

## **Wiltshire Council**

### **Council**

**10 July 2018**

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### **Questions from Lance Allan, Town Clerk and Chief Executive, Trowbridge Town Council**

#### **To Councillor Toby Sturgis, Cabinet Member for Spatial Planning, Development Management and Property**

#### **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?

## Response

1. As set out in the previous response to the questions submitted by Trowbridge Town Council, Wiltshire Council has developed a robust approach to assessing housing land supply, which has been tested at numerous planning appeals and the examination of Chippenham Site Allocations Plan. No evidence has been provided by any party to justify a change to the approach to windfall allowances for the purposes of calculating housing land supply, or the allocation of previously developed land in the WHSAP.

The Council considers that none of the sites allocated in the WHSAP will impact unacceptably upon the character and identity of the villages of Hilperton, Southwick, North Bradley or West Ashton.

The WHSAP is in conformity with the Wiltshire Core Strategy. Moreover, the policies of the Wiltshire Core Strategy and the National Planning Policy Framework would be applied to the consideration of any subsequent planning application and thereby mitigate and limit any potential impacts.

2. Trowbridge has grown, in a plan-led sense, through incremental allocations of land and subsequent development into parished land for many years. Indeed, the West Wiltshire District Local Plan First Alteration, June 2004 contained several significant allocations of greenfield land outside the town policy limits. The Wiltshire Core Strategy continues this plan-led strategy for delivering housing at the town by allocating the Ashton Park site in the parishes of West Ashton and North Bradley; and anticipated the delivery of additional greenfield housing land in Core Policy 29.

The effect of this long-standing approach to delivering growth at Trowbridge has led to the incremental development of land within the parishes of Hilperton, West Ashton, Steeple Ashton and North Bradley, all set against a policy framework for the prevention of coalescence with nearby villages<sup>1</sup>. Therefore, it would appear clear that the proposed allocations set out within the draft Housing Site Allocations Plan follow this long-standing policy approach, rather than conflict with it.

Whilst the position of the Town Council in respect to the proposed allocations is acknowledged, it is noted that their support for certain sites and not others could be considered contradictory. The proposed Elm Grove site is, for instance, situated within the parish of North Bradley. Therefore, it is not clear why the Town Council support some incremental expansion of the town into some

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<sup>1</sup> Paragraph 3.2.35 of the West Wiltshire District Plan First Alteration, June 2004; Core Policy 29 of the Wiltshire Core Strategy

parished areas that would be within the existing open countryside around the Town.

The purpose of the development plan is to manage the needs of a growing population sustainably. Clearly, as a Principal Settlement, Trowbridge is expected to meet a commensurate proportion of that growth. Given the limited potential for brownfield land to meet the needs of the town during the plan period, and the shortfall against the indicative housing requirement, the WHSAP will inevitably consider land adjacent to the settlement boundary and consequently within the open countryside. This is not contrary to the development plan but a necessary step to ensure that enough homes can be provided at the right locations at the right time in order to conform with local and national policy. It is the role of the Local Planning Authority to make the difficult decisions on where development should take place to ensure implementation of strategic planning policy and this is what the WHSAP is seeking to achieve.

It should be noted that the sites proposed in the WHSAP for allocation at Trowbridge will not address the full shortfall but will go some way to correcting the current imbalance. The site selection process undertaken is robust and thorough, eliminating any sites that are currently not considered suitable for development. The reasons behind the selection of sites for the WHSAP can be found in the Trowbridge Community Area Topic Paper.

3. Wiltshire Council considers that the alternative sites suggested are not currently suitable for allocation for housing. Biss Farm, for example, is located on an existing employment allocation associated with Ashton Park. Notwithstanding that point, additional housing in this location would likely lead to significant adverse effects on protected bat species and important habitats such as Green Land Wood. As explained in the Community Area Topic paper for Trowbridge, the allocation of this site for housing development would be contrary to the Wiltshire Core Strategy and was therefore excluded from further consideration.
4. The indicative requirements for each of the community areas have not been revised, and remain as set out in the Wiltshire Core Strategy. The evidence indicates that some Community Areas are on track to exceed their indicative requirements whereas others, such as Trowbridge, are currently falling significantly short of expectations. Melksham, Westbury and Calne are set to exceed their indicative housing requirements by: 14%, 19% and 31% respectively.

The approach and flexibility taken to meeting the indicative requirements set by the Core Strategy is explained in the Housing Land Supply Topic Paper and the Topic Papers for each of the Community Areas.

5. The capacity of settlements and community area remainders to meet or exceed their indicative requirements has been applied on a case-by-case basis. Trowbridge is a Principal Settlement and so reallocating the shortfall to other Market Towns and Large Villages would result in an imbalance in the sustainable pattern of development planned for Wiltshire. Furthermore, Market Towns such as Melksham, Calne and Westbury have sufficient existing commitments to provide a steady supply of housing to the end of the plan period and potentially beyond.

The WHSAP seeks to avoid significant deviations from the indicative requirements set out in Core Policy 2. The review of the Wiltshire Core Strategy will consider the capacity of settlements and community areas to accommodate further growth up to 2036, including any necessary infrastructure to ensure that housing and employment are planned and delivered in a balanced and sustainable way.

6. Wiltshire Council does not consider that a neighbourhood plan would solve all issues relating to housing allocations. A neighbourhood plan can potentially identify deliverable sites for housing either within or outside the settlement boundary. For Trowbridge, there could be a focus on the consideration of allocating brownfield land within the town, but this would need to be supported by robust evidence to demonstrate how and when such sites would be capable of delivering new housing. That said, a neighbourhood plan can cover a plan period that extends beyond 2026, thereby increasing the potential certainty that could be applied to the reliance on housing from previously developed land. Again, that would be a matter for the Town Council to consider in developing the development options that will underpin their neighbourhood plan.
7. As explained in answer to question 2, the allocation of land outside of the settlement boundary does not mean that the proposed sites in the WHSAP are contrary to the Wiltshire Core Strategy.

The review of the Wiltshire Core Strategy is being undertaken collaboratively with Swindon Borough Council, and concurrently with the review of the Swindon Local Plan. Both reviews will roll forward the plan period and determine the updated housing requirements for Wiltshire and Swindon. However, the local plans for each authority will continue to plan for the respective administrative areas only. During this process, the allocation of housing for each of the settlements in Wiltshire will be considered, taking into account up to date evidence. In the meantime, and prior to the review of the Core Strategy being completed, the strategy for maintaining a supply of housing will be determined by executing the policies of the Core Strategy.

The WHSAP, a subsidiary document to the Core Strategy, seeks to ensure surety of supply in line with the current adopted policies of the Wiltshire Core Strategy. It should be noted that, in the absence of the site allocations proposed within the WHSAP, it is likely that the housing market area would be more vulnerable to speculative development.