## Council

#### 10 July 2018

### **Public Participation**

#### **Question from Mrs Jacqui Clark**

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

#### Question (P18-11)

The Wiltshire Council HSAP housing 'allocation' H2.3 was originally, according to paragraph 5.58, for approximately 205 dwellings on approximately 16.33ha.

The purposefully low density was explained in paragraphs 5.59, 5.60, 5.61, 5.63, and 5.64. In particular, the opening sentence of 5.63 acknowledges the sensitive nature of this site as it states 'An important measure will be the provision of landscaping between Elizabeth Way and new housing in order to attenuate noise and reduce the visual impact of this road.'

The revised HSAP suggests that approximately 355 dwellings should now be built on a site of approximately 21.24ha.

Therefore, the proposed number of dwellings has increased by 73% whilst the site has increased by 'only' 31% (not all of which is developable). Can you explain the vast difference between these percentages?

Allowing for the fact that the 'new' land allocation runs alongside Elizabeth Way, and includes undeliverable land in the form of two balancing ponds for run-off from the road (with their surrounding earthwork), can you explain how the aspirations of 5.59, 5.60, 5.61, 5.63, and 5.64 will be incorporated on a site with such a massively increased density?

Does the fact that the WC spatial planning team did not know the position of Elizabeth Way (despite it being open for over two years) lead you to question their competence and knowledge of the wider Trowbridge area when putting forward their suggested housing allocation sites?

#### Response

The evidence used to determine the development potential of the draft site allocations is the methodology employed within the Council's Strategic Housing Land Availability Assessment (SHLAA)<sub>1.</sub> A standard housing density was applied to all the SHLAA site options assessed.

<sup>&</sup>lt;sup>1</sup> Now referred to as the Strategic Housing and Employment Land Availability Assessment (SHELAA)

Whilst this approach was considered to be reasonable at the outset of the plan making process, it has nonetheless been robustly challenged through the consultation process by the development industry on the grounds that the proposed site allocations fail to deliver the most effective use of land and therefore fail to appropriately address national planning policy. As such site densities were reviewed following the consultation.

The National Planning Policy Framework (NPPF) encourages the effective use of land (paragraph 17) to ensure that planning policies optimise the potential of sites to accommodate development (paragraph 58). Since the publication of these policies, the Government has consulted on proposals in its Housing White Paper which call for more intensive use of land and avoiding building homes at low densities in areas of high demand, as well as pursuing higher density housing in accessible locations. Indeed, these proposals were set out in the recent consultation draft of the revised NPPF at Chapter 11. It is therefore evident that the Government is seeking to ensure all local planning authorities present a clear strategy for using land in an effective manner.

The proposed change to the increase in density of the Elizabeth Way site therefore reflects and responds to the latest national policy position on the delivery of new homes, as set out in Budget 2017, the Housing White Paper, and draft revisions to the NPPF. There is no direct correlation between the increase in proposed dwelling numbers and site area.

The proposed increase in the size of the site, together with the measures set out in the draft plan, will ensure that any subsequent development scheme addresses the policies of the Wiltshire Core Strategy in respect of design and the provision of green infrastructure. Moreover, as anticipated by national planning policy, any subsequent development scheme, irrespective of proposed density, will need to ensure it delivers good design in line with the provisions of paragraph 56 through to 66 of the NPPF.

The presence and alignment of Elizabeth Way is known and understood by officers. Indeed, the evidence set out in the Trowbridge Community Area Topic Paper clearly refers to the proposed allocation within the context of the road and considered development to the immediate west of the road would be suitable in principle. This was a simple mapping error, picked up through the consultation and responded to accordingly. The overall competency and knowledge of officers is not in question.