

REPORT FOR STRATEGIC PLANNING COMMITTEE

Date of Meeting	22 nd February 2023
Application Number	20/00379/OUT
Site Address	Land South of Trowbridge, Southwick, Trowbridge, Wilts
Proposal	Outline planning permission with all matters reserved except access for the erection of up to 180 residential dwellings (Use Class C3); site servicing; laying out of open space and associated planting; creation of new roads, accesses and paths; installation of services; and drainage infrastructure.
Applicant	Waddeton Park Ltd
Town/Parish Council	SOUTHWICK
Electoral Division	Southwick (Cllr Prickett)
Grid Ref	386180 159631
Type of application	Outline Planning
Case Officer	Ruaridh O'Donoghue

Reason for the application being considered by Committee

The application is called to Committee at the request of Councillor Prickett. His concerns relate to the scale of development, the visual impact upon the surrounding area, the relationship with adjoining properties and the environmental/highways impacts.

1. Purpose of Report

The purpose of the report is to assess the merits of the proposal against the policies of the development plan and other material considerations and to consider the recommendation that the application be approved.

2. Report Summary

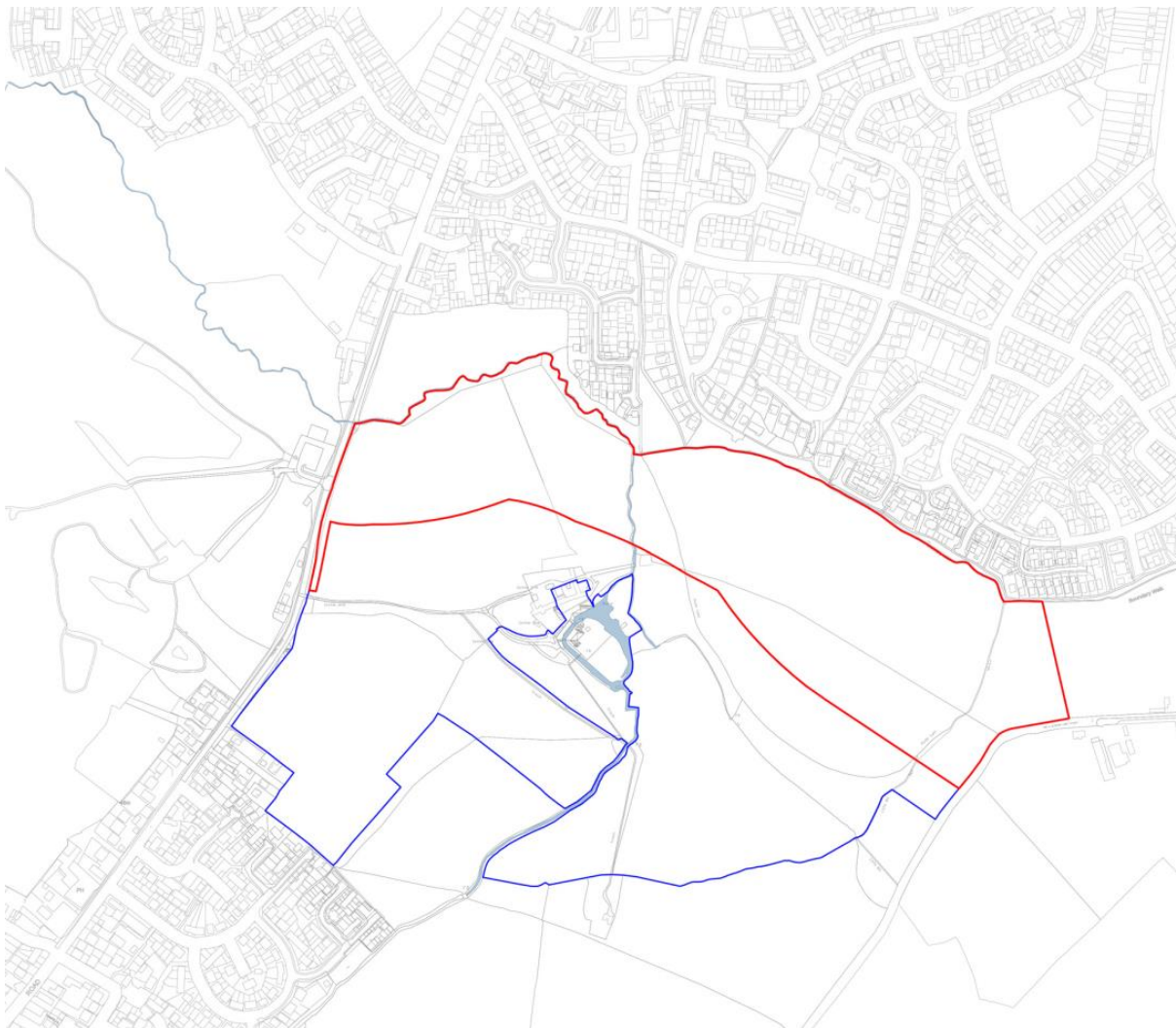
The main issues to be considered are:

- Whether the proposal constitutes EIA development
- Whether the development is acceptable in principle (CP 1 and 2);
- Whether the scheme constitutes high quality design (CP 57);
- Whether the scheme would preserve or enhance the historic environment (CP 58)
- Whether the scheme would have an acceptable landscape impact (CP 51);
- Whether the proposal would have a negative effect upon highway safety including if there is sufficient parking for the proposed development (CP 61 and 64);
- Whether the site can be adequately drained without increasing flood risk elsewhere (CP 67);
- Whether there would be any harmful impacts upon protected species or habitats (CP 50)?

- Whether there will be any land contamination / air quality issues (CP 55)?
- Whether the proposal results in the loss of best and most versatile agricultural land (NPPF 170)?
- Are there any other planning issues raised by the development?
- What planning obligations are required to make the development acceptable in planning terms?

3. Site Description and location

The site of approximately 18.8ha in area (see below and appendix A) is located within Southwick Parish. The northern edges of the site adjoin the boundary of Trowbridge Parish and the Eastern edge abuts North Bradley Parish. It forms part of the Wiltshire Housing Sites Allocation Plan (WHSAP) under the reference H2.6.



Running across the site are a number of a public rights of way (PRoW) – SWCK1, SWCK2 and SWCK3. There are a network of other PRoWs that run close to the site.

The Lambrok Stream (a main river) traverses the site. A strip of land following the path of the brook is classified as Flood Risk Zone 2 and 3.

Southwick Court Farmhouse is located adjacent to the site and is Listed at grade II* along with its gatehouse and bridge over moat.

In archaeological terms, the site appears to represent water meadows from the post medieval period.

In terms of Agricultural Land Classification, the site is grade 3.

The site lies within the Yellow Zone (Medium Risk) defined in the Trowbridge Bat Mitigation Strategy.

Southwick Country Park lies directly to the west of the Application Site and is separated from the site by the A361.

4. Planning History

There is no recorded planning history relating to the application site. However, the following live undetermined applications on the following adjacent sites are (see Figure 1) relevant:

Reference	Description	Decision
18/10035/OUT	Land at Church Lane (H2.4): Outline application for residential development (up to 55 dwellings) with the creation of new vehicular access off Frome Road and removal/demolition of all existing buildings (all matters aside from the formation of the new vehicular access are reserved)	Pending
20/09659/OUT	Land at Upper Studley (H2.5): Erection of 50 dwellings and associated access and landscaping works.	Pending

In addition, the site is allocated in the Wiltshire Housing Sites Allocation Plan (Feb 2020) under site H2.6. This of course relates to the planning history of the site and will be covered later in the report.

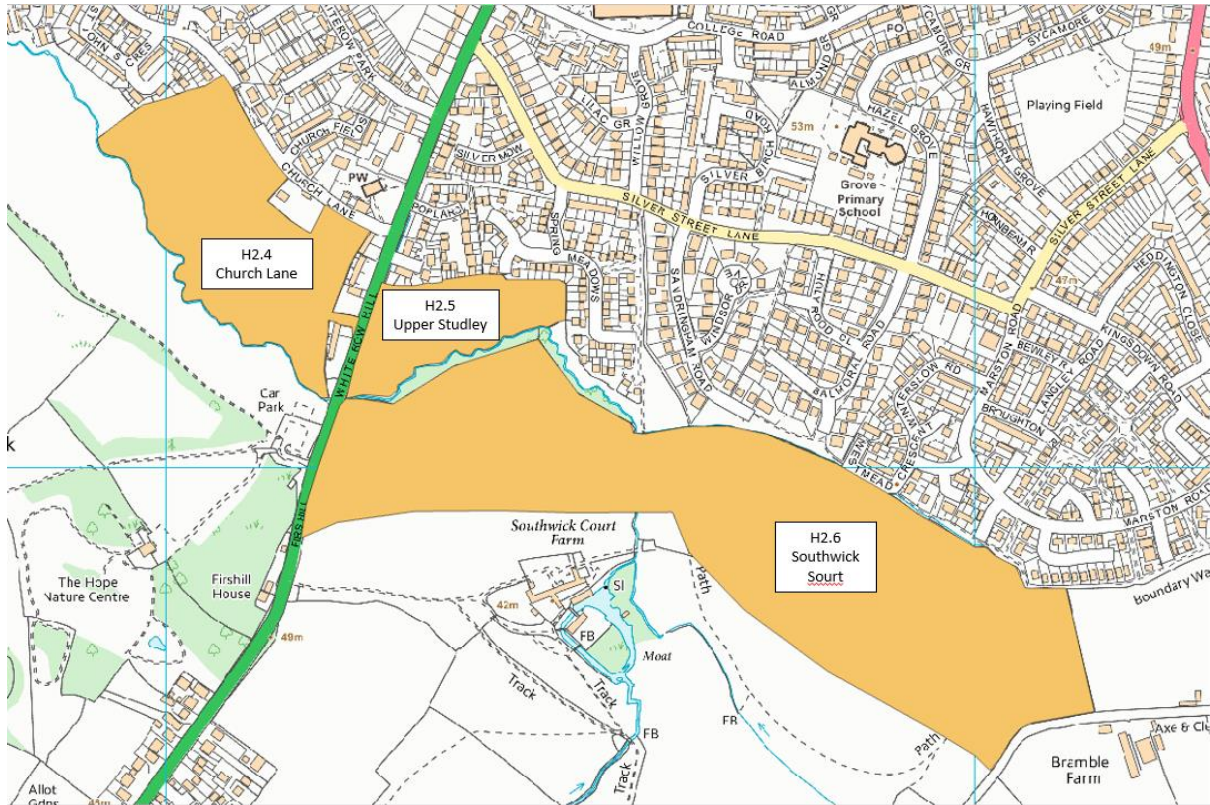


Figure 1 Related WHSAP allocated sites

5. The Proposal

This is an outline application for a development of up to 180 dwellings. The application includes the provision of new open space and associated infrastructure. It should be noted that this is an outline application where all matters bar access is reserved. It is accompanied by the following documents:

- Planning Statement
- Design and Access Statement
- Flood Risk Assessment
- Transport Assessment
- Framework Travel Plan
- Heritage Assessment
- Landscape and Visual Assessment
- Preliminary Ground Investigation Report
- Lighting Parameters Plan
- Green Infrastructure Parameters Plan
- Access, Land use and & Building heights Parameters Plan
- Indicative Layout Plan
- Access Plans
- Tree Constrains Plan

Vehicular access is to be formed off Firs Hill (Frome Road) just to the south of the entrance point into Southwick Country Park. A pedestrian and cycle access are to be formed onto Firs Hill (Frome Road) to the north of the entrance point into Southwick Country Park. Emergency access to and from the site is to be taken off Westmead Crescent on the northern side of the

development. Pedestrian access is retained at the points of entry into the site from existing PRowS with some additional points to ensure better connectivity.

An internal access road leads from the Frome Road across the Lambrok to the proposed housing development. The block of housing is to be located to the northeast of the Southwick Court Farm Complex. It is surrounded by landscape and ecological buffers as well as attenuation for surface water drainage.

The illustrative masterplan for the site is shown at below (also see Appendix B). This seeks to show a possible layout of how the housing could fit on the site in an acceptable and policy compliant manner.



Appendix D, E and F are parameters plans. These would fix at outline stage certain parameters within the site (e.g. ecological and landscape buffer zones) and, if approved as part of this application could not be altered at reserved matters stage (unless a variation to the outline consent is submitted). They show agreed ecological buffers and dark corridors, green infrastructure including landscape buffers, access, land use and buildings heights. Appendix D shows that the net developable area of housing will be 5.96 ha. For the 180 dwellings, this equates to c. 30 dwellings/ha, which is comfortably within expected tolerances for an edge of settlement urban development. It also shows approximately 12.8 ha of publicly accessible open space.

Appendix G, H and I provide the details of the means of access (main and emergency) to the development as well as the indicative plans for the internal access road from the Frome Road to the housing.

6. Planning Policy

Wiltshire Core Strategy 2015 (WCS)

- CP1 – Settlement Strategy
- CP2 – Delivery Strategy
- CP3 – Infrastructure Requirements
- CP41 – Sustainable Construction and Low Carbon Energy
- CP43 - Providing Affordable Homes
- CP45 – Meeting Wiltshire’s Housing Needs
- CP48 – Supporting Rural Life
- CP50 – Biodiversity and Geodiversity
- CP51 - Landscape
- CP52 – Green Infrastructure
- CP55 – Air Quality
- CP56 – Land Contamination
- CP57 – Ensuring High Quality Design and Place Shaping
- CP58 – Ensuring the Conservation of the Historic Environment
- CP60 – Sustainable Transport
- CP61 – Transport and New Development
- CP62 – Development Impacts on the Transport Network
- CP64 – Demand Management
- CP67 – Flood Risk

Wiltshire Waste Core Strategy

WCS6 (Waste Audit)

Saved Policies for the West Wiltshire District Local Plan (1st Alteration)

- U1a Foul Water Disposal
- U2 Surface Water Disposal
- U4 Ground Source Protection Areas

Southwick Neighbourhood Plan (Oct 2021)

North Bradley Neighbourhood Plan (May 2021)

Other

- The Wiltshire Waste Core Strategy (adopted 2009)
- Wiltshire Housing Site Allocations Plan (adopted Feb 2020)
- Policy WCS6 - Waste Reduction and Auditing
- The Wiltshire Local Transport Plan (LTP) and Car Parking Strategy
- National Planning Policy Framework July 2021 (NPPF)
- Planning Practice Guidance (PPG)
- Circular 06/2005 – Biodiversity and Geological Conservation
- “The Setting of Heritage Assets: Historic Environment Good Practice Advice in Planning 3” (HE GPA3)
- Trowbridge Bat Mitigation Strategy (TBMS) SPD

7. Summary of consultation responses

Southwick Parish Council - Objection

Access issues:

- a) *Building of the new access is shown as being across green fields, which will have a detrimental impact on the environment including an impact on the buried roman road*
- b) *The proposed access to Frome Road will generate a significant increase in traffic volume onto the already congested A361*
- c) *Access onto already congested roads will generate significant road safety issues*
- d) *The proposed access road has to cross the Lambrok stream which will require the building of a viaduct. This will have a detrimental impact on the environment and wildlife.*
- e) *Access to the east would be more environmentally satisfactory, would avoid the building of a new road across open fields, a viaduct across the Lambrok and divert away from the historic site of Southwick Court*
- f) *Members propose the merits of any access should be via Axe & Cleaver Lane to Woodmarsh, a route which will particularly benefit pedestrians.*

Heritage issues – impact on Grade II star listed property and its environment, designated as a ‘historic landscape of high importance’. The development of this site would result in extensive harm to this landscape, which cannot easily be mitigated.

Ecological issues – the development, which is on higher ground, would generate run off and pollution, into the Lambrok stream and the lake on the Southwick Court estate which would have a detrimental impact on the varied wildlife living there including otters, water voles, bats, great crested newts.

Flooding – the fields proposed for the development flood on a regular basis and are permanently waterlogged.

Loss of buffer zone with Trowbridge, contrary to the landscape gap policy proposed in the emerging Southwick Neighbourhood Plan.

Trowbridge Town Council - Objection

Flood Risk, for the reasons provided by the Environment Agency.

Flood Risk and Drainage, for the reasons provided by the Principal Drainage Engineer.

Impact on ecology and biodiversity, for the reasons that the application does not provide the necessary evidence in respect of those species which are evident and would be significantly adversely impacted by the development including Otters. In particular, the proposed bridge to carry the road across Lambrok Stream will have a significant adverse impact. The lack of drawings detailing the bridge design results in an unacceptable application which fails to propose how the development area will satisfactorily be accessed.

Impact on Historic Landscape Setting, for the reasons that the proposed road and the bridge, if satisfactorily mitigated for severe adverse impact on biodiversity, ecology and flood risk is likely then to have a significant adverse impact on this aspect. The proposed bridge will have a significant impact on the setting of Southwick Court.

The proposal is not in accordance with the Trowbridge Bat Mitigation Strategy (Figure 6, page 40), for the reason that the TBMS requires a ‘Zone A’ NEW Core Bat Habitat to be created by the developer which is in addition to the RETAINED Core Bat Habitat and then a ‘Zone B’ Dark

Buffer Zone. The applicant has failed to acknowledge the RETAINED Core Bat Habitat in their application and appears to indicate that buildings will be built at the edge of the Dark Buffer Zone, rather than this being the edge of highways and gardens.

AND:

If Wiltshire Council is minded to approve the application, then Trowbridge Town Council would request the following conditions:

A. The proposed road should be designed such that it is sensitive to the; historic landscape character of the area and adjacent buildings; the impact on flood risk and; on the ecological and biodiversity aspects of the site and in particular where it crosses the Lambrok Stream, such that the road and in particular the bridge, together mitigates satisfactorily for all of these three aspects individually and in combination.

B. The development of the site should provide for a through dedicated cycle path from east to west;

- linking to the A361 in such a way that it forms part of a longer route through to Southwick Country Park and via the Church Lane site (H2.4) to Acorn Meadow and Lambrok Road in the Northwest; This requirement appears to have been accommodated in part as part of the revised proposal (February 2021) but further detail is required, and*
- linking to Axe and Cleaver Lane in such a way that it forms part of a longer route through to North Bradley village in the South East; This is not clear on the revised proposal. A cycle route from the site linking to Axe & Cleaver Lane is required from the developed area with an improved surface on Axe & Cleaver Lane, and*
- linking to Boundary Walk in such a way that it forms part of a longer route through to Bradley Road and the Elm Grove site and thence on to Ashton Park in the North East; This is not clear on the revised proposal. A cycle route from the developed area to Boundary Walk, with improvements to Boundary Walk and the path linking to Bradley Road/Woodmarsh is required, and*
- linking to the path between Sandringham Road and Spring Meadows to the North; This is not clear on the revised proposal.*
- The developers should fund improvements to the surface of Axe and Cleaver Lane from the access point from the site to Woodmarsh Road so that it is suitable for cycling; and*
- The developers should fund improvements to Boundary Walk footpath, including widening between the site and Woodmarsh Road so that it is suitable for cycling as well as walking; The developers should provide a suitable crossing point on the A361 to allow the safe passage of cyclists to cross the road and a suitable route for cyclists to access the Church Lane site.*

C. The developer should make a substantial contribution towards the provision of additional children's play equipment at Spring Meadows and at The Grove Recreation Ground, in lieu of an equipped play area on the site. This does not appear to have been incorporated, as the proposal still includes a LEAP.

D. The developer should make a substantial contribution towards improvements and enhancements to Woodmarsh Football Ground. This is not covered by the revised application.

E. If it is to be in accordance with the TBMS the proposal will need to be revised to include a minimum 30m wide protection zone across the whole site in addition to the RETAINED Core Bat Habitat at the edge of the development.

F. The revised application talks about bus stops. Looking at all of the south of Trowbridge sites it would be appropriate that; Sites H2.4 and H2.5 should fund improvements to bus stops and shelters on Frome Road. Site H2.1 should fund improvements to bus stops shelters on Bradley Road in the vicinity of Spitfire Retail Park. Site H2.2 should fund improvements to bus stops and shelters on Woodmarsh.

This site: H2.6, should fund the provision of:

- i. A bus shelter at the junction of Summerdown Walk and Marston Road including seating and a litter bin.*
- ii. The relocation of the bus stop at Marston Road near the junction with Westmead Crescent and the installation of a bus shelter, widened pavement, seating and litter bin in the existing grass triangle area.*

North Bradley Parish Council - objection

Whilst the Parish Council accepts that this development is in the WHSAP it has objected to the development over the various stages of public consultation for the following reasons:

- *The Parish Council would wish to have sight of mitigation plans that would prevent flooding risks. The potential run off from this estate which is on higher ground would pollute the Lambrok stream and lake and have a detrimental effect on wildlife.*
- *There would be immense additional congestion along Frome Road and into North Bradley.*
- *This would be erasing the western boundary of North Bradley.*
- *Should this application be approved, the Parish Council would require a condition that Axe and Cleaver Lane be accessible to emergency vehicles only.*
- *In the development of its Neighbourhood Plan, North Bradley Parish Council has worked towards developing the Landscape Setting Gap as a bat commuting route between the woods to the North East of Trowbridge and Southwick Country Park on their way to the Bradford on Avon roosting sites. The parish council considers that the bats, and particularly the Bechstein bats, are a considerable environmental asset to the parish, and indeed to the whole of the local area. We are very proud to be so blessed. The Parish Council wishes to be positive and enhance provision for bats and not just mitigate against adverse effects. We would hope that Wiltshire Council feels the same way.*
- *With this in mind the proposed woodland in the planning application should contain some semi-mature oak trees and the most south-easterly plot replaced by more woodland, including oaks, to make a substantial sized copse. The objective would be to eventually establish Bechstein roosting sites.*
- *The Council added that this plan should be taken into consideration as part of a master plan and not considered in isolation. They note that the road network has been modified to provide two significant S bends, but the eastern end has no stop end and is pointing into North Bradley's landscape gap. The PC objects to this and asks that a building is located across the end of the road to prevent any developer from extending eastwards.*

Wiltshire Council Highways – no objection, subject to conditions / S106

The LHA support the scheme coming forward, subject to conditions, and provided that appropriate mitigation in the form of contributions to the Trowbridge Transport Strategy and new bus stop provision is secured via a s106 Agreement.

WC Lead Local Flood Authority – no objection, subject to conditions

The LLFA have reviewed the following document that was submitted with the application:

- Level 2 Flood Risk Assessment (November 2019)
- Addendum to the Level 2 Flood Risk Assessment (December 2020)
- Addendum to the Level 2 Flood Risk Assessment (December 2020) - Microdrainage Source Control Outputs
- Revised Illustrative Masterplan
- Revised Parameter Plan – Green Infrastructure
- Consultee Response – LLFA (Drainage)
- Consultee Response – Drainage Comments (2)
- Consultee Response – Wessex Water
- Consultee Response – Wessex Water (2)
- Flood Risk Assessment Addendum 2
- Groundwater Flood Risk Assessment
- Trowbridge Council Flooding Technical Note (Site H2.6)
- Environment Agency Consultee Response (April 2021)
- Flood Risk Assessment Addendum 3 (incl. appendices)
- Hydrology Modelling Report

They also noted that representations have been received by local residents / councillors in relation to the drainage and flood risk of this site. Whilst these comments have been reviewed, they have not been used to influence the drainage team's assessment of the proposed drainage strategy of the site.

After reviewing all the submitted information, included revised documentation requested during the determination process, and noting that the EA have now removed their planning objection subject to condition; the LLFA are now in a position where they can seek to condition the application.

Environment Agency – no objection, subject to conditions

The EA have now removed their objection to the proposal upon receipt of further information that they had requested (notably an amended FRA and revised fluvial modelling). All aspects of the EA's concerns have been suitable addressed and they are now able to offer no objections to the scheme subject to conditions which are set out in more detail in the report.

Wiltshire Council Affordable Housing – no objection, subject to S106

Should it be decided that this site is suitable for residential development, under Core Policy 43 (Providing Affordable Homes) of the Wiltshire Core Strategy an on-site affordable housing provision of 30% will be sought in this location. As this site is proposing 180 new homes, the on-site affordable housing requirement will be for 54 affordable homes - a tenure split of 60% affordable rented homes and 40% shared ownership homes is required. Therefore, the Council would seek 32 homes for affordable rent and 22 homes as shared ownership.

Wiltshire Council Education – no objection, subject to S106

The Council's Education Team have no objections to the development subject to securing s106 money towards the provision of early years, primary and secondary education. The money requested is set out in more detail within the report.

Wiltshire Council Landscape Officer - No objections

Wiltshire Council Arboricultural Officer - No comment

Wiltshire Council Conservation Officer – Comments

Whilst the allocation of the site suggest that some level of harm should be accepted in the interest of providing housing, the allocation policy itself as well as the thrust of general conservation legislation and policy require that this harm should be strictly limited.

On the basis of the submitted indicative development details, I consider that the harm which would result to the Southwick Court group of assets from a development in accordance with the current indicative details should be considered as 'less than substantial harm' but within the higher levels of this category. Assuming that the positive opportunities suggested for the design of the road and the design and layout of the housing are reflected in the final scheme, this may assist in limiting harm but not to reduce it to the suggested "very small level".

Paragraph 196 of the NPPF requires 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". It will fall to the Case Officer for the application to assess the benefits which will accrue and to consider the above comments in respect of conservation issues in conjunction with advice on other planning constraints to reach a view on the final planning balance.

In reaching this decision the Case Officer will be required to take into account not only the special regard required by Section 66 of the Act to be given to the desirability of preserving the setting of listed buildings but also the great weight ascribed to the conservation of designated assets by paragraph 193 of the NPPF (and "the more important the asset, the greater the weight should be") which are echoed in the Council's own heritage policy CP58.

Historic England – comments

The proposed housing will not adversely impact the setting of the Grade II* listed Southwick Court, but the construction of the access road serving the development would have a negative impact. They consider that impact to be relatively minor, but nonetheless adverse.

The creation of a road across the pasture will still have an adverse impact on appreciation of the Grade II* listed buildings, despite its proposed sympathetic design. The engineered nature of the carriageway and the frequency of vehicular traffic will serve to erode the sense of rural isolation of the Grade II* listed building.

An alternative means of accessing the site might be possible by linking into existing roads to the east or the north of the site, negating the need for a new road across the pasture north-west of Southwick Court. If this were possible, it would reduce harm to the setting of Southwick Court to a very minor level indeed.

Historic England's expertise is in the historic environment, and not highway infrastructure or traffic management. We are unable to suggest whether the alternative means of accessing the site from the east or the north is feasible. But it is certainly desirable in terms of preserving the isolated rural setting of the Grade II* listed building.

They recommend that Wiltshire Council carefully considers, in consultation with your colleagues in the Highways Department, whether the alternative means of accessing the site from the North or East is possible. If it is, then the justification for constructing a new road through the pasture north-west of Southwick Court would fail to be clear or convincing, and potentially thus be at odds with paragraph 193 of the National Planning Policy Framework.

Wiltshire Council Public Open Space – no objection, subject to S106

They have no objections to the development, on the proviso that public open space is secured on the site via s106 as well as money for the improvement or development of sports pitches or associated facilities that enable their use. The space requirements and money requested is set out in more detail within the report.

Wiltshire Council Public Art – no objection, subject to S106

They have no objections to the development on the proviso that s106 money is obtained for a scheme of public art to be delivered on the site. The money requested is set out in more detail within the report.

Wiltshire Council Public Protection – no objection, subject to conditions / S106

They have no objections to the development on the proviso that s106 money is obtained for air quality monitoring as part of the Council's requirements to reduce emissions, and that conditions are imposed to deal with construction management and contaminated land.

Wiltshire Council Ecology – no objection, subject to conditions

On review of all the relevant documentation, they no longer have any objections to the scheme subject to:

- conditions to cover the following:
 - Submission of a Lighting Scheme
 - Submission of a Landscape and Ecological Management Plan (LEMP)
 - Submission of a Construction and Environmental Management Plan (CEMP)
- s106 requirements:
 - to offset residual/in-combination losses
 - to ensure that any open space that is looked after by a management company is done so in accordance with the approved LEMP.
- the satisfactory completion of an Appropriate Assessment (AA) under the Habitats Regulations.

The full response of all the matters they have considered can be seen in their consultation response on the online file.

Natural England – comments

Further information is required to determine impacts on designated sites (the Bath and Bradford on Avon Bat SAC). Awaiting comment by Wiltshire Council Ecology to inform their decision.

No response received on the Appropriate Assessment consultation undertaken by Wiltshire Council Ecology.

Wiltshire Council Urban Design – comments

Initially they objected to the scheme wanting to see a more robust Design and Access Statement and more parameters plans to secure the vision stated in this OUT application at REM stage. Concerns were also raised over block structure, housing backing onto public open

space, street layout and the need for a proving layout to demonstrate parking is achievable when POS and drainage etc. are included. After a series of meetings and revisions to plans and statements, the Urban Design Officer is no longer objecting to the scheme subject to the parameters plans being included on the approved plans list. They comment with the following:

“Subsequent to my previous response (email 7th January 2022), the indicative net density is included in the DAS but still includes open space, which it ought not too. Nonetheless, I have no objection to this application, on the basis of the strong urban design framework (which is explained and demonstrated at length in the DAS) which has been incorporated into the site, in particular the developable area. The application provides a clear set of proven design principles for an REM applicant to take instruction from. Thus the applicant complies satisfactorily with CP57.

I shall defer to the highways officer to formally comment on the access road and entry junction, which required a specific design principle for a non-standard ‘rural/estate’ character, which was discussed long ago (as I recall) with Historic England.”

Wessex Water – no objections

They have no objections to the development. Their latest response details standard advice and guidance relevant to their apparatus.

Wales and West Utilities – comments

Comments to state that they have pipes in the area that cross the site. They remind the applicants that they must not build over any of their plant or enclose their apparatus.

Waste and Recycling – no objections

They have no objections subject to the provision of s106 money to provide waste and recycling containers for each dwelling. The money requested is set out in more detail within the report.

Rights of Way – comments / S106

We should take a contribution for TROW17 to be turned into a cycleway so the legal cost of the conversion order.

The bridge over the Lambrok Stream will need to be widened and I think the approach to it should be a ramp rather than steps. The construction of the bridge is timber which while suitable when this was a rural footpath will need to be of a material suitable for the increase in users.

The stile at the junction of TROW17 and SWCK1 will need to be removed.

The bridge at the Northern end of SWCK3 will need to be upgraded to a bridge more suitable for linking two developments it might be a suitable route for a cycleway link as well.

SWCK2 NBRA44 should be upgraded so that it is possible to link to the bridleway on a bicycle.

SWCK62: access is via a cattle grid, request a contribution of £550 to allow for us to install a new kissing gate.

Junction of SWCK1, SWCK3 SWCK62, well used area, request a contribution towards replacing a stile with a kissing gate and placing stone on the approach to this busy junction, we will also repair the headwalls on the ditch to keep the public safe. £950

SWCK1 double stile replace with one kissing gate and culvert the ditch, place stone on the approach. £1,500

SWCK1 junction with SWCK60 improve access through hedge. £200

SWCK1 junction with SWCK60 replace stile with kissing gate and culvert the ditch. £1,500

SWCK1 junction with SWCK5 replace stile with kissing gate £550

SWCK5A improvements to surface around kissing gate £200

SWCK3 junction with Wynsome Street replace stile with Kissing gate £550

SWCK3 improvements to surface around kissing gate £200

SWCK7 replace stile with kissing gate and stone up approach to kissing gate £750

SWCK3 replace stile with kissing gate and stone up approach to kissing gate £750

SWCK6 replace double stile with kissing gate and stone up approach to kissing gate £750

Total request are £8,450 plus the cost of the conversion order.

8. Publicity

The application was advertised initially by way of a site notice and neighbour notification letters. An advert was also placed in the press for the application. There have been a series of amendments to the application which were advertised by way of neighbour notification letters.

A very large number of objections to the development have been received including petitions, individual letters and reports compiled by professionals whose services have been employed to provide objections on behalf of certain local residents. Objections have also been made by the Trowbridge Civic Society and CPRE – these are set out at the end of the summary of objections. The material planning considerations that have come out of all of this are summarised below.

Need

- The CPRE have published a report in February 2021, Wiltshire Housing Assessment, in which it made critical observations of the Council and its housing predictions. In point 79 it suggests that the need for housing allocation should be reduced across Wiltshire as it could be 71% above actual ONS2014 demographic needs. In point 80 it states that the CPRE would want to identify those sites which do least damage to the countryside. Has their opinion been sought?
- Why build on Greenfields when there are numerous brownfield sites in Trowbridge.

- Wiltshire council has already met its expected number of new houses being built, or in fact built more than needed.
- The area has already been overdeveloped.
- We were alarmed to read an article on page 23 of 22nd November, 2019 edition of the Wiltshire Times headed :-"Scandal of empty houses." The sub-heading states:- "Over 1,500 homes in Wiltshire have been empty for over six months, says new survey." This sad statement will need researching before considering this application.
- The land was originally regarded as only marginally sustainable when being considered by Wiltshire Council for inclusion as the final site in its draft Wiltshire Housing Sites Allocation Plan. It was only included because there was a potential shortage of houses in Trowbridge's contribution to the Allocation Plan. That justification is no longer valid because that shortage has been made up.
- I will NEVER support a planning application in my home town when there are so many other sites that fit the bill for new housing! Why build new when you can recycle the old!!

Drainage / Flooding

- The site is very waterlogged
- The site is subject to fluvial flooding
- It is quite unbelievable that this planning application is to build 180 new houses on a recognised flood plain which whilst not quite being illegal, is opposed by the Environment Agency on flood risk grounds.
- The developer has not addressed significant issues pertaining to drainage, or, indeed accepted the fact that the site is subject to annual flooding.
- It will increase floodrisk elsewhere.
- It will serve to exacerbate an already overloaded watercourse
- The bridge/culvert is placed within LIDAR assessment of low points in FZ3 with no room for climate change encroachment and therefore will be closed by flooding.
- Identification of the site as being the source of major flooding across the town to the confluence with the Biss.
- After a long wet spell the drainage system has backed-up forcing polluted water back into the gardens of the residents in Sandringham Road. The application does not address this issue adequately, and implies that "water will naturally flow uphill!"
- Development should be refused due to EA objections.
- Drainage matters cannot be delayed until REM stage
- Flooding has increased on these fields over the past few years
- Was an historic water meadow – that says enough!
- Inadequate drainage and sewerage in the area to cope with this development
- Amazed that the Groundwater Flood Risk Assessment has highlighted no incidences have been recorded within the vicinity of the proposed development.

Ecology / Environment

- Loss of wildlife, flora and fauna
- Active presence of at least 5 Annex IV(a) species recorded on site
- Southwick Country Park has been awarded Nature Reserve status and ALL surface water run-off entering the Lambrook threatens that space.
- It is archaic to always put the economy over the natural world especially considering how much covid 19 has shown how much we need our green space for our mental health.

- It is illegal to cut through or damage the protected trees and ancient hedgerow to the north of the site to enable a so called emergency vehicular access and three pedestrian access points. Therefore, none of the trees and hedgerows which form this sites Northern boundary should be felled for access.
- The development does not comply with the TBMS.
- No mentions of slow worm, Water voles or buzzard which are evidenced as present.
- All we ask is for the council to think about the damaging effects this build will have on the community and the nature both thriving on the land and the surrounding area and call off the construction.
- The developers could not have chosen a better place to build than the Southwick fields, had their intension been to decimate the local bat flight paths.
- All the methods suggested to limit damage to the ecology and biodiversity of the site are merely a cosmetic exercise in mitigation rather than a genuine solution.
- Streetlighting will disrupt local wildlife however minimal.
- This is not NIMBYISM this is crucial conservation.
- Trees will be lost which harbour important wildlife.
- Wiltshire Council's own ecology expert has pointed out that ecology surveys carried out at the site are old and as such "a significant deviation from best practice".
- Not enough of a buffer zone provided for the bats in line with the TBMS requirements
- Loss of roadside hedging on Firs Hill will be detrimental to local ecology
- Application should not be permitted until these hedges have been properly surveyed, and all species named, in the light of new information about the area's biodiversity and alternatives to removal/translocation fully explored.
- The plan does not show how the Lambrok stream is to be bridged – will have a potentially huge impact on local ecology (notably otters).
- The plan is clearly at odds with Wiltshire Council's environmental policy, which notes that "the Council seeks to mitigate the environmental impacts associated with its services". Building 180 new homes on a greenfield site will obviously have a detrimental impact on the local environment, and is clearly an inappropriate use of resources.
- Ecological survey submitted in inadequate
- Swifts must be taken into account if this development goes ahead. UK swift populations are declining and therefore habitat creating is important to stop this decline.
- Wiltshire Council cannot be serious about tackling climate change if it intends to build on this field
- The benefit of residential gardens as environmental habitats will be affected by human activity and pollution
- With COP26 and trying to do what we can to save this planet at the forefront of everyone's minds right now, destroying valuable green space for more housing and roads seems absolutely ludicrous!
- Biodiversity netgains are questionable
- Contrary to Core Policy 50 and NPPF policy

Loss of Green Space / Conglomeration

- Loss of public amenity space used by many over the years for all kinds of leisure activities without any objection from the owners – including walking off the PROWs.
- When moving to this area 46 years ago, we were assured by officials that the open fields separating Trowbridge from North Bradley and Southwick were designated as "green belt" and would never be developed.
- Loss of open space will affect so many local residents health and wellbeing.
- It will lead to the conglomeration of Southwick and Trowbridge.
- No replacement greenspace is provided as mandated by Core Policy 51.

- Lockdown reminded us how vital access to the green outdoors is for human physical and mental wellbeing, but there are precious few places in Trowbridge to explore and enjoy native wildlife and flora. Not enough of it left in Trowbridge.
- The Government is advocating keeping green spaces for the wellbeing of the nation especially mental health.
- The development will inevitably lead to further unwanted development between Trowbridge and North Bradley/Southwick causing conglomeration etc.
- We know that houses are needed, but so are green spaces for residents to use for recreation. It is presumed that the people on the planning committee do not live anywhere near the proposed site, so it will not interfere with them. Please think about how this will impact on the residents here.
- The plan would be a gross intrusion into the green space surrounding the county town. If this process is allowed to continue, the villages surrounding the town will very soon be absorbed to the detriment of their character and that of town, particularly the neighbourhoods on its edge.
- Loss of green space will lead to increased incidences of depression
- Loss of productive farmland

Design / Character of the Area

- Plans submitted by the developer do not respect the current density or nature of the built form: existing properties being - detached houses, detached bungalows, semi-detached houses and terrace dwellings. None of which exceed two stories.
- Housing density is too much
- Not enough thought has gone into the design of this development – we should be building a community not just houses
- The block design proposed for the residential areas is an alien style to modern developments in Trowbridge.
- Policy requires that any new homes must respect both the topography of the land and existing urban form to the immediate north. This suggests that single storey dwellings would be more suitable at north east area of site.
- Lack of details of the height of the bridge – potential to be very intrusive

Location

- The location is wrong – should be on the disused sites in town
- Therein lies the wrong and poor nature of our council. They have passed over so many different opportunities to get Trowbridge centre re developed and now want to ruin one of the nicest rural areas on the town outskirts with footpaths running through it. It is an absolute disgrace.
- Build on Innox Mills instead.
- This proposed development is outside the Trowbridge settlement boundary.
- A new town should be built in Wiltshire as opposed to limited all new development to existing settlements.
- The site is too far away from shops, services and facilities to be considered sustainable

Infrastructure

- The existing local, already overstretched amenity infrastructure will find it impossible to cope with the needs of the families from 180 new homes - e.g. the number of available school places, health centres and dental surgeries.

- Wiltshire Council should therefore adhere to its own recommendation as outlined in The Core Strategy (Jan 2015) Policy 29 and refuse any further planning applications for new properties until additional school provision is provided in Trowbridge
- Trowbridge has well expanded over the years but the town centre is quite inadequate and rather embarrassing seeing it is the county town of Wiltshire.
- Loss of employment sites in the town over the years means there are fewer jobs in Trowbridge yet we are building more and more houses.
- Nearest local primary school is over 2.5km away – not sustainable

Pollution

- Extra traffic on Frome Road means more pollution in the area

Landscape and Visual Impact

- Breaches CP 51
- The development will have a harmful visual impact
- It will harm a tranquil area of Trowbridge/Southwick
- The landscape character around Trowbridge must be preserved
- Landscape and Visual Assessment is skewed towards showing effect that existing urban form will have on planned development as typified on following images from page 29 of LVA.
- Loss of greenbelt
- The new submissions for the proposed access road reveal that a massive bridge will need to be constructed to cross the Lambrok stream. Plans indicate a bridge that is 100 metres long and 5.5 metres wide. Clearance of the flood zone, the roadbed itself and the addition of safety barriers will result in a bridge likely to be 5 metres tall. This is not only an outrageously expensive exercise but will be an indelible blot on the landscape.

Masterplan

- No master plan has been produced for the three sites H2.4, H2.5 and H2.6 as required by policy in the WHSAP.
- Cumulative issues have not been assessed as a result of no master plan

Contrary to Development Plan

- Close inspection of the application demonstrates inconsistencies in practise and in places a total lack of adherence to Wiltshire Council policies.
- Despite many issues being related to reserved matters, the Applicant is yet to demonstrate the ability to present an application which is compliant with Policy, which meets the demands of statutory consultees and which is deliverable.
- The site is outside the Trowbridge settlement boundary and therefore its choice for allocation conflicts with the principles set out in Wiltshire's own Housing Site Allocations Plan and Wiltshire Core Strategy, which say developments will not be permitted outside these boundaries unless they meet exceptions such as job creation or military use.
- Wiltshire Core Strategy, January 2015 states, para 4.16 " there is a general presumption against development outside the limits of the Principal Settlements..." Para 4.17 states development will not be supported "unless they arise through community led planning documents ... which are endorsed by the local community and accord with the provisions of this plan" – the local community actively oppose this.

Contrary to Neighbourhood Plan

- North Bradley NP Policy 1 clearly describes "The North Bradley Landscape Setting Gap as a guarantee that North Bradley will not merge with Trowbridge. Keeping an undeveloped area will also help to maintain a wildlife corridor from Southwick Country Park to the Biss Wood area and will be good for nature." The proposed development is contrary to this.
- We understand that this proposal includes a new road (H07) between the A361 (Southwick Country Park) and the A363 (Woodmarsh Roundabout) which, again, contradicts the NBNP Policy 1 and also the Wiltshire Council Core Strategy Policy 29. Please refer also to the NBNP Policy 4 which states that the Trowbridge Town football ground will be protected from development.

Highways / Parking

- The estates access road is very close to Southwick Park entrance on the already very busy Frome road, where due to the open road appearance, traffic often exceeds the speed limit. The additional daily car journeys to and from this new estate will create further congestion. It is believed that this will result in significant road safety issues and this access road junction could easily become an accident black spot.
- The only way to reach the estate will be by car, in direct conflict with Wiltshire's Policy 61 which states "New development should be located and designed to reduce the need to travel, particularly by private car."
- Junction onto Frome Road is in the wrong place.
- Pedestrian access onto Frome Road is in the wrong place and not near any bus stops.
- The junction with the Frome Road I perceive as an issue, particularly if Park Runs are held in the Country Park, when car parking along Frome Road is atrocious.
- The Frome Road is already an extremely busy and congested road. This development will cause significant further problems.
- The Planning Inspector has directed that other emergency access options be explored and this should be done as Wiltshire Council has previously committed not to breach these historic hedgerows.
- Access is across land that frequently floods – applicant is attempting to delay consideration of this aspect until REM stage which is wrong
- Appendices of transport report are not available thus demonstrating inadequacy of consultation on the proposals
- Location of the development does not encourage non-car use
- Has access to the north or east been properly considered?
- Mitigation improvements at the junction of Bradley Road with County Way should be installed before housing on Southwick Court is occupied.
- The absence of reliable local public transport in the area already creates a large burden of traffic around the roads. If this is not adequately addressed, a development of 180 new homes could result in an extra 300+ cars using the roads, putting pressure on already congested road systems.
- Safe and suitable walking / cycling opportunities are not afforded from the propose development for primary and secondary aged school pupils to get to and from school.
- Access via Axe & Cleaver Lane, a registered bridal way, should be retained for its present use only and not made an access road for any proposed development.
- Speed limit must be reduced on Firs Hill if this development goes ahead (40mph).

Heritage

- If this application is approved it would be tantamount to condoning vandalism of an historic site which would be lost forever for coming generations.

- Evidence of significant Archaeological importance has been placed across the site with zero possibility of error.
- The application is unsympathetic to conserving historical buildings designated as heritage sites within the immediate landscape.
- An application to build a culvert over a water main on a level 3 floodplain with the road running alongside a Grade 2* heritage building (Southwick Court) is not permitted in law.
- Contrary to CP 58 as heritage assets are not conserved.
- No cumulative assessment of heritage across sites H2.4, H2.5 and H2.6.
- The Heritage Impact Assessment report commissioned by Wiltshire Council from Land Use Consultants in 2018 was even more insistent and warned that the development would in fact cause “extensive harm”.
- The access road will cause irreparable harm to the historic setting of Southwick Court.
- Insufficient information to assess the heritage impacts of the development
- Fails the statutory test set out at s66 of the Planning (Listed Buildings and Conservation Areas) Act 1990

Neighbour Amenity

- Losing a peaceful and safe area to live through construction noise and increase in vehicles
- The access bridge required, will have to cross a huge expanse creating unnecessary noise for existing residents of Balmoral Road and Sandringham Road, as well as other nearby settlement.
- It will effects the level of daylight received to my property (17 Boundary Walk) and will result in loss of privacy

Democracy / Local Opinion

- Allowing to build here would go against local sentiment
- Why are the County Council not helping it's tax paying home owners and being underhand in not forwarding the Town Council and our elected councillors with all relevant information on this proposed planning application?

Consultation

- The developers have not consulted with local residents, Trowbridge Town Council, North Bradley Parish Council or Southwick Parish Council, all, of whom have a vested interest and are required in law to be consulted pre-submission.
- Not all Statutory Consultees have been consulted in respect of the cumulative impact on the three sites and when they have, their objections have been ignored and side stepped.
- The required one months' notice of this application by planning notices being prominently displayed near the site to create awareness of the planning application was not given. Many of the local residents are elderly and are probably unaware of this intrusive development on their doorsteps and its implications for them due to this lack of displayed regulation notices.
- In the first iteration of this application Natural England were not consulted. Along with the absence of Archaeological comment this represents a significant failure which has been repeated and not addressed.

Other

- There are material changes in circumstances since the site was presented to the WHSAP Inspector.
- The application form still shows neither land ownership certificate, declares that there is no flood risk and fails to correctly identify the nature of the land as informal recreational as defined in the WHSAP submission. Therefore the application is invalid
- All three developments should be considered as a single conjoined development rather than as three separate applications.
- This outline application for H2.6 has been submitted on a speculative basis by land agents and no actual builder is attached to the project. The agents wish merely to secure planning permission for the initial site access entrance, and then will auction off the project to any willing builder, who is unlikely to be any obligation to adhere to any of the indicative drawings submitted by those agents. It is not acceptable to grant permission for any developer to start putting spades in the ground in any part of the site until a full application has been submitted for the entire development.
- Make developers build the 50,000 houses already with planning permission
- If this development goes ahead do you also plan to rename Boundary Walk? Could I suggest Planners Folly.
- The government's policy is that no application should spend more than a year with decision-makers, including any appeal. In practice this means that planning applications should be decided in no more than 26 weeks, allowing a similar period for any appeal. The original application was submitted on 15 January 2020, was not determined within the allowed legal limit of 26 weeks and should have been withdrawn. Where a planning application takes longer than the statutory period to decide, the government's policy is that the decision should be made within 26 weeks AT MOST. This application is therefore invalid and should be now been rejected by the Local Planning Authority, if it is not voluntarily withdrawn. It was illegally allowed to stay on the portal, blocking legitimate applications for a Village Green. Quite why it was given this favourable treatment is a matter which ought to be investigated and will be drawn to the attention of the Local Government Ombudsman if this development is approved.
- NO EIA has been carried out for the development
- In correct description of the land – WHSAP says it is informal recreation space not agricultural as the applicants have put.
- Errors on application form
- Applicant is silent on ownership of the land proposed for the emergency access
- Documents missing from Councils website
- Appendix 3 of Planning Statement missing which contains reps from third parties made as part of the SCI.
- A planned development of this size also prevents the use of the land for more environmentally-sustainable practices, such as the extension of the solar power electricity farm located nearby.
- DAS is full of inaccuracies and untruths
- Financially the scheme is unviable considering the length of road bridge required
- Delay to determination unacceptable. Wiltshire Council should not allow this to continue and the application should be refused.
- Likely that officers dealing with the application will push the main issues further down the line just to get OUT consent, preserve the WHSAP and 5YRHLS.

Trowbridge Civic Society - objection

General

Importantly, this application is premature. This site would feed traffic along Frome Road into a part of the Trowbridge road network that the traffic analysis for application 19/11459/OUT has shown will be very seriously affected by traffic queues. Mitigation improvements at the junction of Bradley Road with County Way should be installed before housing on Southwick Court is occupied.

The design concept of this developer must be challenged. The landscape character around Trowbridge must be preserved. Last year, the then Housing Secretary, Robert Jenrick is reported to have complained to a "Think Tank" that architects and developers have forgotten how to build beautiful homes. What should be aimed for is a sense of place. It is not good enough to just build houses. We should be looking to build a community. This is endorsed by the report of the Building Better, Building Beautiful Commission January 2020, "Living with beauty - Promoting health, well-being and sustainable growth". This sense of place will be particularly important for this site as it will stand as a separate entity.

The Design and Access statement says "The use of natural local materials to develop a sensitive aesthetic to the site;" We are interested in learning what these "local" materials are.

The block design proposed for the residential areas is an alien style to modern developments in Trowbridge. A more informal broken up edge would be more interesting. The National Design Guide states:- Well-designed places have individual characteristics which work together to create its physical Character. One of the ten characteristics is "Identity – Attractive and Distinctive." We do not feel that the proposals currently satisfy that characteristic.

The provision of bin stores is welcomed. However, we have up to 4 bins in Trowbridge. And what provision will be made for storing cycles?

Highway Considerations

At present there is a stretch of 40 mph speed restriction between Southwick and Trowbridge. The dip in the vertical alignment encourages traffic to speed up and enter both communities at speeds higher than 30mph. A new access designed as a roundabout would control traffic speeds. Why was this not considered?

Such a flowing alignment of the access road, as proposed, will encourage high speeds. It should be designed to be a 20mph environment with tight bends and, perhaps, narrowings where pedestrians and cyclists may tend to cross. The Elm Grove Farm layout is a good model. If the straight alignment is installed then vertical speed control (humps and ramps) would be called for and this would be seen as a failure of modern planning.

The assessment in Table 7.2 that the Frome Road/College Road traffic signals will operate well within capacity is surprising, as it already has significant queueing quite often. It is very difficult to model a single lane approach with a significant right turning movement. It may need a Paramics model to do it more accurately.

This is yet another developer who argues that their development is only going to worsen the traffic congestion a little bit. Add all the Trowbridge developments together and you get a significant worsening. This applicant's Transport Assessment states

"7.4.2 The B3105/B3106 junction has a forecasted V/C above 85% for the Reference and Test Case scenarios. Therefore, the operation of this junction is not due to development traffic. In addition, the Bythesea Road/Stallard Street junction is indicated to operate over 85% V/C due to development traffic during the PM peak hour. However, further analysis has confirmed that development traffic impact on this junction is negligible.

7.4.3 As a result of the strategic modelling and above analysis, we consider that no further capacity modelling is necessary, and no highway mitigation is required.”

So, this is yet another warning of potential central area problems. It is clear that the central Trowbridge road network needs to be managed and the developer required to contribute to improving the network.

The Transport Assessment also states:-

8.1.1 The transport strategy considered within this TA focuses on making best possible use of existing transport infrastructure, with the intention of mitigating the impact of the proposed development, in order of preference, through:

- Demand management;
- Improvements to the local public transport network, and walking and cycling facilities; and
- Minor physical improvements to existing roads.

Rather than getting improvements to the local transport system, ie buses, in the Trowbridge area we are gradually getting a worsening. More cuts to the First services are being carried out. Is Wiltshire Council prepared to subsidise bus operators to a greater extent? Also, as traffic congestion grows, service reliability will get worse, and the use of buses will get even more unattractive. Perhaps the assigned modal split should be re-evaluated?

Environment

The bats around Trowbridge, and particularly the Bechsteins, are a notable feature of the area. There is now the draft Trowbridge Bat Mitigation Strategy. Should we not be really looking at an enhancement strategy to increase the number of bats, rather than just trying to minimise adverse effects? We should be consciously planting oaks in numbers to increase the woodland habitat for the future. Although some planting is proposed, this should be significantly enhanced with this in mind.

A planning requirement is “a comprehensive approach to landscaping to enhance the urban edge of the town.” At the eastern end of the development the applicant is relying on the existing hedgerow. It would clearly be desirable to have a substantial copse, so that the housing was not seen from the east. If native oaks were provided, the copse, in due time, might well provide a roost for the valued Bechstein bats.

Increasing the woodland will also help to mitigate climate change and make this development more sustainable.

The Lambrok Stream is currently a very clean water course. It is understood to home fresh water mussels. So, extra special protection should be given to the stream. It should not be used as a leisure attraction and so attract pollution.

CPRE - objection

Members do not support this proposal for the following reasons:

- Flood Risk - the proposed attenuation does not look to be of sufficient capacity to prevent total run off and create additional flooding at the lower level of Southwick Court.

- *Ecology - CPRE do not believe that the measures being proposed to protect the endangered specie of Beckstein Bat are sufficient. Other rare and at risk species are also near to the site. These include Otter and Water Vole.*
- *Access Road - the length and use of the access road questionable. Should the access road be used as a relief road for Wynsome Street, this would simply be moving the problem from one part of Southwick to another. What is really needed is a full bypass to join the A36 to the A350 and alleviate traffic volumes away from local villages*

9. Planning Considerations

Section 70(2) of the Town and Country Planning Act 1990 and section 38(6) of the Planning and Compulsory Purchase Act 2004 require that the determination of planning applications must be made in accordance with the Development Plan, unless material considerations indicate otherwise.

9.1 EIA Development

The application was screened under Regulation 5(1) of the Town and Country Planning (Environmental Impact Assessment) Regulations 2015. The letter published on the website is dated the 2 April 2021. It was concluded that:

“The development is not of a substantial size such that its environmental impacts would be considered significant or indeed extend beyond a far wider geographic area than the immediate site. Any environmental effects arising from this development can be suitably addressed through appropriate technical documentation as part of the planning application and through suitable mitigation measures in the event of an approval. Therefore, the development is not considered EIA and as such, no Environmental Statement (ES) should be submitted with the application.”

9.2 Principle of Development

The principle of this site being used as housing has already been approved through the site allocation policy plan document (the WHSAP) that was adopted by Wiltshire Council in February 2020.

In the WHSAP the site is referred to as ‘H2.6’ and is subject to Policy H2.6, and this application is to, therefore, determine whether the proposal complies with this policy alongside the relevant policies in the Core Strategy and NPPF. Policy H2.6 states that the site has been allocated for a development comprising of the following elements:

- *approximately 180 dwellings;*
- *a sensitively designed vehicular access from the A361 and road across the site that minimises intrusion within the historic landscape. Signage should be kept to a minimum and particular attention given to reducing any adverse impacts of lighting;*
- *a controlled emergency vehicular access; and*
- *improvements to cycling and walking routes through the site to link in to the existing network.*

The current application seeks up to 180 dwellings, a sensitively designed vehicular access from the A361 and road access to the site, a controlled emergency vehicular access, and improved improvements to cycle and walking routes, and as such, in principle, would comply with Policy H2.6.

The site allocation policy document also states that the development will be subject to the following which are considered later in this report:

Development will be subject to the following requirements:

- *core bat habitat will be protected or enhanced. Design and layout will be informed by appropriate survey, impact assessments and the Trowbridge Bat Mitigation Strategy (TBMS);*
- *appropriate mitigation to protect bats, including financial contributions toward management, monitoring and any off-site measures as necessary, as informed by the TBMS;*
- *sensitive design and layout, which ensures the significance of heritage assets and their settings are not subject to unacceptable harm. New homes will be situated to the east of the Lambrok Stream and adjacent to the existing urban area in a manner that respects both the topography of the land and existing urban form to the immediate north. Land to the west of the Lambrok Stream will remain open and free from residential development. This shall be informed by appropriate heritage and archaeological assessments;*
- *a comprehensive approach to landscaping to enhance the urban edge of the town and in so doing protect and enhance the setting of Southwick Court Farmstead;*
- *retention and enhancement of existing hedgerows and trees as part of wider landscaping and green infrastructure requirements, and the creation of a publicly accessible green corridor along the Lambrok Stream to protect and enhance the character and amenity provided by Southwick Country Park; and*
- *a Flood Risk Assessment (incorporating an assessment of the predicted effects of climate change) and comprehensive drainage strategy to inform site layout and design so that surface water is controlled and does not exacerbate flooding off-site.*

Development will take place in accordance with a masterplan approved by the Council as part of the planning application process. The design and layout will take account of all policy requirements, including the timely and coordinated provision of necessary infrastructure to achieve a comprehensive development of the site. Any cumulative issues associated with heritage, landscape, biodiversity and highway access should be considered on a comprehensive and consistent basis for allocations H2.4, H2.5 and H2.6 to ensure that new development sensitively enhances the urban edge of the town.

With regards the Southwick Neighbourhood Plan (NP), it does not seek to address the allocation formally (and rightly so) but, it does highlight the importance of maintaining the landscape setting and gap between Trowbridge and Southwick. The NP states at paragraph 9.5 that:

“A Landscape and Visual Setting Analysis (LVSA) report was commissioned by the NDP to provide an analysis of the area between Southwick and Trowbridge and identify that which should be preserved and protected from development to provide a landscape gap for Southwick. The report demonstrated that, if carefully designed, the strategic allocation at Southwick Court could be accommodated...”

Provided a gap and landscape setting area are maintained, in principle, the proposal will not conflict with the Southwick NP.

Although within Southwick Parish, the site adjoins North Bradley which also has an adopted NP. The North Bradley NP addresses the allocation of site H2.6 in the WHSAP in a similar manner to Southwick i.e. does not dispute the allocation with WC but wishes to see the landscape setting of North Bradley preserved. There are therefore no ‘in principle’ objections

in the North Bradley NP to the development of this site provided that (the gap and landscape setting) can be accommodated.

In principle therefore, the development is considered to accord with the development plan.

It should also be mentioned in this section that the absence or otherwise of a five-year supply of deliverable housing (5YRHLS) is a material consideration. It is accepted at the time of writing this report that the Council is unable to demonstrate a 5YRHLS. The precise figure is ever evolving but, the Council would assert that at this present moment in time it can demonstrate 4.72 years' worth of housing (taken from the latest Housing Land Supply Statement that has a base date of April 2021). An approximate shortfall of 590 homes. It is therefore accepted that at the time of determining this application, paragraph 11d of the Framework is engaged. This means the policies most important to the determination of this application would be considered out-of-date and accordingly would be afforded reduced weight in the planning balance. Before considering the detailed merits of this application, it should be noted that given the outstanding requirements for housing in the Trowbridge Community Area and the present lack of a 5YRHLS in Wiltshire as a whole, this proposal would make an important contribution to identified need and, the provision of market and affordable housing should carry significant weight in favour of the proposal.

In addition to the above points, one must also highlight that, as this site forms part of an allocation in an adopted development plan document, the following points apply:

- the WHSAP has been produced to provide a surety of supply of land to greatly facilitate the delivery of the housing figures in the WCS up to the period 2026;
- this site has been selected as an appropriate location for housing by the Local Planning Authority (and ultimately, the Planning Inspector at examination) via a site selection process which considered many other locations in the round over a period of several years and subject to varies levels of consultation;
- the issues contained within this report have all been looked at in respect of the sites ability to accommodate housing in principle during the WHSAP process and examination where no significant concerns were raised;
- it is the opinion of officers that to take a different view on the principle of development would be contrary to the position taken on the site in the WHSAP; and that,
- such a reason would be difficult to defend on appeal.

9.3 Masterplan

Nearby to the application site are two further sites allocated in the WHSAP – referred to as H2.4 ('Church Lane') and H2.5 ('Upper Studley') with respective policies Policy H2.4 and Policy H2.5. Common to, and within, Policy H2.4, Policy H2.5 and Policy H2.6 are the following final requirements –

Development will take place in accordance with a masterplan approved by the Council as part of the planning application process. The design and layout will take account of all policy requirements, including the timely and coordinated provision of necessary infrastructure to achieve a comprehensive development of the site. Any cumulative issues associated with heritage, landscape, biodiversity and highway access should be considered on a comprehensive and consistent basis for allocations H2.4, H2.5 and H2.6 to ensure that new development sensitively addresses the urban edge of the town.

The WHSAP has established the principle of development for the sites and highlighted areas that planning applications will be required to address, including flood risk and design.

The Town Council and a number of third parties have expressed the view that the above paragraph in the policies for each of the sites requires a comprehensive masterplan to be developed and approved by the LPA that covers all three sites and therein 'binds' each applicant/landowner/developer to an agreed set of 'parameters'. In actuality this is not the case, as is evidenced in the Inspector's report for the WHSAP.

The Inspector sets out in his report (at paragraphs 69 and 70) his expectation for the planning applications for each site to have regard to the other sites – this in view of their close physical relationships – and more specifically for any cumulative issues associated with heritage, landscape, biodiversity and highway access to be considered on a comprehensive and consistent basis. This does not mean that all three sites must be master-planned as one. The Inspector's report said/says –

“...While all these [sites] are likely to come forward independently of each other, their close physical relationship could have particular implications, particularly for heritage, landscape, biodiversity and highway access if they do not take account of each other in terms of layout and the provision of mitigation measures. To be effective, each policy should make it clear that regard must be had to development taking place in other sites. Furthermore, both individual and cumulative effects on the Country Park must be taken into account.” [Emphasis applied].

It is clear from this statement that the Inspector recognised the close proximity of the three sites and the need to plan for potential cumulative effects associated with their development. At para. 70 he goes on to state:

“This approach should not prejudice the delivery of each site. The recommended modifications make it clear that mitigation measures must be considered on a comprehensive and consistent basis. All this is likely to mean in practice is that schemes coming forward must have regard to other proposals in the development pipeline and ensure they are not mutually exclusive or prejudicial to each other.” [Emphasis applied].

Again, the Inspector's considerations are clear. He recognised/s that planning applications for each site would in all probability come forward through the planning system at different times, and schemes for developing each site should address impacts and mitigation measures on a consistent basis. But what is also clear is that development schemes on any, and all, of the three sites should not individually or collectively prejudice one another.

Whilst the policy must be read as a whole, there are three requirements to address in the final paragraph –

1. Development will take place in accordance with a masterplan approved by the Council as part of the planning application process.
2. The design and layout will take account of all policy requirements, *[i.e. the bulleted requirements in the policy see above]* including the timely and coordinated provision of necessary infrastructure to achieve a comprehensive development of the site.
3. Any cumulative issues associated with heritage, landscape, biodiversity and highway access should be considered on a comprehensive and consistent basis for allocations H2.4, H2.5 and H2.6 to ensure that new development sensitively enhances the urban edge of the town.

Provided the planning application for H2.6 addresses these points and the rest of the policy requirements in full then it can be determined without the need to wait for schemes on H2.4 and H2.5 to similarly demonstrate how they have considered cumulative effects within their submissions. The key here is consistency and ensuring each development scheme

comprehensively addresses policy requirements whilst also not prejudicing delivery on one, or all, of the allocated sites. With specific regard to point 1 the reference here is for a masterplan for H2.6 only – not a multilateral masterplan for H2.4, H2.5 and H2.6.

Therefore, there is a clear and unambiguous policy route through this issue of addressing cumulative effects and that route does not anticipate, or need the submission of a multilateral masterplan.

The masterplan for H2.6 is shown at Appendix B.

9.4 Design

The detailed considerations in respect of design are not for consideration under this outline application i.e., the layout, scale, appearance and landscaping of the development are points to be determined as part of a Reserved Matters application. However, it is still necessary to look at these issues at a higher level to ensure that the figure of 180 dwellings can be accommodated on the site whilst ensuring a high standard of design can be achieved.

Since the original submission the indicative layout plan has gone through several iterations and the Design and Access Statement amended accordingly in order to address the concerns raised by the Urban Design Officer.

From the above, it is concluded that 180 dwellings can be accommodated on the site without compromising the ability to comply with Core Policy 57 at REM stage i.e. a high quality design can be secured at REM stage based on a figure of 180 dwellings without the appearance of overdevelopment and one that can ultimately fit in with the prevailing character of the area (e.g. in terms of density, appearance and layout). A suitable level of detailing has been provided by way of illustrative plans and within an updated Design and Access Statement (DAS) to enable officers to have reached this conclusion. In any event, the scheme as applied for is for up to 180 dwellings, which does allow flexibility to reduce the numbers should that be necessary at REM stage because of unforeseen issues.

Whilst the Urban Designer does have some smaller criticisms of the scheme, on the whole they support the development. The smaller points can be ironed out at REM stage and, with appropriate conditions / informatives, the applicant can be made aware of these points. Ultimately, as said previously, this is an outline application where detailed design matters have been left for future consideration and so the LPA should not be getting too prescriptive at this stage. However, at the request of the Urban Design Officer, the DAS has been updated along with the illustrative material to include more design principles in the scheme, which has provided the LPA with a solid platform from which the REM application is to be based upon in order to secure a high-quality design. A condition can be imposed to ensure the development is in general accordance with the DAS.

The illustrative layout satisfactorily demonstrates that a scheme of 180 dwellings could be accommodated on the site in principle without giving rise to adverse amenity impacts.

Given the presence of the bat corridor to the north of the development block (which naturally will contain a high degree of planting) there exists on average a gap of approximately 40-50m between the proposed dwellings and the nearest existing properties on the indicative layout plan (Boundary Walk, Westmead Close and Balmoral Road). This is more than sufficient to ensure that there will be no adverse loss of privacy to the existing properties (21m metres is considered adequate generally). Furthermore, by reason of this separation distance the development will not cause any loss of light, overshadowing or overbearing impacts upon the adjoining residents (noting the development is limited to 2.5 storeys).

The access, land use and building heights parameters plan, sets out the limits of residential development on the site. Any subsequent REM application would have to follow this. It is clear from this plan that the separation distances involved ensure that at REM stage a proposal can be designed without giving rise to any adverse harm in terms of loss of light, privacy or overbearing impacts to any further properties in the vicinity of the site (notably Southwick Court Farm complex and Bramble Farm).

The detailed aspects of amenity will of course be controlled at REM stage but in principle there are no concerns at this stage as the indicative layout plan has demonstrated that 180 dwellings can be accommodated on the site whilst ensuring the reasonable living standards of the adjoining residents can be preserved. The amenities of the future occupants of the development site are something to be considered at REM stage. However, there appears from the indicative layout plan to be sufficient space to enable a scheme of 180 dwellings to come forward without giving rise to unacceptable amenity impacts upon the future occupants of the development. Such conclusions can be reached as the layout is realistic showing the typical features required of a housing development e.g. parking spaces, amenity space, public open space, roads, footpaths, SUDs, play space, ecological buffers, attenuation ponds and strategic landscaping.

Whilst access is not a reserved matter, details of access should confirm all the access routes (both vehicular and pedestrian) going into and out of a site. As a reserved matter, 'layout' relates to, amongst other things, the internal roads, footpaths, cycleways etc. within the development site itself. As such, it is the opinion of officers that the section of road connecting the block of development with the Frome Road is to be considered under the reserved matter entitled layout. The point of access with the Frome Rd and the junction details etc. are to be considered under this outline consent. However, an indicative plan has been provided and illustrative material of this is also contained within the DAS.

This shows a road designed in a very low-key manner (e.g., soft verges, no street lighting or pavement and minimal signage). There is an obvious constraint that the road must overcome before reaching the development (the Lambrok and its flood plain), and the indicative material seems to demonstrate a way this could be suitably achieved in a policy compliant manner. The WHSAP Inspector notes in paragraph 89 of their Examiners Report that:

"Although the Plan is silent on access, the Council has indicated a preference for access to be taken from Frome Road. This would result in a relatively long access road crossing the open part of the site. Achieving a satisfactory form of development will be challenging. Nevertheless, I am satisfied that with great care, there is scope for development on this site and thus the allocation is acceptable in principle."

Officers are of the opinion that the indicative access proposals put forward with this OUT application square with the Inspectors views above. The plans submitted to demonstrate a suitable internal access are to be conditioned so that the design at REM stage is in general accordance with these details.

9.5 Landscape, Open Space and Visual Impact

Landscape and visual matters have already been considered as part of the housing sites allocation process. In summary, during this process, the sites that were deemed to be totally unacceptable to develop in landscape terms were removed at various stages of the plan's advancement, with the final sites subject to a more detailed landscape assessment. As such, in allocating the site, the Council has already made the assumption that in principle, residential development can take place on the site without causing demonstrable harm to the receiving

landscape. Naturally, such a decision was taken with the caveat that it very much depends on the design and scale of the scheme presented.

Early engagement with the applicants as part of the WHSAP saw a reduction in the size of the development proposals. Original landscape assessments for the site carried out by the Council indicated a low level of potential to accommodate change on the site – this was based upon the potential to develop across the entire site. After further LVA work by the applicants, and the confirmation in the site allocation policy that the western side of the site must be kept open (paragraph 5.78), the developable site area was reduced. Following this, a site visit was undertaken with WC's Landscape and Arboricultural Officers. In this meeting it was confirmed that there is a distinct variation between the landscape character of the allocation site between the eastern side (where the housing is now solely proposed) and western side of the Lambrook Stream, and that the existing urban edge of Trowbridge on the eastern side has a greater influence than indicated. It was confirmed as part of this visit that a comprehensive landscaping scheme could be delivered on the site.

The Examiners Report on the WHSAP (paragraph 89) acknowledges that *“achieving a satisfactory form of development will be challenging.”* But nevertheless, they conclude that they are *“satisfied that with great care, there is scope for development on this site and thus the allocation is acceptable in principle.”* Whilst this quote from the report goes beyond landscape matters it clearly indicates that a carefully considered scheme will be acceptable in principle i.e., will not have adverse visual impacts.

In respect of coalescence between Trowbridge and the neighbouring villages of Southwick and North Bradley, the Examiner concludes at paragraph 92 that:

“The gap to North Bradley would be reduced, but would still exist, particularly in relation to the football ground. The existing gap along Woodmarsh would also be maintained. The solar farms to the south do not alter this conclusion. While clearly not agricultural in nature, the solar panels do not have the character or permanence of residential development. They are also some distance from the southern extent of any likely development. As such, while there would be an inevitable change in the character of the area, the risk of coalescence between Trowbridge and North Bradley or Southwick would not be significant.”

The indicative layout plan satisfactory demonstrates that the above is achievable i.e., a sufficient gap can be left between the built form of the development and the edges of the villages of Southwick and North Bradley. Furthermore, a wide buffer of landscaping exists along the southern edge of the development (the southern buffer on the indicative layout plan averages around 55m in width).

The appellants have submitted a Landscape and Visual Impact Assessment (LVIA) with the application. This has looked at both the impact of the development on the landscape character of the area and on the visual effect it will have, assessing the amenity value of the views. It is based on the GLVIA 3 guidelines published by the Landscape Institute and this is considered appropriate by your officers. The principal conclusion of this assessment was that:

“The application site is not subject to any landscape planning designations identified by the Wiltshire Core Strategy and is allocated for housing development in the adopted Wiltshire Housing Site Allocations Plan. This Addendum has concluded that by incorporating the revised design principles into the scheme at the Reserved Matters stage, the proposals would be of a scale and design that respects the character and distinctiveness of the local landscape and they would not give rise to any significant adverse residual landscape or visual impacts.”

There would be significant benefits to the Public Rights-of-Way network and, in the longer term, to the vegetation within the site and the character of the emerging settlement edge. These conclusions have not been changed by the revised submission, but the additional design information in the Design and Access Statement provides greater certainty relating to the deliverability of the proposals and therefore greater certainty regarding the impacts that will arise.

It is therefore concluded that the scheme would be fully in accordance with the relevant planning policies and that there are no landscape or visual reasons to prevent outline planning permission being granted.”

In general, officers are in broad agreement with the conclusions of this report. The site is not short on space and the landscape buffers shown on the indicative layout plan suggest that at REM stage, a robust scheme of landscaping can be submitted that will ensure that there are no adverse visual consequences arising from the development of this site. Looking at the landscape assessment in more detail, the Council would make the following comments.

The site is agricultural at present, but it is influenced to an extent by the existing residential development forming the edge of Trowbridge where gaps in the planting ensure intervisibility between the houses and the fields (notably on the eastern side) – although in summer months this is more limited. Its character is reflective in parts of the North Bradley Open Clay Lowland in which it sits (as defined in the West Wiltshire Landscape Character Assessment) e.g.:

- gently rolling pastureland
- some intact hedgerows and mature trees forming enclosure
- dense network of footpaths
- influenced by secondary roads

That said, it does not display all the characteristics typified by this landscape type. For example:

- it consists of rather large and open fields as opposed to small to medium sized ones enclosed by mainly intact hedging.
- topography and built form prevent extensive views across the countryside (notably that of the chalk downland)
- no woodland blocks are present on the site

Naturally, the sites inclusion in the WHSAP means it will see an unavoidable character change with the loss of agricultural fields and the subsequent residential development.

As mentioned above, the site is also crossed by a couple of PRowS with other public footpaths close by or adjoining the site. There will again be an impact upon the user's enjoyment of these PRowS because of the development of this field i.e., the visual presence of houses vs the current agricultural character the field has. Both the landscape character change and visual impacts are an inevitable consequence of developing upon fields surrounding principal settlements where growth is usually centred.

Inherently harm will arise from these impacts, but this must be weighed against the following factors:

- the need for housing due to the lack of 5YRHLS
- the sites inclusion in the WHSAP thus establishing the principle of residential development and the inherent changes this would bring to its character

- the magnitude of effect upon the landscape character of the area
- the extent of these visual effects

With regards to the above points the following comments are noted.

The need for housing is clearly a benefit of the scheme but one whose weighting should sit in the overall planning balance. The sites inclusion in the WHSAP is clearly material to the landscape considerations on this site i.e., its inclusion effectively established that the principle of residential development of this field is seen as acceptable. In reaching this conclusion one is already accepting that there will be a degree of harm caused to this field; something inevitable with development.

The site is not a designated landscape, nor is it deemed to be valued landscape as defined within the NPPF. That said, the intrinsic value and beauty of the countryside is one the NPPF recognises as important, and its loss must be carefully considered. Although clearly its landscape character or visual amenities should not be given as much weight as for example, an AONB or national park.

Development of the site would naturally see the loss of the pastureland and perhaps some of its gently undulating form as it is levelled for house construction. However, the development can reinforce field patterns with the addition of dense hedgerow planting along the field margins – the reduction in the size of the remaining field helping to reinforce local character. The southern landscape buffer will see considerable tree planting to provide a scattered woodland block akin to the character of the area and will help to better contain the settlement of Trowbridge from its neighbouring villages.

PRoWs will be upgraded and links enhanced between the existing and proposed areas of development and Southwick Country Park. Whilst there will be inevitable negative experiences from users of the PRoWs that cross the parts of the site where the housing is located, the network of new permissive paths will provide some offsetting of these impacts by creating new attractive viewpoints that people can enjoy. The considerable amounts of planting proposed will also help to secure better views along the PRoWs outside of the site as the existing residential development becomes more contained/screened by the proposed planting.

Due to topography, the existing built form and vegetation around the site has a fairly high degree of visual enclosure which would be further enhanced by the proposed planting schemes. As such, the magnitude of effects of development of this field are much more locally felt which ultimately reduces the extent of the harm experienced. With the mitigation and enhancements measures demonstrated in this outline application, which can be secured as part of the detailed landscape and design work at REM stage, landscape character will be broadly conserved in accordance with the requirements of Core Policy 51 (noting that this policy accepts a degree of harm provided it is mitigated to an acceptable level).

The green infrastructure parameters plan submitted as part of this application sets out the areas intended to provide landscape buffering, ecology corridors, attenuation, and public open space. This plan should be conditioned as part of any outline consent to ensure it is safeguarded at REM stage to deliver the required amount of green infrastructure to make the proposal acceptable. This will ensure the principles put forward at OUT stage are secured.

It has also been noted that a great many comments have referred to the hedgerows that form the northern and western boundaries of this site – in particular their removal to accommodate site accesses. The Hedgerow Regulations 1997 have been referenced and there is an understanding by third parties that any section of these hedges must not be allowed to be removed unless it is a matter of national emergency or one of overriding public safety. This is

not quite the full picture. The aim of the regulations is to protect ‘important’ hedgerows in the countryside by controlling their removal through a system of notification with the Local Authority. It is not a blanket ban on the removal of hedgerows. In most cases it requires, through the serving of a Hedgerow Removal Notice, the LPA to consider whether the hedgerow is important (as defined by the regulations) or not. If it is important the presumption would be in favour of retention unless the LPA is satisfied with the reasons set out by the applicant for wanting its removal.

However, the Regulations allow under Section 6 (e) the removal of a Hedge where required *“for carrying out development for which planning permission has been granted or is deemed to have been granted, ...”* Your officers have had regard to the purposes of the regulations in reaching its recommendation to grant planning permission for this development and do not consider the integrity and/or function of these hedges from an historical landscape, archaeological or wildlife perspective to be harmed by small sections being removed to make way for site access. Should the committee decide to grant planning permission, such permissions would be deemed to permit the removal of sections of these hedges to provide access to the site – no separate notice under the Hedgerow regulations is required.

Reference has also been made to the loss of open space as a result of this development. The Local Plan has policies to safeguard against the loss of public open space and recreational facilities e.g., Policies LP1 and LP2 contained within the West Wiltshire Leisure and Recreation DPD. However, it should be noted that this is not public open space nor is it an existing recreational facility. Whilst it has PROWs crossing it, members of the public are not permitted to stray off the legal line of these PROWs and freely wander around the land subject to this development. As such, it is not public open space under the meanings identified within, for example, Policies LP1 and LP2. It is therefore not protected by such policies. The legal line and definitive widths of the PROWs will be retained to enable members of the public to continue to use them.

The Council does however have a Green Infrastructure (GI) Policy (CP 52) and whilst this site is not deemed to be public open space, it is considered to be GI. The GI parameters plan accompanying this application safeguards a reasonable amount of the space on site with the aims of delivering significant enhancements within these areas. Whilst some loss of GI is unavoidable to accommodate the new housing, it is being replaced around the edges with higher value/quality GI (e.g., safeguarding existing PROWs, creating new permissive paths, opening up the field to the west of the site as parkland, extensive planting, attenuation ponds, and suitable wildlife corridors for ecology. In light of the above, it is considered that the development will not adversely affect the integrity and value of this section of GI and therefore, there is no breach of CP 52.

9.6 Heritage Impact

In respect of listed buildings, Section 66 of the Planning (Listed Buildings and Conservation Areas) Act 1990 requires a local planning authority to have special regard to the desirability of preserving the building or its setting or any feature of special architectural or historic interest which it possesses.

When considering the effects of development upon non-designated heritage assets, the NPPF requires that *“a balanced judgement will be required having regard to the scale of any harm or loss and the significance of the heritage asset.”* (Paragraph 203, NPPF)

The heritage assets considered in this assessment are the following:

- Southwick Court Farmhouse, gatehouse and bridge – grade II*

- The moated site – of schedulable quality
- The farmstead – curtilage listed
- Knapps Cottage (formerly Southwick Hill Cottage) – a non-designated heritage asset

The red line boundary of the site itself does not include any designated heritage assets and as such, the assessment has looked at setting issues only.

The applicants have submitted a Heritage Impact Assessment (HIA) and one was commissioned by the Council as part of the evidence base to the WHSAP. It is noted that third parties have also made extensive comments on heritage impacts including the submission of an HIA by a heritage consultancy. These have all been considered by the Council's Conservation Officer in their assessment.

In respect of the Southwick Farm complex, the proposed development site which is currently in agricultural use plays an important role in the setting of these assets. The Conservation Officer has stated that:

“Whilst the earthworks of the water meadows may have become eroded to the point where they are only discernible to the trained eye, the group of assets continue to be set within an appreciable tract of open land, the overall use and character of which remains agricultural. The field boundaries also remain much as they were at the time that the farmstead and water meadows were created in the late C16/17th centuries and they were in common ownership as part of the manor of Southwick. This surrounding rural hinterland provides its context and contributes to understanding of its origins, development and to its significance.”

The Conservation Officer goes on to state that:

“Such functional and historic relationships between a designated farmstead and the surrounding agricultural land which forms their setting are generally acknowledged to contribute positively to the significance of the heritage assets – both in allowing them to be appreciated within their historic context and in contributing to the understanding of their development and function within the landscape. Whilst the overall land holding of the estate may have been diminished by the encroachment of the town, this makes the remaining area, if anything, of greater rather than lesser value in providing a meaningful setting.”

The Conservation Officer makes it clear that the development of this site is going to have a negative effect on these heritage assets due to the following:

- the loss of agricultural land historically associated with the farm complex;
- physical development within the setting (houses and road);
- noise, disturbance and light pollution from construction and occupation of the development;
- cumulative impact of the urbanisation of the wider rural setting of Southwick Court (solar farm and modern development to the north and south of the site in conjunction with this proposal); and,
- the creation of the access road across the western half of the site and the bridge which is required to cross the Lambrook flood plain.

Whilst the above is not an exhaustive list, it summarises the main impacts that have led the Conservation Officer to conclude that harm would arise to the setting of the Southwick Court farm complex. They have concluded that the scheme would cause less than substantial harm to the designated heritage asset known as Southwick Farm complex which includes the grade II* listed farmhouse, gatehouse and bridge. Whilst concluding the same level of harm as the

applicants in their HIA (i.e., less than substantial), they consider the harm to be of much greater significance than the “very small level” of harm acknowledged by the applicant’s consultants. They also disagree with Historic England’s assessment of the harms being limited.

In Respect of Knapps Cottage, the Conservation Officer concludes that:

“Knapps Cottage (formerly Southwick Hill cottage), a modest historic but non-designated cottage, is located beyond a mature tree’d hedge-line and in a heavily landscaped plot some distance further to the south of the site. Its surroundings are already heavily compromised by the solar farm to the east and current proposals are unlikely to have an additional impact on its special interest which relates primarily to its immediate garden plot.”

It was not therefore considered further in their assessment.

Paragraph 199 of the NPPF reminds us 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)...”* It goes on to state at paragraph 200 that any harm identified should require clear and convincing justification.

In light of the comments from the Conservation Officer, your officers accept that harm will arise from this proposal upon the designated asset comprising Southwick Court Farm complex.

With regards the LPA’s duties under paragraph 200, the clear and convincing justification is based on the need for housing and the lack of other suitable alternatives sites within Trowbridge to meet its identified housing needs for the plan period up to 2026. An assessment of all the alternative sites was considered during the WHSAP process for the current plan period (up to 2026) and after a process of elimination H2.6 was one of the sites deemed suitable to be put forward to meet housing need in the area.

However, as harm has been identified, the LPA is required in accordance with paragraph 202 of the NPPF, to consider what public benefits, if any, arise from this development and that, if there are public benefits, are they sufficient to outweigh the less than substantial harm identified above. In carrying out this assessment, if any public benefits arise from the proposal the LPA should first consider whether these public benefits can be accrued elsewhere without the need to cause the heritage harm identified.

In assessing the public benefits, the LPA has had regard to paragraph 5.83 of the WHSAP which states about site H2.6 that:

“The social, environmental and economic advantages of the development, including the provision of homes along with significant improvements to biodiversity and provision of open space will achieve substantial public benefits.”

In light of the above and in consideration of the application particulars, the LPA would consider the following to be public benefits of the scheme:

- the contribution towards the Council achieving a 5YRHLS;
- the provision of market and 30% affordable homes;
- economic benefits would ensue from the development in the creation of construction jobs and from expenditure post occupation;
- significant biodiversity enhancements; and,
- significant improvements to public open space.

In answer to the question about whether such benefits could be accrued elsewhere this is answered above when addressing paragraph 200 of the NPPF i.e., the clear and convincing justification for the harm is on the basis that the housing cannot be delivered elsewhere in Trowbridge. Furthermore, Trowbridge, as a Principal Settlement (defined in the WCS), is expected to grow as part of the WCS vision and, to achieve this, new housing is required to meet the town's needs. Again, as part of the identification of sites in the Trowbridge Community Area, this site was not only identified as able to deliver towards that need but, one that was also suitable to be developed without causing as much harm as others that formed part of the same assessment. It is therefore concluded that these public benefits cannot be accrued elsewhere to meet the identified needs of Trowbridge without causing more or unacceptable harm. What is more, ecological constraints have caused much delay to the delivery of housing in Trowbridge and so the need has become ever greater.

Furthermore, it should be noted that there are mitigation opportunities which have been employed by the applicants which have helped to reduce the impacts to Southwick Court Farm complex. These include but are not limited to, limiting all of the housing development to the eastern side of the site away from the Farm Complex, significant planting along the southern boundary of the development site, and the sensitive design of the vehicular access to the site. Such demonstrated measures will be secured by the submitted parameter plans on this application and as part of the detailed design at REM stage.

Note should also be taken of what the Inspector said in their examination report at paragraph 89:

“Southwick Court (H2.6) is allocated for around 180 dwellings. It comprises open fields on the edge of the settlement. The site is subject to several constraints relating to heritage, drainage and biodiversity. As a result, development is only suitable on the eastern part of the site. Although the Plan is silent on access, the Council has indicated a preference for access to be taken from Frome Road. This would result in a relatively long access road crossing the open part of the site. Achieving a satisfactory form of development will be challenging. Nevertheless, I am satisfied that with great care, there is scope for development on this site and thus the allocation is acceptable in principle.”

In other words, with great care over the design etc. the site could be developed on the eastern side without giving rise to unacceptable harm to the heritage assets. Looking at the access proposals as indicatively set out in the OUT documents, it is difficult to see how one could design a road that is any more low-key than that set out, whilst still complying with highways requirements and the drainage constraints of the site. That said, it is a matter that will be fully considered at REM stage when the detailed design of the access is road is presented to the Council. Consultation with Historic England and the Council's Conservation Officer would form part of this assessment.

Taking account of the mitigation measures outlined above, and the comments from the Inspector in their Examination Report, it is considered that the substantial public benefits accrued from the development of this site will outweigh the less than substantial harm identified to the heritage assets identified. The duty imposed by section 66, referred to above, is complied with if the harm caused to the listed buildings or their setting is assessed as being not as significant as the benefits which the proposed development will bring. This is the case here and; therefore, your officers are able to conclude that there will not be overall heritage harm that would justify a reason for refusal in this case.

9.7 Agricultural Land

The site is classified as grade 3. The area was not surveyed in the Post 1988 Agricultural Land Classification maps and so it is not possible to tell if the site is 3a (Best and Most Versatile Land (BMV)) or 3b (not BMV). However, given that the site was historically a water meadow, and given the evidence supplied by locals about how waterlogged the area is, it seems unlikely that it would be good quality agricultural land.

That aside, the portion of the site that is being lost to housing is just 6.3ha of the 18.8ha site. If it were BMV land that was being lost, it is not significant in area (Natural England are generally concerned where areas greater than 20ha are being lost). This portion of land falls well below that threshold and therefore, its loss is considered acceptable.

Furthermore, as this site has been promoted through the plan-led system (the WHSAP), it is noted that the issue of loss of BMV would have been looked at in conjunction with all other sites being considered. The LPA would not look to promote sites that saw significant loss of prime agricultural land unless absolutely necessary.

9.8 Sequential and Exceptions Test

As part of the site allocation plan process, H2.6 was subject to sequential testing, the results of such clearly leading to its inclusion in the Plan i.e., the sequential test was passed; noting in this allocation that the site includes the access road off the Frome Road and, as such, the proposed housing and access road were considered as one entity.

This outline application is in conformity with Policy H2.6 i.e., no deviations from the allocation (e.g., increasing the housing numbers beyond the allocated amount or altering the location). As such, it is not necessary to apply a further sequential test to this application.

That said, a sequential approach to development within H2.6 has been applied to the proposals whereby all the residential development parcels are located within Flood Risk Zone 1. Whilst the access road to the residential part of the site has to cross over Flood Zones 2 and 3, this was envisaged at allocation stage and, the site includes emergency access to the north which is outside of Flood Zones 2 and 3.

9.9 Flood Risk and Drainage

The site is approximately 18.81 ha in total with only 4.4 ha being changed to impermeable areas requiring positive drainage. Infiltration testing was carried out which demonstrated that the underlying geology was not suitable to include this method into any SUDs strategy.

As such, the strategy to deal with surface water is to provide attenuation ponds to store surface water. Water from the impermeable areas will be piped to the ponds and then restricted discharge pipes will control the flow of water into the existing watercourse (The Lambrok). The rate of discharge into the Lambrok will not exceed the current greenfield run-off rate for the field and must in fact achieve betterment (which it does).

The Lead Local Flood Authority (LLFA), having reviewed all the relevant information, including the additional documentation sought by them and the EA during the application, have now removed their objection to the scheme. The amount of time it took, and the amount of information requested should be a good indicator that this matter was fully investigated. The EA removing their objection was also an influencing factor in this decision.

The LLFA's latest response suggests a number of conditions that their recommendation is subject to. Having reviewed these conditions, officers are satisfied that the information requested by them is reasonable and necessary to make the development acceptable in

planning terms i.e., to ensure the scheme does not lead to increased flood risks elsewhere during both the construction and occupation phases of the development. That said, the drainage team have suggested a total of 7 conditions which appears an unnecessary amount. It seems logical these matters could be dealt with via one overarching condition to cover a detailed surface water drainage strategy incorporating all of the points raised by the LLFA by referring to their latest response letter in the condition. With this condition in place, your officer's assert that the scheme now complies with current policy (Core Policy 67 of the WCS and paragraph 167 of the NPPF).

The illustrative layout plan submitted with this application has had regard to the need to deliver sustainable urban drainage (SUDs) features alongside a development of up to 180 dwellings. This is evidenced on the indicative plan where the No. 7 green dots are labelled in the key as green links including swales (swales being a form of SUDs/source control measure). Whilst this plan does not include a comprehensive suite of SUDs, it is the opinion of officers that sufficient space exists within this plan to accommodate such features at REM stage – and this would very much be expected. Furthermore, the applicants have noted the comments from the LLFA in respect of this matter and, given that this is an application for up to 180 dwellings, the numbers could be reduced at REM stage should the LPA (or LLFA) consider the need for greater SUDs provision throughout the development that cannot otherwise be accommodated without reducing dwelling numbers. Furthermore, it is noted in the LLFA's latest response that they appear happy for the matter to be dealt with at REM stage.

The Environment Agency (EA) were consulted from the outset and, after lengthy deliberations, including revised and additional documentation (notably revisions to the FRA and further modelling work), they have no further concerns about the proposals in terms of fluvial flood risk. Again, the amount of time it took, and the amount of information requested should be a strong indicator that this matter was fully investigated by them. All other aspects of the EA's concerns have been suitably addressed via the revised documentation or can be addressed through the use of suitably worded planning conditions. Subject to conditions, they have withdrawn their previous objection. The conditions suggested by the EA would cover the following:

- Development to be carried out in accordance with the submitted flood risk assessment.
- Water efficiency measures to enable growth in a sustainable manner with the same water resources.
- The submission of a Construction and Environmental Management Plan to prevent pollution of the water environment.

Having reviewed the conditions, officers consider them to be both reasonable and necessary and therefore suggest they are imposed on any permission given.

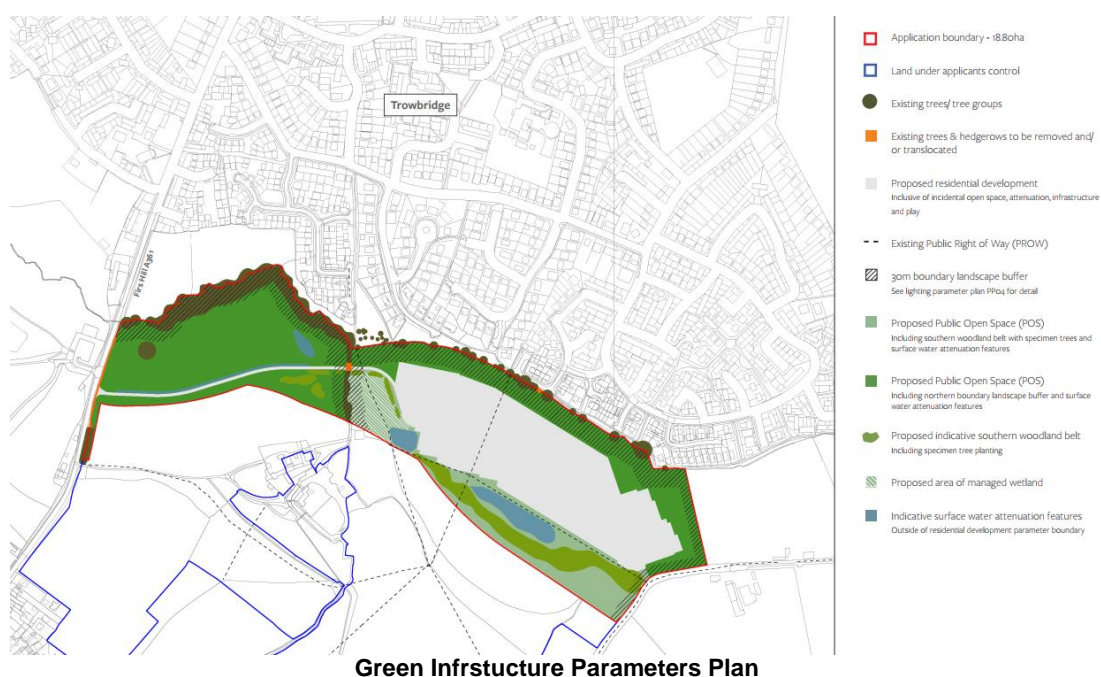
It is noted that a number of interested parties have expressed concern that there is a discrepancy between the application particulars and the real-world experiences of residents. Residents have provided accounts and images to show that areas of the site are continually waterlogged through the winter months and frequently flooded. In answer to this, your officers would state that the LLFA and the EA are the statutory advisors to the LPA on matters relating to drainage and flood risk. In the case of the EA, they are also the Government's advisory body on flooding and floodrisk. As they are both advising your officers that the scheme is now acceptable in relation to these matters, the LPA has no reason other than to conclude that the proposal will not lead to increased flood risks elsewhere. To go against the professional advice received i.e., seeking to raise grounds for refusal on flooding matters, would make it very difficult for the LPA to substantiate those grounds at appeal.

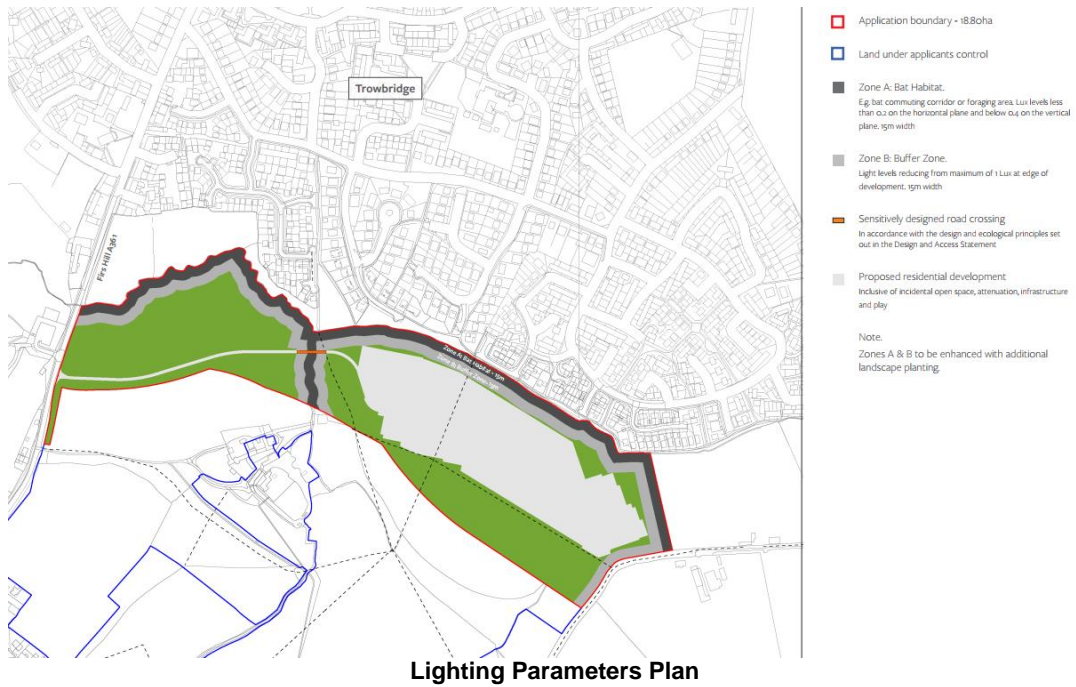
9.10 Ecological Impact

An Ecological impact assessment was submitted for the application which was based on the following surveys carried out between 2016 and 2020:

- The following further surveys have been carried out to date:
- Otter and water vole, badger, July 2017.
- GCN HSI and eDNA September 2020
- Bat survey Ground level tree assessment and endoscope survey 2020.
- Bat activity May to October 2016, April 2019, July and October 2020.
- Bat Automated Static Surveys May to October 2016, April 2019, August to October 2020
- Building inspections (Southwick Court September 2020)

The Council’s Ecologist raised an initial holding objection to the application until it could be demonstrated that the development would have an acceptable impact on protected species and priority habitats. In that regard further survey work has been undertaken at the request of Wiltshire Council Ecologists since the original submission and parameters plans covering lighting and ecological buffers zones have been revised (see below and Appendix E and F). It is now considered that alongside other surveys, those required by the Trowbridge Bat Mitigation Strategy have been undertaken and the results used to inform the layout and parameters of the site.





In particular, the assessments have identified the relevant ‘core bat habitat’ on the Application Site as the corridor along the northern boundary of the site (and the Lambrok Stream) and included an appropriate buffer zone and dark corridor on the parameter’s plans identified above in line with TBMS guidance. Furthermore, an ecological buffer and dark corridor is maintained along either side of the Lambrok Stream within the land controlled by the applicant. Critically, as noted by some third parties, there are no requirements for a minimum 60m buffer zones within the red line of this development site (as illustrated in Figure 6 of the TBMS). This is because the core bat habitats identified only have new housing along the one side (existing housing does not count). As such, only 30m is required to be policy compliant and this is achievable based on the parameters plans submitted in line with Figure 6 in the TBMS.

As the site is within the Yellow Sensitivity Zone within the Trowbridge Bat Mitigation Strategy (TBMS) particular regard has been given to the impact of the development upon local bat populations – both in terms of habitat loss (building on the green fields) and by recreational pressure placed upon nearby habitats by new residents of the development (e.g. walking in Biss or Green Lane Woods where significant bat roosts are located). However, it should be noted that, whilst particular regard has been given to local bat populations, all matters of ecological importance have been considered e.g. the effect of development on the Lambrok and the existing hedgerows on the site.

The net result of the additional survey work, coupled with the original survey work, reports and updated parameters plans has allowed the Ecologist to remove their objection to the scheme subject to certain conditions, s106 contributions and the satisfactory completion of an Appropriate Assessment (AA) to consider any potential significant effects on the Bath and Bradford on Avon Bat SAC. The AA has been done (see appendix I) and this concludes that there would be no adverse impacts on the Bath and Bradford on Avon Bat SAC as a result of this development proposal. It further notes that no net loss of biodiversity is achieved on site, in fact the opposite, biodiversity net gain is accomplished (in line with current policy standards). Whilst recreational pressures are cited as a concern within the TMBS, the development is well placed to access Southwick Country Park with CIL monies being used to improve visitor facilities here to ensure it acts as Suitable Alternative Natural Green Space (SANG).

After additional clarification from the case officer and ecologist, Natural England have supported the Council position in respect of the AA (see Appendix J).

The following conditions have been requested and should be imposed on any permission given:

- that the development is carried out in full compliance with the following plans:
 - Land at Southwick Court, Trowbridge Green Infrastructure Plan. Drawing 150202 PP 03. Clifton Emery Design (October 2020).
 - Land at Southwick Court, Trowbridge Lighting. Drawing 150202 PP 04. Clifton Emery Design (October 2020).
 - Southwick Court BNG. The Biodiversity Metric 3.0 Tool – Calculation Tool, 21/October/2021 and,
- that development shall not commence until the submission of a Lighting assessment of the final scheme, a Landscape and Ecological Management Plan (LEMP) and a Construction and Environmental Management Plan (CEMP).

The LPA has reviewed the requested conditions and considers them to be reasonable and necessary to make the development acceptable in planning terms and to ensure the ongoing maintenance and management of the site for the benefit of ecology. Section 106 Contributions are also required towards the Trowbridge Bat Mitigation Strategy, to be paid before commencement with no option for return after ten years. As part of the s106 agreement there is also a requirement to set up and remit a management company. The validity of this request is set out in a further section of this report.

Overall, with these conditions and s106 in place, and the positive recommendation on the AA, it can be concluded that the development can proceed without unacceptable harm to protected species or priority habitats.

9.11 Archaeology

The application was accompanied by a field survey, LIDAR, geophysics and a detailed desk-based heritage assessment.

This desk-based findings conducted by the applicants identified no potential features requiring further archaeological investigation. As such, they did not consider it necessary to carry out field evaluation. The Councils Archaeologist disagrees however and considers that a “*trial trench evaluation of the proposed development footprint, sampling a minimum of 4% of that area...*” is necessary. They state that this work must be undertaken prior to a decision being made. The applicants however disagree and have not undertaken field evaluation. They have stated that if Wiltshire are minded to insist upon trial trenching then a suitably worded planning condition could be attached to the consent.

Turning to this matter, regard should be had to paragraph 18a-041-20190723 of the Planning Practice Guidance (PPG) where it states:

“Decision-making regarding such assets requires a proportionate response by local planning authorities. Where an initial assessment indicates that the site on which development is proposed includes or has potential to include heritage assets with archaeological interest, applicants should be required to submit an appropriate desk-based assessment and, where necessary, a field evaluation. However, it is estimated that following the initial assessment of archaeological interest only a small proportion – around 3% – of all planning applications justify a requirement for detailed assessment.”

The applicants assert that the evidence does not suggest trial trenching is required/necessary and therefore, the request does not represent a proportionate response in accordance with the NPPF and advice in PPG above. The LPA's position is that of the consultee i.e., that trial trenching should take place prior to the decision being made. The decision has also been informed by third parties who seek to assert that there are significant archaeological finds on the site and have gone so far as to say they are of national significance.

In order to provide flexibility, and to enable the application, as well as applications 18/10035/OUT and 20/09659/FUL to be dealt with in a timely manner (rather than further delays), your officer's recommend that this matter is deferred and delegated to the Head of Development Management to ensure trial trenching is undertaken prior to the decision being issued. This enables the Committee to make a decision on the application with the knowledge that trial trenching will take place before the decision is issued by the Council, noting that the s106 process is likely to take around 6 months.

In accordance with policy contained within the NPPF, the results of the trial trenching will be used to inform the decision on the need for any further archaeological work that would need to be undertaken prior to development. Securing this method of archaeological evaluation will ensure that the estimated archaeological potential of the site is properly recorded and, if it reveals significant finds, that these would then be investigated and preserved, in line with local (CP58) and national planning policy. The carrying out of trial trenching post Committee decision would not jeopardise any potential below ground heritage assets.

Furthermore, it should be noted that there is nothing set out in legislation that mandates at which stage in the process trial trenching should be undertaken i.e., whether it should be undertaken before or after consent. In light of the above, your officer's would contend that there is no reason why this issue cannot be delegated.

9.12 Environmental Impact

The Council's Public Protection team have no objection to the development provided the following elements are covered:

- A s106 sum of £10000 to go towards air quality monitoring;
- that a construction management plan is submitted to the LPA for approval via condition; and,
- that a contaminated land report is submitted for approval via condition.

Officers have reviewed the above requests and consider the conditions suggested to be reasonable and necessary to make the development acceptable in planning terms. The same conclusions were drawn on the s106 request.

9.13 Highways / Rights of Way

As the site is allocated within the Wiltshire Housing Site Allocations Plan, it has already been considered in principle as suitable and sustainable by the Council for a residential development of up to 180 dwellings.

This outline planning application is supported by a Transport Assessment and Framework Travel Plan which were prepared in consultation with the Local Highway Authority.

The site is in close proximity to existing local services and facilities with the current pedestrian and cycle infrastructure near to the site offering reasonable walking and cycling opportunities. Furthermore, the site is accessible by quite good public transport services. Coupled with the

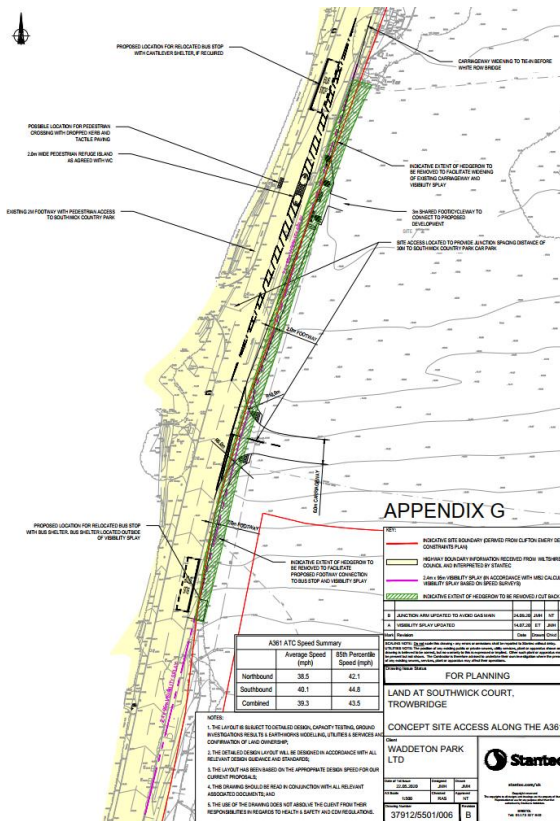
proposed pedestrian and cycle access points into and out of the site, there is sufficient opportunities for future occupants to travel via sustainable modes as opposed to the private car.

The Transport Assessment (TA) shows that the development will have an immaterial impact at congested junctions and is not modelled to exceed the design capacity elsewhere. The transport impacts of the development proposals were tested using the Strategic Trowbridge Model, as requested by the Highway Authority. With regards to construction impacts, the TA is silent however, this is not surprising given it is an outline application. This matter can be conditioned.

With regards to the cumulative impacts of access points onto the Frome Road by sites H2.4, H2.5 and H2.6, the LHA make the following comments:

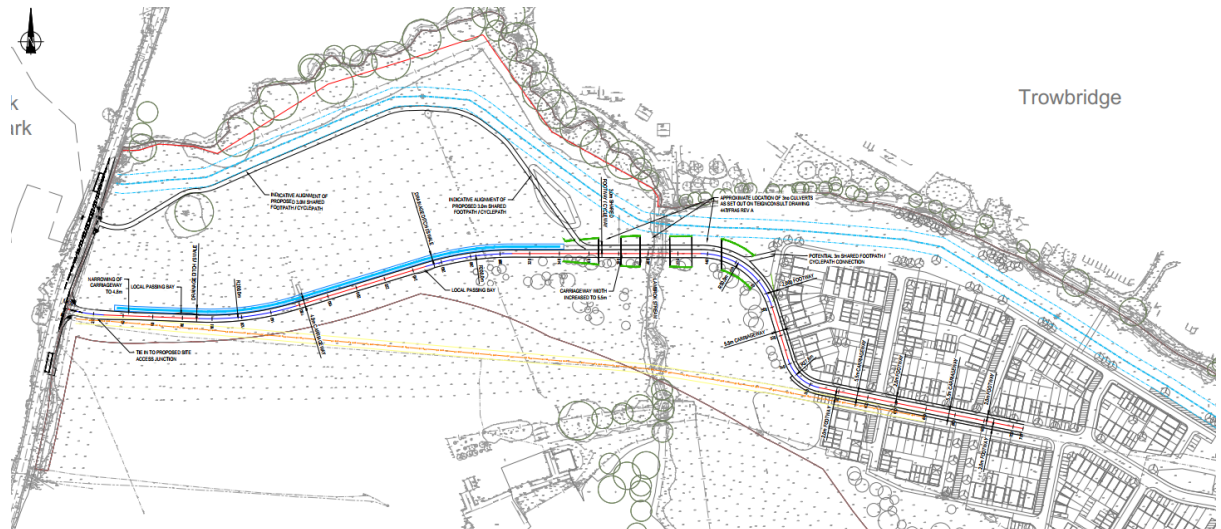
“In light of Policy H2.6 and the consideration of adjacent sites H2.4 and H2.5, drawing 18048-GA03 attached to application 20/09659 provides a summary of the 3 sites access junction arrangements onto Frome Road. Whilst a number of access points in a short distance would be typically objected to on the basis of multiplicity of access points, which may present safety issues, in this instance, it is intended to have the opposite effect through identifying to drivers that they are entering an urban fringe with greater activity thereby eliciting greater caution.”

In relation to the site-specific access, the junction was redesigned following comments from the Local Highways Authority (LHA) as it was perceived to be an excessive design for its purpose. The resultant junction is now illustrated on Stantec Drawing 37912-5501-006B (see below and appendix G) and has been agreed with the LHA (i.e., it is safe and suitable). This drawing will need to form part of the approved plans. A separate foot and cycleway is provided to the north of the proposed access to minimise the impact of the road on heritage assets. The LHA consider this to be a suitable and thus attractive cycling and walking route to link the development up with the Frome Road.



The detail of bus stop shelters has not been established and these will need to be specifically considered in an access condition and will need to include real time information boards as standard. These details can be secured via condition with the monies being provided through s106 contributions.

The internal access road was redesigned following comments from the Local Planning Authority. The revised access road proposals are shown on Stantec Drawing 37912-5501-010G (see below and appendix I). Whilst the internal access road is a matter to be considered at REM stage, the REM application will need to be designed in general accordance with this plan. This can be conditioned to ensure minimal impacts on sensitive receptors e.g., Southwick Court.



Given the scale of development, an emergency access is also required. Whilst the principal of the access point is accepted, this will need to be subject of further design to establish its acceptability to accommodate large fire tenders, whilst not presenting an opportunity for general vehicle usage that would conflict with intended pedestrian/cyclist priority. This can be conditioned.

In conclusion, in light of the above, it is considered that the residual cumulative impacts on the road network are not considered to be 'severe'. The LHA's conclusions are of course predicated on the fact conditions and s106 obligations will be necessary to make the development acceptable in planning terms. As discussed within this section, the highways conditions would cover the following:

- Access provided before 1st occupation.
- Full details of bus shelters to be positioned on both sides of Frome Road to be agreed with LPA before commencement of development.
- Emergency access details to be submitted and approved in writing and constructed prior to occupation of 50th dwelling.
- Approval of a construction management statement prior to commencement

The s106 obligations relating to highways matters are set out in detail in section 9.15 of this report.

The Rights of Way Team have no objections to the development. However, this is subject to the upgrades to the existing P_{Ro}W_s within the site and to their access points into and out of the site. For the most part, these issues can be addressed by financial contributions as part of the s106 agreement with the remaining elements considered at detailed design stage as part of any subsequent REM application. The 106 contributions are covered in detail later in the report.

9.14 Community Infrastructure Levy (CIL)

The new dwellings would be liable for CIL. The site would fall under charging zone 2 where the sum equates to £55 per square metre of residential floor space created. Floor space calculations can only be provided at detailed design stage and thus CIL calculations would be required at reserved matters stage.

10. S106 contributions

Core Policy 3 advises that 'All new development will be required to provide for the necessary on-site and, where appropriate, off-site infrastructure requirements arising from the proposal. Infrastructure requirements will be delivered directly by the developer and/or through an appropriate financial contribution prior to, or in conjunction with, new development. This Policy is in line with the tests set under Regulation 122 of the Community Infrastructure Levy Regulations 2010, and Paragraph 57 of the National Planning Policy Framework. These are:

- Necessary to make the development acceptable in planning terms
- Directly related to the development; and
- Fairly and reasonably related in scale and kind to the development

The infrastructure items listed below are those that are relevant to the Application site and are required in order to mitigate the impact of the proposed scheme. The Applicant has agreed (see Appendix K) to provide the following (the calculation is based on the net addition of dwellings which is 180):

Affordable Housing

CP43 states that on dwellings of 5 or more affordable housing provision of at least 30% will be provided and transferred to a Registered Provider. CP45 also requires affordable dwellings to address local housing need and to incorporate a range of different types, tenures, sizes of homes in order to create a balanced community. CP46 requires in suitable locations, new housing to meet the needs of vulnerable people will be required

The applicant has agreed to provide 54 affordable housing units which meets the 30% required and will be transferred to a Registered Provider. Based on current housing need figures for Trowbridge these should be a mix of 60% affordable rent and 40% intermediate housing with a unit mix of 2-bed flats, 2-bed bungalows and 2, 3, 4 person houses and should also not normally be in groups exceeding 12-15 dwellings. There is also a need for 10% of these affordable homes to be identified for extra care units (adapted for disabled residents or wheelchair adapted accommodation).

Recreation and Open Space

The principle of obtaining quality open spaces and opportunities for sport and recreation is stated in paragraph 98 of the NPPF. Saved Policy LP4 of the Leisure and Recreation DPD states that where new development (especially housing) creates a need for access to open space or sport recreation provision an assessment will be made as to whether a contribution to open space or sport recreation is required. Saved Policy GM2 of the Leisure and Recreation DPD requires the management and maintenance of new or enhanced open spaces which will be included within the S106.

The proposal generates a public open space requirement of 6605.64m² public open space with 318.6m² of this as equipped play all of which should be secured in perpetuity. The Play Officer is satisfied that this requirement can be met on site (the applicants are in fact provided in excess of this figure (400 m²))

A leisure contribution of £42,480.00 is required for the upgrade of Woodmarsh Sports Ground. This is considered a reasonable request as the sports ground lies within walking distance of the site and is likely to be used by residents of the new development as one of the nearest community facilities.

Education

The NPPF (paragraph 95) encourages Local Authorities to ensure that sufficient choice of school places is available to meet the needs of existing and new communities. In order to ensure this, Core Policy 3 lists the provision of education as a priority 1 theme where it is required due to the impacts of a development proposal.

Early Years - A contribution of £385,484 is required to go towards the funding of 22 pre-school places within the area. The Early Years Officer has advised that the existing Early Years provision will not be able to support the needs of additional families requiring Early Years and Childcare in this area as they are all operating at high capacity.

Primary School – This development would result in a need of 51 primary school places. Which amounts to a total sum of £956,658 (51 x £18,758) which will be utilised towards expanding the local Primary Schools to accommodate the pupil forecasts from this development.

Secondary School – There is currently no spare capacity at a secondary level in the Trowbridge area (Clarendon, John of Gaunt and St Augustine’s RC Schools). The proposal would generate a need for 38 places at a cost of £22,940. A total contribution of £825,840 would therefore be required which will be put towards the provision of a new secondary school to serve Trowbridge.

Refuse

A contribution of £17,280 (£91 per dwelling x 180) would be required to provide the new dwellings with adequate waste and recycling bins. This is in conformity with the Wiltshire Council Waste Collection Guidance for New Development and is listed in Core Policy 3 as an infrastructure priority theme 1.

Public Art

An indicative public art contribution figure (based on £300 per dwelling) for the applicant to deliver the integration of public art for this site would be £54,000 for 180 dwellings. It is expected that no more than 10% of this figure should be spent upon the production of a public art plan.

Art and design in the public realm will help to mitigate the impact of development by contributing to good design, place-shaping, infrastructure and engage communities with the development.

The above contribution is considered reasonable and necessary in line with the following policies of the development plan:

- Core Policy 3 promotes and defines public art as a type of place-shaping infrastructure and states that the cost of providing infrastructure can be met through the use of planning obligations.
- Core Policy 57 promotes “the use of high standards of building materials, finishes and landscaping, including the provision of street furniture and the integration of art and design in the public realm.”
- Saved West Wiltshire District Plan 1st Alteration Policy I2 also makes reference to The Arts.
- The Planning Obligations Supplementary Planning Document (October 2016) refers to the 2011 guidance note of art and design in the public realm.

In addition, the NPPF recognises that cultural wellbeing is part of achieving sustainable development and includes cultural wellbeing within the twelve core planning principles that underpin both plan-making and decision-taking. The PPG complements the NPPF and states that *“Public art and sculpture can play an important role in making interesting and exciting places that people enjoy using.”*

Air Quality

CP 55 seeks positive contributions to the aims of the Air Quality Strategy in Wiltshire and as such a financial contribution towards Air Quality Monitoring is required in areas where air quality is being monitored by the Council. A contribution of £10000 to cover the cost of real time air quality monitoring equipment is being sought. This is considered reasonable and necessary as part of the Council's commitment to reducing emissions.

Ecology

At Appendix 2 of The Trowbridge Bat Mitigation Strategy (Habitat Mitigation Plan) a sum of £777.62 is required to be collected by S106 for each dwelling to address in-combination and residual effects of additional housing on bat habitats through new woodland and hedgerow planting. The total sum for this development would be $180 \times £777.62 = £139,971.60$.

The contribution towards the TBMS, are to be paid before commencement, with no option for return after ten years. Setting up and remit of management company is also required for maintaining the bat habitat (marked on a plan) in a suitable condition for bats in terms of the ability of habitat to support invertebrate prey for bats and maintaining it in a dark condition.

These requests are considered under Core Policy 3 of the WCS as an infrastructure priority theme 1: specific projects needed to ensure compliance with the Habitats Regulations. As there is a direct link between the residual effects of additional housing on bat habitats the money is necessary to make the development acceptable and it also shows how it directly relates to this development. It is reasonable in scale and kind as it directly relates to the number of dwellings proposed for the site.

Highways

CP 61 states that where appropriate contributions will be sought towards sustainable transport improvements and travel plans will be required to encourage the use of sustainable transport alternatives. CP 63 identified transport strategies for Wiltshire's Principle Settlements (Trowbridge being one of them) which seek to achieve a major shift to sustainable transport by helping to reduce reliance on the private car and by improving sustainable transport alternatives. Part of the funding for these strategies is to be derived from developer contributions. Such requests are also listed under Core Policy 3 as infrastructure priority theme 1. The following planning obligations are sought by the LHA:

- A contribution of £102,147 towards pedestrian and cycle enhancements/schemes identified in the Trowbridge Transport Strategy along the Frome Rd corridor.
- New bus stop provision - £40,000
- Refuge pedestrian crossing - £10,000

More detailed breakdowns of the contributions are detailed in the LHA consultation response. The transport strategy contribution is based upon infrastructure that is directly related to the

impacts of housing growth caused by sites H2.4, H2.5 and H2.6, with the sum identified above being a percentage of the total figure covering all three sites.

Such contributions are necessary to mitigate the impacts of the development on the surrounding highways network and to encourage more sustainable travel movements to and from the development.

In addition to the above the Public Rights of Way Team have also requested the following planning obligation:

- At total request of £8,450 plus the cost of the conversion order to make the necessary improvements and upgrades to the existing PRoWs that cross the site.

The public rights of way in the vicinity of and crossing the site will be directly affected by the scheme through their increased use by future occupiers of the development, and so the request being made here is reasonable and justified. The cost is no more than is necessary to carry out the improvement works.

11. Conclusion (The Planning Balance)

It should be noted that at the heart of the NPPF there is a presumption in favour of sustainable development requiring local planning authorities to approve development proposals that accord with an up-to-date development plan without delay; and where there are no relevant development plan policies, or the policies which are most important for determining the application are out-of-date, permission should be granted unless (taken from paragraph 11 of the NPPF):

- The application of policies in the NPPF that protect areas or assets of particular importance provides a clear reason for refusing development proposed; or
- any adverse impacts of doing so would significantly and demonstrably outweigh the benefits, when assessed against the policies in the NPPF taken as a whole;

With regards to the above, the plan is not up-to date in all aspects as the Council finds itself without a 5YRHLS. As such paragraph 11d is engaged.

In relation to the first bullet point of paragraph 11d, it has not been found that the application of policies within the Framework that protect areas or assets of particular importance provides a clear reason for refusing this development. Whilst heritage harm was identified, the public benefits were considered to outweigh the harm caused when the necessary heritage balance was conducted. This fully squares with the Framework's policies on protecting the historic environment.

In light of the above, the second bullet point of paragraph 11d is engaged which means that, any harm identified must be significant and demonstrable if it is to be considered grounds to refuse the application.

The benefits

Provision of entry level AH / housing to address 5YRHLS shortfall –

Given the lack of a 5YRHLS within the county, the widely acknowledged nationwide housing crisis, the further shortage of affordable housing both locally and nationally, and the provision of 180 dwellings with 30% to be delivered as affordable, officers consider that significant

weight should be given to this benefit. The development would make a very important contribution to the Council's housing land supply and this point should attract substantial positive weight – particularly given the site is allocated in the Wiltshire site allocation plan via H2.6.

Expenditure on construction and investment in the area / creation of construction jobs –

Some positive weight should also be attributed to this benefit, providing a boost to the economy through the provision of all associated construction jobs with a development of this scale. After all, the construction industry has been highlighted by the government as one of the key areas for growth post pandemic and more generally. A limited, yet still positive, amount of weight can also be attributed to the economic expenditure from future occupants of the development within the local economy.

Financial contributions towards off site infrastructure –

Whilst these contributions are required to make the development acceptable in planning terms, some of the contributions would be of benefit to the local population and, without the development would be unlikely to happen. In this case, a contribution to provide improvements to Woodmarsh Sports Ground, would not only be of benefit to future occupants of the development who may choose to use this facility, but to many locals who already use it. Some limited positive weight can be attributed to this point.

The 'harms'

As noted above, any harm identified would need to be both significant and demonstrable in order to justify refusing the planning application. In this case, after significant amendments throughout the determination process, it is concluded by officers that there will be no significant or demonstrable harm arising from this development that cannot otherwise be mitigated through the detailed design process at REM stage, the use of appropriately worded planning conditions, and via s106 contributions/obligations.

Neutral

It is noted that lack of identified harm against policies of the WCS is not a benefit of the scheme but would be a neutral aspect of it. The lack of technical objections raised to the development and its conformity with the development plan are therefore neutral points within the balance.

Conclusion

It is the opinion of officers that no significant or demonstrable harm has been identified that would outweigh the benefits (in the case of the provision of market and affordable housing, significant benefits) that this development would accrue. In the absence of any identified planning harm, it is therefore recommended that this application be approved subject to the conditions listed below and the satisfactory completion of a s106 legal agreement containing the contributions identified in this report.

RECOMMENDATION:

That the Head of Development Management be authorised to grant planning permission, subject to:

- 1. first, completion of archaeology trial trenching and any necessary changes to conditions/plans arising from the results on the proviso that any substantial**

material changes to the scheme as a result of finds will require the application to be taken back to the Strategic Planning Committee; and,

- 2. following satisfactory resolution of 1, completion of a planning obligation/Section 106 agreement covering the matters set out in this report,**

and subject also to the planning conditions listed below –

Conditions:

- 1 The development hereby permitted shall be begun either before the expiration of three years from the date of this permission, or before the expiration of two years from the date of approval of the last of the reserved matters to be approved, whichever is the later.

REASON: To comply with the provisions of Section 92 of the Town and Country Planning Act 1990 as amended by the Planning and Compulsory Purchase Act 2004.

- 2 An application for approval of the reserved matters specified in Condition 3 below, must be made to the Local Planning Authority before the expiration of three years from the date of this permission.

REASON: To comply with Section 92 of the Town and Country Planning Act 1990.

- 3 No development shall commence until details of the following matters (in respect of which approval is expressly reserved) have been submitted to, and approved in writing by, the Local Planning Authority:

- (a) The scale of the development;
- (b) The layout of the development;
- (c) The external appearance of the development;
- (d) The landscaping of the site.

The development shall be carried out in accordance with the approved details. The reserved matters shall be submitted as a single phase, unless otherwise agreed by the Local Planning Authority.

REASON: The application was made for outline planning permission and is granted to comply with the provisions of Section 92 of the Town and Country Planning Act 1990 and Article 5 (1) of the Town and Country Planning (Development Management Procedure) (England) Order 2015.

- 4 The development hereby permitted shall be carried out in accordance with the following approved plans and documents:

- Dwg Ref: 150202 PP 01 Rev E Location Plan
- Dwg Ref: 150202 PP 02 Rev Q Access, land use and building heights
- Dwg Ref: 150202 PP 03 Rev U Green Infrastructure Plan
- Dwg Ref: 150202 PP 04 Rev Q Lighting
- Dwg Ref: 37912/5501/006 Rev B Concept Site Access

- Dwg Ref: 37912/5501/005 Rev A Emergency Access
- Dwg Ref: Southwick Court BNG. The Biodiversity Metric 3.0 Tool – Calculation Tool (21 October 2021)

REASON: For the avoidance of doubt and in the interests of proper planning.

5 The development hereby permitted shall be carried out in general accordance with the design and layout principles in the following:

- Dwg Ref: 150202 PP05 Rev B.Design Principles
- Dwg Ref: 150202 R01 Rev P Design and Access Statement
- Dwg Ref: 37912/5501/010 Rev G Proposed Internal Access Road

REASON: For the avoidance of doubt and in the interests of proper planning.

6 No development shall commence within the area edged in red on the Location Plan (Ref 150202 PP 01 Rev E) until:

- a) A written programme of archaeological investigation, which should include on-site work (i.e. trial trenching) and off-site work such as the analysis, publishing and archiving of the results, has been submitted to and approved by the Local Planning Authority; and
- b) The approved programme of archaeological work has been carried out in accordance with the approved details.

REASON: To enable the recording of any matters of archaeological interest.

7 No development approved by this permission shall commence until a scheme for water efficiency has been submitted to and approved in writing by the Local Planning Authority. The scheme shall be implemented in accordance with the agreed details.

REASON: In the interests of sustainable development and climate change adaptation.

8 No external lighting shall be installed on site until plans showing the type of light appliance, the height and position of fitting, illumination levels and light spillage have been submitted to and approved in writing by the Local Planning Authority. The plans will be in accordance with the appropriate Environmental Zone standards set out by the Institute of Lighting Engineers in their publication GN01:2011, 'Guidance for the Reduction of Obtrusive Light' (ILP, 2011), and Guidance note GN08-18 "Bats and artificial lighting in the UK", issued by the Bat Conservation Trust and Institution of Lighting Professionals. Lighting levels shall be in accordance with those defined on the approved Lighting Parameter Plan (Ref 150202 PP 04 Rev Q).

The approved lighting shall be installed and maintained in accordance with the approved details and no additional external lighting shall be installed.

A post-installation lighting survey must be conducted (in accordance with section 8.3.4 of the Trowbridge Bat Mitigation Strategy) and submitted to the Local Planning

Authority. This survey must demonstrate that the lighting levels comply with the approved Lighting Parameter Plan.

REASON: In the interests of the amenities of the area, to minimise unnecessary light spillage above and outside the development site and to ensure lighting meets the requirements of the Trowbridge Bat Mitigation Strategy.

- 9 No development shall commence on site until a scheme for the discharge of surface water from the site has been submitted to and agreed in writing by the local planning authority. This should address the matters raised in the Council's letter, as Lead Local Flood Authority dated 9th November 2022

REASON: To ensure that the development can be adequately drained.

- 10 The development hereby approved shall not commence until a Construction and Environmental Management Plan (CEMP) has been submitted to and approved in writing by the local planning authority. The CEMP shall include details of the following relevant measures:

- i. An introduction consisting of a construction phase environmental management plan, definitions and abbreviations and project description and location;
- ii. A description of management responsibilities;
- iii. A description of the construction programme;
- iv. Site working hours and a named person for residents to contact;
- v. Detailed Site logistics arrangements;
- vi. Details regarding parking, deliveries, and storage;
- vii. Details regarding dust mitigation;
- viii. Details of the hours of works and other measures to mitigate the impact of construction on the amenity of the area and safety of the highway network;
- ix. Communication procedures with the LPA and local community regarding key construction issues – newsletters, fliers etc;
- x. Details of how surface water quantity and quality will be managed throughout construction;
- xi. Details of the safeguarding measures to deal with the following pollution risks:
 - the use of plant and machinery
 - wheel washing and vehicle wash-down and disposal of resultant dirty water
 - oils/chemicals and materials
 - the use and routing of heavy plant and vehicles
 - the location and form of work and storage areas and compounds
 - the control and removal of spoil and wastes
- xii. Details of safeguarding measures to highway safety to include:
 - A Traffic Management Plan (including signage drawing(s))
 - Routing Plan
 - Details of temporary/permanent Traffic Regulation Orders
 - pre-condition photo survey - Highway dilapidation survey
 - Number (daily/weekly) and size of delivery vehicles.
 - Number of staff vehicle movements.
- xiii. In addition, the Plan shall provide details of the ecological avoidance, mitigation and protective measures to be implemented before and during the construction phase, including but not necessarily limited to, the following:

- Pre-development species surveys including but not exclusively roosting bats, otter, water vole and birds.
- Phasing plan for habitat creation and landscape works including advanced planting proposals including pre-development provision of TBMS zones A and B and predevelopment provision of hedgerow mitigation/ translocation along Firs Hill A361.
- Identification of ecological protection areas/buffer zones and tree root protection areas and details of physical means of protection, e.g. protection fencing.
- Method statement to include pollution prevention measures for construction of causeway over Lambrok Stream to minimise harm to the watercourse and protected and notable species.
- Working method statements for protected/priority species, such as nesting birds, reptiles, amphibians, roosting bats, otter, water vole, badger and dormice.
- Work schedules for activities with specific timing requirements in order to avoid/reduce potential harm to ecological receptors; including details of when a licensed ecologist and/or ecological clerk of works (ECoW) shall be present on site.
- Key personnel, responsibilities and contact details (including Site Manager and ecologist/ECoW).
- Timeframe for provision of compliance report to the local planning authority; to be completed by the ecologist/ECoW and to include photographic evidence.

There shall be no burning undertaken on site at any time.

Construction hours shall be limited to 0730 to 1800 hrs Monday to Friday, 0730 to 1300 hrs Saturday and no working on Sundays or Bank Holidays.

The development shall subsequently be implemented in accordance with the approved details of the CEMP.

REASON: To minimise detrimental effects to the neighbouring amenities, the amenities of the area in general, and detriment to the natural environment through the risks of pollution and dangers to highway safety, during the construction phase and in compliance with Core Strategy Policy 62.

- 15 The development shall be carried out in accordance with the submitted flood risk assessment (July 2022 Addendum 4 To Level 2 Flood Risk Assessment Land South Of Trowbridge, Ref. 447/Fra2/Addm4, V1 – 21.07.22 and Appendix 2 Modelling Report including drawings FRA10 – FRA14) and the following mitigation measures it details:

- In accordance with page 5 of the FRA the bridge soffit shall be set 600mm above the design flood with a 39% allowance for climate change.

These mitigation measures shall be fully implemented prior to occupation and subsequently in accordance with the scheme's timing/ phasing arrangements. The measures detailed above shall be retained and maintained thereafter throughout the lifetime of the development.

REASON: To minimise flood risk to/from the development.

- 16 Prior to the start of construction ground works/excavation, site clearance, vegetation clearance and boundary treatment works, a Landscape and Ecology Management Plan (LEMP) shall be submitted to and approved in writing by the Local Planning Authority.

The LEMP will detail long term objectives and targets, management responsibilities and maintenance schedules for each ecological feature within the development (other than small, privately owned, domestic gardens) including, but not exclusively: Wildlife ponds and wetland for SUDS, Floodplain Wetland Mosaic (wet grassland, scrapes, reedbed), native tree and scrub planting, semi-natural neutral meadow grassland and retained hedge, scrub and trees.

The LEMP will include:

- A phasing plan demonstrating the timing of habitat creation works in relation to
- Zone A and Zone B TBMS landscape buffers, new landscape edge along the southern boundary, grassland and translocation of hedge/ hedge planting will be completed in advance of or alongside vegetation stripping.
- A plan specifying the location and type of integral bird nesting features (including for swift) and bat roosting features to be provided. Numbers to be provided in line with best practice guidelines.
- Distinguishing between formal and informal open space and land required to meet mitigation and BNG objectives.
- Details of how habitats are created will be managed to achieve predicted BNG gains for the duration of the development.
- A mechanism for monitoring the success of the management prescriptions, incorporating review and necessary adaptive management in order to attain targets.
- Details of the legal and funding mechanism(s) by which long-term implementation of the plan will be secured.

The LEMP shall be implemented in full and for the lifetime of the development in accordance with the approved details.

REASON: To ensure the long-term management of landscape and ecological features retained and created by the development, for the benefit of visual amenity and biodiversity for the lifetime of the scheme.

- 17 No development shall commence on site (other than that required to be carried out as part of a scheme of remediation approved by the Local Planning Authority under this condition), until steps (i) to (iii) below have been fully complied with. If unexpected contamination is found after development has begun, development must be halted on that part of the site affected by the unexpected contamination to the extent specified by the Local Planning Authority in writing until step (iv) has been complied with in full in relation to that contamination.

Step (i) Site Characterisation:

An investigation and risk assessment must be completed to assess the nature and extent of any contamination on the site, whether or not it originates on the site. The investigation and risk assessment must be undertaken by competent persons and a

written report of the findings submitted to and approved in writing by the Local Planning Authority. The report of the findings must include:

- a) A survey of the extent, nature and scale of contamination on site;
- b) The collection and interpretation of relevant information to form a conceptual model of the site, and a preliminary risk assessment of all the likely pollutant linkages;
- c) If the preliminary risk assessment identifies any potentially significant pollutant linkages a ground investigation shall be carried out, to provide further information on the location, type and concentration of contaminants in the soil and groundwater and other characteristics that can influence the behaviour of the contaminants;
- d) An assessment of the potential risks to:
 - human health,
 - property (existing or proposed) including buildings, crops, livestock, pets, woodland and service lines and pipes,
 - adjoining land,
 - groundwater and surface waters,
 - ecological systems,
 - archaeological sites and ancient monuments;

This must be conducted in accordance with DEFRA and the Environment Agency's "Model Procedures for the Management of Land Contamination, CLR 11" and other authoritative guidance.

Step (ii) Submission of Remediation Scheme:

If any unacceptable risks are identified as a result of the investigation and assessment referred to in step (i) above, a detailed remediation scheme to bring the site to a condition suitable for the intended use must be prepared. This should detail the works required to remove any unacceptable risks to human health, buildings and other property and the natural and historical environment, should be submitted to and approved in writing by the Local Planning Authority. The scheme must include all works to be undertaken, proposed remediation objectives and remediation criteria, a timetable of works and site management procedures.

Step (iii) Implementation of Approved Remediation Scheme:

The approved remediation scheme under step (ii) must be carried out in accordance with its requirements. The Local Planning Authority must be given at least two weeks written notification of commencement of the remediation scheme works.

Step (iv) Reporting of Unexpected Contamination:

In the event that contamination is found at any time when carrying out the approved development that was not previously identified it should be reported in writing immediately to the Local Planning Authority. An investigation and risk assessment should be undertaken in accordance with the requirements of step (i) above and where remediation is necessary, a remediation scheme should be prepared in accordance with the requirements of step (ii) and submitted to and approved in writing by the Local Planning Authority.

Step (v) Verification of remedial works:

Following completion of measures identified in the approved remediation scheme a verification report should be submitted to the Local Planning Authority. The report should demonstrate the effectiveness of the remedial works.

A statement should also be provided by the developer which is signed by a person who is competent to confirm that the works detailed in the approved scheme have been carried out (The Local Planning Authority can provide a draft Remediation Certificate when the details of the remediation scheme have been approved at stage (ii) above).

The verification report and signed statement should be submitted to and approved in writing of the Local Planning Authority.

Step (vi) Long Term Monitoring and Maintenance:

If a monitoring and maintenance scheme is required as part of the approved remediation scheme, reports must be prepared and submitted to the Local Planning Authority for approval at the relevant stages in the development process as approved by the Local Planning Authority in the scheme approved pursuant to step (ii) above, until all the remediation objectives in that scheme have been achieved.

All works must be conducted in accordance with DEFRA and the Environment Agency's "Model Procedures for the Management of Land Contamination, CLR 11" and other authoritative guidance.

REASON: To ensure that risks from land contamination to the future users of the land and neighbouring land are minimised, together with those to controlled waters, property and ecological systems, and to ensure that the development can be carried out safely without unacceptable risks to workers, neighbours and other offsite receptors.

- 18 Prior to first occupation of any dwelling, the access junction shall be completed in all respects in accordance with the approved Stantec Drawing 37912-5501-010G. Illustrated visibility splays serving the access shall be maintained free of any obstruction exceeding 900mm above the adjacent nearside carriageway level. The access provision and associated visibility splays shall be maintained as such thereafter.

REASON: In the interests of highway safety and in compliance with Core Strategy Policy 60 and 61.

- 19 Prior to first occupation of any dwelling, the access junction shall be completed in all respects in accordance with the approved Stantec Drawing 37912-5501-010G. Illustrated visibility splays serving the access shall be maintained free of any obstruction exceeding 900mm above the adjacent nearside carriageway level. The access provision and associated visibility splays shall be maintained as such thereafter.

REASON: In the interests of highway safety and in compliance with Core Strategy Policy 60 and 61.

- 20 Prior to first occupation of any dwelling, the access junction shall be completed in all respects in accordance with the approved Stantec Drawing 37912-5501-010G.

Illustrated visibility splays serving the access shall be maintained free of any obstruction exceeding 900mm above the adjacent nearside carriageway level. The access provision and associated visibility splays shall be maintained as such thereafter.

REASON: In the interests of highway safety and in compliance with Core Strategy Policy 60 and 61.

Informatives:

The development should include water-efficient systems and fittings. These should include dual-flush toilets, water butts, water-saving taps, showers and baths, and appliances with the highest water efficiency rating (as a minimum). Greywater recycling and rainwater harvesting should be considered. An appropriately submitted scheme to discharge the condition will include a water usage calculator showing how the development will not exceed a total (internal and external) usage level of 110 litres per person per day.

The applicant is advised to receive all necessary Highway Authority Approvals before commencing works within the Highway.

Appendices

Location Plan	Appendix A
Illustrative Masterplan	Appendix B
Access, Land Use and Buildings Heights Parameters Plan	Appendix C
Green Infrastructure Parameters Plan	Appendix D
Lighting Parameters Plan	Appendix E
Concept Site Access	Appendix F
Proposed Internal Access Road	Appendix G
Emergency Access	Appendix H
Appropriate Assessment	Appendix I
Natural England Agreement	Appendix J
S106 Heads of Terms Agreement	Appendix K