drive.

**The sites identified in the draft Crudwell Neighbourhood Plan for further assessment:**

The draft Crudwell Neighbourhood Plan has identified two potential sites for development to meet local housing needs: one along Tuners Lane to the northeast of the existing settlement boundary and the other at Ridgeway Farm, Tetbury Lane which is to the southwest of the village. Both sites lie outside the settlement boundary, but abut 20<sup>th</sup> century housing estates. The Ridgeway Farm site has also been identified within Wiltshire Council's draft Housing Site Allocations Plan, which has been the subject of public consultation and is due to be considered at a public inquiry in Autumn 2018.

The Heritage Assessment Process:

This assessment follows the Historic England guidance on settings referred to above. The initial assessment comprised documentary research to identify any designated heritage assets, and a preliminary map regression exercise to identify potential non-designated heritage assets, whose settings might also be affected by the proposed development of either site. This exercise established that there were no designated heritage assets in or adjacent to either site, but that the western boundary of the Crudwell Conservation Area runs near both sites; and it identified several locations where the development might be visible or seen within its setting and this potential impact required further assessment. In addition a number of more distant listed buildings might also have glimpsed views of the development. Historic mapping also identified a number of older buildings that had the potential to be identified as non-designated heritage assets and whose settings might also be affected by development of these two sites and therefore required further consideration.

This documentary research was followed by a field inspection of both sites, using public views to assess the potential impacts on the affected parts of the Conservation Area and of those buildings that had been identified as having heritage interest from the initial map regression. Views to and from the potential development sites were assessed in order to clarify the potential for development to have adverse impacts upon affected heritage assets. See *Fig 1 Identified sites and main views* and *Fig 2 Photograph locations and references*.

In addition all buildings, sites or places that had the potential to be identified as non-designated heritage assets were inspected from public land and three possible candidates have been identified and assessed in terms of potential development impacts.

## **Site Assessment.**

### **Site 1: Tuners Lane:**

This site of 1.3ha is located adjacent to the current village boundary on the northeast side of Tuners Lane immediately to the west of the third phase of mid-20<sup>th</sup> century housing estates that extends as a series of cul-de-sacs northwards from The Street along the east side of Tuners Lane. This site is approximately 300m from the junction with The Street and is in open countryside. Its eastern boundary hedge is separated by an access drive, garaging and the rear gardens from the most westerly row of properties within this estate which is set on slightly higher ground and overlooks it.

The proposed development site is currently used for grazing and is part of a larger field that is enclosed by hedgerows. It is situated on the gently sloping northern side of a shallow valley at the bottom of which is a small stream that meanders eastwards through the village. The site is in the southeast corner of the field, which is the lowest part of the field. The southern boundary of this field borders on Tuners Lane which runs parallel to the stream at this point. There is gently rising ground to the north, west and northeast giving long distance views across fields enclosed by mature hedgerows.



Photo 3 Tuners Lane Site seen from the Lane looking east. The hedge screens more immediate views.



Only on the south are there shorter views across the valley towards the housing along Tetbury Lane which is set back slightly behind the crest of the rising ground to the south. Prominent within these longer distance views is the recent housing development adjacent to the second site, that at Ridgeway Farm (Phase 1).



Photo 4 Tuners Lane Site seen from within the field, looking east. The lane and southern part of the site is at a lower level than the housing beyond, however the ground rises to the left (north). Just visible on the left are the roofs of the modern farm buildings at Crudwell Court Farm, which screen the site from the east.



Photo 5 Tuners Lane Site seen from the adjacent housing estate, looking west.

There are no historic buildings near the Tuners Lane site. The closest are the unlisted 19<sup>th</sup> century farm complex of West Crudwell Farm lying some 300m to the west, which is completely concealed from view by the intervening hedgerows and tree planting. A similar distance to the east and partly concealed behind the brow of the hill is Crudwell Farm Court. Whilst the large modern farm buildings to Crudwell Court Farm are discernible set against a backdrop of trees, the earlier farm buildings constructed at the end of the 19<sup>th</sup> century (they are first shown on the 1901 O.S. map) cannot be seen.



Photo 6 Tuners Lane Site looking south towards Tetbury Lane with the Ridgeway site in the distance. The Conservation Area boundary skirts the modern houses on the left.



Photo 7 Tuners Lane Site seen from the public footpath crossing the meadow to the north. The site lies beyond the two large trees and the Conservation Area boundary follows the hedge on the right.



Looking from the site southwards towards the Conservation Area, the closest buildings are all of later 20<sup>th</sup> century date and are partly screened by the intervening hedgerow field boundaries. The nearest historic building is Malthouse Cottage, an unlisted building which is c.234m from the nearest point of the site, and is largely concealed by mature planting.

The two proposed development sites are inter-visible and can also be seen from the footpaths running between Tuners Lane and Tetbury Lane. When looking from the footpaths towards the Tuners Lane site, development will be seen against a backdrop of rising ground; and in views eastwards into the site, the development will be seen against the backdrop of the existing housing estate.

The character of the adjacent part of the Conservation Area is one of predominantly 20<sup>th</sup> century housing set within mature gardens. Any new development on this site will be seen set against the background of the rising ground to the rear of the site; and will “read” as a continuation of the existing development along the lane. In comparison, the recently constructed housing at Ridgeway Farm is clearly visible, because it is sited on a ridge and the upper parts of the buildings are seen against the sky.

#### **Tuners Lane Heritage Impacts Conclusion:**

It is concluded that development of this site will not affect the settings or special significance of any heritage assets. Whilst the boundary of the Conservation Area is distantly visible from the site this is an area of modern housing and it is not considered that these views will affect the special significance of this part of the Crudwell Conservation Area.

No Strategic Environmental Assessment would therefore be required in respect of development on this site.



### **Site 2. Ridgeway Farm site:**

This c.1.8ha site is part of single large field on the north side of Tetbury Lane, which is located immediately to the rear of existing residential development along this side of the lane, which comprises a mix of later 19<sup>th</sup> century and 20<sup>th</sup> century housing within a semi-rural setting. As described above, the site is just below the ridge which rises towards the south, and which separates two gently sloping valleys containing streams which meander in a south-easterly direction between fields.

The site is within farmland which faces northwards across the valley towards Tuners Lane. Its west boundary aligns with a belt of planting which encloses the boundary of the adjacent field to the north, and the corner of the curtilage of a dwelling converted from a former chapel. From this point, the south boundary of the site wraps around the recently-completed development of 10 dwellings on the former Ridgeway Farmyard site, five of which front onto the lane; and it extends eastwards behind the residential curtilage to a single dwelling and its associated large plot of land which is concealed from view by mature hedgerows.



Photo 8 View west towards the Ridgeway Farm Site from the footpath leaving the Conservation Area adjacent to April Cottage and the Old Malthouse. The older Dawneys estate of one and one and a half storey dwellings can be seen on the left.

Most of the east boundary runs alongside the 1970's housing development, however the north east corner of the field opens into another field which was described in relation to the Tuners Lane site, and which is crossed by footpaths, and

runs northwards alongside the boundary of the Conservation Area. Both these fields contain partially ploughed-out ridge and furrow earthworks.



Photo 9 View from the NE corner of the Ridgeway Farm Site eastwards towards the Conservation Area boundary seen in the context of the medieval ridge and furrow. The two nearest buildings, The Old Malthouse and April Cottage set on either side of a public footpath, have some historic merit but are not listed or currently recognized by the Council as non-designated heritage assets.



Photo 10 Ridgeway Farm Site entrance seen from Tetbury Lane looking east towards the phase 1 development. To the left is part of the converted former chapel.





Photo 11 In this view from the south from adjacent to the allotments the NE corner of the Phase 1 Ridgeway Farm Site is surprisingly prominent on the ridge.



Photo 12 View northeast from the village playing fields. The roofs of the Phase 2 Ridgeway Farm Site are likely to be visible on either side of the central group of trees because they will be built on the rising ground to the north of Tetbury Lane.

**Ridgeway Farm - Heritage Impacts Conclusion:**

The development of the second phase of this site will impact upon the setting of the Crudwell Conservation Area boundary which skirts the adjacent meadow c.120m from the nearest point of the proposed development site. There will be direct inter-visibility between the Ridgeway Farm Phase 2 site and the Conservation Area boundary and because the proposed development will be located on higher ground it will be more prominent within views to and from the Conservation Area.

It is considered that without mitigation, the impact on these views would cause localised low-moderate harm to the setting of this part of the Conservation Area; however in the context of the Conservation Area as a whole any localised harm here would result in only minimal harm to the special significance of the Crudwell Conservation Area as a whole.

No Strategic Environmental Assessment would therefore be required in respect of development on this site.

**Non-designated heritage assets:**

No heritage assets have been formally recognized by the Council as having sufficient local interest to be formally recognized as non-designated heritage assets. However a number of buildings within the vicinity of the Ridgeway site that are both recorded on the tithe map of 1842 and the first edition large scale Ordnance Survey Map of 1887. Those buildings and heritage assets closest to the two development sites have been inspected from public viewpoints and it is considered that three sites have the potential to be considered by the Council as non-designated heritage assets, two of these, Malt House Cottage and April Cottage back onto the field adjacent to the development site and are within the closest part of the Conservation Area to the Ridgeway Farm site. For comparison, Malthouse Cottage is c. 150m from the

In addition the surviving medieval ridge and furrow earthworks both within the proposed development site and the field to the east, adjacent to the Conservation Area boundary, may also be identified by the Council as a non-designated heritage asset and as the area of earthworks within the potential development site would be destroyed by the development it would have a direct effect on its significance as a heritage asset.

In addition to these three possible non-designated heritage assets other historic buildings were assessed but were not considered further because they were screened from both sites by intervening belts of trees. These included West Crudwell Farm, and the listed and historic buildings associated with Chedglow Manor.

A number of buildings along Tetbury Lane to the west and east of Ridgeway Farm were considered further however they have all been much altered or extended and were not considered to merit recognition as non-designated heritage assets.

**Heritage Impacts on non-designated heritage assets:**

It is considered that only the Ridgeway Farm development site will affect any potential non-designated heritage assets: The development will affect and potentially cause harm to the settings of two potential non-designated heritage assets which lie within the same part of the Conservation Area mentioned above. These are Malt House Cottage and April Cottage however these buildings are primarily of architectural and historic interest and the contribution made by their rural village edge setting to this interest is small. Whilst the change to a slightly more developed setting would cause some harm it is considered that the impact on their overall significance would be negligible.

There will however be a direct impact on part of the surviving area of ridge and furrow within the proposed development site although the earthwork remains within the intervening field containing the public rights of way on the east side of this site will remain undisturbed. Surviving earthwork remains have the potential to be recognized as non-designated heritage assets, and the loss of part of the surviving area of these earthworks through development will result in harm to their significance. Because these remains would, if identified as non-designated heritage assets by the Council, have only low significance, their partial loss through development would only result in minor adverse environmental effect.

It is not considered that development of either site would have a significant environmental effect in terms of heritage impacts on any potential non-designated heritage assets.

**Conclusion:**

This assessment has concluded that although development on both sites will be locally prominent, that at Ridgeway Farm has the greater potential to affect the settings and significance of both designated and non-designated heritage assets. The visual impact of the proposed development can be gauged in relation to the phase 1 development; and without additional mitigation it is considered that the phase 2 development will result in moderate harm to the setting of the nearest part of the Conservation Area - to the west of the small green at the junction of Tuners Lane and the main road. However in terms of the impact on the Significance of the Conservation Area as a whole, the effect of this development would be minimal.

There would also be minor harm to the significance of the surviving medieval earthworks on and adjacent to the Ridgeway Farm site which have the potential to be identified as a non-designated heritage asset. However as a non-designated heritage asset its significance would be low and the adverse environmental effect of this direct impact would be minor.

Despite the identified potential to impact on heritage assets development on this site would not result in any significant environmental effects. Development on the Tuners Lane site would not impact on the significance of any Heritage assets and as a consequence it is our professional opinion that development on either or both of these sites could be undertaken without causing Significant Environmental Effects on Heritage assets such that the requirement to undertake a Strategic Environmental Assessment would be required.

JME Conservation Ltd

August 2018.





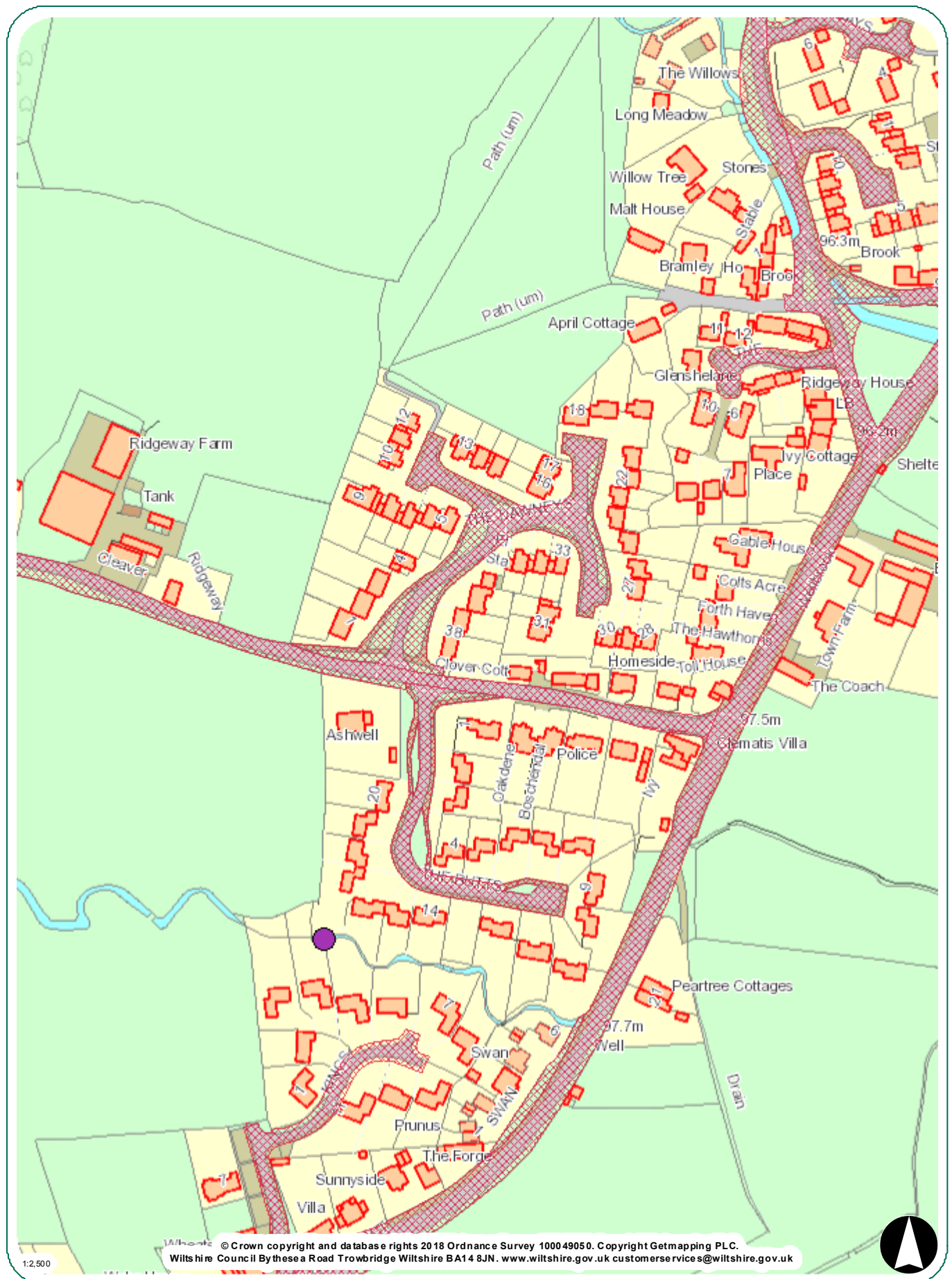
# Crudwell Neighbourhood Plan: Sustainability Appraisal

## Appendix 6: Results of traffic survey undertaken on 6th June, between 7.30am and 9.30am

Crudwell Neighbourhood Plan Traffic Survey													
<b>Wednesday 6th June - 7:30-9:30AM</b>													
	Cars/Vans/HGV's/Lorries/Farm Traffic/Buses/Coaches/Public Service Vehicles/ Mcycles									Included in Total traffic figures			
	Total	7:30-45	7:45-8:00	8-8:15	8:15-30	8:30-45	8:45-9:00	9-9:15	9:15-30	HGV/Lorry	Farm traffic	Buses/Coach	Mcycles
Tuners Lane (Junc) towards Street	54	6	7	7	10	6	8	5	5	1	0	1	0
Tuners Lane (Junc) away from Street	23	0	1	5	2	2	6	3	4	3	1	1	0
Total	77												
No queues													
Tetbury Lane (Junc) towards Street	118	18	9	9	14	23	18	15	12	1	4	1	2
Tetbury Lane (Junc) away from Street	85	9	13	7	4	9	13	23	7	0	4	1	2
Total	203												
queuing on 6 occasions max. of 6 cars													
The Street towards Cirencester	764	94	84	113	90	142	81	88	72	29	2	5	9
The Street towards Malmesbury	665	81	98	84	77	89	110	73	53	41	6	6	5
Total	1429												
23 slow moving queues towards Malmesbury													
Tuners Lane (top) towards Street	7	1	0	2	0	2	1	0	1	0	1	1	0
Tuners Lane (top) away from Street	5	0	1	1	0	0	0	1	2	0	0	1	0
<b>Saturday 9th June - 4-6PM</b>													
	Cars/Vans/HGV's/Lorries/Farm Traffic/Buses/Coaches/Public Service Vehicles/ Mcycles									Included in Total traffic figures			
	Total	4:00-4:15	4:15-30	4:30-45	4:45-5PM	5:00-5:15	5:15-5:30	5:30-45	5:45-6PM	HGV/Lorry	Farm traffic	Buses/Coach	Mcycles
Tuners Lane (Junc) towards Street	19	6	5	1	3	3	0	0	1				
Tuners Lane (Junc) away from Street	22	5	5	3	6	1	1	1	0				
Total	41												
Tetbury Lane (Junc) towards Street	67	7	6	5	16	14	7	2	10				1
Tetbury Lane (Junc) away from Street	65	3	10	13	13	7	5	5	9				1
Total	132												
The Street towards Cirencester	346	46	54	28	55	46	31	43	43	3	1	3	9
The Street towards Malmesbury	550	58	66	66	75	69	70	71	75	10	2	5	10
Total	896												



## Appendix 7: Extent of Maintainable Highway, Wiltshire Council, October 2018

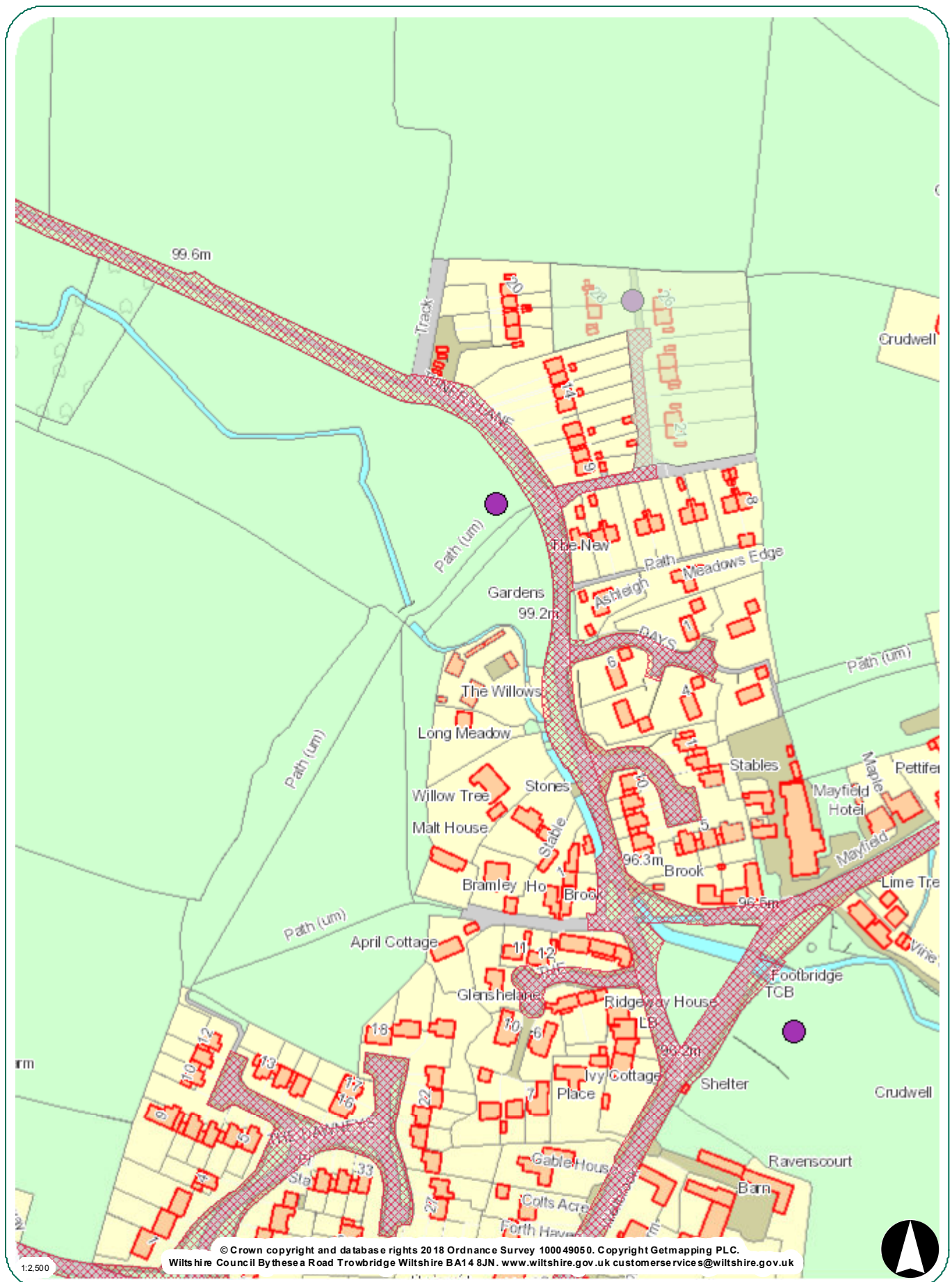


0 25 50 100 Meters

MaintainableHighways









0 25 50 100 Meters

Maintainable Highways



