

# Housing Site Allocations Plan – Statement and Questions to Wiltshire Council – 10<sup>th</sup> July 2018

## Background Information

### How many houses need to be provided?

The housing numbers are based upon the Wiltshire Core Strategy (WCS) which allocates housing numbers to Housing Market Areas (HMAs). Trowbridge sits in the North & West HMA which stretches from Royal Wootton Bassett to Warminster.

The HMA breakdown for Trowbridge and Completions 2006-2017 are included in table 4.2 of the Addendum to the 15<sup>th</sup> May Cabinet papers.

The Trowbridge 'Developable Commitments' are contained in 'Community Area Topic Paper – Trowbridge' dated May 2018 and are as follows:

	<b>N&amp;W HMA</b>	<b>Trowbridge</b>	<b>Rural</b>	<b>Trowbridge CA Total</b>
<b>WCS indicative requirement</b>	24740	6810 (97.6%)	165 (2.4%)	<b>6975</b>
<b>Completions 2006-2017</b>	13025	3019	256	<b>3275</b>
<b>Developable Commitments</b>	10606	1561	32	<b>1848</b>
<b>Windfalls<sup>x</sup></b>	2209	976 (97.6%)	24 (2.4%)	<b>1000</b>
<b>TOTAL</b>	<b>25840</b>	<b>5556</b>	<b>312</b>	<b>6132</b>
<b>Shortfall/(Surplus)<sup>y</sup></b>	<b>(1100)</b>	<b>1254</b>	<b>(147)</b>	<b>1107</b>

<sup>x</sup> As explained by Cllr Sturgis at the Trowbridge Area Board meeting on Thursday 24<sup>th</sup> May 2018; *“One thousand of the Windfalls allowance has been allocated to Trowbridge.”*

<sup>y</sup> Before any allocations.

## Windfalls

As indicated above, Cllr Sturgis at the Trowbridge Area Board said that; 1000 of the (2209) windfall allowance for the N&W HMA has been allocated to Trowbridge, although this is not explicit in the documents published so far. Cllr Sturgis' statement goes some way towards the position of Trowbridge Town Council. Although the Town Council has argued that these 1000 should at least in part be on specifically allocated sites (as many other local planning authorities do such as Cotswold DC, at Cirencester) and not treated as Windfalls. (The NPPF definition of Windfalls is provided later in this document, and it can be seen that these brownfield sites in a Settlement Boundary should not all be treated as Windfalls.) Whether they are treated as Windfalls or as allocated sites the net shortfall remains the same at 1107 based on these figures.

Trowbridge Town Council can support the statement made by Cllr Sturgis and therefore the position of Wiltshire Council, that 1000 of the N&W HMA Windfall Allowance is allocated to Trowbridge. (The table above allocates these by the same percentage as the original WCS indicative requirement therefore allocating 976 of the Windfalls to Trowbridge and 24 to the rural areas of the CA). Trowbridge Town Council goes further in supporting the position of Wiltshire Council, by evidencing the following sites, as being in one or more of the following categories;

- owned by Wiltshire Council,
- owned by others in the One Public Estate bid,
- identified for potential residential development,
- under construction,
- received planning permission,
- live planning applications,

<b>Trowbridge 'Windfall' sites</b>	<b>Houses</b>
County Hall East/Margaret Stancomb/Hospital	300
Bowyers factory site	250
The Pavillions, White Horse Business Park	104
Bradley Road	79
Ashton Street Centre	70
Charterhouse	40
St George's Works	30
United Church Buildings	25
McDonogh Court	20
Courtfield House	21
Clark's Mill	19
Court Mills	7
Carpenter's Arms	6
John Bull	5
<b>TOTAL</b>	<b>976</b>

### **Meeting the Shortfall**

Therefore, the shortfall across the Trowbridge CA is 1107 houses.

Trowbridge Town Council DOES SUPPORT the following sites:

Elm Grove Farm 248/613	250
Church Lane 1021	45
Spring Meadows 3260	45
<b>TOTAL</b>	<b>340</b>

This is fewer than the allocations identified in the Addendum as presented to Cabinet on 15<sup>th</sup> May, which is 1100 additional houses. There is therefore a difference of 760 houses.

## Evidence

Councillor Sturgis and the Cabinet at the meeting on Tuesday 3<sup>rd</sup> July indicated that Trowbridge Town Council had failed to provide any evidence to demonstrate why the proposals being considered by Wiltshire Council should be dropped. What is evident is that Councillor Sturgis and therefore the Cabinet have chosen to ignore the evidence which has been put forward. If a court was presented with clear evidence on CCTV of someone committing a crime, more evidence is not required in order for them to be convicted, in fact one would expect a guilty plea!

## Core Strategy

Wiltshire Council says in the WCS at para 5.147:

*“It is recognised that the villages surrounding Trowbridge, particularly Hilperton, Southwick, North Bradley and West Ashton have separate and distinct identities as villages. Open countryside should be maintained to protect the character and identity of these villages as separate communities.”*

Trowbridge Town Council supports this position and therefore seeks to maintain and protect the existing open countryside as identified in the WCS and between the Settlement Boundary of Trowbridge and these neighbouring villages.

Some of the sites identified as allocations in the HSAP fail to maintain the open countryside and fail to protect the character and identity of the villages of Hilperton, North Bradley and Southwick as separate communities and are therefore contrary to the WCS.

**Trowbridge Town Council therefore DOES NOT SUPPORT the following sites:**

S of Elizabeth Way	355
W H BP	225
Southwick Court	180
<b>TOTAL</b>	<b>760</b>

**All of these sites are contrary to the Core Strategy. No further evidence is required to be submitted by Trowbridge Town Council or any other organisation or individual to demonstrate that these sites should not be brought forward within the Housing Sites Allocation Plan as they are not sound for the single, simple reason that they are clearly and unequivocally contrary to the WCS, which is the underlying base document which is the foundation upon which the HSAP is being developed.**

The proposed site at North Bradley includes at the northern end (closest to Trowbridge) an open countryside gap which is only one field wide. Building on that field fails to protect the open countryside. A ‘landscape buffer’ which is less than one field wide is not ‘open countryside’. If this field is retained then this development is not an extension of the urban envelope of Trowbridge, it is simply an unsustainable detached bit of North Bradley.

Notwithstanding this, significant evidence has been provided by other organisations and individuals offering very good reasons why these sites should not be brought forward in the

HSAP. It is not for Trowbridge Town Council alone to repeat such evidence to persuade Wiltshire Council that its proposed HSAP is unsound.

## Alternatives

Councillor Sturgis and the Cabinet at the meeting on Tuesday 3<sup>rd</sup> July indicated that Trowbridge Town Council had failed to offer any alternatives to the proposals being considered by Wiltshire Council. What is evident is that Councillor Sturgis and therefore the Cabinet have chosen to ignore the alternatives which has been put forward. The alternatives are based upon two elements, an allocation of alternative sites and an acceptance of the flexibility within the WCS.

Trowbridge Town Council SUPPORT the following alternative sites:

Additional allocation at Wain Homes' part of Ashton Park	21
Biss Farm 3247	267
<b>TOTAL</b>	<b>288</b>

Trowbridge Town Council supports site 3247 for a mixed use development as per the existing planning application. Trowbridge Town Council understands that this site is and has been allocated for some time for employment uses, but these have failed to come forward and as the site is now located between the Ashton Park site and the existing Settlement Boundary then it should be reallocated for mixed use development.

Accepting these two sites as alternatives leaves a shortfall of (760-288) 472.

## Flexibility

Wiltshire Council explains that the numbers in the WCS are indicative, that there needs to be flexibility, that it would be unrealistic to adhere rigidly to the levels set in the WCS, (see 4.35 below extract from the Addendum). Trowbridge Town Council agrees with this.

Wiltshire Council explains that: '*A shortage of new housing and infrastructure for instance will limit provision for affordable homes, could depress economic growth and undermine the viability and vitality of town centres*', (see 4.34 extract from the Addendum below). Trowbridge Town Council agrees with this.

### Objective 3 Spatial Strategy

- 4.34** The scale and distribution of site options at each settlement should also be consistent with that proposed by the spatial strategy in the WCS. A shortage of new housing and infrastructure for instance will limit provision for affordable homes, could depress economic growth and undermine the viability and vitality of town centres. On the other hand, widespread over provision, particularly toward smaller rural settlements, might undermine the spatial strategy. A symptom of this would be over burdened local infrastructure and greater environmental impacts from more travelling between settlements and more widespread loss of countryside.
- 4.35** It would not, however, be reasonable to expect the distribution and scale of land supply to adhere rigidly to the levels set in the WCS. It would be unrealistic to expect as much. The WCS explains that levels are indicative and that there needs to be some flexibility.
- 4.36** Levels of housing development in settlements and rural areas are indicative levels of growth. They are approximate and neither minimum or maximums; instead they are an indication of the general scale of growth appropriate for each area and settlement during the plan period.

Considering that towns such as Melksham, Westbury and Calne have met their requirements, it is concerning that without further allocations, particularly in locations which support infrastructure provision such as the reinstatement of the Wilts & Berks Canal and to facilitate further road improvements then these towns are in danger of the risks identified above, depressed economic growth and undermining of the viability and vitality of their town centres.

Wiltshire Council says the following about longer term growth at Trowbridge:

- 4.58** Constraints to Trowbridge's longer term growth will be addressed as part of the review of the Core Strategy that will look from 2016 beyond 2026 to 2036. This might include a review of how Green Belt boundaries around the town may affect the town's longer term prospects.

Trowbridge Town Council supports this position and in particular considers that a review of the Green Belt is required to secure sustainable development for the town in future. The Town Council believes that significant further allocations at Trowbridge, other than those supported above, should be delayed until the WCS review has been completed and a review of the Green Belt can be undertaken. This is similar to the position Wiltshire Council has adopted in the South HMA (see below extract from the Addendum) where the five-year land supply cannot be met towards the end of the current plan period and is equally valid in Trowbridge, (which is only part of the N&W HMA).

- 4.32** Housing trajectories are site by site estimates of start and finish dates and annual completions. Aggregating housing trajectories for each HMA shows how the Plan helps to deliver in excess of five years supply of land in each area for the remaining years of the plan period. The table below provides estimates of how many years supply there will be in each remaining year of the plan period. It shows that supply exceeds the five year requirement through to the end of the plan period for all years except ~~one~~ **four** in the South Wiltshire HMA and ~~well before~~ **by** then additional allocations will be included within the review of the WCS.

Taking all these together it is appropriate to consider how the shortfall of 472 houses can be allocated. If the neighbouring villages are undertaking neighbourhood plans, seeking to support the WCS by maintaining open countryside between them and Trowbridge, and maintaining the sustainability of such communities close to the town, then modest additional allocations in these villages should be supported of say 24 houses each for Hilperton, North Bradley and Southwick, totalling 72 houses. The remaining 400 houses

should be allocated in Melksham and other towns in order to avoid a depression of economic growth and undermining of vitality and vibrancy in their town centres. Even with this degree of reallocation, Trowbridge would still be the largest growth settlement in the plan period.

## **Neighbourhood Plans**

Councillor Sturgis and the Cabinet at the meeting on Tuesday 3<sup>rd</sup> July indicated that Trowbridge Town Council should undertake a Neighbourhood Plan in order to overcome these issues. What is evident is that Councillor Sturgis and the Cabinet have been poorly advised with regard to what a Neighbourhood Plan for Trowbridge could achieve.

A Neighbourhood Plan for Trowbridge can only deal with locations inside the town boundary.

- Ashton Park is 90% outside the town boundary.
- Southwick Court is outside the town boundary.
- Land west of White Horse Business Park is outside the town boundary.
- Land south of Elizabeth Way is outside the town boundary.

## **Questions:**

- 1. Why has Wiltshire Council accused Trowbridge Town Council of failing to offer any evidence when the evidence is simple and straightforward, that the HSAP is contrary to the WCS?**
- 2. By ignoring this evidence, Wiltshire Council must be able to argue that all three of the sites which Trowbridge Town Council opposes are acceptable under the Core Strategy. Can Wiltshire Council therefore provide clear and concise reasoning why the development of open countryside between Trowbridge and Hilperton, Southwick and North Bradley is not contrary to the Core Strategy?**
- 3. Why has Wiltshire Council accused Trowbridge Town Council of failing to offer any alternatives when clear alternatives have been provided such as site 3247 at Biss Farm?**
- 4. What flexibility has been demonstrated in any adjustments to the numbers of houses allocated to each community area in the N&W HMA from the figures in the WCS to the HSAP and as indicated at the Developer workshop on 5<sup>th</sup> March 2015?**
- 5. What would an acceptable level of flex be in terms of reallocation from one community area to another, given the long-known inability of Ashton Park to deliver and the long-known potential for other towns to deliver greater numbers during the plan period?**
- 6. Why does Wiltshire Council think that a Neighbourhood Plan for Trowbridge would solve all of the issues for housing allocations in Trowbridge when none of the sites proposed in the HSAP which Trowbridge Town Council opposes are in the Trowbridge Town Boundary?**
- 7. Surely, as these proposed sites and Ashton Park are almost all outside the town boundary but part of the Trowbridge urban allocation then the only solution is a strategic cross-boundary plan such as the Core Strategy and its Housing Sites Allocation Plan, with the flexibility to reallocate to other towns once it was evident that Ashton Park would not be able to deliver the**

**requirement within the plan period and without compromising the focus for development at Trowbridge, Chippenham and Salisbury?**



## **APPENDIX.**

### **Additional information including summary and extract from previous reports.**

#### **A. Background**

The Housing Site Allocations Plan (HSAP) was presented to and approved by Wiltshire Council's Cabinet on Tuesday 20<sup>th</sup> June 2017, for progressing to the consultation stage in the Summer of 2017. The expectation is that it will be confirmed by Wiltshire Council in the Spring/Summer of 2018 and then go to an Inspector for public examination.

<http://cms.wiltshire.gov.uk/mgAi.aspx?ID=66252#mgDocuments>

The cabinet meeting was attended by over 40 members of the public, mainly from the town and neighbouring parishes, many of whom addressed the meeting. The Town Clerk attended the meeting and addressed the meeting, to; confirm that consultation had taken place with the town and parish councils; that the town council was disappointed that the proposal did not reflect its position and to ask why Ashton Park was only expected to deliver 300 dwellings per annum.

#### **B. Consultation**

Public Consultation took place from 10<sup>th</sup> July to 22<sup>nd</sup> September. This included public consultation events in Chippenham, Salisbury, Devizes and on Wednesday 26<sup>th</sup> July in Trowbridge which appeared to be well attended by people from the locations most likely to be impacted.

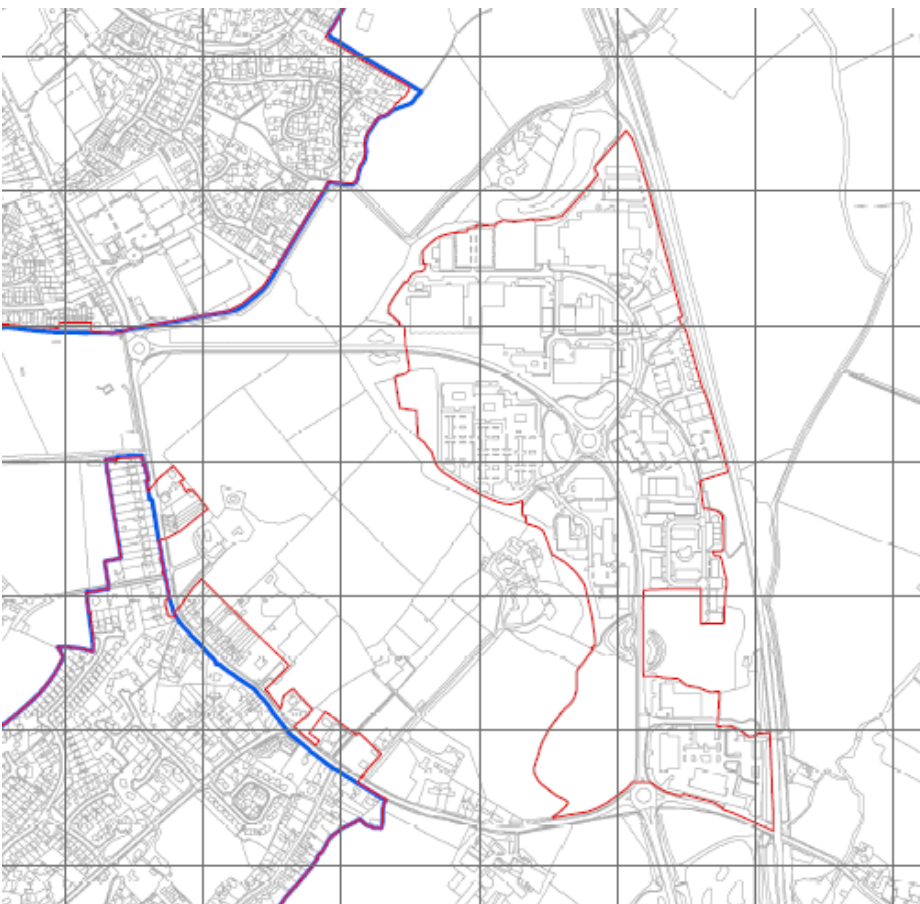
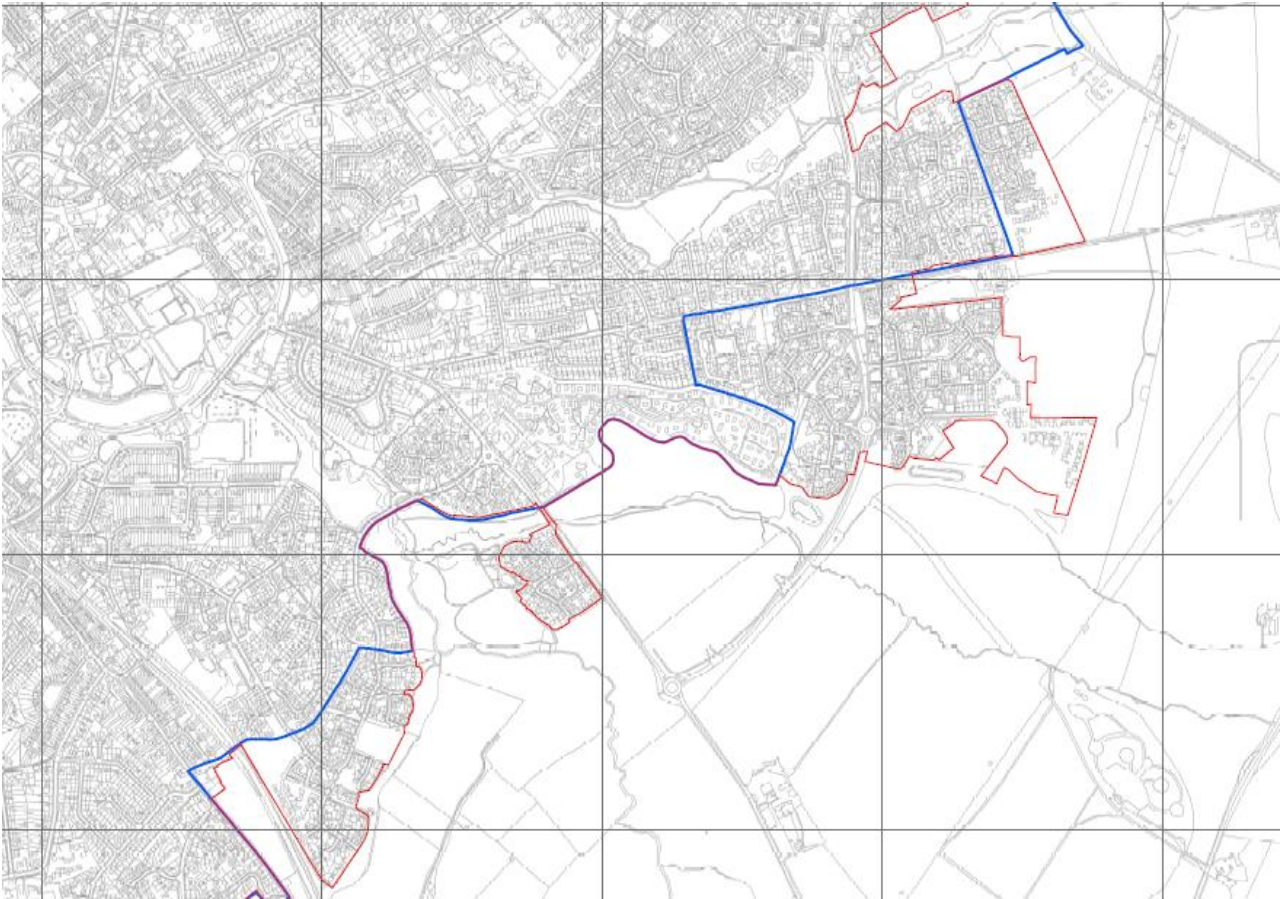
The Town Council's Policy and Resources Committee considered the proposals initially at its meeting on Tuesday 27<sup>th</sup> June 2017 and considered the HSAP at its meeting on 5<sup>th</sup> September 2017, when the town council's initial consultation response was approved.

The HSAP deals with two specific matters: Settlement Boundaries and Housing Site Allocations.

#### **C. Settlement Boundaries**

The HSAP makes proposals to revise the Settlement Boundaries, these are the boundaries of development drawn around each settlement (including Trowbridge, Staverton, Hilperton, West Ashton, North Bradley, Southwick and White Horse Business Park). Within the Settlement Boundary, development proposals will normally be considered acceptable. Outside the Settlement Boundary, development proposals will normally be considered to be in open countryside and will therefore not be considered acceptable, unless they are in an area specifically identified for future development such as the Ashton Park urban extension or a site allocated in the HSAP.

The extract below shows how the revised boundary (red line) removes areas of open space such as Paxcroft Brook and includes areas of new development at Castle Mead, Southview Park and Old Farm (West Ashton Road).



The proposed Trowbridge Settlement boundary also includes a detached part covering the White Horse Business Park (see extract on the left). This is not defined as part of the North Bradley Settlement boundary. See page 29 of the Trowbridge Community Area Topic Paper;

***“Trowbridge . . . I10, I11, J11, J10, J9 Amend boundary to include area of built employment development physically related to the settlement.”***

## D. Housing Site Allocations

The HSAP takes forward preferred sites from those which have been suggested by owners and developers as potential sites for housing, through the Strategic Housing Land Availability Assessment (SHLAA) to meet the needs of the Wiltshire Core Strategy (WCS) which were not already allocated in the WCS. The WCS allocated Ashton Park as an urban extension of Trowbridge to meet the needs of Wiltshire, the North and West Housing Market Area (HMA) and Trowbridge in achieving the number of houses to be built in the period 2006 to 2026. Ashton Park was expected to deliver 2600 houses in the plan period. (The plan was adopted in January 2015, even though it covers the period from 2006, this is normal.) The WCS expressed the housing requirement for Trowbridge Community Area as follows:

Table 5.17 Delivery of Housing 2006 to 2026 - Trowbridge Community Area

	Requirement 2006-26	Housing already provided for		Housing to be identified	
		Completions 2006-14	Specific permitted sites	Strategic sites	Remainder to be identified
Trowbridge Town <sup>56</sup>	6,810	2,152	409	2,600	1,649 <sup>57</sup>
Remainder	165	230	7	0	0
Community Area total	6,975	2,382	416	2,600	1,649

56. Housing numbers for Trowbridge include those planned for the village of Hilperton.

57. The remainder of the Community Area has sufficient commitments to exceed the indicative requirement.

## E. Ashton Park

The main application for Ashton Park covering around 90% of the site: [15/04736/OUT](#) was submitted in May 2015 including 2500 houses and was determined in April 2018. Delays were substantially due to the mitigation measures which need to be agreed for the Bechstein Bats, which roost in Green Lane and Biss Woods.

An additional application covering the remainder of the site which is in separate ownership: [15/01805/FUL](#) was submitted in April 2015, including 120 houses and was refused.

So applications have already been submitted for over 2600 houses.

The developers of the major portion of the site are now claiming that once this is approved they will then only be able to commit to a build rate of 300 houses per year, which will deliver 1600 out of the 2600 by 2026, leaving a shortfall of 1000.

The Core Strategy was adopted by Wiltshire Council on 20<sup>th</sup> January 2015, including an allocation of 2600 houses at Ashton Park, deliverable by 2026. In September 2015 Wiltshire Council published its Housing Land Supply Statement (HLSS) which identified that Ashton Park would only be able to deliver 2100 houses by 2026. In fact, in July 2014 the then HLSS identified that Ashton Park would only be able to deliver 2350 houses by 2026. Despite this, the WCS, adopted in January 2015 was still using the figure of 2600!

## Preferred Sites

Wiltshire Council therefore revised the housing requirement for Trowbridge as follows:

Table 2.2 Housing requirements for Trowbridge Community Area at April 2017<sup>(4)</sup>

Area	Indicative requirement 2006-2026	Completions 2006-2017	Developable commitments 2017-2026	Indicative residual requirement
Trowbridge	6,810	2,965	1,825	2,020
Trowbridge CA Remainder	165	255	23	0

- 2 Bat Special Areas of Conservation ('SAC') – Planning Guidance for Wiltshire (Issue 3.0, September 2015) Available at: <http://www.wiltshire.gov.uk/planninganddevelopment/biodiversityanddevelopment/writingecologicalsurveysplanning.htm>
- 3 Wiltshire Council (December 2016). *Wiltshire Infrastructure Delivery Plan 3 2011-2026. Appendix 1: Trowbridge Community Area.*
- 4 Wiltshire Council (June 2017). *Topic Paper 3 Housing Land Supply.*

Trowbridge CA	6,975	3,220	1,848	2,020
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The figure of 2020 should be reduced to 1907, which is the difference for the CA between the requirement and the completions/commitments (6975-3220-1848=1907)

Once a figure has been established Wiltshire Council need to identify the sites that will deliver those additional dwellings. Wiltshire Council have assessed each of the sites put forward by developers and owners and is proposing the following sites to meet some of the need:

### Preferred sites

**5.21** Table 5.7 below shows the preferred sites identified for allocation and the revised capacity following the consideration of necessary mitigation measures and the need to reduce the net developable area.

Table 5.7 Preferred sites identified for allocation for Trowbridge

SHLAA ref	Site name	Capacity after mitigation
Site 263/297	Elizabeth Way	205
Site 298	Land off the A363 at White Horse Business Park	150
Site 613/248	Elm Grove Farm	200
Site 1021	Church Lane	45
Site 3260	Upper Studley	20
Site 3565	Southwick Court	180
<b>TOTAL:</b>		<b>800</b>



## **F. Sites which the Town Council does NOT support**

**263/297/293(part) – Hilperton Gap**, Town Council policy is to oppose development in the Gap. Part of the site is owned by Wiltshire Council. Part of the site is subject to a planning application by Framptons/HPT which has recently been updated; [16/00672/OUT](#). All of the site lies in Hilperton Parish.

**298 North Bradley Gap**, located in North Bradley parish.

**3565 Southwick Court Gap**, proposed by Waddeton Park, agent Savills. Letter to town council 12<sup>th</sup> January 2017. Located in Southwick and North Bradley parishes.

See below an extract from the WCS regarding open country between the town and villages at paragraph 5.150 page 181.

- it is recognised that the villages surrounding Trowbridge, particularly Hilperton, Southwick North Bradley and West Ashton, have separate and distinct identities as villages. Open countryside should be maintained to protect the character and identity of these villages as separate communities. The local communities may wish to consider this matter in more detail in any future community-led neighbourhood planning

## **G. Sites which the Town Council supports**

**613/248 Elm Grove Farm**, proposed by Coulston Estates who with their agents have held various meetings with the town council, potential to improve Elm Grove Recreation Ground lies partly in Trowbridge and partly in north Bradley parish.

**1021 Church Lane**, Access available from Frome Road to avoid issues with Church Lane, located in the town boundary.

**3260 Upper Studley**, Discussions have been held with Newland Homes who expressed an interest in this site, located within the town boundary.

## **H. Other sites which the town council supports but have been removed**

**256 South of Green Lane**, between 167 (HSAP) and 272 (application) homes, is the extension to Castle Mead. Has been discussed by the town council with Persimmon, was subject to a planning application submitted in April 2016: [16/03420/FUL](#) (See Appendix A)

**292 North of Green Lane**, between 170 and 250 homes, lies between Ashton Road and Paxcroft Mead and is located in Steeple Ashton parish. Has been discussed with Taylor Wimpey and with Steeple Ashton Parish Council. was subject to a planning application submitted in May 2016 and recently revised: [16/04468/OUT](#) (See Appendix A)

The HSAP process has discounted these two sites due to their proximity to Green Lane Wood.

**3247 West Ashton Road**, between 210 and 300 homes, employment allocation is being promoted for residential purposes by Persimmon. A recent exhibition took place at the Civic centre (25<sup>th</sup> May 2017). If necessary additional employment land in the Ashton Park allocation to compensate. The HSAP incorrectly identifies this site as being part of the Ashton Park allocation.

Together sites 256, 292 and 3247 could provide between 547 and 822 homes, so that the sites at Southwick Court (3565), the Hilperton Gap (263 & 297) and between North Bradley and White Horse Business Park (298) do not need to come forward. This means that the sites supported by the town council would deliver at least as many new dwellings as the sites preferred by Wiltshire Council.

## I. Brownfield Sites and Windfalls

In the HSAP Wiltshire Council appears to ignore the number of homes which can be delivered from brownfield sites, either discounting them as being '*in the Settlement boundary*' or including them in the overall North & West HMA Windfall figure.

An analysis of the sites which have been removed due to them being located in the Settlement Boundary shows that some 250 homes are identified against such sites in Trowbridge including 55 at the District Council Offices, which was subject of a public consultation by Newland Homes for 80 homes.

Other sites are not even identified, even though Wiltshire Council are the owners or have been in discussion with the owners about proposals for residential development. The One Public Estate Bid from Wiltshire Council includes the following:

The document identifies "*The Outputs by 2020: 300 new homes,*" and also notes that this site "*would act as a catalyst for the transformation other key sites in Trowbridge such as: . . . Bowyers . . .*"

### Work Stream 1: Trowbridge

#### Overview:

As a result of the programme of work supported by OPE Round 3, high level master planning and analysis of the site show that the East Wing site if developed in conjunction with the current hospital site has the potential to deliver 300 new homes;

The masterplan for Innox Mills (Bowers) indicates that at least 100 new homes are likely to be provided on that site.

The National Planning Policy Framework (NPPF) identifies Windfalls as follows:

#### Windfall sites

Sites which have not been specifically identified as available in the Local Plan process. They normally comprise previously-developed sites that have unexpectedly become available.

It can therefore be concluded that on the basis that the Former District Council Offices has been specifically identified by Wiltshire Council and the East Wing site has been specifically identified by Wiltshire Council and that the Bowyers site has been specifically identified by Wiltshire Council they should all be included in the preferred sites list with minimal risk that they would not be delivered by 2026.

## J. Other Towns and Villages

So if Ashton Park is not delivering soon enough why is Trowbridge still bearing the brunt of the additional allocations for the North and West HMA when other towns are finding it much easier to meet their targets? Wiltshire Council has recognised difficulties in meeting the target for Trowbridge for some time.

### Appendix C: Developer workshop

**Full list of questions and points raised through the Developer workshop held on 5<sup>th</sup> March 2015**

Q - There is a significant shortage of dwellings / capacity in Trowbridge, will the Council look at other areas to help address supply in the local area. For example, is there merit in seeking to identify more land / SHLAA sites in Warminster? In other words, how will you settle the Trowbridge supply problem? Will it result in a further decant of housing numbers to other areas?

A - We will test SHLAA capacity at Trowbridge against the overall indicative requirement. This process is ongoing and involving: transport modelling / assessments and other disciplines. We have to test the projected quanta in other areas and see whether there is an opportunity for identifying additional development sites at other settlements in the same HMA. However, the process of flexing supply requirements within HMAs will nonetheless need to examine and assess the individual geography of places as some settlements may (or may not) have opportunity to grow. Warminster has a strategic allocation and planning issues to address - e.g. flood risk. Therefore, as part of the process of testing the ability for Trowbridge to accommodate the uplift in housing numbers, consideration may need to be given to other Market Towns and local Large Villages.

- Due to potential limited capacity in Trowbridge consideration may need to be given to taking a more flexible approach within the North and West HMA.
- Consideration should be given to allocating appropriate sites in the Large Villages within the Trowbridge Community Area Remainder.

Evidence clearly indicates that Trowbridge cannot meet the requirement and that towns such as Melksham and Westbury are being denied the opportunity to grow and develop to sustain services.

## **Appendix A.**

### **Section 18 submission from Persimmon – West Ashton Road employment land**

Future development proposals for Land at Biss Farm are consistent with the Settlement Strategy for the Trowbridge Community Area and will make an important contribution to meet the identified housing requirement. In any case, PHW considers that a comprehensive review of the existing settlement boundaries through the Housing Site Allocations DPD should be undertaken to enable the delivery of sustainable development throughout the Plan Period. The comprehensive review should be undertaken irrespective of overall housing provision as the above housing requirements for the Community Area are 'indicative' minimum figures. Additional housing at Trowbridge will help sustain and enhance the Town's services and facilities which will in turn help to promote better levels of self containment and a viable sustainable community. The site is located to the South East of Trowbridge and comprises approximately 13 hectares of relatively level land. This land has an existing Planning Permission for employment, however, very limited interest has been received since it was marketed in April 2013. PHW believes that residential development would be more suited within this location. The land uses surrounding Biss Farm are predominately residential. Land to the South of the site has a draft allocation within the emerging Core Strategy for 2,600 dwellings; Land at Biss Farm should form part of this allocation for residential development. For additional information, please see attached Call for Sites Submission Form and Location Plan. It is considered that this site could deliver approximately 300 dwellings within the SHLAA's initial 5 year period. Future residential development within this location would positively contribute to its locality and produce local housing that will go some way in sustaining the vitality of the Town. We hope that the above and attached information clearly outlines our interest and provides sufficient information to inform the 'Call for Sites' process. Should you require any further information then please do not hesitate to contact me.

## **Extract of Report to Policy & Resources Committee – 1<sup>st</sup> May 2018:**

### **6.1 Commercial**

**Bowers** – www.innoxmills.co.uk are close to agreement with a developer with a track record of developing mixed use sites incl. significant residential and expect to make an application in 2018.

**County Hall East** – Wiltshire Council have made a mixed use outline application including the new health facilities to replace the hospital and new leisure facilities.

**6.2 Housing** – A number of sites have been delayed pending resolution of mitigation measures associated with colonies of Bechstein Bats at Biss Wood and Green Lane Wood. Some have now been refused or withdrawn. The following provides a summary of the situation.

#### **A. Ashton Park and associated sites.**

**Ashton Park** – Persimmon et al. - (mainly in West Ashton and North Bradley Parishes), a revised application 15/04736/OUT for 2,500 houses, employment, facilities, schools, and A350 improvement was permitted by the Strategic Planning Committee on Wednesday 25th April. Bat mitigation measures include, moving employment land adjacent to Biss Woods and increasing the new A350 road elevation to provide bat tunnels have now been incorporated. The town council responded on 15th February with no objection, but raising issues regarding footway/cycleway links to Steeple Ashton and the town centre.

**Southview Park** - Wain Homes existing development is complete, apart from the cycle/footway link to Drynham Rd. New applications 16/00547/FUL 17/12509/FUL have been submitted for part of Ashton Park to the south of Southview Park providing up to 121 new dwellings. Concerns about access via Southview Park, links to the rest of Ashton Park, to the LEAP at Southview Park and to the cycling and walking network have been raised.

#### **B. Sites within the settlement boundary**

**Charterhouse** - McCarthy & Stone are building at Seymour Rd to provide 40 apartments. 16/03974/FUL

**Bradley Road** – The former District Council site has been bought by Newland Homes with permission 17/05669/FUL to provide 79 new homes.

**White Horse Business Park** - (North Bradley Parish) following a Prior Approval application to convert The Pavillions to residential, the owners agreed a plan of action to seek a commercial use for the building. If this is not successful, the residential conversion will be allowed, to provide around 104 new homes.

**Court Mills** – An application 18/03020/FUL for conversion to 7 town houses overlooking the Park.

St George's Works – Gaiger Bros are developing 30 apartments 18/02924/VAR

**Courtfield House** – Ashford Homes are expected to bring forward proposals soon for conversion of the House and to build a small number of houses in the garden, providing 21 dwellings.

**United Church Buildings** – The new owners' and their agents attended Town Development Committee on 13th March to present proposals for conversion into 25 apartments prior to submitting an application which has now been registered.

**McDonogh Court** – The owners have submitted an application 18/02099/FUL for construction of 20 houses and flats off Polebarn Road.

**Clark's Mill** – The owners have submitted an application 18/00200/FUL for conversion to 19 dwellings next to the Town Bridge.

**Ashton Street Centre** – To be disposed of by Wiltshire Council should accommodate 70 dwellings.

#### **C. Promoted by Wiltshire Council in the Housing Site Allocations Plan (HSAP):**

**Hilpertons Gap 263/297** - (Hilpertons Parish) Framptons submitted a revised application 16/00672/OUT for 170 houses in the Gap, accessed off Elizabeth Way. The Town Council has objected. The Hilpertons Neighbourhood Plan which has been consulted on, reluctantly accepted the principle of development in this part of the Gap, whilst retaining the open character close to Hilpertons Road near Fieldways.



**Southwick Court 3565** – (Southwick and North Bradley Parishes) Savills on behalf of Waddeton Park are promoting development on land between the town boundary and Southwick Court, east of Frome Road. [www.landsouthoftrowbridge.co.uk/](http://www.landsouthoftrowbridge.co.uk/) indicating road access off Frome Rd, 180 houses and a new school.

**Elm Grove Farm** – (partly in North Bradley Parish) Coulston Estates, are promoting development at Elm Grove Farm and land adjacent to Drynham Lane, west of the railway line with a view to bringing the site forward to provide 200 houses and a new school.

**Church Lane** – Accessed directly off Frome Road is in the town boundary providing 45 houses.

**Spring Meadows** – This site accessed off Frome Rd is inside the town boundary providing 20 houses.

**East of Woodmarsh** – This site to the south of the A363 is being proposed for 150 houses.

#### **D. Sites Discounted by Wiltshire Council.**

**Castle Mead Extension** – Persimmon - Application 16/03420/FUL for 272 more homes up to Green Ln Wood was withdrawn. Discounted due to proximity to Green Lane Wood. The Bat reports indicate this site cannot proceed in the foreseeable future.

**Ashton Road** - currently in Steeple Ashton Taylor Wimpey made a revised application for around 200 homes 16/04468/OUT. Now refused due to proximity to Green Lane Wood. The Bat reports indicate that this site cannot proceed in the foreseeable future.

**Biss Farm** - An application for 267 houses 17/09961/OUT, primary school, pub and care-home has been submitted by Persimmon for land north of Leap Gate and east of West Ashton Road, currently allocated for employment uses. Discounted in the HSAP as already allocated for employment.

The adopted Core Strategy identifies Settlement Boundaries, within which development proposals are normally acceptable. Outside the Settlement Boundaries it allocates new areas of development, which includes the largest allocation in the Wiltshire Council Area, Ashton Park on the edge of Trowbridge. The result of this is that specific sites within the Settlement Boundary for Trowbridge are not identified or allocated as development sites.

The Core Strategy did not identify sites to accommodate all of the housing requirements in the plan period and the Ashton Park allocation has only just received outline planning permission, at a meeting of the Strategic Planning Committee on Wednesday 25th April, and is therefore significantly behind schedule. This low rate of housing growth in the Trowbridge Area means that the HSAP, currently being considered by Wiltshire Council, has sought to allocate a number of controversial housing sites in the Trowbridge Area to meet the currently unmet requirement. The HSAP is also proposing to revise the Settlement Boundaries. The HSAP fails to provide an opportunity to allocate specific sites which are in either the current or proposed Settlement Boundary.

The Core Strategy is now being reviewed with a view to a revised and updated Local Plan being brought forward over the next few years to cover the period up to 2036, whilst this suggests different Housing Market Areas, with Trowbridge and Chippenham being separated, it still does not indicate that it will address the failure to allocate sites in Settlement Boundaries.

The Brownfield Land Register is in two parts, part one is now published but this also fails to allocate specific sites such as Bowyers and County Hall East because they are not identified through the Strategic Housing Land Availability Assessment (SHLAA). [www.wiltshire.gov.uk/planning-brownfield-register](http://www.wiltshire.gov.uk/planning-brownfield-register)

Therefore, as the Core Strategy, HSAP and Brownfield Land Register all fail to adequately identify such sites, the Town Council believes that Wiltshire Council should include in the HSAP an opportunity to ensure that brownfield sites within the Settlement Boundary are specifically allocated and not treated as part of the wider Housing Market Area (HMA) Windfalls figure. Since the last meeting I have discussed this with the Director of Planning and Economic Development at Wiltshire Council and provided him with evidence of other planning authorities which allocate sites within their Settlement Boundaries for housing. The examples I provided were; North Hertfordshire, New Forest,

Shropshire, South Somerset, East Riding and Cotswold. For example, in Cotswold District the plan allocates sites within Cirencester's Settlement Boundary as well as a strategic site for over 2000 new houses, offering some similarities to Trowbridge.

Cabinet is due to consider the HSAP on 15th May with Full Council due to make a decision on 22nd May. It is therefore appropriate for the Town Council to reconsider its previous submission to the consultation in order to make a revised representation to Wiltshire Council at these meetings.