

**WILTSHIRE HOUSING SITE ALLOCATIONS PLAN (WHSAP) EXAMINATION**  
**Written Statement No. 3 of 3 by North Bradley Parish Council**

**1.0 Introduction:**

1.1 This statement is made against the soundness of the WHSAP and in particular its approach towards consultation with the North Bradley Neighbourhood Plan Steering Group on the parallel development of the NDP and WHSAP.

**2.0 Representations**

*Issue 4. Has the site selection process for housing allocations been soundly based?*

This representation should be read alongside representations made concerning Issues 1 and 3.

**2.12 Issue 4:**

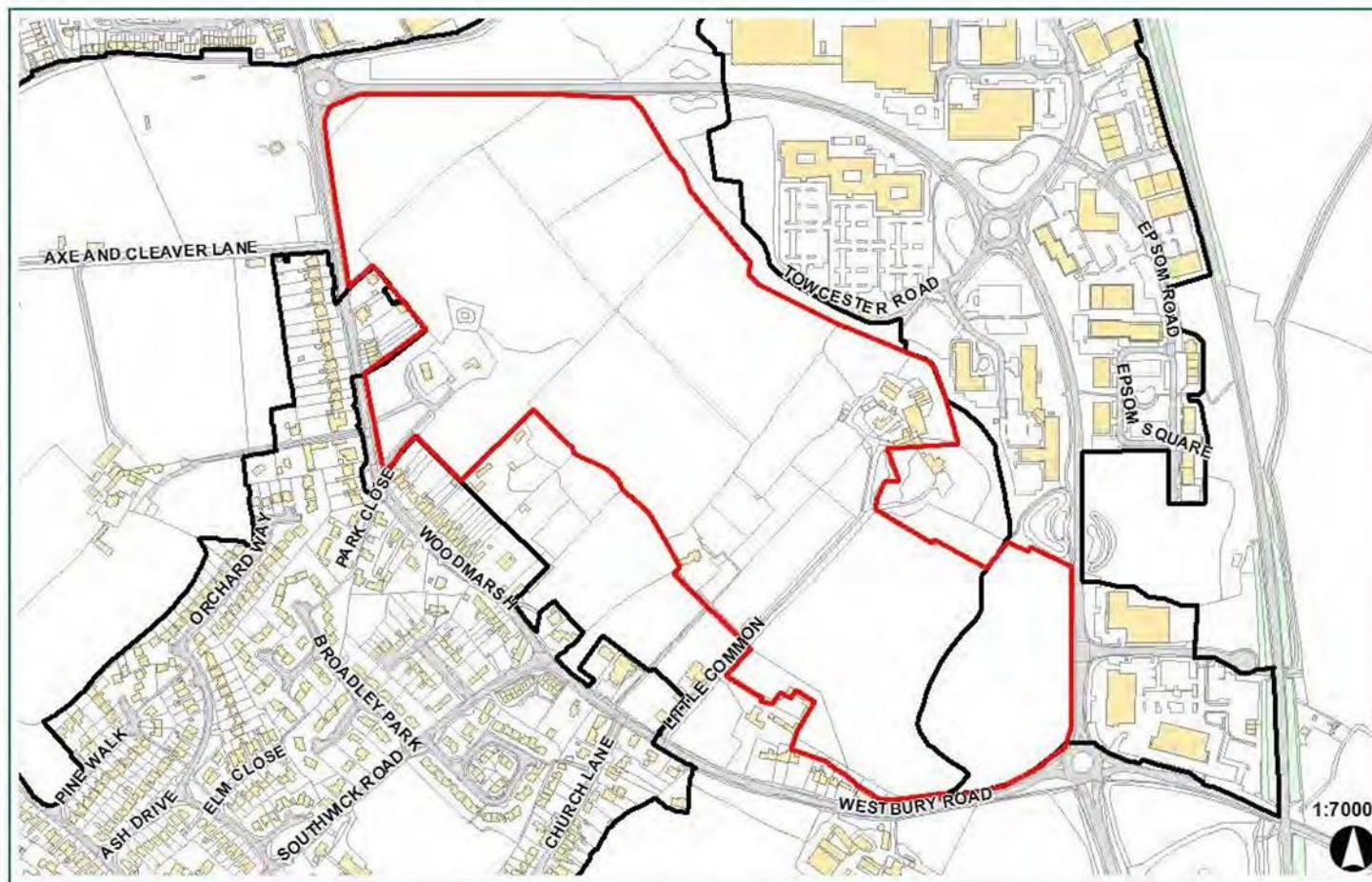
While in general site selection has been properly carried out, unfortunately the full details of site detailed site H2.2, Land off the A363 at White Horse Business Park, have been compromised and not co-ordinated with the emerging North Bradley Neighbourhood Plan.

2.13 The current WHSAP draft says:

*'Approximately 25.26ha of land off the A363 south-west of the White Horse Business Park is allocated for the development of approximately 150 dwellings, as identified on the Policies Map. It is reasonably well located with regard to services and facilities.*

*The site extends over a significant area of agricultural land used for a mix of grazing and arable cropping. It is contained, to a degree, by existing development to the east and west and fronts a 'gateway' route to the town. An objective of detailed design and layout will be to retain visual separation of the Town's urban area from North Bradley village. To achieve this, development proposals would need to be focussed within the north-east of the site, screened with new planting and provide improvements to walking and cycling routes through to the town'.*

WHSAP MAP Site H 2.2

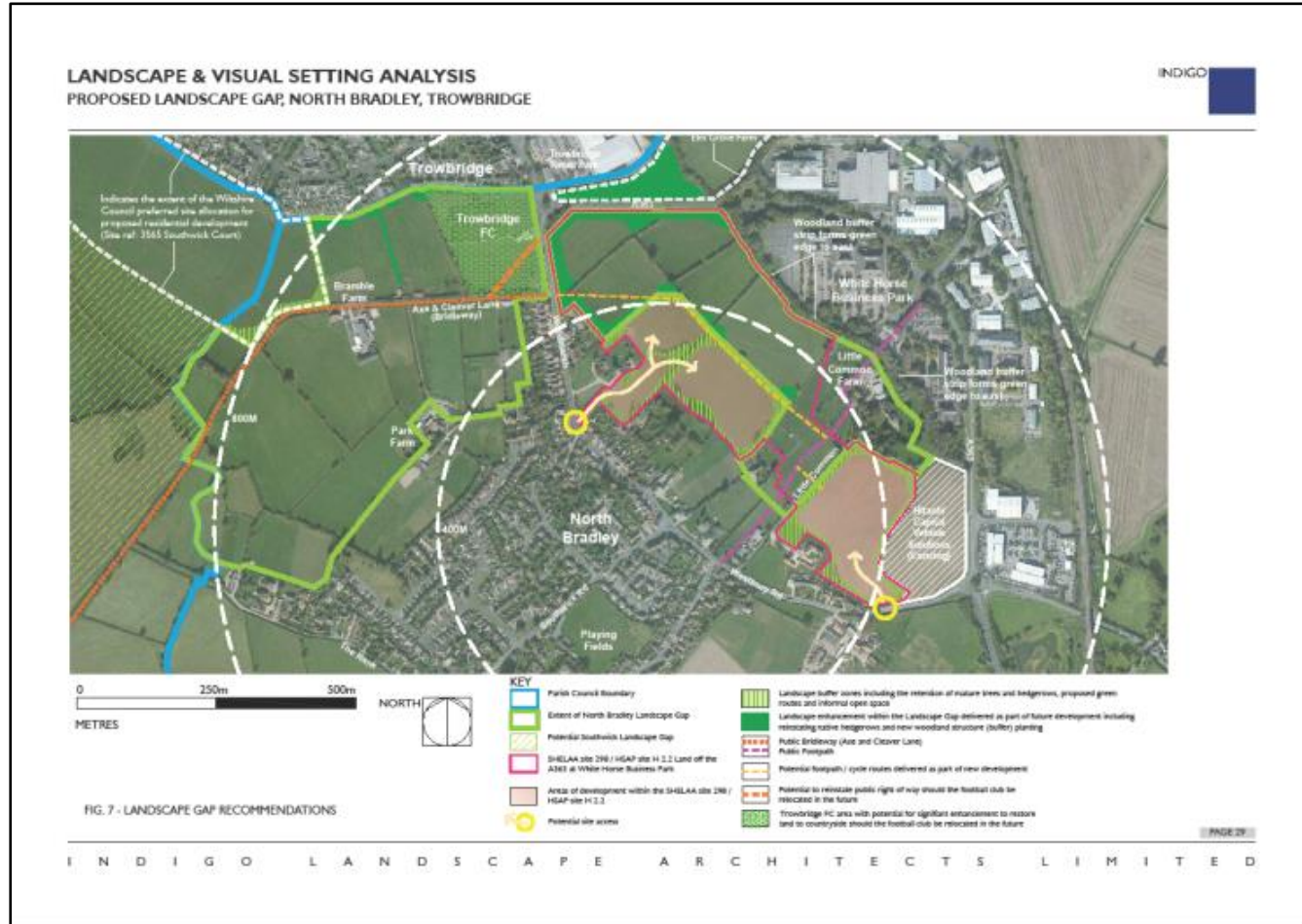


 Proposed housing allocation     Proposed Settlement Boundary

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2.15 While the site has been accepted by the NDP, the detail of the policy as set out above is completely at odds with the emerging NDP. The essence of the problem is that, the WHSAP policy attempts to create a landscape gap in the south-west of the site by concentrating development in the north-east. However, detailed discussions with a professional landscape architect employed by the Parish Council and Wiltshire Council's own Ecologist have determined that the best location for a gap that would separate Trowbridge from North Bradley and which would also create the best 'dark corridor' for the protected bats of the Bath and Bradford on Avon SAC is in the north and west, with development being concentrated in the south. The NDP proposal is shown on the site map below:

NDP map



2.16 The policy wording of the WHSAP should be changed to reflect the emerging NDP. This would:

- Ensure protection of the bats of the SAC
- Provide the clarity expected from a Development Plan Document
- Ensure proper co-ordination between the HSAP and the emerging North Bradley Neighbourhood Plan as required by the NPPF and PPG.

2.17 Full detail of the case for this change was made to Wiltshire Council in October 2018 in the Representation given here as Appendix 1.

## North Bradley Parish Council

### Formal Consultation Response to Wiltshire Housing Site Allocations Plan EXAM.01 Focussed Consultation on Schedule of Proposed Changes

October 2018

# Contents

1.0	Introduction	1
2.0	Policy H2: SHELAA Site 298 / HSAP Site H 2.2	2
3.0	Boundary Changes	4
4.0	Conclusion	5

## Appendices

Appendix 1:	North Bradley NDP: Map Showing Landscape Gap, Proposed Layout for Site H 2.2
Appendix 2:	Site Map for HSAP Site 2.2.

# Glossary of Terms

<b>Acronym or Term</b>	<b>Definition</b>
<b>HSAP</b>	Housing Site Allocations Plan
<b>LPA</b>	Local Planning Authority (Wiltshire Council)
<b>NB</b>	North Bradley
<b>NDP</b>	Neighbourhood Development Plan
<b>NPPF</b>	National Planning Policy Framework - 'The Framework' sets out planning policies for England
<b>PPG</b>	Planning Practice Guidance
<b>SAC</b>	Special Area of Conservation
<b>WCS</b>	Wiltshire Core Strategy

## 1.0 Introduction

- 1.0 This is the formal response of North Bradley Parish Council to the '*Focussed Consultation of the Schedule of Changes to the Wiltshire Housing Site Allocations Plan*' (HSAP). The Parish Council acknowledges the change in respect of the Strategic Site 298 H 2.2 '*Land off A363 at White Horse Business Park*' following submissions on behalf of the Parish Council. While the Parish Council would prefer that this site is not developed, it does not wish to impede the delivery of a strategic site and recognises the need to avoid conflict between higher level plans and the NDP. On this basis only it therefore SUPPORTS the allocation of all the proposed strategic sites ('*Elm Grove Farm*' (SHELAA Site 613, HSAP H2.1), '*Southwick Court*' (SHELAA Site 3565, HSAP H2.6) and '*Land off the A363 at White Horse Business Park*' (SHELAA Site 298, HSAP H2.2).
- 1.1 HOWEVER, while the revised HSAP indicates that the quantum of development on site 298 / H 2.2 has been reduced to facilitate the creation of a meaningful landscape gap between the site and Trowbridge, it does not take account of the work already done between the Neighbourhood Plan team, the team's professional planner, landscape architect and the LPA's own ecologist. The Parish Council therefore believes that it is necessary to add more detail to the plan text in order to:
- 1.2 This Response also comments on the proposed settlement boundary changes to North Bradley village, which the Parish Council SUPPORTS.



## 2.0 Policy H 2: HSAP Site H 2.2 / SHELAA 298 Land off White Horse Business Park

2.0 The proposed change indicated at PC60 in the Extended Consultation document reduces the number of homes at site H2.2 (land off the A363 south-west of the White Horse Business Park) from 225 to 175. The explanatory text says that this is;

*'To reflect the resolution of Wiltshire Council's Cabinet, the capacity of allocation H2.2 is proposed to be amended. It was previously proposed through a schedule of proposed changes put before May Cabinet that the site capacity should be increased from 150 dwellings to 225 dwellings in order to maximise efficient use of land whilst protecting heritage and ecological interests. However, as a result of subsequent further consultation it was resolved by Cabinet in July 2018 that the figure of 225 should be reduced by 50 dwellings, to 175. This would better enable the provision of a strategic landscape buffer between Trowbridge and the village of North Bradley.'*

2.1 This is welcome. However, in fact the resolution of the Cabinet reflected the emergence of the North Bradley Neighbourhood Plan, brought to Cabinet's attention by local councillors. This emerging Neighbourhood Plan establishes a defined landscape buffer between Trowbridge and the village of North Bradley. Through discussions with the county ecologist it also goes further than this and puts forward a specific general layout for site H 2.2, designed to provide a satisfactory landscape gap (as determined by professional landscape architect consultants) which is also optimal in respect of the flightpaths and foraging corridors for the protected bats of the Bath and Bradford on Avon SAC (as suggested by the County Ecologist).

2.2 As it stands, the allocation of site H 2.2 in the HSAP covers the following matters:

- a) Number of dwellings
- b) Need to separate Trowbridge and North Bradley and respect setting of the village
- c) Need to focus development proposals within the north-east of the site
- d) Improvements in walking and cycling infrastructure
- e) Retention of landscape features
- f) Need to create a 'dark corridor' for bats
- g) Contributions towards school and medical facilities.

2.3 However it does not include:

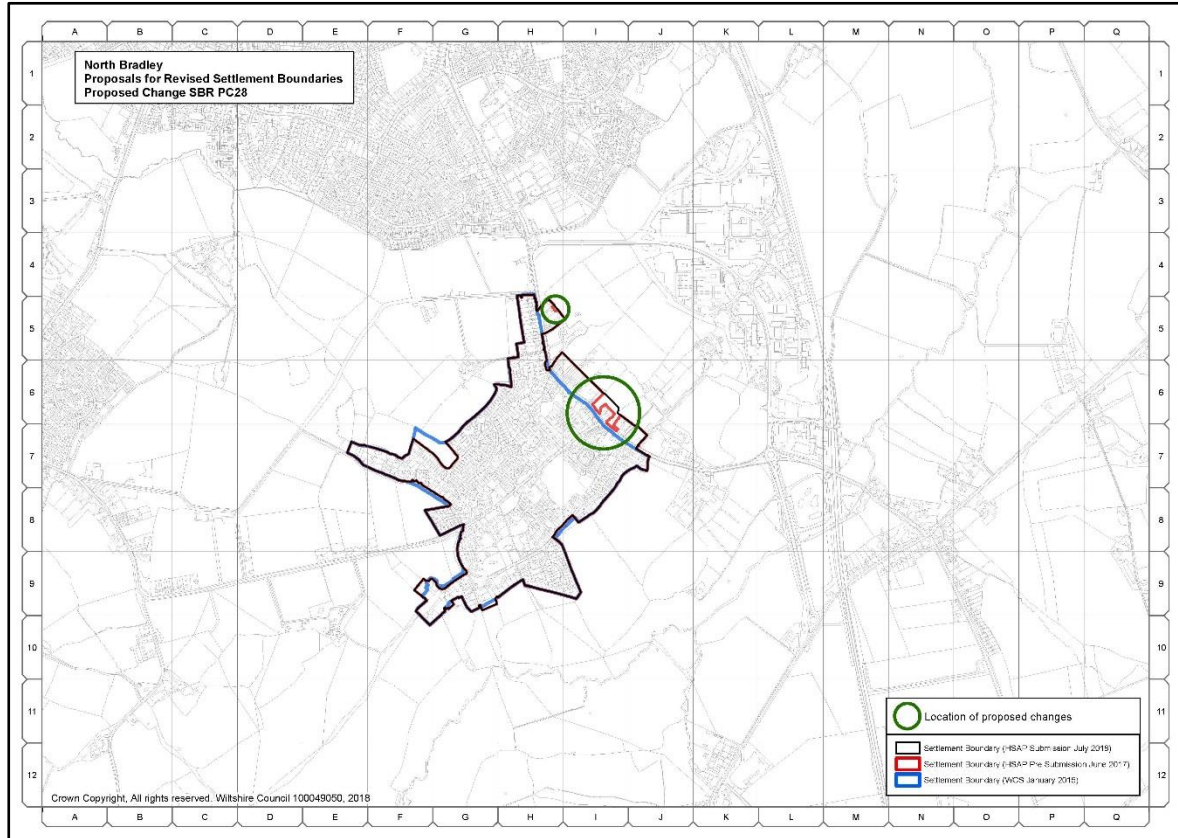
- a. The fact that a more detailed site layout is being developed by the North Bradley Neighbourhood Plan (NDP)
- b. That the NDP will contain a landscape setting policy covering the entire area.
- c. That the preferred layout in the NDP does NOT concentrate development in the north-east as proposed in the HSAP but west and south-west - adjacent to the village. This has been discussed and agreed between the landscape architects advising the NDP and the County Ecologist.

**Of all the above points, point c) is the most critical. As presently written there is likely to be a conflict between the NDP and the HSAP on this point.**

- 2.4 It is accepted that the North Bradley Neighbourhood Plan has not yet reached the Regulation 16 stage. However, it seems likely to do so before the HSAP is adopted. It should therefore be possible to make some mention of the link between the two plans, at least in general terms at this stage. This would not be putting too much weight on an emerging plan, simply improving co-ordination between community and council planning at an appropriate stage ('working constructively' as advised by PPG paragraph 43) and demonstrating awareness, support for Localism and good practice. It would also be allowing the NDP to achieve the role anticipated for it in NPPF paragraph 28 in adding value and detail to the Development Plan, something that would provide greater clarity and opportunity for engagement by the developers of Site H 2.2.
- 2.5 It is therefore suggested that the following changes (indicated in blue text) are made to the text of Policy H 2.2:
- 5.52 *Approximately 25.26 ha of land off the A363 south-west of the White Horse Business Park is allocated for the development of approximately 175 dwellings, as identified on the Policies Map. It is reasonably well located with regard to services and facilities. The site extends over a significant area of agricultural land used for a mix of grazing and arable cropping. It is contained, to a degree, by existing development to the east and west and fronts a 'gateway' route to the town. An objective of detailed design and layout will be to retain visual separation of the Town's urban area from North Bradley village. The issue of the setting of the village of North Bradley is currently being taken forward by the emerging North Bradley Neighbourhood Plan which aims to create a landscape setting policy and suggests a general site layout for this HSAP site. The NDP has yet to reach The Regulation 16 stage, when it will have significant weight, however it is already clear that to achieve a satisfactory design, creating a suitable landscape buffer while simultaneously conserving biodiversity, development proposals would need to be focussed within the **west and south-west of the site**, screened with new planting and provide improvements to walking and cycling routes through to the town.*
- 5.53 *The site is characterised by a distinctive pattern of mature and semi-mature hedgerows and trees that form a feature in the landscape. Development of the site would need to retain these features and thereby provide a layout that respects the setting of North Bradley village as an important element of detailed design. Existing hedgerows and trees also provide habitat for protected and non-protected species. These natural features therefore provide wildlife corridors that link habitat features within the local area; in particular, 'dark corridors' for foraging bats. This matter is addressed further in the emerging North Bradley Neighbourhood Plan and its supporting documents which include a landscape assessment and have involved the participation of the County Ecologist. These documents will achieve significant weight once they reach the Regulation 16 stage.*
- 5.54 *The site is in an area likely to be used by Bechstein's bats associated with the Bath and Bradford on Avon Bats SAC. Sensitive habitat features on / adjacent to the site include: woodland belts associated with the White Horse Business Park; a network of mature hedgerows/hedgerow trees; and the grounds of Willow Grove.*
- 5.55 *These features should be retained and / or buffered from development (including residential gardens) by wide (10-16m), dark (<1 lux), continuous corridors of native landscaping which will allow for their long-term protection and favourable management in order to secure continued or future use by Bechstein's bats. Development will be required to contribute towards the delivery of the Trowbridge ~~Bat Recreation Management~~ Mitigation Strategy.*

### 3.0 Boundary Changes

3.0 The revised HSAP proposes settlement boundary changes as indicated on the map below. The Parish Council support these changes which represent 'good housekeeping', tidying the boundary to reflect the current pattern of development.



## 4.0 Conclusion

4.0 The Parish Council generally does not object to the revised HSAP. However changes are necessary for the sake of clarity and to better co-ordinate two emerging Development Plan Documents. In particular a great deal of effort has been expended in discussions with the county ecologist and the landscape architect advising the NDP Steering Group to devise the best site layout that will achieve the twin objectives of:

- Best separating Trowbridge and North Bradley and providing a meaningful rural setting for the village, and at the same time,
- Protecting the habitat of protected bats from the SAC.

This site layout so devised is fundamentally different from the one put forward in the HSAP and this discrepancy needs to be corrected in order to prevent conflict later in the plan process for both HSAP and NDP and to best protect the bats of the SAC. Development at site H2.2 should be concentrated in the west and south west, not in north-east as proposed in the current HSAP draft.

4.1 Maps showing both the proposed HSAP site H 2.2 and the proposed layout in the North Bradley NDP are given as appendices to this Response.



# Appendix 1: Landscape Gap Area and Proposed General Site Layout for H 2.2 (Development concentrated in south and west of site to leave clear bat corridor)

## LANDSCAPE & VISUAL SETTING ANALYSIS PROPOSED LANDSCAPE GAP, NORTH BRADLEY, TROWBRIDGE



0 250m 500m  
METRES



### KEY

- Parish Council Boundary
- Extent of North Bradley Landscape Gap
- Potential Southwick Landscape Gap
- SHELAA site 298 / HSAP site H 2.2 Land off the A363 at White Horse Business Park
- Areas of development within the SHELAA site 298 / HSAP site H 2.2
- Potential site access
- Landscape buffer zones including the retention of mature trees and hedgerows, proposed green routes and informal open space
- Landscape enhancement within the Landscape Gap delivered as part of future development including reinstating native hedgerows and new woodland structure (buffer) planting
- Public Bridleway (Axe and Cleaver Lane)
- Public Footpath
- Potential footpath / cycle routes delivered as part of new development
- Potential to reinstate public right of way should the football club be relocated in the future
- Trowbridge FC area with potential for significant enhancement to restore land to countryside should the football club be relocated in the future

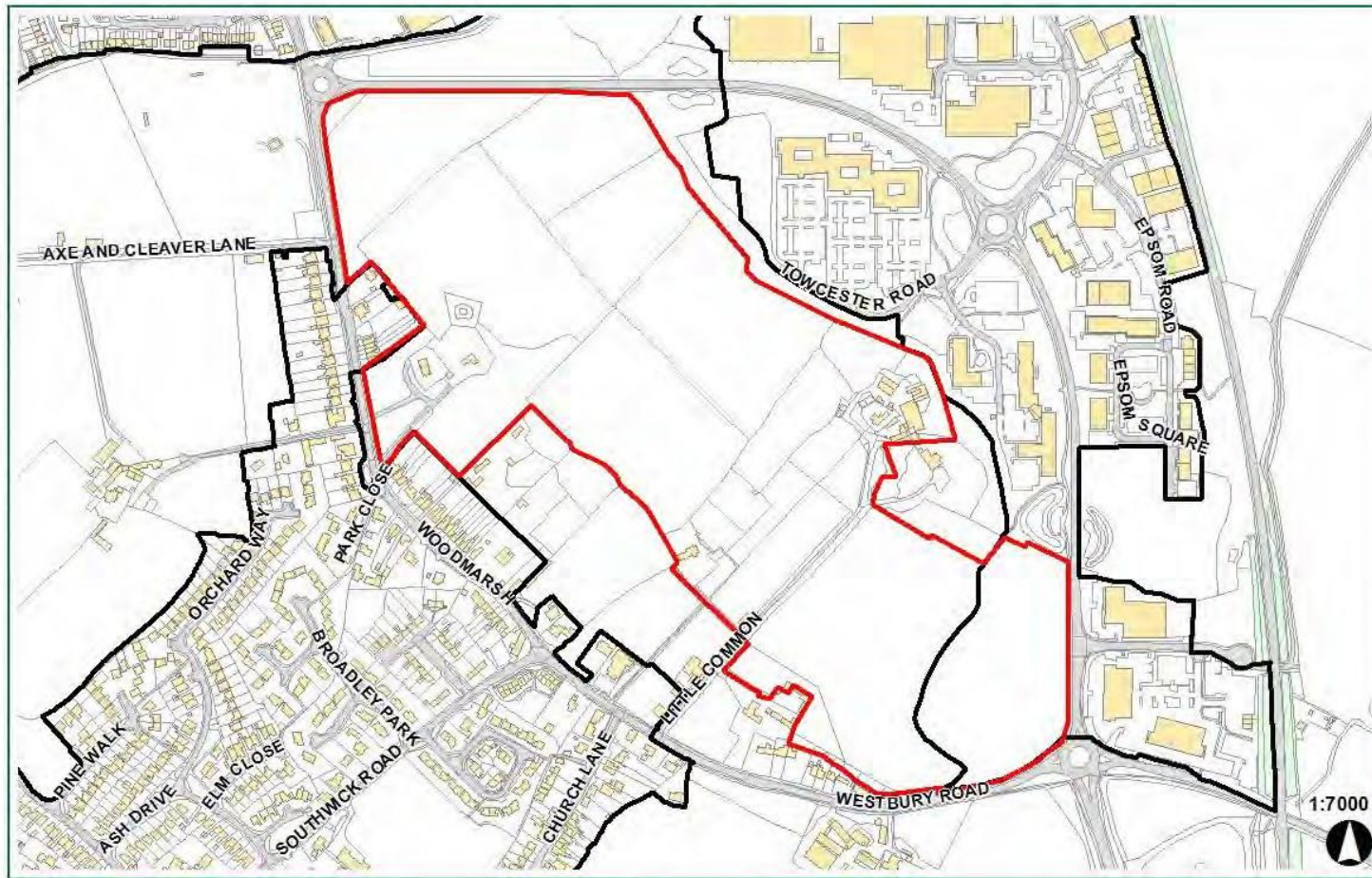
FIG. 7 - LANDSCAPE GAP RECOMMENDATIONS

PAGE 29

I N D I G O L A N D S C A P E A R C H I T E C T S L I M I T E D

Appendix 2

Land off the A 363 at White Horse Business park



 Proposed housing allocation     Proposed Settlement Boundary

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## WILTSHIRE HOUSING SITE ALLOCATIONS PLAN (WHSAP) EXAMINATION

### Written Statement No. 2 of 3 by North Bradley Parish Council

#### 1.0 Introduction:

1.1 This statement is made to fully inform the Examiner of the stage that the North Bradley Neighbourhood Plan has reached.

#### 1.2 Representations

**Issue 3:** *Does the distribution of site allocations accord with the spatial strategy in the WCS?* In particular:

3.3 Is the approach set out in Stages 1 and 2 of the site selection process justified? In particular, has a consistent and justified approach been taken to excluding specific locations from the scope of the exercise, including:

- areas with made or emerging Neighbourhood Plans? (\* Note, in responding to this question, the Council is requested to provide an up to date assessment of the **stage each relevant Neighbourhood Plan is at in its preparation**).

This representation should be read alongside representations made concerning Issue 1 and 4.

#### 1.3 State of Preparation of the North Bradley Neighbourhood Plan

1.4 The North Bradley NDP is currently out to Regulation 14 consultation. Most of the technical work has been completed and by the time of the WHSAP Examination consultation responses will have been absorbed and a submission draft created shortly thereafter, ready for submission. The plan should therefore be considered to have some weight in terms of the Examination of the WHSAP.





Wingfield CP

Steeple Ashton CP

# North Bradley Neighbourhood Plan

Regulation 14 Consultation Draft  
January 2019

ge CP

West Ashton CP

North Bradley CP

Southwick CP

Heywood CP

Our Community  
2018-2026

Westbury CP

Dilton Marsh CP



# North Bradley Neighbourhood Plan

## Contents

1.0	Introduction	4
2.0	Area covered by the plan and timescale	4
3.0	Evidence base	6
4.0	Planning policy context	6
5.0	What is North Bradley like today?	9
6.0	Scoping research, community engagement and the development of Vision, Objectives and Policy	17
7.0	Site selection	22
8.0	Formal policies of the plan	23
9.0	Informal Community Actions	43
10.0	Monitoring	44

Appendix 1 Plan evidence base

Appendix 2 The neighbourhood plan area

Appendix 3a North Bradley and nature

Appendix 3b Bat Consultation Area

Appendix 4 North Bradley and heritage

Appendix 5 North Bradley and flood risk

Appendix 6 Shortfall of open space

Appendix 7 North Bradley and Ashton Park

Appendix 8 HSAP consultation response

Appendix 9 Windfall development

Appendix 10 The Neighbourhood planning team

## Glossary of Terms

<b>Acronym or Phrase</b>	<b>Definition</b>
<b>CP</b>	Core Policy (of the Wiltshire Core Strategy)
<b>DPD</b>	Development Plan Document
<b>HNS</b>	Rural Housing Needs Survey
<b>HRA</b>	Habitat Regulations Assessment
<b>HSAP</b>	Housing Sites Allocation Plan
<b>LDF</b>	Local Development Framework
<b>LoD</b>	Limit of development (e.g. village boundary)
<b>LPA</b>	Local Planning Authority (Wiltshire Council)
<b>NDP</b>	Neighbourhood Development Plan
<b>NPPF</b>	National Planning Policy Framework – Revised July 2018
<b>PC</b>	Parish Council
<b>Qualifying Body</b>	Body authorized by law to create a Neighbourhood Plan. Normally the Parish Council.
<b>Reg. 14 / 15</b>	Regulation 14 of the Neighbourhood Plan (General) Regulations 2012 requires that a formal 6-week Consultation be carried out. Regulation 15 Requires a Consultation Statement to be submitted.
<b>SA</b>	Sustainability Appraisal – A wide-ranging appraisal of the impacts of policy (such as this plan) to include socio-economic as well as environmental factors.
<b>SEA</b>	Strategic Environmental Assessment – European legislation requiring all plans to be assessed for environmental effects.
<b>SHELAA</b>	Strategic Housing and Employment Land Availability Assessment
<b>SHLAA</b>	Strategic Housing Land Availability Assessment
<b>SPA</b>	Special Protection Area (for biodiversity)
<b>SSR</b>	Site Selection Report
<b>WCS</b>	Wiltshire Core Strategy

## 1.0 Introduction

- 1.0 The Localism Act of 2011 allows communities led by a 'Qualifying Body', usually the local Parish Council (PC), to write Neighbourhood Development Plans (NDPs). Such plans say what the community wants to happen in their area and this is then used by the planning authority (in this case Wiltshire Council) to control future development. Unlike earlier parish plans, Neighbourhood Plans have the same legal standing as the Wiltshire Core Strategy (WCS). The North Bradley Neighbourhood Plan (NDP) also has the same timescale as the WCS - running until 2026.
- 1.1 Given the outward growth of Trowbridge and the general extent of change happening locally, in October 2016 the Parish Council felt that the community should seize the opportunity provided by the new plans and have a say in what happens in North Bradley. Accordingly, the Parish Council invited local residents to join a Steering Group that would guide the overall progress of the Plan.
- 1.2 As for the contents of the plan – its ideas and policies – these must come from the community itself. But they must also be based on real evidence. The first steps therefore were to begin what is known as 'scoping' research and also to start community engagement to find out what people liked and disliked about North Bradley and what they wanted to change. The scoping research is contained within a separate Scoping Report, while the full details of the community engagement is given in the Consultation Statement. To avoid too much need for cross-referencing however and for ease of reading, brief summaries of both the research and community responses are given here in the plan document itself.
- 1.3 During production of the NDP Wiltshire Council launched a draft of their Housing Site Allocations Plan (HSAP). This includes some strategic sites in the NDP Plan area which the parish council regrets. However the NDP cannot block strategic sites and the Steering Group acknowledges the need for strategic growth at Trowbridge. However the negotiations on behalf of the NDP have succeeded in reducing the impact of these sites and ensuring that they are balanced by policies which protect the separate village identity of North Bradley and conserve and enhance the local environment and wildlife.

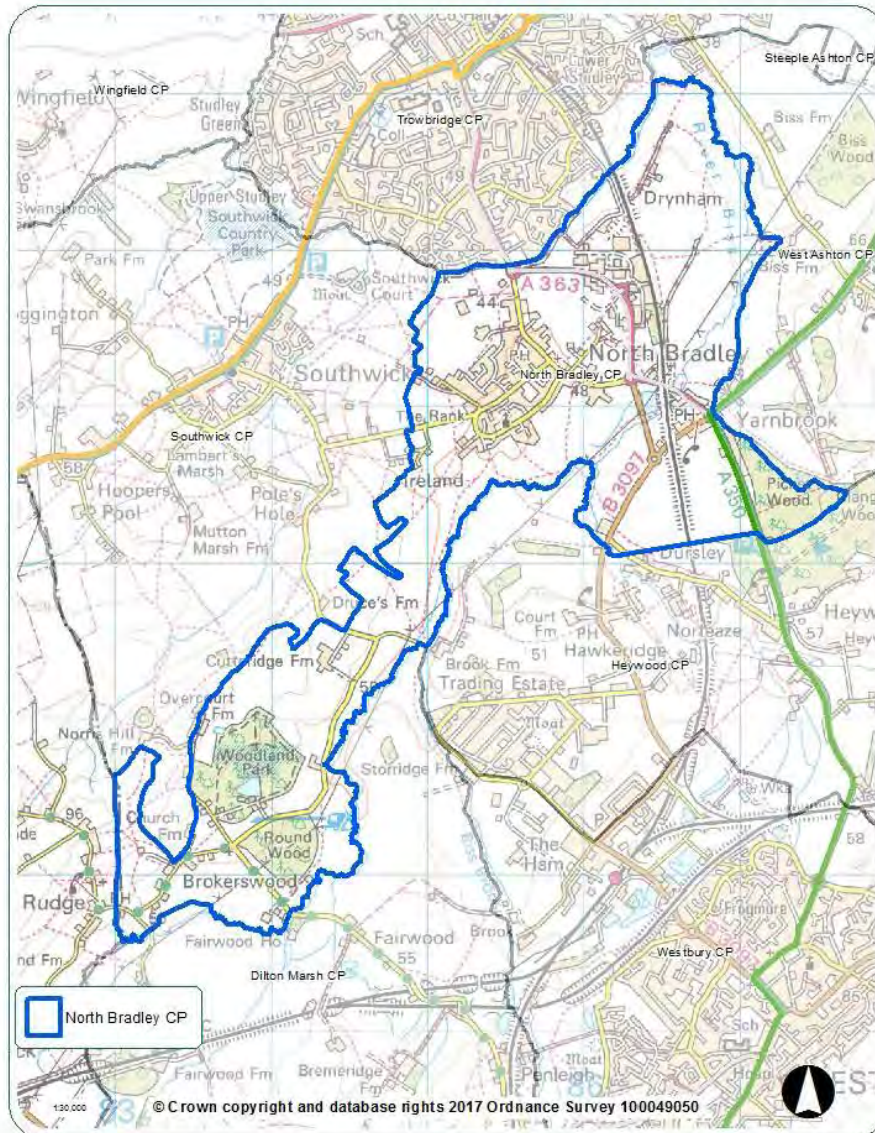
## 2.0 Area covered by the plan and timescale

- 2.0 The whole parish of North Bradley is embraced by the Plan and is considered appropriate because designating the whole parish ensures that the entire community can be involved. It is a recognised and logical area understood by local people. Full justification for the designation is given in the Area Application:  
<http://www.wiltshire.gov.uk/mobile/north-bradley-np-area-application.pdf>
- 2.1 The North Bradley Neighbourhood Plan runs from 2018 – 2026. This timeframe was chosen because eight years is a reasonably long span of time for the policies to take effect, and also because it coincides with the end date of the Wiltshire Core Strategy with which the NDP shares some of its evidence base; the timescale is long enough to be useful in planning terms, yet not so long that is likely to become significantly out of date by the end of this period. To build-in flexibility, the plan is subject to periodic review.

## Map of North Bradley Neighbourhood Area



### North Bradley Neighbourhood Area



## 3.0 Evidence base

3.0 The Planning Scoping Report provides a record of some of the detailed research undertaken to:

- Identify Issues and problems
- Take account of other plans, programmes and policies and understand the context they provided
- Consider the actions needed to correct the problems and tackle the issues as a basis for policy making
- Suggest possible planning and non-planning policies for the NDP.

This Planning Scoping report formed the basis for a separate but more concise SEA Scoping Report which is also available.

- 3.1 The documents and plans reviewed in order to gather the evidence are given as a list, both in the separate Planning Scoping Report and here in the NDP (as Appendix 1).
- 3.2 A separate and accompanying Site Selection Report (SSR) considered housing sites for the Neighbourhood Development Plan (NDP). This includes discussion of sites proposed in the HSAP, the Strategic Housing and Economic Land Availability Assessment (SHELAA) and by the community. Other separate documents include the accompanying Landscape and Visual Analysis Report, the Housing Needs Survey (HNS), the Strategic Environmental Assessment (SEA - both Scoping and Environmental Reports) and the Habitat Regulations Assessment (HRA).
- 3.3 The views of local people are a major driver of the plan - the input of the community and those stakeholders consulted throughout were critical and their comments are a key part of the evidence foundation of the NDP. These comments can be found in the Consultation Statement (CS).
- 3.4 In order to make the origins of policies clear, each policy in this NDP document is accompanied by a box identifying policy links and paragraphs entitled: "Evidence Base" and "Justification". These sections give a brief summary of underlying evidence and the reasoning behind each item or policy.

## 4.0 Planning Policy Context

- 4.0 The following section is a brief summary, not of the entire planning policy context, but of the parts that are felt to bear most directly on the NDP as finally written. A fuller discussion of the policy context can be found in the accompanying Planning Scoping Report (SR).
- 4.1 The planning context for the NDP begins with **Legislation and Regulations**, including the Town and Country Planning Act 1990 (as amended), the Planning and Compulsory Planning Act 2004, The Localism Act 2011, the Neighbourhood Planning (General) Regulations 2012, the Neighbourhood Planning (General) (Amendment) Regulations 2015, the Neighbourhood Planning (General) and Development Management Procedure (Amendment) Regulations 2016, the Neighbourhood Planning Act 2017, and the Environmental Assessment of Plans and Programmes Regulations 2004. In addition to legislation and regulations, the Government provided National Planning Policy Framework and Planning Practice Guidance.
- 4.2 **The National Planning Policy Framework was revised in July 2018. All references in this plan are to the revised version. The Plan is also compliant with the earlier version.**



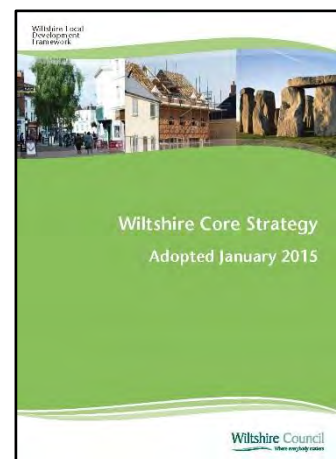
- 4.3 The NPPF (which was revised in July 2018) indicates that Neighbourhood Plans can set out; *‘.detailed policies for specific areas, neighbourhoods or types of development. This can include allocating sites, the provision of infrastructure and community facilities at a local level, establishing design principles, conserving and enhancing the natural and historic environment and setting out other development management policies’* (Paragraph 28).
- 4.4 NPPF paragraph 29 continues:  
*‘Neighbourhood planning gives communities the power to develop a shared vision for their area. Neighbourhood plans can shape, direct and help to deliver sustainable development, by influencing local planning decisions as part of the statutory development plan. Neighbourhood plans should not promote less development than set out in the strategic policies for the area, or undermine those strategic policies.’*  
 Greater detail regarding the NPPF and its influence over the NDP can be found in the accompanying Scoping Report.
- 4.5 Planning legislation and subsequent Regulations and Guidance, such as the NPPF, the main planning context is provided by the Development Plan – a collective name for the planning documents prepared by the Local Planning Authority (LPA), in this case Wiltshire Council is given below. The main element of the Development Plan relevant to the NDP is the Wiltshire Core Strategy (WCS) although a Housing Sites Allocation Plan (HSAP) is also now being produced and the WCS is itself being reviewed. The Development Plan also includes saved Policies of the West Wiltshire Local Plan First Alteration (2004). Some policies of the West Wiltshire Leisure and Recreation DPD are also still in force.

- 4.6 Core Policies 1 and 2 of The **Wiltshire Core Strategy** (WCS) places North Bradley in the category of ‘Large Village’. Large Villages are defined as;

*‘Settlements with a limited range of employment, services and facilities’.*

The overall spatial strategy for such settlements is as follows:

*‘Development at Large and Small Villages will be limited to that needed to help meet the housing needs of settlements and to improve employment opportunities, services and facilities’.*



- 4.7 A particular issue for North Bradley, and one acknowledged in the WCS, is the maintenance of a space between the developed eastern edge of Trowbridge and the North Bradley itself. Paragraph 5.150 of Core Policy 29 states:

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

- 4.8 The need to preserve open space however, is not just about ensuring the separate rural character and identity of North Bradley survives, it is also related to ensuring that there is enough open space for recreation, health and well-being and biodiversity. North Bradley has a number of green open spaces (including formal recreation areas for children).

4.9 In terms of housing, this is covered by WCS Core Policies 1, 2, 29, 42, 43, 45 and 46. North Bradley is defined as a Large Village and nearby Trowbridge is recorded as a Principal Settlement. As a large village, North Bradley is not expected to absorb significant amounts of housing. Trowbridge on the other hand is expected to sustain substantial growth, reflecting the overall spatial strategy of the plan.

4.10 The housing needs of the local area are already substantially met by existing strategic allocations, including the major urban extension of Trowbridge - Ashton Park. The WCS identifies just 165 additional houses being required across the entire community area up until 2026. The more recent Wiltshire Council Housing Supply Statements of November 2017 and March 2018 show that the required number has already been provided leaving a theoretical residual requirement of zero until 2026.

4.11 However, core Policy 29 states that:

*'An additional 950 dwellings will then be developed at the town only once improved secondary school provision is in place towards the end of the plan period and there has been a further assessment of effects on protected bat species and their habitats to ensure that they are properly safeguarded'.*

It adds:

*'Further land for housing development at Trowbridge will be identified in the Housing Site Allocations DPD'.*

4.12 The now emerging Housing Site Allocations Plan (the HSAP) interprets the above to mean allocating sites outside of Trowbridge (although this was not clear from the original wording). Three of these sites are proposed in North Bradley Parish.

4.13 The landscape around North Bradley and especially between it and Trowbridge performs an important role as a landscape setting. This is explored fully in the Landscape Setting Report given as Appendix (8).

WCS Core Policy 51 (Landscape) has a number of relevant things to say including:

*'Development should protect, conserve and where possible enhance landscape character and must not have a harmful impact upon landscape character, while any negative impacts must be mitigated as far as possible through sensitive design and landscape measures'.*

4.14 Core Policy 50 (Biodiversity and Geodiversity Protection) is also relevant particularly because the area around North Bradley is rich in wildlife. In particular, a protected species, Bechstein's Bat, is present.

This core policy expects all development to result in no net loss for biodiversity and to include mitigation measures where appropriate. Development potentially affecting a Natura 2000 site must provide avoidance measures and demonstrate that the proposals would have no adverse effect. All development should seek opportunities to enhance biodiversity.

- 4.15 Core Policy 60 Sustainable transport is particularly relevant:  
*'The council will use its planning and transport powers to help reduce the need to travel particularly by private car, and support and encourage the sustainable, safe and efficient movement of people and goods within and through Wiltshire. This will be achieved by:*
- i. planning developments in accessible locations*
  - ii. promoting sustainable transport alternatives to the use of the private car in accordance with its functional importance and in partnership with other transport planning bodies, service providers and the business community*
  - iv. promoting appropriate demand management measures*
  - v. influencing the routing of freight within and through the county*
  - vi. assessing and, where necessary, mitigating the impact of developments on transport users, local communities and the environment'.*
- 4.16 The broad aim of the NDP is to meet the wishes of the community through interpreting the above policy, adding important detail and indicating how the higher level policy should be applied locally. This will add certainty for both developers and the local community and, as the policy framework the NDP will be taking forward has already been subjected to extensive SA, help ensure that the development encouraged by the NDP will be sustainable.

## 5.0 What is North Bradley Like?

### 5.0 Physical Context

The physical context of the parish is explored more fully in the Planning Scoping Report and in the Landscape Setting and Visual Analysis Report, both available as separate documents. The following therefore is an overview of that information, describing here the physical layout and social and environmental characteristics of the village in order to reduce the amount of cross referencing needed. Topic headings are the same as those used in the evidence base for the Wiltshire Core Strategy from which some of the evidence comes. The policies of the NDP stem directly from an appreciation of this context.

- 5.1 North Bradley lies between the towns of Trowbridge and Westbury and is a parish of several parts – some old, some new; some relatively developed, others open and rural. The main village is located around 400 metres due south of the outskirts of Wiltshire's county town, Trowbridge and about 2km (one and a quarter miles) from the town centre. The village itself is separated from the growing town by a number of small fields, including one which is the home of Trowbridge Football Club. This 'gap' performs a number of functions, the most important of which is to provide the rural setting for the village of North Bradley, physically separating it from the urban form of Wiltshire's principle settlement and therefore preserving its distinct rural character and sense of place.
- 5.2 The parish is elongated, running on a rough north-east / south west axis and extending some 4 kilometers (2.5 miles) southwest of North Bradley village, beyond Brokerswood to the Somerset boundary near the village of Rudge. The north-eastern part of the parish contains most of the urban areas; North Bradley village and the White Horse Business Park, while south-west from North Bradley the parish is rural farmland, terminating, in landscape terms, in Brokerswood Country Park. The river Biss runs along the same north-east / south-west axis as the parish itself to the east of North Bradley village.



- 5.3 The busiest roads of the parish are to the north-eastern end, close to the main built up area. Despite the A363 having been diverted north to the White Horse Business Park some years ago, the smaller Westbury Road and Woodmarsh, which run past North Bradley Village into Trowbridge, still carry a fair volume of traffic. At its eastern most point, where the A363 meets the A350 at Yarnbrook, traffic volumes and congestion can be extreme. Bradley Road runs south-west from Westbury Road and can also be busy, linking North Bradley as it does with the busy village of Southwick and on to the A36 – a major route.
- 5.4 **Historic Background**  
Although now dominated by 20th century development, the history of North Bradley is ancient, being mentioned in the Doomesday Book, when the village was part of the manor of Steeple Ashton. Earlier remains, dating from the Roman period have also been found. A wide swathe of land roughly equating to the middle third of the parish has been designated as an Area of Archaeological Potential.
- 5.5 Today, most of the visible heritage of the village is grouped in a rough horse-shoe shape around the Church of St Nicholas and a small green, the former of which dates from the 15<sup>th</sup> century and is grade II\* Listed. There are **20 Listed Buildings** in North Bradley. A large 19th-century vicarage lies to the south-west of the church. There is a sprinkling of mainly nineteenth century cottages and a few grander eighteenth century houses in the village.
- 5.6 However, while there is significant heritage in the village, the majority of development is more modern. Terraces and semi-detached brick villas of the nineteenth and early 20th<sup>th</sup> centuries lie along the A 363 road, while to the south and south-east of this is located the majority of the post war estate style housing that makes up the bulk of the village's building stock. Much of this dates from the 1970's and consists of detached and semi-detached houses and bungalows. The strikingly modern-looking White Horse Business Park is located to the north of the parish, either side of the diverted A363.
- 5.7 **Landscape**  
Land and townscape in North Bradley are very mixed. In the suburban centre, the feeling is of a typical housing estate of the 1970's and '80's, yet along some of the quieter side-roads there is the feeling of country lanes, where older cottages face open fields and hedgerows. The area around the church seems very typical of an English village, while the business park in the north of the parish, even though landscaped, is full of very much larger buildings and has a harder, more modern and angular feel to it. These buildings and the busy main roads (B 363 and Westbury Road) help to define the harder, commercial edge of Trowbridge against the suburban and country characteristics of North Bradley.
- 5.8 The vast majority of undeveloped land in the parish is open countryside, amounting to over 1600 acres. All the land, apart from public areas such playing fields, is farmed; approximately half is arable and half pasture. Underlying geology plays a large part in establishing landscape character – being composed here mainly of clays. The landscape (a mixture of character areas B2 and E3 in the WWLCA) is fairly flat and low-lying.
- 5.9 To the south and south west of the main village lies open countryside –the remains of the large tracts of common land that existed here in earlier centuries. The land is fairly flat but with gentle undulations. It contains small wooded areas, and is mainly given over to farming, the fields being enclosed by hedges and small trees. To the extreme south west lies Brokers Wood, a country park full of mature trees and carefully designed walks. The River Biss runs along much of the eastern edge. There is a great contrast between the more developed northern end of the parish and the south.

- 5.10 North Bradley is now separated from Trowbridge by just a few narrow fields. However, there is still enough greenness in this gap to keep alive the differentness and separate character of North Bradley. Retaining the physical separation of Trowbridge and North Bradley and enhancing the greenness of the gap is inseparable from retaining the character and identity of the latter. This is emphasised by paragraph 5.150 (Core Policy 29) of the Wiltshire Core Strategy:

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

- 5.11 The Wiltshire Landscape Study 2015 shows a shortfall of open space in the area, while the Wiltshire Landscape Character Assessment (part of the evidence base for the WCS) suggests that the landscape in this area should be positively enhanced.
- 5.12 The necessity of maintaining the gap between North Bradley and Trowbridge is further explored in the separate Landscape and Visual Setting Analysis Report. This forms the underlying justification for one of the policies of the plan. The SEA concluded that the approach of the NDP to protecting the landscape was likely to have significant positive environmental effects.

#### 5.13 **Biodiversity**

At the European level, the EU Biodiversity Strategy 5 was adopted in May 2011 in order to deliver an established new Europe-wide target to 'halt the loss of biodiversity and the degradation of ecosystem services in the EU by 2020'. The Wiltshire Biodiversity Action Plan (shortly to be supplemented by a new Wiltshire and Swindon Landscape Conservation Framework) is also relevant. Further detail on Biodiversity is available in the Planning and SEA Scoping Reports.

- 5.14 **Habitats** in the area include: **Water:** balancing ponds at Yarnbrook, and lake at Brokerswood plus River Biss. These are home to many amphibians and insects as well as fish; **Hedgerows and trees:** the whole parish has hundreds of mature trees from those in the fields and hedgerows and the others in private gardens. Bechstein's Bat from the Bath and Bradford on Avon SAC is present locally and is known to forage close to trees and other cover.

#### 5.15 **Farmland habitat**

Much of the land in the parish is farmed – mainly arable. This land is home to a range of species from plants, fungi, butterflies, mice, birds, bats, hares and rabbits. In addition to suburban trees and small wooded clumps in open country, the two main areas of woodland are the substantial resource of Brokerswood to the south and Picket Wood which is partly within the parish and is an SSSI full of rare butterflies, bats and birds. Retaining hedgerows, large trees, open water and dark corridors unlit at night are all important in order to protect wildlife.

#### 5.16 **Urban habitat**

Most people forget that built up areas, with their trees, gardens, buildings and drainage systems are also habitats for animals. In North Bradley, these include hedgehogs (an endangered species), sparrows. Churchyards, road verges, allotments and private gardens – especially those with ponds – are an important part of this habitat. North Bradley has a population of urban foxes and badgers have also been seen. The existing recreation grounds and green spaces are undoubtedly of benefit to biodiversity as are the allotments.

#### 5.17 **Bats and the Bath and Bradford on Avon SAC**

The parish is a roosting and foraging area for bats (including the rare Bechstein's Bat) from the Bath and Bradford-on-Avon Special Area for Conservation (SAC), a Natura 2000 site. The issue of the bats has become a major constraint on development near Trowbridge. Draft planning guidance has also been published by Wiltshire Council and this includes a 'bat consultation area' which covers part of the parish of North Bradley. (See Appendix 3b). The 'Trowbridge Bat Mitigation Strategy' will consider impacts on bats and restrictions that may need to be imposed on development.

5.18 The HRA for sites in the Housing Site Allocation Plan (HSAP) found that the sites contained within the plan risked harm to the SAC. However the HRA proposes to help manage risk by the implementation of a Trowbridge Bat Management Mitigation Strategy and by site specific HRA's on proposals. It is therefore recommended that all NDP policies include a commitment to contribute towards the delivery of the Trowbridge Bat Mitigation Strategy and a requirement for HRA.

5.19 It has been confirmed by the county ecologist that while even individual homes may have an impact and require mitigation or even merit refusal, the larger the overall quantum of development the area absorbs over the plan period then the more likely adverse impacts would be. (In other words, there are both individual and cumulative impacts to consider). Development has the potential to affect the bats in various ways, for example in terms of disturbance from human recreation and lighting has therefore been a consideration in the site selection process for the NDP (see SSR) and has led the Steering Group of the NDP to create a bespoke bats protection policy.

5.20 The NDP was fully screened under HRA Regulations. Wiltshire Council issued a Screening Decision in July 2018. This concluded that an SEA and HRA would be required, primarily because the NDP allocates sites for housing and these could have impacts on heritage and the Bath and Bradford on Avon SAC. Comments were also made about some specific sites and the plan was adjusted accordingly (see Consultation Statement (CS) and especially Site Selection Report (SSR) for more detail. the SEA concluded that the impact of homes on biodiversity would be acceptable if at appropriate scale and if correctly managed within an overall strategy that aimed for a net gain in biodiversity.

#### 5.21 **Flood Risk and water**

North Bradley lies in the clay vale of West Wiltshire, and has the valley of the Biss Brook on its eastern border. The area is mostly drained by ditches which flow into the brook. The highest land is on the western edge of the parish, rising to about 80 metres (270 feet). Flood risk over most of the parish is relatively low. However, the maintenance of the River Biss, the balancing ponds at Yarnbrook and agricultural drainage ditches are relevant issues in managing risk. Occasional road flooding (from heavy rain) does occur at the railway bridge near Yarnbrook.

#### 5.22 **Climate change**

The effects of climate change for the south west by 2050 for a medium emission scenario are as follows:

- increase in winter mean temperature is 2.1°C and increase in summer mean temperature of 2.7°C
- increase in winter rainfall of 17% and decrease in summer of 20%.

What this means for North Bradley is likely to include increased frequency of extreme events – drought and storms with heavy rain. Flash flooding may increasingly occur – something of obvious significance to the northern part of the parish which is built over former low-lying marshland. There may be some erosion of agricultural soils and migration of species – both into and out of the area. There is the possibility that the land may be able to grow different crops in future. The changed climate may increase the risk of injuries and illness due to more ‘freak’ events and the presence of invasive species of insects.

#### 5.23 **Population and housing**

The population of Trowbridge Community Area (TCA) has been growing steadily in line with national trends. In 2001, it was around 36,500. In the 2011 census, it had grown to 41,600. It is expected to rise to 48,500 by 2026. An important contribution to the increase is that the age distribution is changing. We are living longer and this is contributing to the population increase. Nationally, life expectancy is estimated at 79 years and rising. Here it is 83 years for women and 79 years for men. The population over 70 years of age is expected to grow by one third from 2016 to 2026.

5.24 Overall, as shown by the Wiltshire JSA (based on 2011 Census data) Trowbridge has a lower level of child poverty than the national average but is the joint highest community area in Wiltshire at 14.8%. North Bradley is more affluent than the Trowbridge average. However, it is likely that the community follows the overall Trowbridge pattern of pockets of affluence mixed with pockets of relative deprivation.

5.25 The population is increasing, however:

- The Wiltshire Housing Supply Statements of November 2017 and March 2018 indicate that the need calculations of the WCS have been met and that a zero theoretical requirement remains in the Community Area until 2026.
- The Housing Land Supply is, at present, above the minimum required

5.26 On the other hand, the draft Wiltshire Housing Site Allocations Plan (HSAP) states that additional housing over and above that allowed for in the Wiltshire Core Strategy is required for the following reasons:

- To maintain an adequate housing land supply in accordance with Government requirements over the remaining plan period (i.e. until 2026) and reflecting the need expressed in the WCS Core Policy 29 for an additional 950 homes to be found for the needs of Trowbridge.
- To support the role of Trowbridge as a Principal Settlement
- To reflect the fact that Ashton Park has not been delivered as expected and that due to this and other factors, a shortfall of 1220 dwellings will result compared with the allocation in the WCS.
- To ensure that land allocated is capable of development within the plan period to meet other objectives.

5.27 It is accepted that strategic growth at Trowbridge is preferable to scattered development (the broad spatial strategy of the WCS). The NDP supports the overall strategy of the WCS. However, the NDP seeks to balance growth imposed by the HSAP with a local concern for the environment and in particular the landscape setting of North Bradley village and the local biodiversity especially the rare bats of the Bath and Bradford on Avon SAC.

5.28 The end result is a plan aimed at delivering *truly* sustainable development; by accommodating both strategic and local needs but balancing this with needs of the local community, biodiversity and the preservation of local character that is a key aim of the NPPF (e.g. paragraphs 127, 170) and is essential to create truly sustainable development.

#### 5.29 **Community health and wellbeing**

The Wiltshire Joint Strategic Assessment (JSA) for Trowbridge Community Area shows that the health of residents in the area is good compared with national figures. However, one area for concern is that Trowbridge Community Area has the highest morbidity rate for cancer (rank 20 out of 20 community areas). Ranked 19 out of 20 for alcohol related admissions to hospital and 18 out of 20 for cardiovascular disease. It is also the least active CA in Wiltshire. These findings have obvious implications for retaining as many opportunities for both formal and informal physical exercise and recreation.

#### 5.30 **Air quality and environmental pollution**

Air quality is generally good in North Bradley, thanks to the large tracts of open countryside surrounding the settlements. One way that air quality could be improved would be to improve the local network of paths and cycle ways and connect them into the town and surrounding villages. This would help reduce the need to travel by car and so reduce emissions.

5.31 Generally, water quality is good, with water supplies from underground aquifers spread over a wide area of South West England. Water is unlikely to be a constraint on development in either quantity or quality.

#### 5.32 **Land and soil**

Land and soil are valuable resources – there is a general preference for example not to build on the highest quality agricultural land. Soil in the parish is mainly Agricultural Land Grade 3 and 4 – good to fair. The planning system also has a preference for not building on greenfield sites if brownfield ones are available (thereby recycling land rather than using fresh). There is no register of brownfield sites covering North Bradley but Appendix 3 of the 2012 SHLAA discusses the available sites in North Bradley – none of which are brownfield. There are no derelict factories, large areas of waste ground or redundant offices and the general availability of brownfield land, although not quantified due to lack of precise data, is considered to be low.

#### 5.33 **Service centre provision (facilities and self-containment)**

Facilities within or immediately adjacent to North Bradley, include two village halls, a petrol station and convenience shop, two pubs and numerous clubs and societies. For many services, the village looks to Trowbridge. Within that context however, access to services and facilities overall is good.

5.34 There are a number of special green spaces in the parish, all in the centre of the main village:

- Peace Memorial Hall
- The Pound
- Oak Drive Recreation Ground
- Daubeny - the Common
- The Allotments
- Green Field at Woodmarsh (Trowbridge FC Ground).

The importance of these sites is discussed more fully in the scoping report, they are much valued and used by the community.

- 5.35 However, the Wiltshire Open Space Study of 2015, produced by Wiltshire Council, identifies a shortfall in provision of most kinds of open space in both the Trowbridge rural and urban areas (See Appendix 8). The Study sets out a clear role for Neighbourhood Plans in:
- Protecting the existing resource
  - Enhancing the existing resource
  - Relocating the resource
  - Identifying new resources
  - Identifying sites no longer required.
- 5.36 The main village hall is the **North Bradley Peace Memorial Hall & Recreation Ground**, located just off Southwick Road. This has a range of facilities. **The Progressive Hall**, in Woodmarsh was built in 1911/12 and is a lovely example of early 20th century architecture. This is used mainly for indoor activities such as Bonsai, band practice, drama, dancing and parties. Due to its age the Hall needs investment for modernisation. There are four churches in the parish. The Baptist Parish Church has a burial ground that is now almost full. A fresh site is therefore needed.
- 5.37 **Education**  
Current provision includes 'The Willows' pre-school. This is located within the grounds of the Primary School, and started in 2004, being run by a voluntary committee. North Bradley has a successful primary school, recently rated 'Good' by Ofsted and catering for pupils from ages 4-11. There are currently around 180 pupils at the school, which has been extended a number of times, most recently to add a kitchen. Currently the school is full and demand is strong. The expected growth of Trowbridge, added to a strong though fairly constant local birth rate, will create a huge increase in demand – however this is planned to be absorbed by new primary schools on the east side of the town.
- 5.38 **Economy and enterprise (business and jobs)**  
As throughout its history, North Bradley is largely dependent on Trowbridge for employment with many residents working in Trowbridge or at the 'White Horse Business Park'. A significant number of people do commute further afield, but this is lower than average for a rural area. This proximity to employment creates a relatively sustainable working pattern, however it could be improved by improved bus services and better paths including upgrades to cycleways, which would also help to improve health. There are relatively few small businesses within the parish. However, larger employers exist at the White Horse Business Park on the north-eastern corner of the parish. While this provides very welcome local jobs, the outward expansion of the site towards North Bradley threatens to destroy the last remaining green gap between Trowbridge and the village.
- 5.39 **Tourism and Internet**  
Given the countryside nearby and proximity to centres such as Bradford on Avon and Bath, it is felt that tourism employment has the potential for expansion. Enhancement of internet and mobile phone services would facilitate more working from home.
- 5.40 **Transport**  
North Bradley is not far from Trowbridge and, while it could be argued that people do not have far to access services, or indeed the mainline railway there, there still are some transport issues. Most residents in North Bradley own and use a private car or motorcycle – according to the 2011 Census, 1219 vehicles were owned by 727 households. The volume of all traffic on Wiltshire's roads fell slightly following the economic crash of 2008, but is now rising again.

- 5.41 In terms of safety, according to Government statistics, the number of road accidents in Wiltshire increased (from 979 in 2011 to 1136 in 2015, a rise of 16% in 4 years). No accidents were recorded in North Bradley village but some did occur on the A363 (especially at the roundabout at the White Horse Business Park, Southwick Road and at Yarnbrook roundabout. Community Speedwatch confirms the presence of speeding vehicles.
- 5.42 However, public transport provision is better than in more remote villages. There is a reasonable bus service providing links to other villages and into Trowbridge. Trowbridge has a railway station. There is a reasonable network of paths and bridleways, but no cycleways (See Map as Appendix 6). This is a shame as there is potential to take many journeys off the roads. The lack of drop kerbs raises safety and practicality concerns especially for the elderly, children and the disabled. Users of electric buggy / scooters can have a dangerous and difficult time getting around as can people on bicycles. These matters could be improved through use of funding from new development (for example CIL or any replacement funding).



Sustainable Transport improvements are one aim of the NDP  
Image Alberto Dzib. Wikipedia.



## 6.0 Scoping Research, Community Engagement; Development of Vision, Objectives and Policy

6.0 The two main strands creating the North Bradley Neighbourhood Plan are:

- Research and evidence (including both SR's, SSR and Landscape Setting Report)
- The wishes of the community as expressed through community engagement.

The overall approach has been that both evidence and community wishes should align or at least have good overlap, before draft policy is created. It was also felt wise to create the Vision and Objectives first and then let policy be checked against and conform with those, since the policies are intended to bring about both Vision and Objectives.

6.1 Accordingly, while the scoping research was going on, initial community engagement sought out the views and wishes of local people. The results of these various exercises are gathered together in the Consultation Statement (CS). There they were considered together and used to generate draft Vision and Objectives.

6.2 Once the draft Vision and Objectives were in place, a table in the Scoping Report was used to create draft policies that were both supported by evidence and were generally in line with or which would take forward the Vision and Objectives. Before finalizing the wording, policies were checked against the themes and comments made during community engagement.

6.3 Full details of the community engagement methods employed and the detailed results are given in the accompanying 'Consultation Statement'. The resulting draft Vision, being how residents would like the Parish to be in 2026 is as follows:

### NDP DRAFT VISION

By 2026 North Bradley will have retained its landscape setting, including its physical separation from Trowbridge and its own distinct rural character. Local wildlife will have been protected and will be thriving.

The Parish will have secured benefits from development, including the Ashton Park Strategic Site and the Elm Grove Farm site proposed in the Housing Sites Allocations DPD, in terms of provision of new and upgraded infrastructure. New sites will have become integrated and functioning parts of the Parish.

Necessary housing will have been provided and local facilities, including pubs and shops and recreational and open space will have been preserved or added. The Parish will be cleaner and, where possible, provide a better habitat for nature. There will be an improved and better maintained transport network including foot and cycle paths and speeding vehicles will have been reduced and pedestrian safety improved.

#### 6.4 Evidence

Consultation: Inputs from Community engagement including the Questionnaire  
Documentary: All in Scoping Report

#### 6.5 Justification

The Vision encapsulates the wishes of the community, as expressed in the early community engagement, where these are capable of inclusion in a neighbourhood plan. They have been checked against the NPPF and the policy context including the WCS and have been found to be consistent.



## NDP DRAFT OBJECTIVES

1. To Preserve the rural setting and identity of North Bradley, in particular the open spaces between the village and Trowbridge, but also existing cherished green open spaces.
2. To allow the community to grow and develop in a sustainable way, with new housing and matching infrastructure.
3. To improve transport for residents including:
  - \* Reducing vehicle speeds
  - \* Improving parking
  - \* Improving sustainable transport including bus services and the creation and maintenance of the network of paths and cycle-ways.
4. To influence the detailed planning of development, to ensure the Parish community benefits in terms of improved infrastructure.
5. To encourage and support community facilities such as shops, pubs, places of entertainment and leisure and new and existing open space.
6. To protect and improve the natural and built environment in terms of habitat for wildlife but also the living environment for people in terms of litter and cleanliness.
7. To enhance and protect where appropriate community facilities and assets, for example recreation areas, and to provide a site for a new non-denominational burial ground within the Parish.

### 6.7 Evidence Base

Consultation: Inputs from Community Engagement including the Questionnaire.

Documentary: cross referenced with NPPF and policy context including WCS as well as the evidence base contained within the Scoping Report

### 6.8 Justification

The Objectives represent the things needed to tackle the issues and problems revealed by scoping research or community engagement (see both Scoping Report and Consultation Statement). They summarise what the plan aims to really achieve, and form an agreed set of principles underpinning the plan. Broadly speaking, the policies of the plan aim to bring about the objectives.

## 6.9 NDP DRAFT POLICY IDEAS

Policy ideas result from a fusion of the ideas generated by the community (recorded in the Consultation Statement or CS) and those resulting from objective research (see Scoping Report and SSR). The table below shows how inputs from the Scoping Research (SR), the Consultation Statement (CS) and Site Selection report (SSR) fed into the creation of draft policy and how policies are aimed at meeting plan objectives. Other sources are also indicated such as fresh (post-Scoping Report) research in the neighbourhood plan (NDP), and its appendices, the separate Landscape and Visual Setting Analysis Report and the Housing Needs Survey (HNS). All policies were subject to SEA AND HRA before the 'Regulation 14' consultation. The Consultation Statement explains how this led to some modifications.

### NDP DRAFT FORMAL PLANNING POLICY IDEAS

Issue	Plan Objective	Policy Approach plus source and policy background (SR = Scoping Report, CS = Consultation Statement)
<b>Biodiversity</b> Protecting habitat especially for rare species such as Bechstein's Bat.	1, 6	<b>Bat protection policy could require ecological assessment of schemes and mitigation proposals (SR).</b> <b>Formal Landscape Setting Policy, Local Green Space and Burial Ground policies</b> will help preserve and create habitat (SR and CS).  The SEA identified a need for the NDP to aim for a net gain in biodiversity.  See also Landscape and Visual Setting Analysis Report.
<b>Land and Soil</b>	1, 6	Making best use of land includes preservation of landscape setting (SR and CS). Include <b>formal Landscape Setting Policy</b>
<b>Flood Risk and Water</b>	2, 6	No significant risk to development. (SR) (CS) Not likely to add to existing policy. <b>No policy.</b>
<b>Air Quality and Pollution</b>	1,6	Possible issue at Yarnbrook (SR and CS), but unlikely NDP could add to existing policy mechanisms. <b>No Policy</b>
<b>Climate Change</b> Reducing carbon Assisting adaptation	1, 2, 3, 4,	<b>A Formal Green Local Space / Landscape policy</b> protecting the most cherished spaces from development (reducing the heat island effect of Trowbridge and North Bradley village). (CS) (SR) <b>Developer Contributions policy</b> to help reduce emissions through encouraging sustainable transport (CS) <b>Design policy</b> to help encourage appropriate local renewable energy (e.g. at Ashton Park). (CS, SR) However, this would duplicate WCS.
<b>Historic Environment</b>	1, 6	<b>A Formal Design Policy</b> taking account of these areas and describing local and appropriate materials etc. (CS and SR). However, this would need justification through a VDS or similar in order to define local characteristic and add positively to existing WCS policy. Could consider in review if resources available. <b>Informal Policy.</b>
<b>Landscape</b> Preserving village identity and setting	1,6,7	<b>Formal Landscape Planning Policy</b> to include the fields between Trowbridge and North Bradley as suggested in the Wiltshire Core Strategy (5.150) (SR and CS) <b>Formal Planning Policy to designate the most important green spaces as 'Local Green Space'</b> to protect from development. (CS) (SR)

Issue	Plan Objective	Policy Approach plus source and policy background (SR = Scoping Report, CS = Consultation Statement)
<p><b>Population and Housing</b> Contributing towards the provision of new homes as required by the WCS and NPPF</p> <p>Providing local affordable housing</p>	2,4	<p><b>Support Elm Grove Farm and Southwick Court Strategic Sites</b> (no need to allocate as HSAP is already taking forward) <b>in Landscape Policy. Oppose Land Off WHBP - Site 298 (H 2.2)</b></p> <p><b>See CS, SR and Landscape &amp; Visual Setting Report</b></p> <p><b>Take forward local and Trowbridge strategic need by considering locally acceptable sites. SSR suggests sites</b></p> <p><b>Formal Planning Policy</b> could require that some of the affordable units at Ashton Park go to local people from the Parish. However, this is already Wiltshire Council housing policy. Rejected to avoid duplication.</p>
<p><b>Community Health and Wellbeing.</b> Insufficient open space Need to improve access to exercise and recreation due to health issues.</p>	1,3,5,6,7	<p><b>Formal Developer Contributions Policy</b></p> <p>Cycle Paths and footpaths (CS) (SR) Recreation facilities (including upgrading and retaining existing) (CS) (SR)</p> <p><b>Formal Local Green Space Policy</b> (CS, SR) Preserve existing open spaces for recreation.</p> <p><b>Formal Planning Policy retaining landscape / green spaces</b> (such as the North Bradley Gap) (see above). (CS, SR, NDP)</p>
<p><b>Education</b> Support provision and quality</p>	5, 7	<p>Support for local school (CS) (requires no policy as is already ongoing) New School due to be provided by Ashton Park (SR)</p>
<p><b>Service Centre Provision</b> Support improvements</p>	2,5	<p><b>Formal Planning Policy to encourage shop /pub?</b> Rejected – although welcome, pub already has planning permission. Not sure such a policy would add much to existing WCS policy.</p> <p><b>Formal Local Green Space Policy</b> (CS, SR) Preserve existing open spaces for recreation.</p> <p>Need to restore and improve the Progressive Hall? (CS) Could be dealt with by means of a <b>Formal Developer Contributions Policy.</b></p>
<p><b>Transport</b> sustainable transport</p>	3,4	<p><b>Formal Developer Contributions Policy</b> to help pay for public transport / foot and cycle path improvements (CS, SR)</p>
<p><b>Economy and Enterprise</b> Support appropriate local jobs</p>	2, 5	<p><b>Formal Employment Policy</b> preventing conversion of Business Units to housing subject to criteria (WCS Core Policy 35) suggested. However, this would duplicate existing WCS policy and so was rejected. (CS)</p> <p><b>Formal Landscape Policy</b> preventing outward expansion of the business park in a way that would harmfully reduce the gap between it and North Bradley village. CS, SR and Landscape and Visual Setting Analysis Report</p> <p>Policy encouraging tourism (CS) was considered but this would duplicate existing WCS policy and add no significant local detail. Rejected.</p>
<p><b>Infrastructure</b></p>	2,3,4,5,7	<p><b>Formal Developer Contributions Policy (including S106 and CIL)</b> Ensuring the community's wishes for infrastructure are respected (CS)</p>

- 6.10 Not all policy ideas suggested by the community could be incorporated in formal land-use planning policies. However, the Steering Group felt that many of these were good ideas and should not be wasted. It was therefore proposed to include non-land use informal community actions, with no legal status but presenting a focus for community action, in the plan.

#### NDP DRAFT INFORMAL (NON-STATUTORY) COMMUNITY ACTION IDEAS

Issue	Plan Objective	Policy Approach plus source and policy background (SR = Scoping Report, CS = Consultation Statement)
<b>Biodiversity</b> Improving habitat and mitigating losses	1,6	<b>Informal Action</b> in the parish to improve habitat and reduce litter, also to maintain and make more accessible for education the balancing ponds at Yarnbrook (CS)
<b>Service Centre Support enhancement</b>	2,5	<b>Parish Council</b> to support suitable planning applications for pub's shops if and when they emerge. (CS)
<b>Transport</b>	3,4	<b>Informal Non-Planning Policy</b> to encourage action over parking issues and speeding. (CS)
<b>Climate Change</b> Reducing carbon Assisting adaptation	1,2,3,4	<b>Informal community action</b> such as tree planting to provide summer shade and absorb carbon. Maintenance of Yarnbrook Balancing Ponds and the River Biss as well as farm ditches to manage flood risk. (CS)
<b>Historic Environment</b>	1,6	<b>Informal Community Action:</b> Consider commissioning a Design Guide or Character Assessment and applying for the area around the Church and School to be designated a Conservation Area. (CS)
<b>Landscape</b>	1,6,7	<b>Informal community action</b> to preserve and enhance trees and hedgerows (CS)

## 7.0 Site Selection

- 7.0 The accompanying Site Selection report (SSR) explains how site selection evolved during the plan-making process. Early community engagement had made it clear that the main objectives for the community were to provide for limited levels of local housing, especially to meet the need for younger people wanting to buy or rent a home and for older residents, but to do this while preserving a credible rural setting to North Bradley and avoid the loss of character that would result were coalescence allowed to occur between North Bradley and Trowbridge. Sites community engagement established that the community would accept some housing for market needs.
- 7.1 The Steering Group were also aware of the need to create a balanced plan likely to deliver sustainable development. It is unlikely that the North Bradley Neighbourhood Plan would be seen by an Examiner as delivering sustainable development if it planned on the one hand to protect a large area of open space as a landscape gap, while not providing people with enough homes to live in in future years on the other.
- 7.2 The process contained the two threads of:
- negotiating with the LPA over proposed strategic sites in the parish and
  - considering much smaller local housing sites to meet local need (both affordable and market).
- 7.3 In terms of the first of these, It became clear during the plan making process that there could be a conflict between the wishes of the community (in the creation of a landscape setting 'gap' between North Bradley and Trowbridge) and the ambitions of Wiltshire Council's HSAP, most particularly site 298 H2.2, located to the north-east of the village. Following community engagement, the Parish Council, supported by two Wiltshire Councilors, presented an argument to Wiltshire Council's Cabinet that, if the site could not be avoided (which the community preferred) then it should be reduced in size and development concentrated to the east, leaving as wide a landscape gap between the site and Trowbridge as possible. This was accepted and it was agreed that the LPA and the Parish Council should meet to discuss details. Wiltshire Council agreed to reduce the site in size from a level of 225 (proposed) to 175 homes.
- 7.4 In terms of considering local sites, the NDP team carried out a site selection process of its own, recoded in the SSR and based on consideration of:
- An appraisal of HSAP sites
  - Assessment of SHELAA Sites
  - Suggestions from the community.

The SEA concluded that none of the sites eventually selected for allocation would have significant negative environmental effects and some positive effects were to be expected.

## 8.0 Policies of the Plan

- 8.0 The following section includes the formal land-use policies of the North Bradley Neighbourhood Plan. They are designed to deliver the plan's Vision and Objectives as suggested by the community. In taking forward the policy ideas given in the Scoping Report and reproduced again for clarity in the preceding section, policy choice was informed by a re-read of the Vision and Objectives and then draft ideas checked again against the Themes and Comments from the Community. In practice this was an iterative and creative process, dipping in and out of the Consultation Statement and Planning and SEA Scoping Reports, as factual evidence and the community's wishes were synthesized to create workable draft policies. This work was undertaken by the planning Consultant who has experience of drafting policy for an LPA and is summarised in the preceding table.
- 8.1 The policies of the North Bradley Neighbourhood Plan have been prepared to be in accordance with Planning Law, Regulations, government policy and guidance. Among the legal requirements is the rule that they must help take forward the policies of the Local Plan for the Area. Specifically, the 'Basic Conditions' require that NDP policies are; *'in general conformity with the strategic policies contained in the development plan...'* In the case of the North Bradley Neighbourhood Plan this means primarily the policies of the Wiltshire Core Strategy. Before each policy a box is provided containing relevant policies involved so that this connection can be more easily seen.
- 8.2 Paragraph 28 of the revised NPPF says:  
*'Non-strategic policies should be used by local planning authorities and communities to set out more detailed policies for specific areas, neighbourhoods or types of development. This can include allocating sites, the provision of infrastructure and community facilities at a local level, establishing design principles, conserving and enhancing the natural and historic environment and setting out other development management policies.'*
- 8.3 NPPF paragraph 29 continues:  
*'Neighbourhood planning gives communities the power to develop a shared vision for their area. Neighbourhood plans can shape, direct and help to deliver sustainable development, by influencing local planning decisions as part of the statutory development plan. Neighbourhood plans should not promote less development than set out in the strategic policies for the area, or undermine those strategic policies.'*
- 8.4 It is a basic principle of planning policy that it should not repeat higher level policy, nor may it deal with subjects that are not within the scope of land-use planning. Guidance from Locality recommends that policies should 'add value' to the existing policy background: *'There is little point in your neighbourhood plan addressing issues that have already been covered by your local authority in its Local Plan. A neighbourhood plan should address gaps or provide further detail rather than duplicating existing policies.'* ('How to Write Planning Policies' 2015). This point is emphasised by NPPF paragraph 16 (f).
- 8.5 This does not mean that a neighbourhood plan has to slavishly avoid all areas for which the Local Plan has a policy. Indeed, there is a valuable role for neighbourhood plans in adding detail and local interpretation. In doing so, a plan would comply with Planning Practice Guidance (paragraph 41), which states that a neighbourhood plan should *'... be distinct to reflect and respond to the unique characteristics and planning context of the specific neighbourhood area for which it has been prepared'*.



- 8.6 For or example, a neighbourhood plan might take forward strategic housing requirements by including local sites, or by avoiding conflict with proposed strategic sites; it could indicate local needs for investment (in terms of Planning Obligations), or it could point out local priorities in terms of landscape, nature or heritage conservation. In assisting higher policy to move from the general towards the specific, the neighbourhood plan ensures that local things important to the community are recognised early in the planning process, saving time and speeding consensus, thus 'adding value' to the overall planning context. In this way, avoiding repetition but adding detail, it can provide clarity and certainty for both developers and the community.
- 8.7 The draft plan was subject to SEA and the SEA Environmental report concluded that the NDP policies were likely to have an overall positive environmental effect. Some changes were incorporated as a result of the SEA. Most notably the plan moved from protecting biodiversity to protecting *and* enhancing it, aiming for a net biodiversity gain. The Plan was also subject to HRA and modifications were made as a result to ensure the protection of biodiversity, especially the bats of the nearby Bath and Bradford on Avon Special Protection Area (SPA).



## 8.8 Policy 1: North Bradley Gap - Landscape Setting and Housing Sites in the Wiltshire Housing Site Allocations Plan (HSAP)

Context	References
North Bradley Plan Objectives	1,6
Wiltshire Core Strategy	CP 1, 2, CP 29 (see especially paragraph 5.150), CP 50, 51.
NPPF	Paragraphs 8, 28, 96, 97 (e.g. Trowbridge FC ground), 127 (especially (c) and (d)), 170, 174.

8.9 Paragraph 5.150 of the Wiltshire Core Strategy states:

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

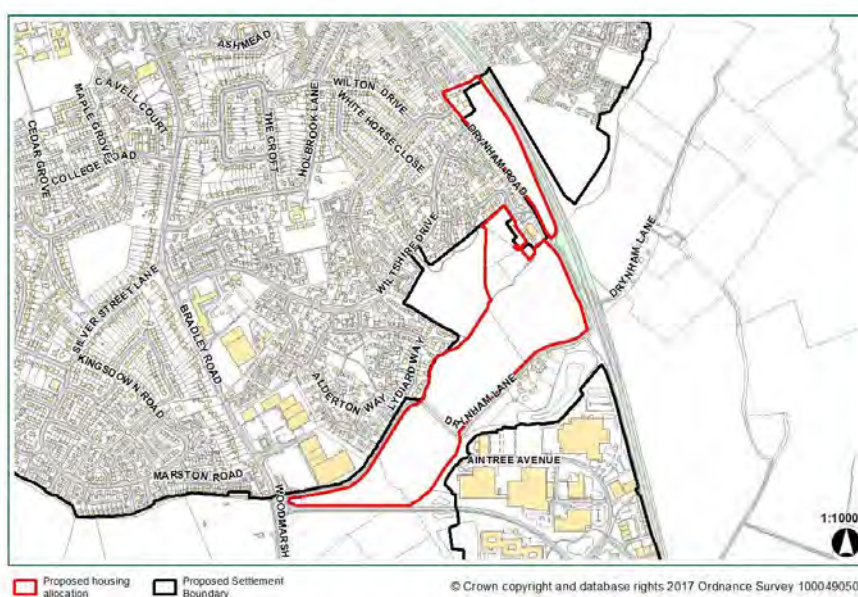
8.10 The emerging Wiltshire Housing Site Allocations PLAN (HSAP) proposes three sites that are in or partly in the Parish of North Bradley. These are as follows:

- Elm Grove Farm SHELAA 613, HSAP Site H2.1
- Land Off 363 at White Horse Business Park SHELAA 298 (HSAP Site H2.2) and,
- Southwick Court SHELAA 3565 (HSAP site H2.6).

Maps and basic descriptions of these proposed sites are given below:

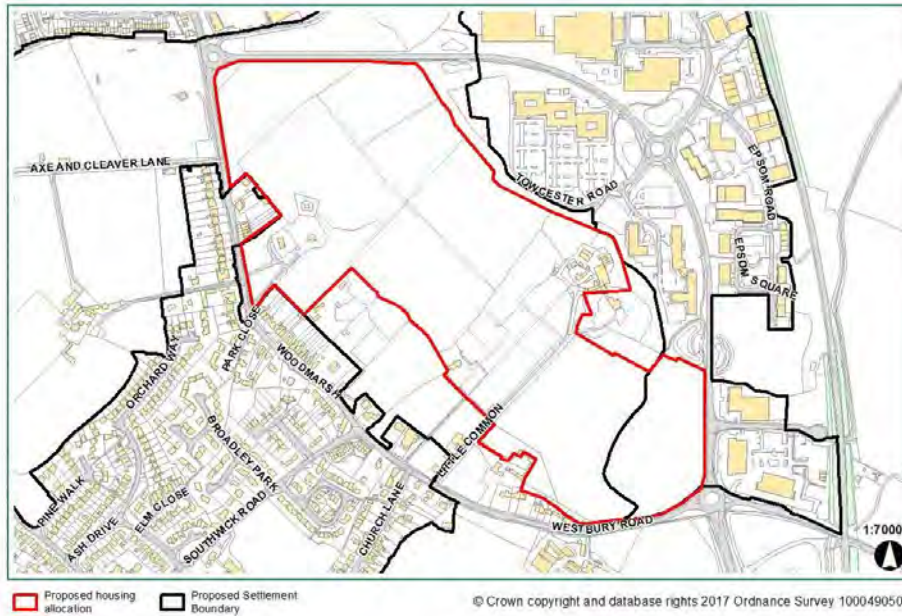
8.11 Elm Grove Farm SHELAA 613, HSAP Site H2.1

The site is approximately 14.33 ha, and is anticipated to accommodate 200 homes, a new primary school and community facilities.

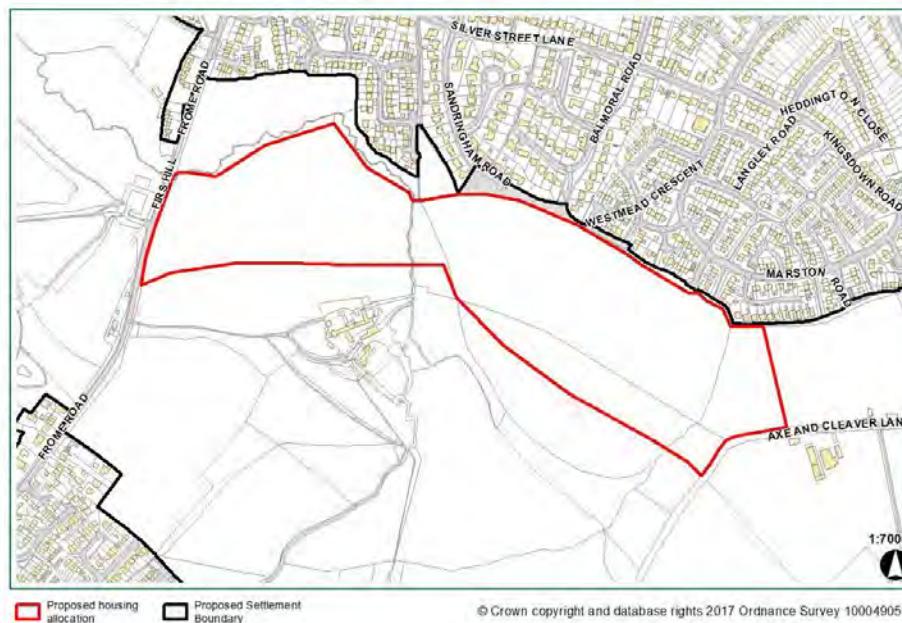




8.12 SHELAA 298 (HSAP Site H2.2) Land off the A 363 at White Horse Business park  
 The site comprises 25.26ha of land and the anticipated number of new homes was approximately 225 in the draft HSAP, sink reduced to 175.



8.13 SHELAA 3565 (HSAP site H2.6) Southwick Court  
 This site is located mainly in Southwick Parish, but has a small component in North Bradley Parish. The site is approximately 18.17ha in size and it is suggested that 180 homes could be accommodated there.



8.14 While the need to accommodate some additional housing is accepted (particularly the 950 homes for Trowbridge referred to in CP 29 of the WCS) the North Bradley community does not believe that this would be sustainable if it destroyed the landscape setting of North Bradley. On the other hand, a neighbourhood plan cannot block a strategic scheme and compromise, through negotiation with the LPA, has proved to be necessary.

- 8.15 The accompanying Landscape and Visual Setting Analysis Report demonstrates why a landscape gap is important and how this should be implemented, while accommodating the strategic sites proposed in the HSAP. The conclusions of this expert and independent report are accepted and taken forward by the SSR and this NDP.
- 8.16 The site at Elm Grove Farm (SHELAA 613, HSAP Site H2.1) is on the north side of the A363 next to the built form of Trowbridge. In many ways, if development has to happen, this is an ideally located site, which seems likely to deliver sustainable development. It is therefore duly supported by this NDP as an acceptable location for housing or mixed-use development. Because the site is already being taken forward in the HSAP it is not considered to be necessary to formally allocate it in this plan. However, the site needs to be carefully landscaped and there is then potential to incorporate public open space. These matters are addressed in Policy 1 below.
- 8.17 The site at 'Southwick Court' (SHELAA 3565 HSAP H2.6) does contain a small element between North Bradley and Trowbridge. However, this is not felt to be significant enough an intrusion to oppose the site, which could be acceptable if correctly landscaped. Accordingly the original landscape diagram provided in the Landscape and Visual Setting Analysis Report was revised following the Site Selection Report (April 2018) to exclude site 3565 H 2.6 from the proposed landscape protection area.
- 8.18 'Land Off the A363 at White Horse Business Park' site (SHELAA 298, HSAP Site H2.2) did present a significant challenge to the aims of the emerging NDP. As taken forward in the proposed draft HSAP following public consultation, this site was put forward for 225 homes. Negotiation with the LPA resulted in a reduction to 175 homes and an agreement in terms of layout that created a wide landscape buffer between the site and Trowbridge. In addition the NDP establishes a landscape protection area, designed to preserve in future a clear, undeveloped rural setting for North Bradley village. This was devised by consultants advised by the County Ecologist as is explained in the Landscape Setting and Visual Analysis Report. It is shown in the diagram below.

### **Policy 1: Landscape Setting and HSAP Housing Sites**

The HSAP housing sites H2.1 , H2.2 and H.6 as set out in the Wiltshire Housing Sites Allocation Plan (HSAP) are accepted subject to reduction in quantum of homes on site H2.2 to an indicative 175 units. Layout of site H 2.2 shall follow the principles and general layout indicated in the landscape policy map accompanying this policy.

More widely, the landscape setting of North Bradley village (the open spaces between the village and Trowbridge) as shown edged green on the diagram below, will be preserved and if possible enhanced for biodiversity and recreation. No development will be permitted in the 'North Bradley Landscape Protection Area ' shown on the policy map except in accordance with Wiltshire Core Strategy Policy.

Where development is permitted in compliance with this policy, it must satisfy the following additional criteria;

- The overall openness and landscape value of the gap between North Bradley and Trowbridge must not be compromised nor the rural setting of North Bradley harmed
- Existing facilities for informal recreation and sustainable transport must be preserved or enhanced
- The scheme must preserve local biodiversity and habitat resulting in a net gain.

#### **8.19 Main Evidence Base**

Consultation Responses from Community Engagement  
HRA – Wiltshire Council  
Landscape and Visual Setting Analysis Report  
NPPF – (as above)  
Response to early draft HSAP (Appendix 9).  
SEA Scoping and Environmental Reports (AECOM, 2018)  
Wiltshire Council Core Strategy 2015 Policy 29 (especially paragraph 5.150)  
West Wiltshire Landscape Character Assessment 2007, Wiltshire Open Space Study  
Wiltshire Housing Sites DPD Consultation Draft and evidence base.

#### **8.20 Justification**

The chief aim of the policy is to take forward Wiltshire Core Strategy Policy in preserving the separate identity and landscape setting of North Bradley, while balancing this with the need to provide housing for Trowbridge as required by WCS CP 29 and as proposed in the HSAP. The policy effectively modifies and adds detail to the early draft policies of the HSAP. It should be read together with the other policies of the Neighbourhood Plan, especially policies 2 and 3. The plan does not seek to impose a blanket restriction since this seems unreasonable. It is not the aim of the plan to stop all development around the village, but to preserve the openness and greenness of the rural setting between North Bradley and Trowbridge. More detailed justification is found in the accompanying Landscape and Visual Setting Analysis Report.

8.21 The policy has secondary aims, reflecting the other important reasons why the spaces are so valued; as a resource for local biodiversity and recreation and sport (e.g. Trowbridge football ground which forms part of the 'Gap' to the north west, the footpaths and bridleways and the foraging area is used by the bats from the nearby SAC). It is the aim of the Plan to enhance these secondary elements of the Gap's importance for the benefit of the environment, for biodiversity and community and in the interests of achieving sustainable development over the parish as a whole.



**LANDSCAPE & VISUAL SETTING ANALYSIS  
PROPOSED LANDSCAPE GAP, NORTH BRADLEY, TROWBRIDGE**



FIG. 7 - LANDSCAPE GAP RECOMMENDATIONS

## 8.22 Policy 2: Housing - General

Context	References
NDP Objectives	2
Wiltshire Core Strategy	CP 1, 2, CP 29, CP 43, CP 45
NPPF	Paragraphs 11, 16, 28, 59, 62, 69, 71, 127, 170, 174

8.23 The Neighbourhood Plan Steering Group wanted to ensure that local housing needs were met, as this is a Plan Objective, supported through community engagement. They therefore decided to gather evidence in the form of a housing needs survey (HNS) as a first step. The group also analysed recent windfall developments.

8.24 It was found that local affordable housing need was relatively small. The HNS showed a need for:

Subsidised rented housing	- None
Shared ownership / discount market homes	- 1 x 1 bed
Sheltered housing for older people	- None

8.25 Housing Needed

In order to meet the above need an allocation of 5 homes would be needed based on the prevailing rate of 30% affordable applying in the Trowbridge Area. However this does not take account of need later in the plan period (since the HNS figure is valid only until 2020 and the NDP runs until 2026). Nor does this low number build in any flexibility.

8.26 Past and Future Windfall Developments.

Data supplied by Wiltshire Council (Appendix 9) shows that 16 homes were delivered through windfall developments (non-allocated sites) over the last 10 years. Were this delivery rate to continue then one might expect around 14 to be delivered during the 9 years of the NDP plan period.

8.27 However, all of these schemes were for less than 5 units, meaning that they delivered no affordable housing. This does not necessarily mean that no sites larger than this and so delivering some affordable housing will come forward over the NDP plan period. However, it does imply that windfalls alone are unlikely to deliver much to meet affordable housing need.

8.28 In addition to accommodating the large WCS strategic site (2,500 homes) at Ashton Park, the community's positive approach to housing is therefore:

- to support strategic sites at 'Elm Grove Farm' (613, H2.1) and 'Southwick Court' (3565, H2.6) and 'Land off White Horse Business Park' (298, H2.2) subject to reduction in numbers at H2.2 and a landscape gap between that site and Trowbridge.
- to allocate sites to meet local need over the plan period including an allowance to ensure flexibility and sure housing types are delivered that are needed by the community
- to add policy detail to manage windfall development in conjunction with national policies and those of the development plan
- to add policy detail to encourage innovative ways of providing housing.

This approach plans positively, meets local need and broadly reflects the wishes of the local community.

- 8.29 In terms of innovative housing, one option is to encourage self-build. In 2010, around 13,800 self-build homes were completed - around the same as those turned out by all the volume house builders combined. However, self-build or 'custom-build' is now part of the Government's Housing Strategy (Housing Strategy for England 2011) to deliver more, better and more affordable homes and local authorities are encouraged in Planning Practice Guidance to create policies to facilitate this.
- 8.30 All new housing in the NDP area will lead to recreational impacts on core bat roosts in woodlands to the south of Trowbridge in combination with other developments. Developer contributions will therefore be used to provide mitigation measures as set out in the Trowbridge Bat Mitigation Strategy. While it is not anticipated that housing coming forward within the settlement boundary will impact on habitat used by bat species which are features of the Bath and Bradford on Avon Bats SAC, where this is necessarily the case, development will be expected to comply with the approach outlined in the Trowbridge Bat Mitigation Strategy.

## Policy 2 – Housing

The community supports small-scale housing schemes and infilling, in accordance with policies of the Wiltshire Core Strategy, within the settlement boundary throughout the plan area that will not detract from the present rural village character or setting. The following are particularly encouraged.

### a. Self-Build Homes

sites delivering single units of self-build housing will be permitted within the built-up area of the main village subject to acceptable impacts on the amenities of neighbours and compliance with other policies of the plan.

### b. Eco-homes

Innovative designs incorporating renewable energy, sustainable construction methods or habitat enhancement are welcomed and will be permitted subject to compliance with other policies of the Neighbourhood Plan, acceptable impacts on neighbours and policies of the Wiltshire Core Strategy.

c. Retirement homes, sheltered accommodation or other homes specifically designed or adapted for the less able or for the retired population will be considered favourably subject to compliance with the Wiltshire Core Strategy and other policies of the NDP.

d. Affordable homes comprising entry-level homes that offer one or more types of affordable housing as defined in Annex 2 of the NPPF.

e. All developments should aim to enhance local habitats for wildlife by design, such that development creates a net gain for biodiversity overall.

### 8.30 Evidence Base

Community Engagement / Consultation Statement  
SEA Scoping and Environmental Reports (AECOM, 2018)  
Scoping Report, Housing Needs Survey, Review of recent windfall development  
Wiltshire Housing Site Allocations Plan, NPPF, PPG.

### 8.31 Justification

The policy responds to the NPPF's encouragement to 'plan positively', accepting the HSAP strategic sites (albeit with caveats). Self-Build and other housing is also encouraged. Planning Practice Guidance (Paragraph: 025 Reference ID: 57-025-201760728). A net gain for biodiversity from development sites is sought as suggested by the SEA.

## Policy 3: Housing – NDP Sites

Context	References
NDP Objectives	2, 6
Wiltshire Core Strategy	CP 1, 2, CP 29, CP 43, CP 45
NPPF	Paragraphs 11, 16, 28, 59, 62, 69, 71, 127, 170, 174

8.32 The Site Selection Report explains in full detail the rationale for selecting the following sites. Essentially the overall aim is to meet local need, reflecting the wishes of the community as far as is possible, and the actual sites available. The overall quantum of housing proposed is more than required to meet immediate need, but this reflects the need to build flexibility into the plan and ensure supply until the end of the plan period in 2026. The total number of homes allocated over the whole plan period is 60, with 30% of these being affordable. The sites selected were subject to SEA.

8.33 All of the sites selected are well-related to the existing developed area of the village and do not impact on the proposed landscape protection area indicated in Policy 1. They are all suitable, available and deliverable as set out in the SSR.

8.34 The HRA for the HSAP identified the Bath and Bradford on Avon SAC, an important habitat for bats, to be a constraint on development in the area. The HRA suggested that;

*'...the need to protect important habitat features is expressly stated in the relevant policies'.*

The HRA then went further and stated that ecological studies would be required in advance of development and that risk of harm to the bats through recreational pressure from new development would be managed through implementation of a Trowbridge Recreation Management Mitigation Strategy and by site specific HRA's on proposals.

With the above in mind, and reflecting the concerns of the County Ecologist expressed during the SEA and HRA Screening for the NDP, the NDP requires all allocated sites to be accompanied by an appropriate ecological evaluation of impact and a statement explaining how they will meet the requirements of the Wiltshire Bat Mitigation Strategy.

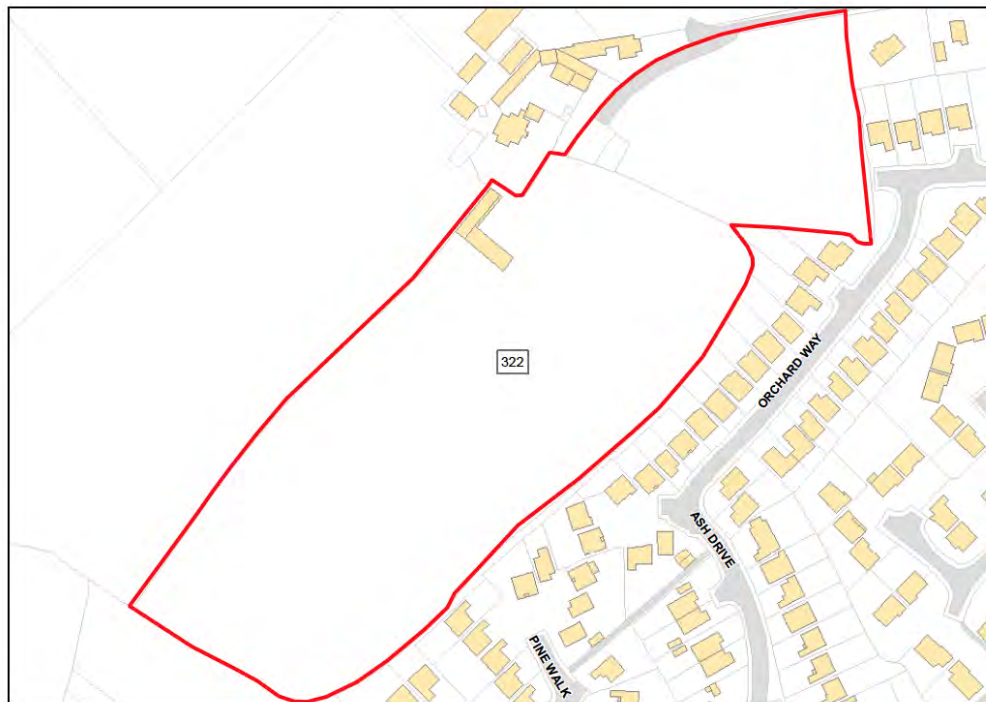
8.35 The SEA, acting on advice received from Natural England, recommended that the NDP should seek a net gain for biodiversity. Since development is the most likely aspect of the plan that could harm biodiversity it seems appropriate to require all development designs to aim for a net overall positive effect on biodiversity.

8.36 The following sites are allocated:



## Park Farm, SHELAA 322

Site Area	3.14ha
Indicative dwellings	35
Affordable homes	11 (30%)
Site Specific points	<ul style="list-style-type: none"> <li>i. Satisfactory access would need to be provided. Potential access via Oak Drive is not acceptable to the community as this is a village green.</li> <li>ii. Development would need to be set well back away from existing properties by means of a buffer strip.</li> <li>iii. Hours of work during construction must be limited to avoid undue disturbance to existing properties.</li> <li>iv. Significant area of site would need to be landscaped; hedgerows retained and enhanced to minimise impact on neighbours and to deliver a net gain for biodiversity.</li> <li>v. In view of the risks this development presents to the SAC, this development will be expected to be surveyed, designed and mitigated in full accordance with the Trowbridge Bat Mitigation Strategy. Full mitigation for loss of habitats must be achieved within the application boundary</li> <li>vi. Pedestrian and cycle access should be provided across the site to make a route to Woodmarsh and give better access to the Woodmarsh bus stops from Orchard Way and cycle route to Trowbridge</li> <li>vii. Any design must demonstrate how the setting of local non-listed heritage asset Woodfield House would be mitigated.</li> </ul>



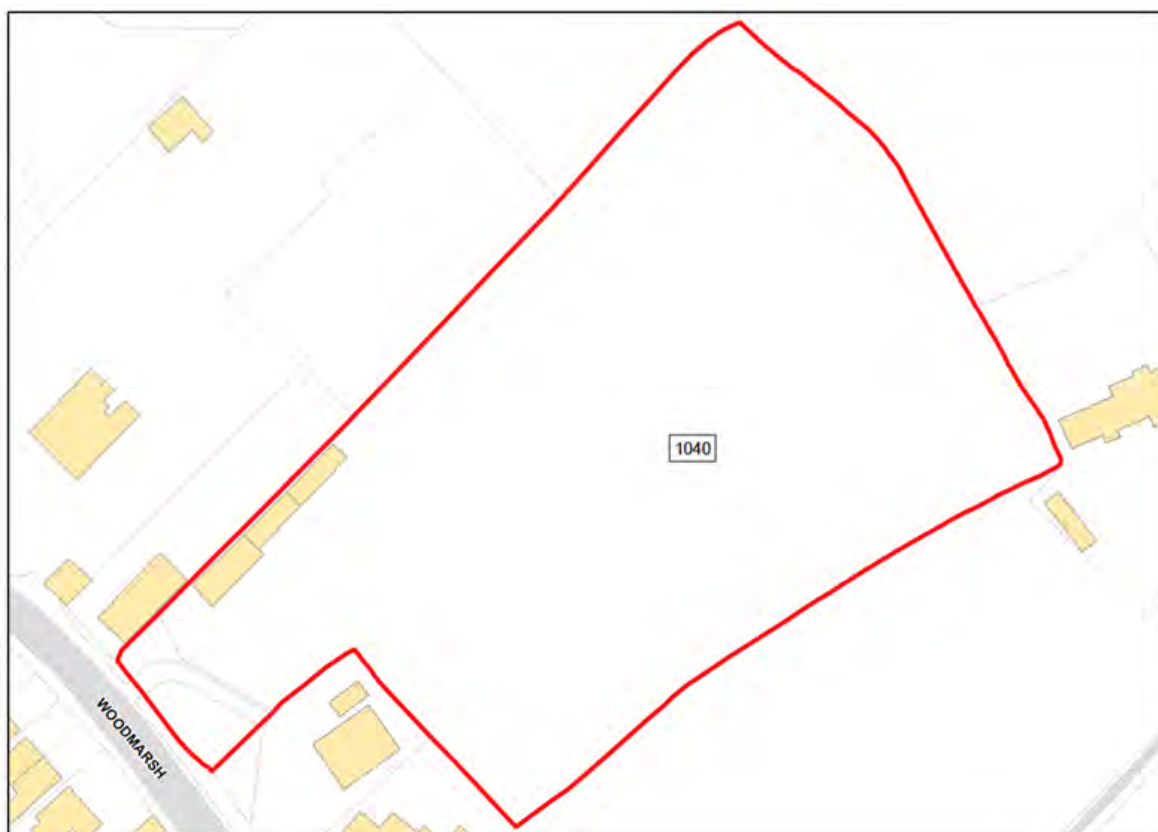
### Justification:

Care would be needed in design to protect the historic but unlisted Woodfield House ( comment Wiltshire Council Conservation Officer during SEA Scoping)  
 Protection for the bats of the SAC is required by law and this policy supports NPPF paragraphs 170, 171 and 174. This was also identified by the County Ecologist in the HRA  
 A net gain for biodiversity was a recommendation of the SEA.



## 54 Woodmarsh, SHELAA 1040

Site Area	1.12ha
Indicative dwellings	25
Affordable homes	8 (30% )
Site Specific points	<ul style="list-style-type: none"> <li>i. Satisfactory access design to be agreed</li> <li>ii. Screening and separation from neighbouring properties will be required.</li> <li>iii. Suitable screening and sound reduction measures would be required to protect new homes from noise from Progressive Hall as it is used for meetings and in Summer has to have open windows for ventilation.</li> <li>iv. In view of the risks this development presents to the SAC, this development will be expected to be surveyed, designed and mitigated in full accordance with the Trowbridge Bat Mitigation Strategy. Full mitigation for loss of habitats must be achieved within the application boundary</li> <li>v. The design should deliver for a net gain for biodiversity</li> <li>vi. The design of any scheme must avoid harm to the historic but unlisted Kings Lodge and Progressive Hall or their settings.</li> </ul>



### Justification:

Care would be needed with design to protect the historic but unlisted Kings Lodge and Progressive Hall (LPA's Conservation Officer Comment)  
 Protection for the bats of the SAC is required by law and this policy supports NPPF paragraphs 170, 171 and 174. This was also identified by the County Ecologist in the HRA.  
 A net gain for biodiversity was a recommendation of the SEA.

## Policy 4: Local Green Space

Context	References
North Bradley Plan Objectives	1, 5
Wiltshire Core Strategy	Core Policy 52
NPPF	Paragraphs 97, 99, 100, 101

- 8.37 It was clear from the community engagement that local people valued a number of green spaces in the parish. The merits of these are discussed more fully in the Planning Scoping Report. Although loved by local people, not all met the criteria for designation of Local Green Space as set out in the NPPF.
- 8.38 The Wiltshire Open Space Study (2015) identifies a shortage of open space locally, especially in view of rising populations, (see Appendix 6) and suggests a role for Neighbourhood Planning in addressing this. The following policy takes up that invitation.
- 8.39 Wiltshire JSA indicates health issues for the Trowbridge Community Area which would benefit from exercise and increased recreation such as cancer and cardio-vascular disease. As development pressure increases around them (the Trowbridge CA will take one of the largest single quanta of housing in the WCS) the need for counterbalancing space for recreation and peaceful contemplation is significant.
- 8.40 The designation of Local Green Space places restrictions on development in those areas, effectively protecting them and retaining their existing use. The restriction is similar to that on Green Belt land. The ability for Neighbourhood Plans to designate Local Green Space stems from paragraphs 99-101 of the NPPF. This makes it clear that the power must be used sparingly. Paragraph 100 says:
- ‘The Local Green Space designation should only be used where the green space is:*
- a) in reasonably close proximity to the community it serves;*
  - b) demonstrably special to a local community and holds a particular local significance, for example because of its beauty, historic significance, recreational value (including as a playing field), tranquillity or richness of its wildlife; and*
  - c) local in character and is not an extensive tract of land’.*
- 8.41 The SEA indicated the need to seek a net enhancement of biodiversity and the protection of existing green spaces is likely to assist with this objective.

8.42 A range of Local Green Space sites were suggested, however not all fitted with the above strict criteria. Sites unsuitable on this basis, though still felt to be special by local residents, were rejected as shown in the following table. More background on the sites is to be found in the Service Centre section of the Scoping Report.

Site	Comment
Green at Ash Drive / Willow Close	Pleasant open space but not demonstrably special (e.g. regular use by community)
Green space adjacent to the Church of St Nicholas	Pleasant open space but not demonstrably special (e.g. regular use by community)
Recreation Ground at Peace Memorial Hall <a href="https://northbradleypeacememorialhall.wordpress.com/">https://northbradleypeacememorialhall.wordpress.com/</a>	Central and close to population, the social and recreational hub of the village since WWII. Used for all main events.
Pine Walk / Oak Drive Recreation Area	Useful recreation space since 1980's. Maintained by Wiltshire Council, there are memorial seats and a tree and a very popular play area for children. The northern end has trees which are a natural adventure playground for children.
Daubeny - The Common	Pleasant open space. Valued and once used as the site for the annual North Bradley Fair. Less use nowadays and is already protected by the fact that it forms the setting for a listed building (Daubeny Alms Houses).
The Pound	Stray cattle were put in 'The Pound' until they were reclaimed in the 19 <sup>th</sup> century. However current use is limited.
The Allotments	Central, close to population and much valued with a waiting list. Only few plots – but these provide exercise for people and habitat for wildlife.
Football Field	Grounds of Trowbridge FC. Much used for many years, small and close to population. Also provides a barrier to development from Trowbridge.

8.43 The policy therefore reads:

#### Policy 4 – Local Green Spaces

The following areas as shown on the policy map below are designated as Local Green Space in accordance with paragraphs 76, 77 and 78 and the NPPF ('The Framework'). Development on the sites shall be limited according to the NPPF but extension or enhancement of the existing recreational facilities for the recreational benefit of the community will be permitted.

- The Peace Memorial Hall Playing Field
- Pine Walk / Oak Drive Recreation Area
- The Allotments
- Trowbridge Town FC Football Field

#### 8.44 Evidence Base

Consultation: Community Engagement (see Consultation Statement)

Documentary: NPPF paragraphs 76 and 77, Wiltshire Open Space Study (2015), SEA Scoping and Environmental Reports (AECOM, 2018)

Wiltshire Core Strategy Core Policy 52, West Wiltshire Local Plan Policy R12.

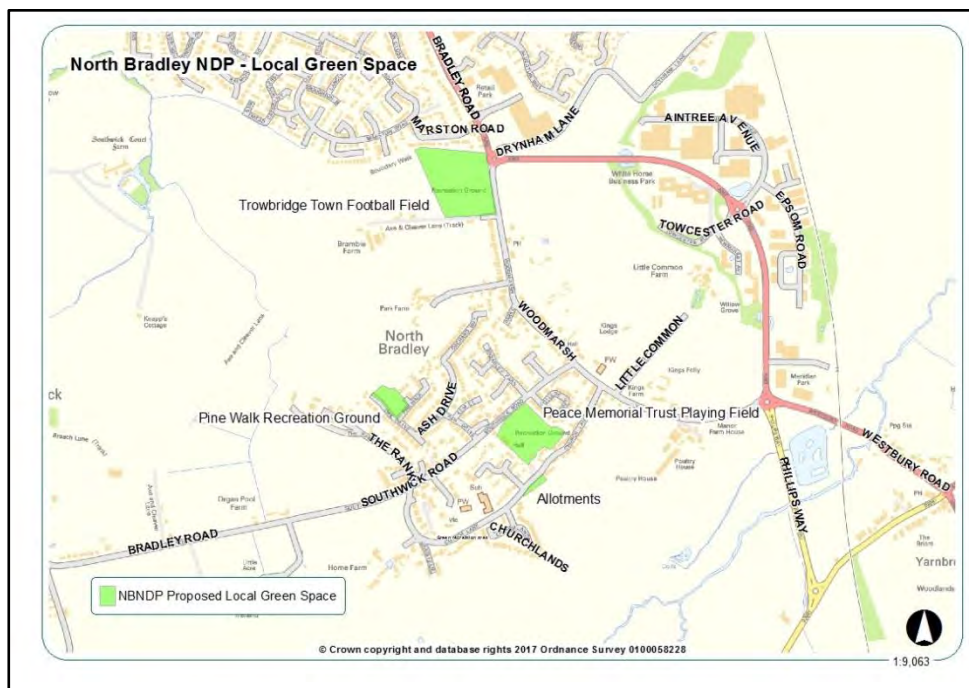
Wiltshire JSA (health issues in Trowbridge Community Area suggest that population would benefit from better access to recreational facilities). Scoping Report.

#### 8.45 Justification

The areas are in close proximity to the community they serve. They are demonstrably special, being in regular and varied use by all sections of the community. The sites are local in character and are not large tracts of land. Other sites considered do not seem to be of high enough quality to comply with the letter and spirit of the NPPF. Only the most significant sites, of long term and regular use by the community, moderate in size and close to the population they serve were selected as most clearly fulfilling the criteria of NPPF Paragraphs 99 and 100.

The preservation of green space in this way is consistent with Wiltshire Core Strategy Policies 50, 51 and 52 and West Wiltshire Local Plan Policy R12.

It supports the recommendation of the SEA to seek a net gain for biodiversity from the NDP overall.



## 8.46 Policy 5 Bat Conservation Policy

Context	References
North Bradley Plan Objectives	6
Wiltshire Core Strategy	29, 50, 51, 52
NPPF	170, 171, 174, 176

8.47 The Scoping Report which accompanies this plan explains in some detail the presence and importance of locally-occurring protected bat species, including the rare Bechstein's Bat. The bats habitat is the Bath and Bradford-on-Avon Special Area of Conservation (SAC); this is a Natura 2000 site. The SAC has been the subject of planning guidance (*'Bat Special Areas of Conservation (SAC) Planning Guidance for Wiltshire'*) produced by Wiltshire Council in September 2015, and has been the cause of several Habitat Regulations Assessments (HRA) on recent development applications in the area, including within the parish. The issue of the bats was a concern during site selection for the NDP as can be seen in the accompanying Site Selection Report (SSR).

8.48 The importance of protecting biodiversity is recognised in the NPPF and the WCS and the bats themselves are protected by law and by Core Policy 50 of the WCS states that; *'Any development potentially affecting a Natura 2000 site must provide avoidance measures in accordance with the strategic plans or guidance set out in paragraphs 6.75-6.77 above where possible, otherwise bespoke measures must be provided to demonstrate that the proposals would have no adverse effect upon the Natura 2000 network'*.

However, it is not immediately clear from this that the matter affects North Bradley and the policy below seeks to clarify this in the NDP.

8.49 Paragraphs 170 and 174, the NPPF make it plain that biodiversity is an important issue for plan makers to consider. Core policy 29 of the WCS identified impacts on the Bath and Bradford on Avon SAC as being of importance. However, the implications of the SAC for housing development in the Trowbridge area has emerged as being a more significant issue since first being recognised in the WCS. The most recent policy position is reflected in the draft Wiltshire Housing Sites Allocation Plan which recognises that risks to the SAC may arise from development throughout Trowbridge. As a result of the HRA process, two allocations in Trowbridge were removed from the plan and six were taken through to a full appropriate assessment. This identified three sources of potential impact as follows:



Bechstein's Bat is a local resident.

Image: Parc naturel régional des Vosges du Nord. Wikipedia



- Direct loss of habitat within development sites and indirect effects on habitat due to lighting, proximity to dwellings etc.;
- Increased recreational pressure on local woodlands used by breeding Bechstein's as a result of the cumulative effects of development in the area, and;
- Residual effects on bat habitat which cumulatively lead to reductions in bat habitat at a landscape scale.

It has been confirmed by the county ecologist that while even individual homes may have an impact and require mitigation or even merit refusal, the larger the overall quantum of development the area absorbs over the plan period then the more likely adverse impacts would be

- 8.50 Further guidance is available from the Bat Conservation Trust and recent HRA's for development in nearby Southwick (e.g. 17/03269/OUT *Wynsome Street, Southwick, Trowbridge*) have indicated some local issues. It is the intention of the policy to highlight this as an issue early in the development process and ensure that it receives attention before detailed schemes are drawn up. This will serve to protect the bats from inappropriate development, help to ensure that new housing benefits habitat, and also to assist the development process by reducing delays.
- 8.51 Schemes to improve public facilities and access routes may also lead to impacts on bats, especially where these lead to increased lighting, such as floodlighting of sports pitches, or changes to the extent or management of hedgerows e.g. for improvements to footpaths and cycleways. Any such proposals should consider the guidance contained in the Trowbridge Bat Mitigation Strategy and planning applications will need to demonstrate there will be no adverse effect on bats from the application alone and in-combination with other development. Poorly sited developments may be refused but carefully designed schemes making use of modern lighting techniques and equipment as illustrated in the above strategy, may bring improvements on sustainable transport routes for both people and bats.
- 8.52 Policy 4 therefore is as follows:

The entire NDP area falls within zones of sensitivity for those species of bats which are features of the Bath and Bradford on Avon Bats SAC. All Planning applications will therefore need to comply with guidance on survey and mitigation contained in the Trowbridge Bat Mitigation Strategy. Development is unlikely to be permitted in areas identified as being of high sensitivity for bats

- 8.53 **Evidence Base**  
 Bat Conservation Trust website: <http://www.bats.org.uk/>  
 Bat Special Areas of Conservation (SAC) Planning Guidance for Wiltshire  
 Guidance. Bats: surveys and mitigation ... (Natural England and DEFRA)  
 Habitat Regulations Assessment for Wiltshire planning application 17/03269/OUT  
 Neighbourhood Plan Scoping Report (SR), Neighbourhood Plan Site Selection Report (SSR)  
 National Planning Policy Framework (NPPF), Wiltshire Core Strategy  
 SEA Scoping and Environmental Reports (AECOM, 2018)
- 8.54 **Justification**  
 The policy takes forward an important NDP Objective. It reflects the Vision (e.g. by '*providing a better habitat for nature*') The policy is consistent with the NPPF (170, 171 and 174), the Wiltshire Core Strategy and Wiltshire Planning Guidance on Bats and SAC's. It adds local detail and clarity to higher level policy and aims deliver sustainable development by balancing human development with the need to conserve and enhance the natural world. The policy has been created with the involvement of the County Ecologist. The policy also reflects the advice from Natural England received during the SEA process and the conclusion of the SEA which recommended seeking a net gain for biodiversity for the NDP overall.



## Policy 6: Developer Contributions Policy

Context	References
North Bradley Plan Objectives	3, 4, 6,
Wiltshire Core Strategy Planning Obligations DPD	CP 3, 52, 60, 61, 62 Sections 3, 6, 7, 9, 10
NPPF	28, 34

8.55 Developers will be required to contribute towards the provision of local infrastructure and to mitigate impacts of development proposals in order to make them acceptable in planning terms, in accordance with National and Core Strategy policy. This is taken to include both CIL contributions and those made by section 106 agreement. The following policy identifies areas for priority investment both in terms of contributions made with reference to a particular scheme and to the spending of local CIL receipts.

8.56 The Planning Policy basis for this is 1990 Town and Country Planning Act, WCS Core Policy 3 (as expanded on by the guidance in Wiltshire Planning Obligations SPD May 2015), the NPPF and Planning Practice Guidance, which states:

*'Policies for seeking planning obligations should be set out in a Local Plan, neighbourhood plan and where applicable in the London Plan to enable fair and open testing of the policy at examination. Supplementary planning documents should not be used to add unnecessarily to the financial burdens on development and should not be used to set rates or charges which have not been established through development plan policy.'*

*Planning obligations assist in mitigating the impact of development which benefits local communities and supports the provision of local infrastructure. Local communities should be involved in the setting of planning obligations policies in a Local Plan, neighbourhood plan and where applicable in the London Plan'.*



Local roads can be busy and sustainable transport improvements are needed.

## Policy 6 – Developer Contributions Policy

All new housing and employment development proposals in the area will be expected to contribute towards local infrastructure in proportion to their scale and in accordance with National and Wiltshire Core Strategy policy. The Scheme at Ashton Park is expected to contribute to infrastructure that will benefit the whole parish (such as links from footpaths and cycleways into the wider parish) as is that at Elm Grove Farm, although it is accepted that a proportion of infrastructure will serve the needs of Trowbridge also.

Local priorities (not in order of importance) are:

- Improvement of existing footpaths including the introduction of crossings, dropped curbs and smoother surfaces suitable for electric buggies as well as pedestrians.
- The installation of cycle paths linking the parish with Trowbridge
- Improvement of local bus services
- Upgrading of recreational and other facilities at the Peace Memorial Hall and the Progressive Hall
- Provision of health care facilities within the parish
- The provision of a new non-denominational burial ground
- The enhancement of habitat for biodiversity

Care must be taken when creating new infrastructure not to impact adversely on the bats of the nearby SAC – for example through the effects of the lighting of footpaths or cycleways.

### 8.57 Evidence Base

Consultation: Community Engagement (see Consultation Statement)  
Documentary: Wiltshire Core Strategy Policy CP3, Wiltshire Planning Obligations NPPF  
Planning Scoping report  
SEA Scoping and Environmental Reports (AECOM, 2018)  
SPD May 2015, Planning Practice Guidance 2017  
Wiltshire Local Plan Viability Study, February 2014.

### 8.58 Justification

The purpose of this policy is not to add further burdens to development (although viability in the area is robust as indicated by the Wiltshire Local Plan Viability Study), nor to duplicate higher level policy. The policy is designed to set out local priorities, based on the wishes of the community and objective evidence, and to provide certainty to developers and add value and detail to the existing policy framework. It is also designed to help deliver sustainable development by ensuring good sustainable transport links between Ashton Park and North Bradley parish and between North Bradley and Trowbridge, thereby reducing the need to travel. The policy takes forward NPPF paragraph 34. The SEA identified developer contributions as being important in achieving some net environmental benefits; for example, the improvement of sustainable transport. The policy could also support a key recommendation of the SEA; creating a net gain for biodiversity.

## 8.59 Policy 7 Parish Burial Ground

Context	References
North Bradley Plan Objectives	4, 5, 6
Wiltshire Core Strategy	CP 3
NPPF	28, 92, 170, 174, 180

The following policy does not allocate a particular site – instead it is aspirational and informative. Site selection is being considered by the Baptist Church and Parish Council, but will be within the parish at a location with good access and sustainable transport links. This is likely to take some time.

8.60 The Baptist Church currently has a burial ground that is reaching capacity. At the same time, as evidence in the Scoping Report shows, the population is both growing and ageing.

Burial grounds perform a number of functions in a local community. They:

- Give local residents the option of local burial close to family and relatives
- Provide an open space of value to biodiversity and for walking and contemplation.

### Policy 7 – Parish Burial Ground

The provision of a new non-denominational burial ground within the parish will be supported subject to compliance with the relevant legislation.

#### 8.61 Evidence Base

Consultation: Community Engagement (see Consultation Statement)  
 Representation from the Baptist Church.  
 Planning Scoping report  
 SEA Scoping and Environmental Reports (AECOM, 2018)  
 Wiltshire Core Strategy Review - Gap Assessment Paper 1.

#### 8.62 Justification

The growth and changing age profile of the population indicates such a facility will be needed. Although a crematorium is available at Semington, burial offers a number of environmental advantages, not least the incidental provision of green space and wildlife habitat. The provision of such a facility will improve the sustainability of development generally in the area, since it would clearly not be sustainable to continue increasing population as proposed by the WCS without commensurate provision for end of life. It is known that the current review of the Wiltshire Core Strategy is considering a permissive policy for community facilities including cemeteries, but this is likely to be years away.

8.63 Burial grounds are often sanctuaries for wildlife; such as mice, owls, other birds, bats and invertebrates. Creating anew burial ground would therefore support the recommendation of the SEA that the plan seeks a net overall gain for biodiversity.

## 9.0 Informal Community actions

9.0 The following Community Actions do not form part of the statutory neighbourhood plan. They are non-planning matters which nevertheless are important to the community. They are included here as a focus for community action but have no legal force.

Issue	Informal Policy	Implementation
Biodiversity, Landscape and Climate Change	The Parish Council will help lead and co-ordinate action to improve local habitat, landscape and appearance of the area by leading community action and working with local landowners.	Actions may include: Tree and hedgerow planting Litter picking Maintenance of the Yarnbrook balancing ponds, River Biss and local drainage ditches Installation of nesting boxes or creation of mini nature areas in private gardens.
Education	The Parish Council will support the creation of a viewing platform at the Balancing Ponds at Yarnbrook for the benefit of environmental education.	Actions may include working with interested parties to maintain and make more accessible the balancing ponds both to ensure their function, enhance biodiversity and make them useful for education.
Historic Environment	The Parish Council will consider measures to conserve and protect the heritage, in particular that surrounding the Church of St Nicholas and School.	Organise a survey and / or Village Design Statement of Design Guide, to record the heritage that is there and suggest guidance. Consider applying to have this area designated a Conservation Area.
Transport: Parking	The Parish Council will work with the community and Wiltshire Council to press for action to alleviate problems.	Discussion with community and Highway Authority to take action to reduce parking problems – e.g. through double yellow lines or other restrictions.
Transport: Speeding	The Parish Council will support Community Speedwatch or other similar initiatives aimed at reducing the number and speed of speeding vehicles in the parish. It will also support appropriate traffic calming measures.	Support for Community Speedwatch and other initiatives.
Transport: HGV's	The Parish Council will work with stakeholders to help re-route or otherwise reduce the impact of HGVs on local roads.	Work with Wiltshire Council and others.
Service Centre Facilities	The Parish Council will support appropriate applications for new shops, pubs and facilities.	Monitoring planning applications and appropriate action.

## 10.0 Monitoring

- 10.0 Monitoring of development plan documents is required by law. Wiltshire Council currently produces an annual monitoring report (AMR) and will assess the overall performance of the Development Plan in Wiltshire. This will meet the main requirements for monitoring.
- 10.1 However, the parish will also be carrying out monitoring. Monitoring is intended to:
- Monitor the predicted significant effects of the plan
  - Track whether the plan has had any unforeseen effects
  - Ensure action can be taken to reduce / offset the significant effects of the plan.
- 10.2 As part of this the Parish Council will produce a Local Monitoring Report (LMR) and this will be supplied to the LPA. It will also be made available to the community via the parish website. The LMR will take the form of a simple table plus a few paragraphs of explanatory and advisory text.
- 10.3 The written summary and conclusion of the LMR will allow the Parish Council to identify not only whether the policies are working, but also what other issues are emerging. It will also enable the Council to judge the effectiveness of mitigation measures proposed. In some cases, monitoring may identify the need for a policy to be amended or deleted, which could trigger a review of the NDP, or for further policy guidance to be developed e.g. as a Supplementary Planning Document.
- 10.4 The community could also consider monitoring local biodiversity (for example through expert surveys). This would measure whether the plan has succeeded in delivering a net gain for biodiversity as recommended by the SEA.

## Appendix 1: Evidence base (not exhaustive)

An Air Quality Strategy for Wiltshire 2006  
CIRIA (2010) Planning for SuDs – making it happen [online]  
CPRE 'Planning and Localism: Choices and Choosing  
County SMR and GIS System  
Defra (2009) Safeguarding our Soils: A strategy for England [online]  
DEFRA "Neighbourhood Planning, The rural frontrunners: research and case studies', April 2013  
DCLG, Neighbourhood Planning – 2013  
Designated Nature Sites – Natural England website  
Design in Neighbourhood Planning, The Design Council,  
English Indices of Deprivation 2015  
English Heritage, Neighbourhood Planning and the Historic Environment –  
August 2014  
Historic England, The Historic Environment in Local Plans –March 2015  
HM Government (2010) The Government's Statement on the Historic Environment for England  
[online  
Environmental Assessment of Plans and Programmes Regulations 2004  
European Commission (2011) 'Our life insurance, our natural capital: an EU biodiversity strategy to  
2020' {online}  
Flood Risk Maps – Environment Agency website  
Hampshire Avon Catchment Abstraction Management Strategy for Wiltshire 2006  
Landscape and Visual Setting Analysis Report, Indigo Landscapes, 2017  
Localism Act 2011  
Planning and Compulsory Planning Act 2004  
Locality, Neighbourhood Plan, Roadmap  
Locality, the Quick Guide to Neighbourhood Planning  
MyCommunity – online resource  
National Planning Policy Framework  
Neighbourhood Planning (General) Regulations 2012  
Neighbourhood Planning (General) (Amendment) Regulations 2015  
Neighbourhood Planning (General) and Development Management Procedure (Amendment)  
Regulations 2016  
Neighbourhood Planning Advice Note – Historic England website  
Planning Aid, 'How to develop a Vision and Objectives'  
Planning Portal, online resource  
Planning Practice Guidance – online resource  
Planning Advisory Service – Checklist  
Site assessment for neighbourhood plans: A Toolkit, Locality  
Town and Country Planning Act 1990 (As Amended)  
UK Census - Wiltshire and North Bradley Parish – 2011  
UK Climate Projections (UKCP09) team. <http://ukclimateprojections.defra.gov.uk/>  
UK Traffic Data website  
Wiltshire Biodiversity Action Plan 2008  
Wiltshire Council, Neighbourhood Planning Guidance February 2013  
Wiltshire Council's portal on Neighbourhood Planning including "Front Runner" projects:  
<http://www.wiltshire.gov.uk/planninganddevelopment/planningpolicy/neighbourhoodplanning.htm>Wilt  
shire Council, SEA Guidance Note, September 2015  
Wiltshire Council SEA Screening Decision  
Wiltshire Council HRA Screening Decision  
Wiltshire Council SFRA 2008  
Wiltshire Council, SHLAA April 2013  
Wiltshire Council Topic Paper 7 - Economy (January 2012)  
Wiltshire Council, Topic Paper 10 - Transport -January 2012

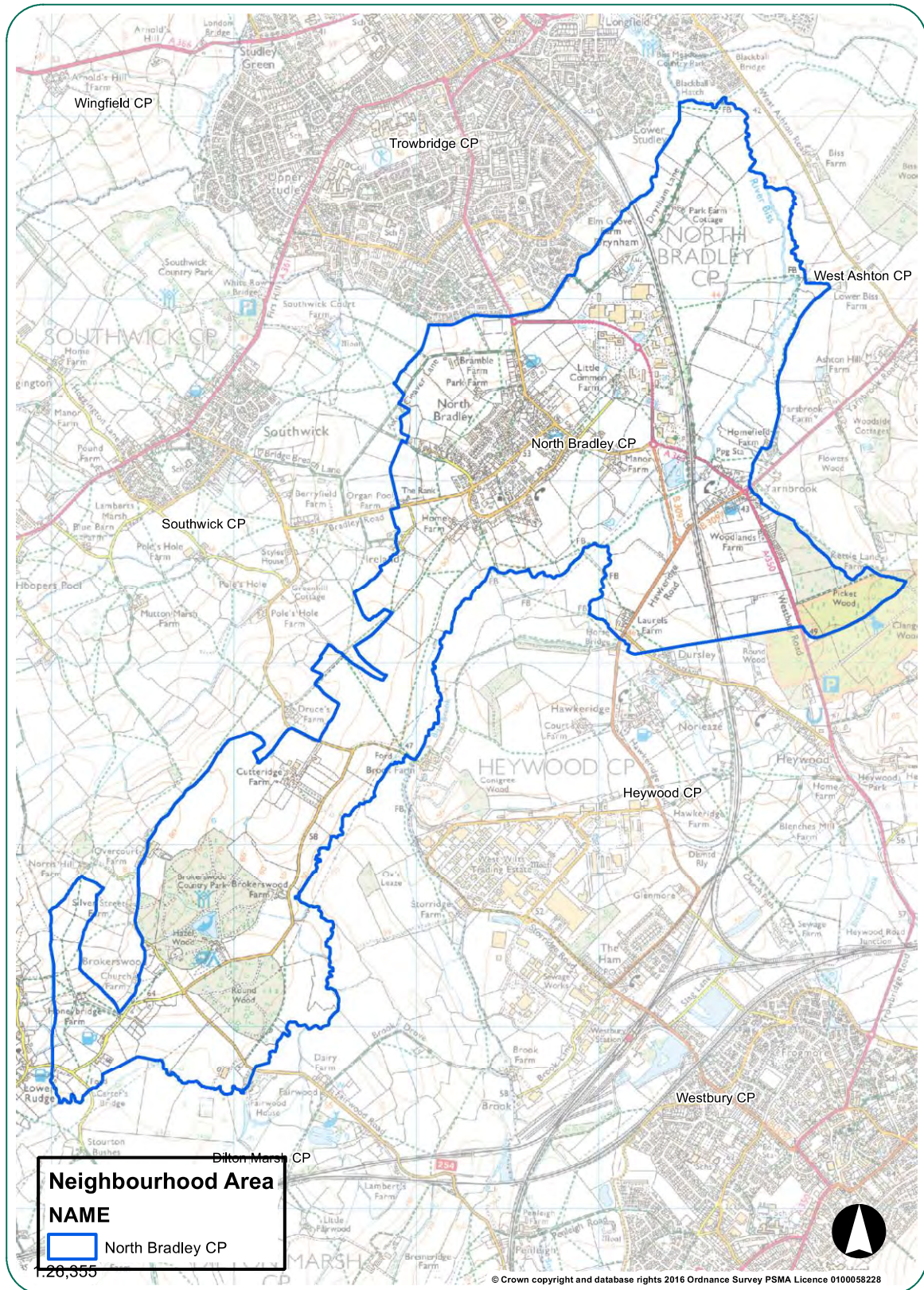


Wiltshire Strategy for 14 - 19 Education and Training 2005  
Wiltshire and Swindon Economic Strategy 2003 - 2008  
Wiltshire Council, Topic Paper 2 – Housing - (January 2012)  
Wiltshire Core Strategy 2015  
Wiltshire Core Strategy Review 2016 and 17 (Various)  
Wiltshire Council (2015): JSA for Trowbridge Community Area, [online]  
Wiltshire Council Topic Paper 8 - Infrastructure & Developer Contributions January 2012  
Wiltshire Infrastructure Delivery Plan 2011-2016  
Wiltshire Council, Topic Paper 11- Green Infrastructure  
Wiltshire JSA Traffic Injuries  
Wiltshire Local Plan Viability Study, February 2014  
Wiltshire and Swindon Biodiversity Action Plan Steering Group (2013) Landscape Biodiversity  
Areas: A landscape-scale framework for conservation in Wiltshire and Swindon  
Wiltshire and Swindon Historic Environment Record  
Wiltshire Council, Topic Paper 10 - Transport -January 2012  
Neighbourhood Planning Advice Note – Historic England website  
Listed Buildings Online  
Wiltshire Council Topic Paper 9 - Built and Historic Environment -January  
'Writing Planning Policies' - Locality 2014

# Appendix 2 North Bradley Neighbourhood Plan - The Plan Area



## North Bradley Neighbourhood Area

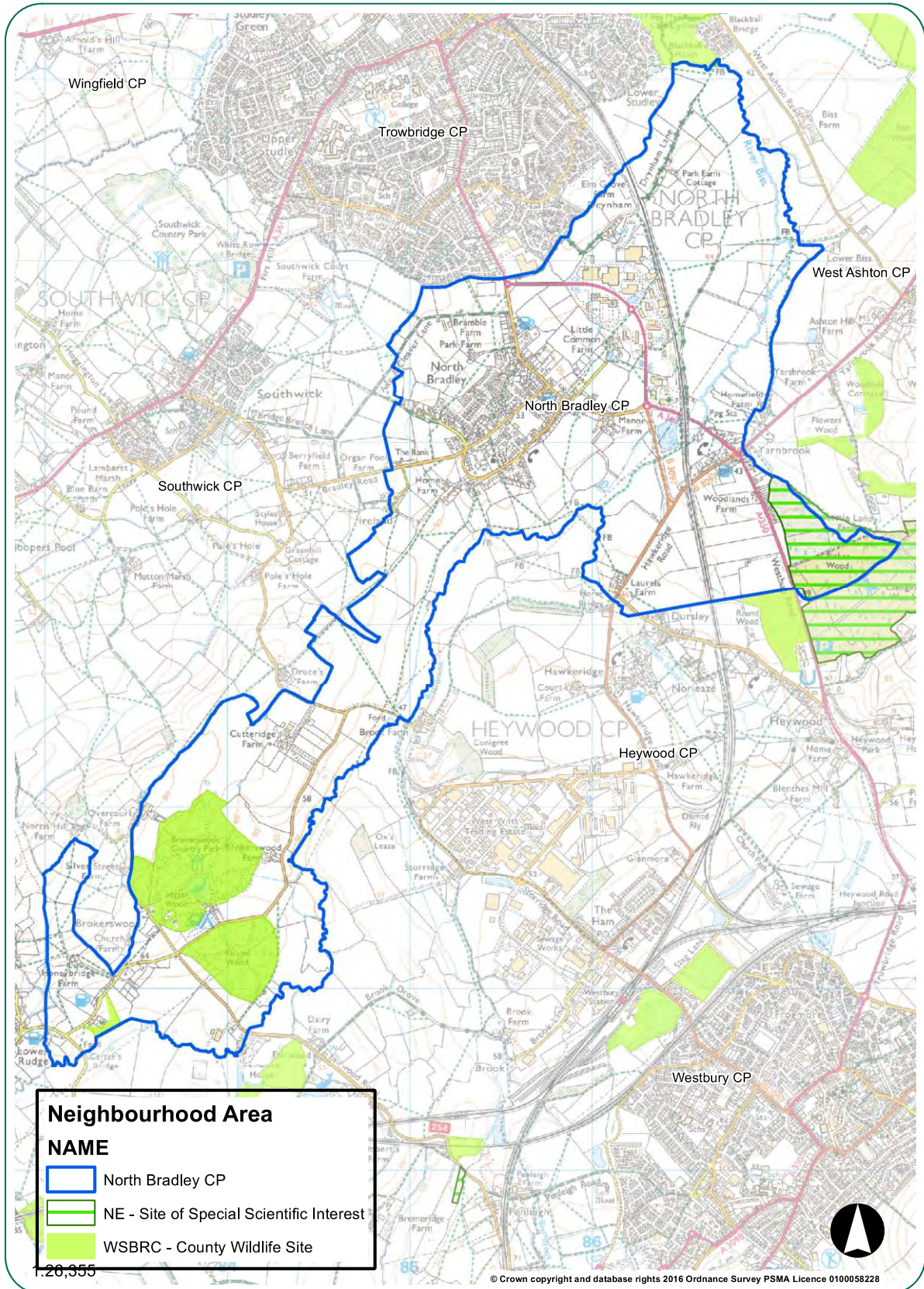




# Appendix 3a North Bradley and Nature



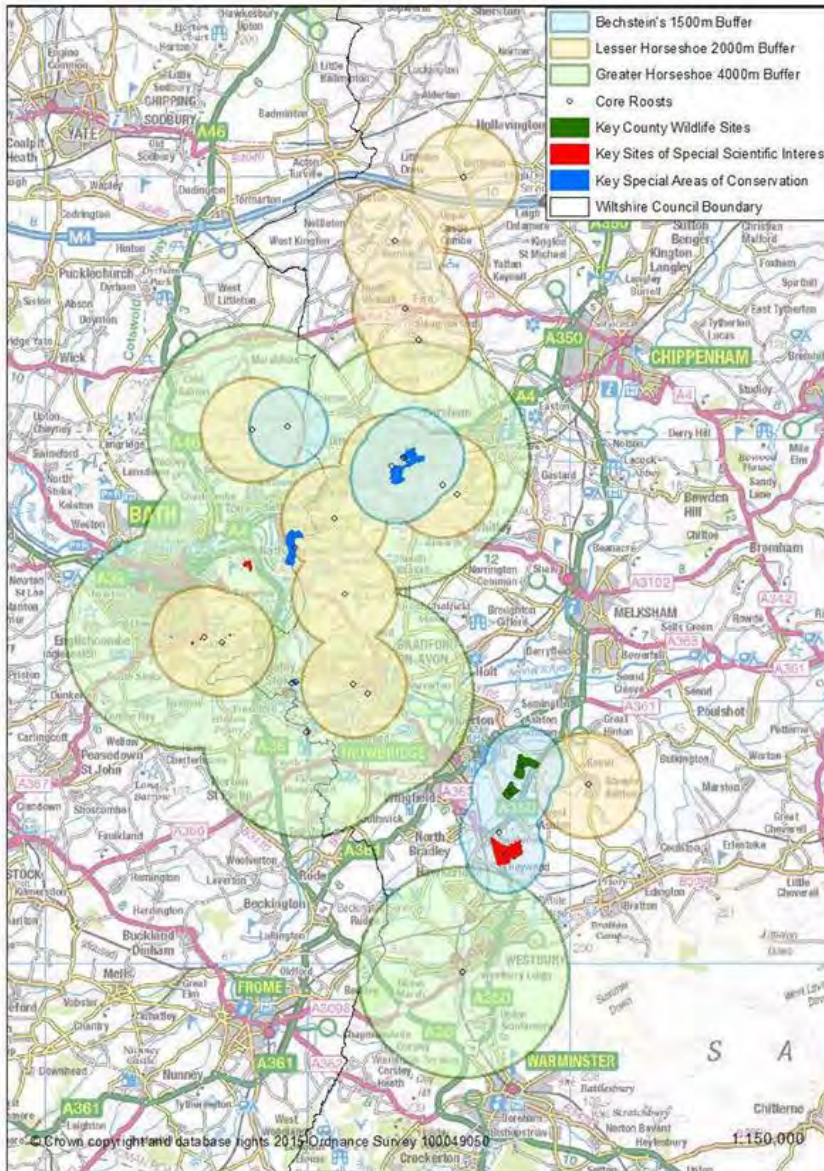
## North Bradley and Nature





# Appendix 3b

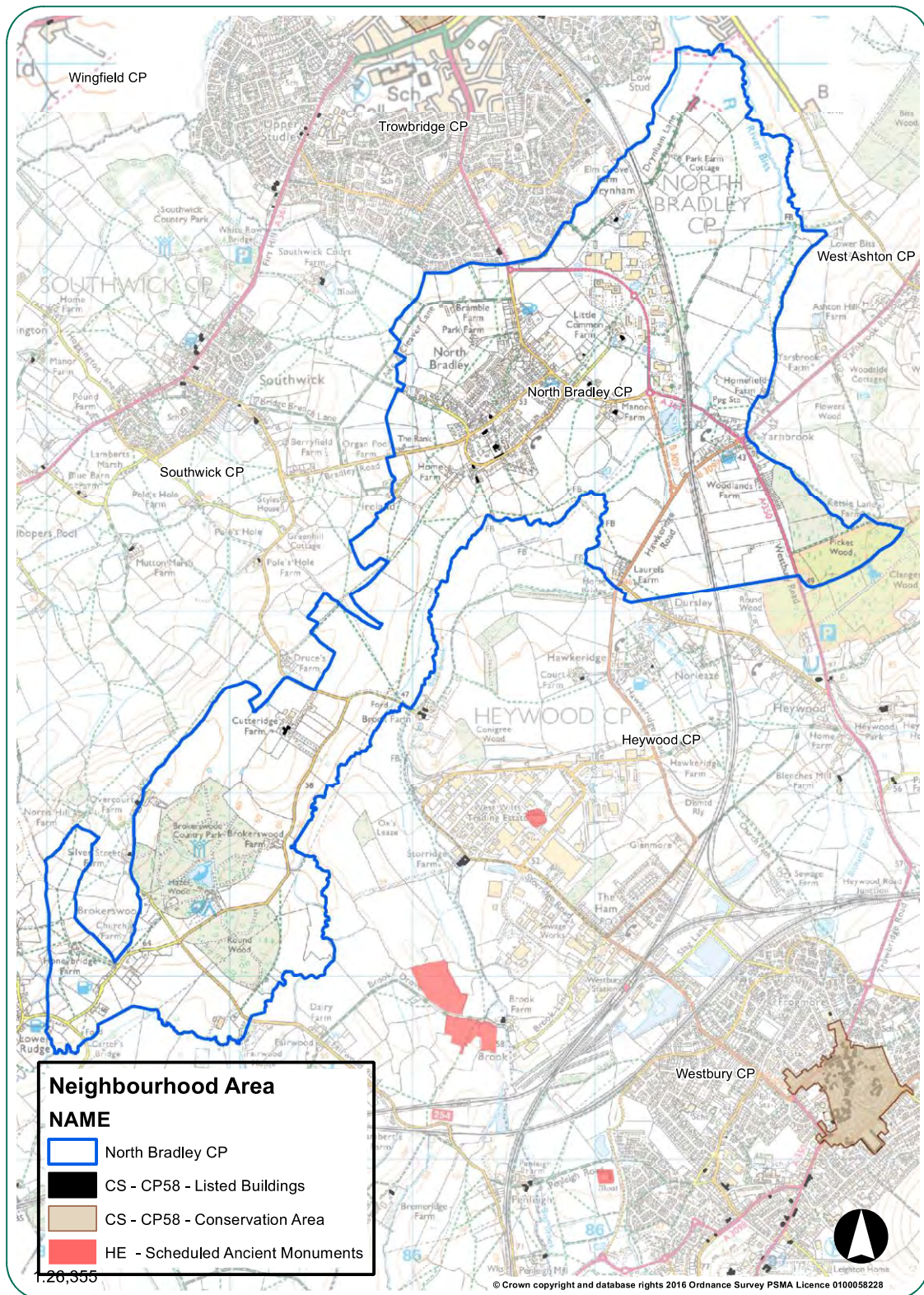
**Plan 2 Inset map of the Bradford-on-Avon Bat SAC Core Roosts showing Core Areas (i.e. buffers) for each species**





# Appendix 4 North Bradley and heritage

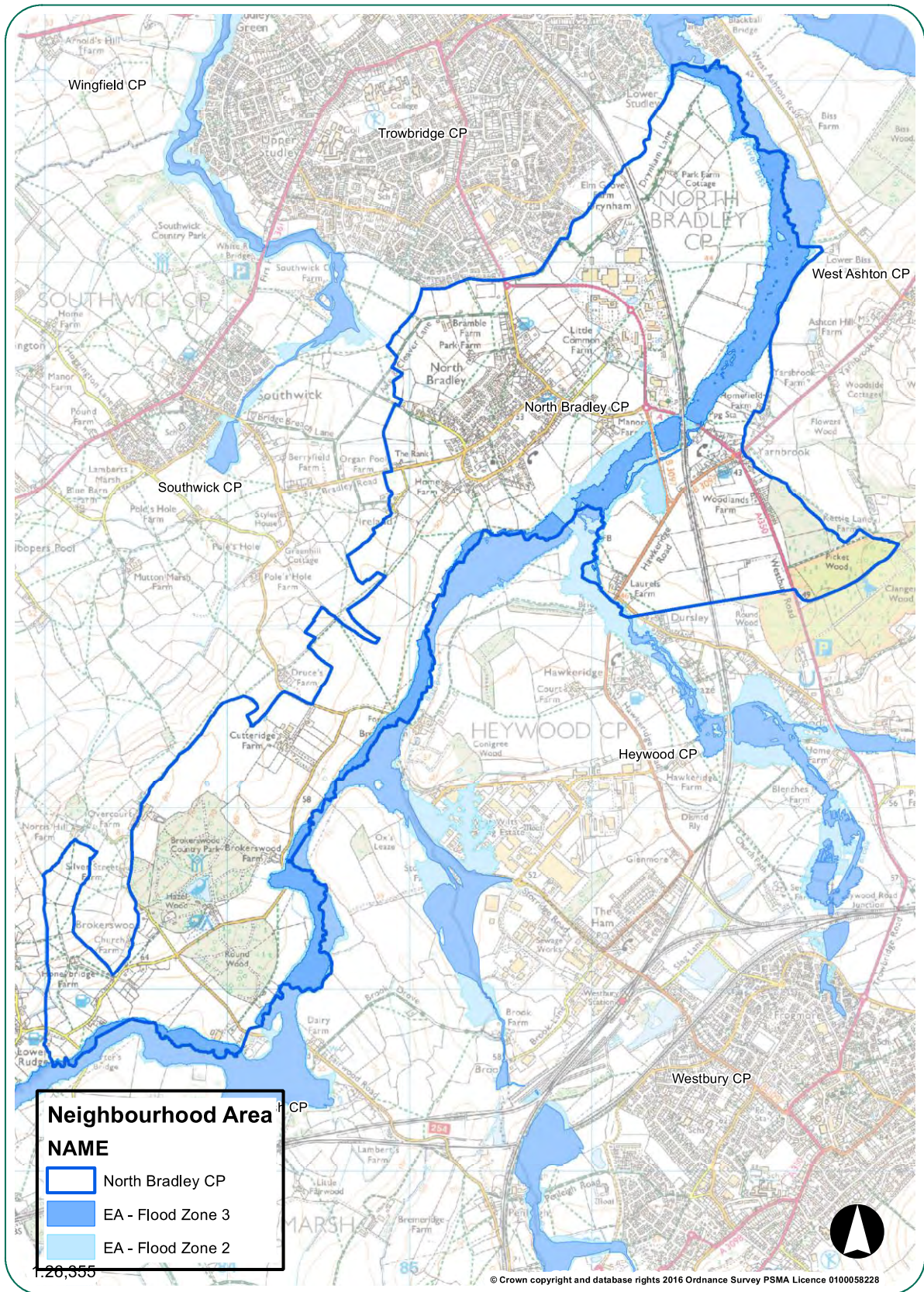
## North Bradley and Heritage





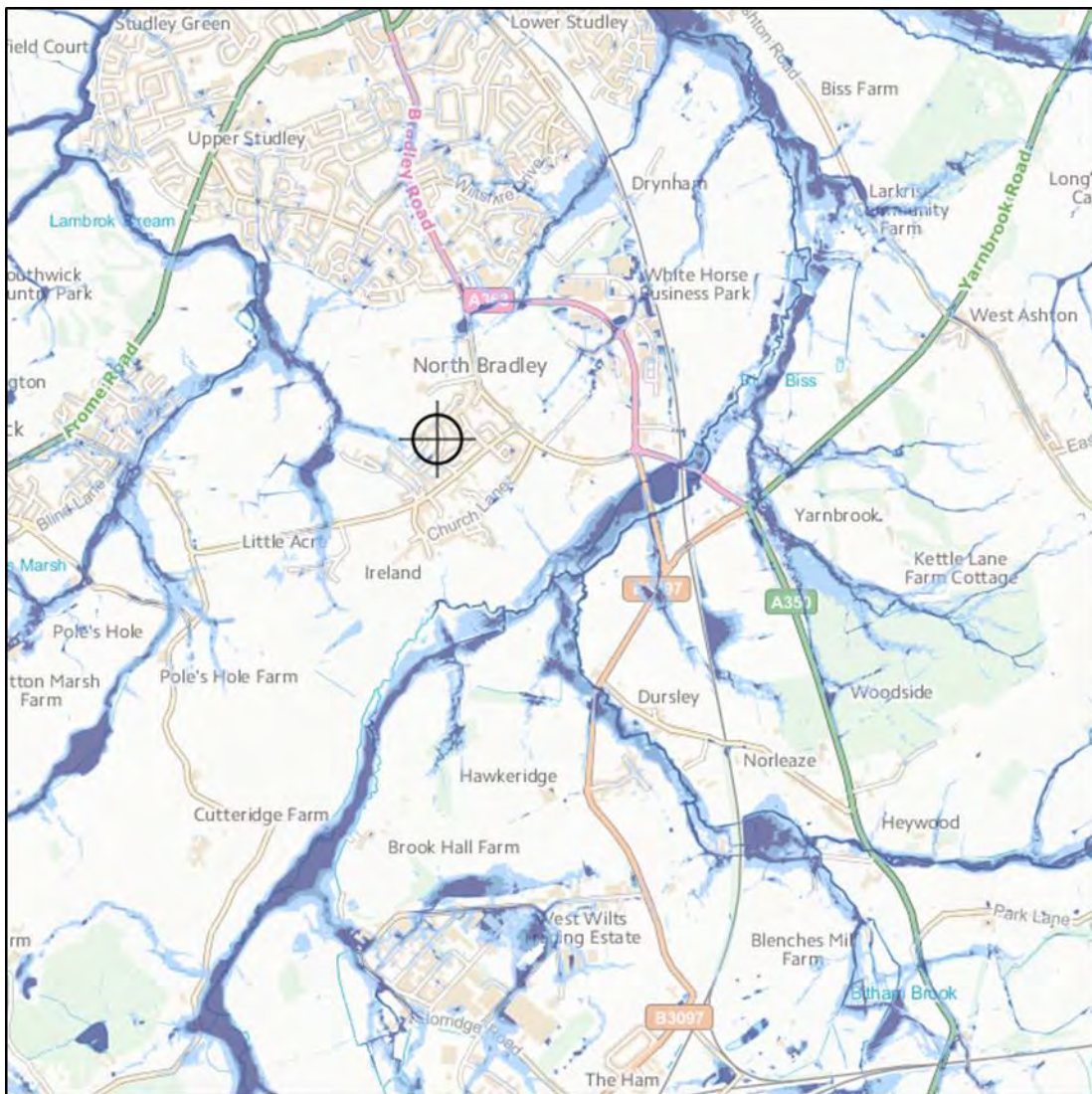
# Appendix 5 North Bradley and Flood Risk - Rivers

## North Bradley and Flood Risk





## Appendix 5 North Bradley and Flood Risk – Surface Water



## Appendix 6: Shortfall of open space:

Table 17: Supply of open space in rural analysis areas against the Wiltshire Standard (Ha/1000)

CBA	Allotments	Recreation Space (combined)	Recreation Space	Recreation Space (Private)	Play Space
Amesbury	-1.32	-2.28	-9.88	7.60	-0.10
Bradford on Avon	-2.13	2.21	1.98	0.23	-0.37
Calne	-0.20	23.84	15.92	7.92	-0.23
Chippenham	-0.40	10.68	-4.51	15.19	0.04
Corsham	1.72	11.61	8.56	3.05	0.21
Devizes	-1.12	-0.65	-15.71	15.06	-0.37
Malmesbury	0.62	-13.83	-15.18	1.35	-0.23
Marlborough	-2.13	59.11	-7.40	66.51	0.00
Melksham	-1.61	-11.56	-11.87	0.31	0.13
Pewsey	-1.27	-3.02	-9.51	6.49	0.17
Royal Wootton Bassett and Cricklade	-0.92	-5.91	-5.91	0.00	0.16
Southern Wiltshire	0.00	0.00	0.00	0.00	0.00
South West Wiltshire	-0.68	7.63	5.45	2.18	-0.32
Tidworth	-0.13	79.13	60.57	18.56	-0.47
Trowbridge	-0.74	-4.21	-4.21	0.00	-0.12
Warminster	1.36	-3.75	-6.76	3.01	-0.06
Westbury	-1.23	9.83	9.83	0.00	-0.02
Westbury	-0.58	6.83	6.83	0.00	-0.15

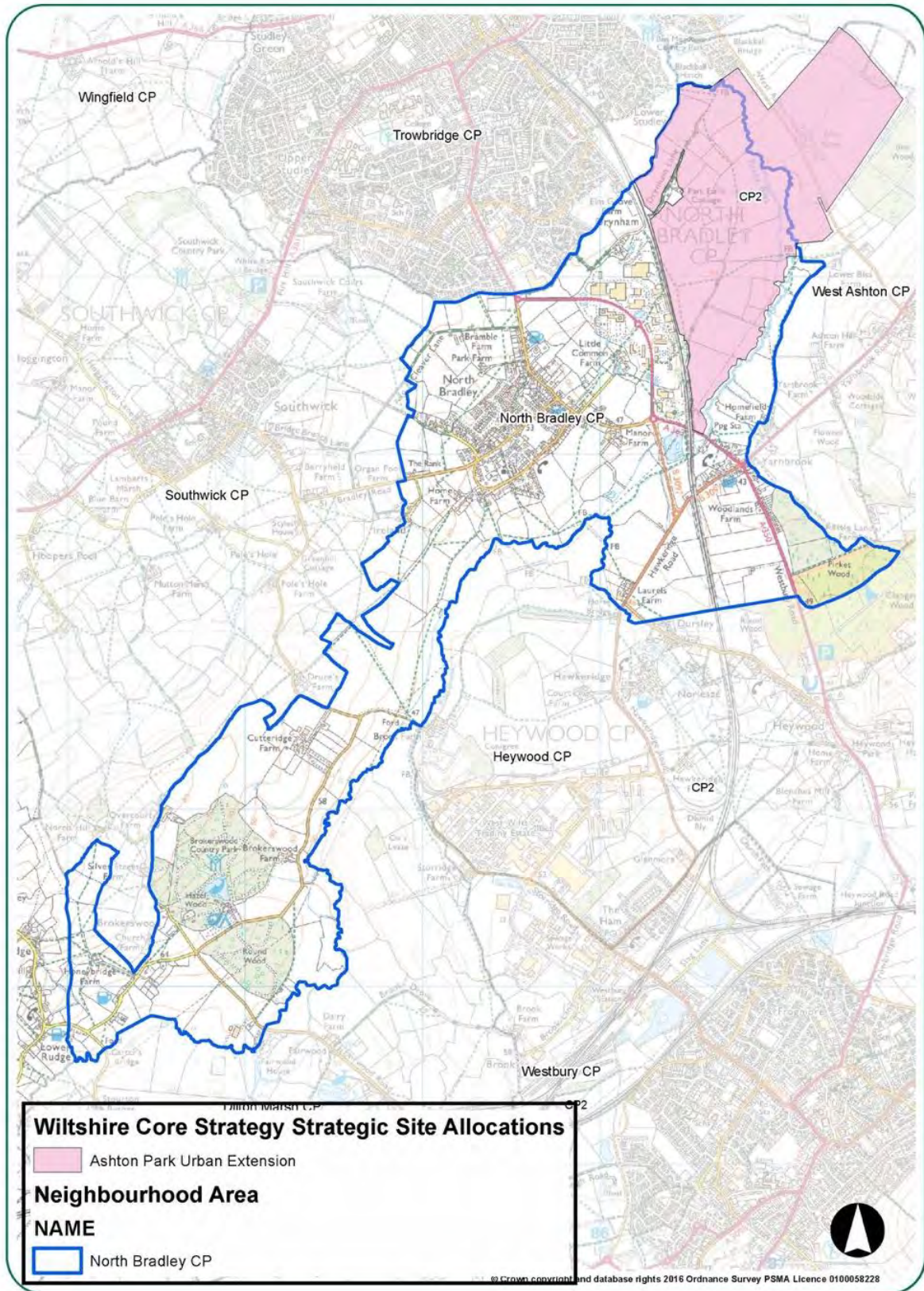
Source: Wiltshire Open Space Study 2015



# Appendix 7 North Bradley and Ashton Park



## North Bradley Parish & The Ashton Park Urban Extension



Appendix 8 Consultation Response to the Housing Site Allocations Plan (HSAP)

**North Bradley Parish Council**

**Formal Consultation Response**

**To**

**Wiltshire Housing Site Allocations Plan**

**September 2017**

**1**



## Contents

<b>1.0 Introduction</b>	<b>1</b>
<b>2.0 Boundary Changes</b>	<b>2</b>
<b>3.0 HSAP and NDP Sites</b>	<b>3</b>
<b>4.0 Conclusion</b>	<b>13</b>

### Appendices

<b>Appendix 1 E-mails to and from Wiltshire Council</b>
<b>Appendix 2 Landscape Setting Report</b>
<b>Appendix 3 Draft NDP Landscape Setting Policy</b>

## Glossary of Terms

<b>Acronym or Term</b>	<b>Definition</b>
<b>DCLG</b>	Department for Communities and Local Government
<b>HNS</b>	(Rural) Housing Needs Survey
<b>HRA</b>	Habitat Regulations Assessment
<b>HSAP</b>	Housing Site Allocations Plan (Formally known as the Sites DPD)
<b>LPA</b>	Local Planning Authority (Wiltshire Council)
<b>NB</b>	North Bradley
<b>NDP</b>	Neighbourhood Development Plan
<b>NPPF</b>	National Planning Policy Framework - 'The Framework' sets out planning policies for England
<b>PPG</b>	Planning Policy Guidance
<b>Qualifying Body</b>	Body authorized by law to create a Neighbourhood Plan. Normally the Parish Council.
<b>SA</b>	Sustainability Appraisal – Appraisal of the impacts of a plan to include socio-economic and environmental factors.
<b>WCS</b>	Wiltshire Core Strategy

## 1.0 Introduction

- 1.0 This is the formal response of North Bradley Parish Council to the 10-week consultation on the above draft plan. The Parish Council OBJECTS to the Housing Site Allocations Plan (HSAP) and in particular two of the three sites suggested for allocation within the Parish.
- 1.1 While the Parish Council routinely comments on such consultations, the community are currently engaged in producing a Neighbourhood Plan (NDP), and this gives an additional significance to the following comments, since good planning practice and Government guidance demands that good co-ordination is maintained between emerging strands of policy and that, wherever possible, conflicts should be reconciled and aims harmonised. Paragraph 157 of the NPPF says: *Crucially, Local Plans should ... be based on co-operation with neighbouring authorities, public, voluntary and private sector organisations.* It does not seem to the Parish Council as if the standards set in the NPPF or in Planning Practice Guidance have been met in the preparation of the HSAP.
- 1.2 The HSAP includes not only sites, but also proposes changes to settlement boundaries. Such boundary changes have consequences for the application of policy, for example in determining where a presumption in favour of certain development should occur. The following response deals with the settlement boundary issue first before moving on to consider the sites.

## 2.0 Boundary Changes

- 2.0 The boundary reviews generally consist of 'good housekeeping' in terms of updating boundaries to take in areas of development that are logically part of the village and parish of North Bradley.
- 2.1 It is noted that the boundary of the White Horse Business Park (WHBP) has been moved westwards (as indicated in red on the map below). The Parish Council would normally have objected to this as an encroachment into the Parish. However, the area is not indicated as being suitable for saving as part of the proposed landscape setting policy as identified in the Landscape Setting report that supports the HSAP (see Appendix 2). The Parish Council is aware of the need to argue from sound evidence, and also values the local employment that could be provided by an expansion of the WHBP, and therefore does not object to this expansion, subject the larger area identified in the emerging NDP being protected. It does suggest however that landscaping be provided as indicated in the Landscape Setting Report main map (see Appendix 2 and section 3 below).





### 3.0 DPD and NDP Sites

- 3.0 It is regrettable that, despite the LPA's Link Officer being asked to provide maps indicating the landscape policy of the NDP on 19<sup>th</sup> April, (see Appendix 1 for e-mail) that the implications of the landscape setting policy for site selection for the HSAP were not communicated to the Spatial Planning HSAP team. Additionally it is a pity that the Steering Group were not in any case directly consulted about site selection in their area at the site selection stage, before the HSAP went out to consultation on 10<sup>th</sup> July. Had this happened, the HSAP team would have known that the area in which they have allocated sites, is likely to be subject to a landscape policy, reflecting the wishes of the community, that retains open space between Trowbridge and North Bradley.
- 3.1 The Parish Council is also concerned about the validity of the planning argument in the HSAP – with some of the assertions appearing to be based on rather thin evidence.
- 3.2 Overall, there is, unfortunately, a fundamental conflict between the emerging HSAP and NDP. However, as these are both at an early stage, it may yet be possible to harmonise them. Nevertheless, as things stand, the Parish Council finds itself in the position of having to OBJECT to the emerging Housing Site Allocations Plan on the following Grounds:
- 3.3 **Failure in Duty to Cooperate**  
The HSAP has fallen short of the standards required by the 2011 Localism Act, which amended the 2004 Planning and Compensation Act, and subsequent Planning Practice Guidance and is therefore flawed and likely to be UNSOUND.
- "The local planning authority should work with the qualifying body to produce complementary neighbourhood and Local Plans. It is important to minimise any conflicts between policies in the neighbourhood plan and those in the emerging Local Plan, including housing supply policies. This is because section 38(5) of the Planning and Compulsory Purchase Act 2004 requires that the conflict must be resolved by the decision maker favouring the policy which is contained in the last document to become part of the development plan. Neighbourhood plans should consider providing indicative delivery timetables, and allocating reserve sites to ensure that emerging evidence of housing need is addressed. This can help minimise potential conflicts and ensure that policies in the neighbourhood plan are not overridden by a new Local Plan". Paragraph: Planning Practice Guidance, Neighbourhood Plans, 009 Reference ID: 41-009-20160211.*



3.4 The NPPF (Para. 155) says:

*Early and meaningful engagement and collaboration with neighbourhoods, local organisations and businesses is essential. A wide section of the community should be proactively engaged, so that Local Plans, as far as possible, reflect a collective vision and a set of agreed priorities for the sustainable development of the area, including those contained in any neighbourhood plans that have been made.*

3.5 The North Bradley NDP has in fact been developing since November 2016. Early community engagement took place in February and March 2017. After conducting a considerable amount of research, Regulation 14 consultation for the NDP is now imminent and the NDP will shortly be submitted for SEA and HRA Screening. Community engagement revealed a strong desire to preserve the identity and setting of North Bradley village and to prevent it from losing its identity as a suburb of the principal settlement. The main evidence base for the plan is contained within a Scoping Report, which together with a professional Landscape Report (the latter given here in full as Appendix 2) indicate multiple reasons for retaining a landscape setting gap between Trowbridge and North Bradley on the grounds of setting, preventing coalescence that would lead to loss of local distinctiveness, and harm to biodiversity. Indeed the NDP is encouraged to create such a policy by virtue of paragraph 5.150 of the Wiltshire Core Strategy:

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

Given the existence of paragraph 5.150 and the emergence of the HSAP, it is surprising that Wiltshire Council did not realise the additional importance of ensuring co-operation with local NDP teams of the villages around Trowbridge. However, this may reflect a wider problem; the fact that Wiltshire Council does not seem to take neighbourhood planning as seriously as the regulations require.

3.6 It is accepted that some consultation with Parish Councils did take place, but Neighbourhood Plan Steering Groups are semiautonomous bodies, often made up of community members not members of the Parish Council. Simply consulting a Parish Council is no guarantee that this will result in effective consultation of any neighbourhood plan group. No effort was made to directly reach out to any NDP group in order to ascertain whether conflict was likely to arise between sites emerging there and those that could be considered for the HSAP.

3.7 The Wiltshire approach seems to fall short of what Planning Practice Guidance requires. PPG says:

*‘The duty requires active and sustained engagement. Local planning authorities and other public bodies must work together constructively from the outset of plan preparation to maximise the effectiveness of strategic planning policies. It is unlikely that this could be satisfied by consultation alone. Local planning authorities that cannot demonstrate that they have complied with the duty will fail the independent examination process’. Paragraph: 009 Reference ID: 9-009-20140306*

3.8 It goes on:

*‘Cooperation should take place throughout Local Plan preparation – it is important not to confine cooperation to any one point in the process.*

*Local planning authorities and other public bodies need to work together from the outset at the plan scoping and evidence gathering stages before options for the planning strategy are identified. That will help to identify and assess the implications of any strategic cross boundary issues on which they need to work together and maximise the effectiveness of Local Plans. After that they will need to continue working together to develop effective planning policies and delivery strategies. Cooperation should continue until plans are submitted for examination and beyond, into delivery and review.*

*Local planning authorities should bear in mind that failure to demonstrate compliance with the duty at the Local Plan examination cannot be corrected after the Local Plan has been submitted for examination. The most likely outcome of a failure to demonstrate compliance will be that the local planning authority will withdraw the Local Plan’. Paragraph: 012 Reference ID: 9-012-20140306*

3.9 We have to ask, why was a simple audit not undertaken of emerging NDP sites? This could have taken the form of a questionnaire to all groups. Alternatively a working group could have been formed in all areas where areas were proposed including representatives of both NDP groups and the LPA. This would have indicated sites and possible conflicts at an early stage. Unfortunately the answer to this question seems to suggest that the Wiltshire Council’s attitude to neighbourhood planning as a whole may be the cause.



### 3.10 **Incorrect approach to neighbourhood planning in site selection**

Verbal communication with the LPA seems to indicate that they believe a neighbourhood plan is 'not relevant' until it reaches the Regulation 16 stage. This is incorrect. It is disturbing that the LPA seems to believe that a neighbourhood plan about to embark on Regulation 14 Consultation is not worthy of consideration in site selection. If this really is the attitude of Wiltshire Council then it seems to conflict with that of the Government. Annex 1. Paragraph 216 of the NPPF says:

*From the day of publication, decision-takers may also give weight to relevant policies in emerging plans according to:*

- *the stage of preparation of the emerging plan (the more advanced the preparation, the greater the weight that may be given);*
- *the extent to which there are unresolved objections to relevant policies (the less significant the unresolved objections, the greater the weight that may be given); and*
- *the degree of consistency of the relevant policies in the emerging plan to the policies in this Framework (the closer the policies in the emerging plan to the policies in the Framework, the greater the weight that may be given).*

### 3.11 **Planning Practice Guidance Neighbourhood Planning para 07 adds:**

*'An emerging neighbourhood plan may be a material consideration. .... Factors to consider include the stage of preparation of the plan and the extent to which there are unresolved objections to relevant policies ... Decision makers should respect evidence of local support prior to referendum when seeking to apply weight to an emerging neighbourhood plan. .... It is for the decision maker in each case to determine what a material consideration is and what weight to give it.'*

3.12 Wiltshire Council might say that they have complied with the above wording, in determining that the North Bradley NDP is not worthy of consideration at the site selection stage of the HSAP. However, the decision made is clearly wrong when one considers its effects. In the case of the North Bradley Neighbourhood Plan, these include a fundamental conflict between the emerging policies of both NDP and HSAP. This cannot be good planning and it suggests that the way the HSAP was developed was faulty.

3.13 The advice given in PPG is clear:

Whilst a referendum ensures that the community has the final say on whether the neighbourhood plan comes into force, as part of the development plan, decision makers should respect evidence of local support prior to the referendum when seeking to apply weight to an emerging neighbourhood plan' PPG Paragraph: 007 Reference ID: 41-007-20170728

- 3.14 In order to avoid conflicts such as the one that has arisen, and given the stakes in this case, it seems evident that any emerging neighbourhood plan likely to conflict with the sites selected by the HSAP should be taken account as soon as possible, and weight duly attached according to its stage of progress. As it is, there was no direct consultation between the HSAP and neighbourhood plan groups and the entire matter of neighbourhood planning took up just 3 paragraphs in the HSAP.
- 3.15 Topic Paper 2, paragraph 6.6 states that in Step 3 of the site selection procedure, note was taken ‘...of how work on *Neighbourhood Plans* has progressed since first considered at stage 2 and the extent to which they may contain housing proposals of their own.’ However, this DID NOT occur at North Bradley where no contact was made by the LPA to the NDP team.
- 3.16 **HSAP is based on questionable argument for housing growth**  
The Wiltshire Core Strategy indicates that additional housing is required for growth in Trowbridge. Core Policy 29 sets out that an additional 960 dwellings should be developed *at the town ...*<sup>3</sup> and the HSAP itself is foreshadowed; ‘*Further land for housing development at Trowbridge will be identified in the Housing Site Allocations DPD ...*’. However at no point is the fact that these houses might have to be accommodated within North Bradley parish mentioned – an example of poor drafting that effectively denied the community awareness that this might happen.
- 3.17 However, there is a more serious objection to the HSAP’s interpretation of the above policy. The HSAP states (4.52)  
‘...housing development at Trowbridge will fall short of the WCS indicative level of 6,810 dwellings by around 1,220’.
- But, this assessment is based on the un-verifiable assumption that the Ashton Park will be much slower in delivery than anticipated and that sites for additional homes therefore need to be identified to avoid a shortfall in housing land supply later in the plan period. In fact the HSAP acknowledges that of the projected shortfall of 1220, fully 1000 come from the assumption that 1000 homes now will not be delivered within the WCS plan period (up to 2026) as thought.
- 3.18 However, this assumption about Ashton Park relies simply on the word of the developers who supplied this estimate to the LPA. This cannot be considered to be reliable. The developers may have a vested interest in encouraging the belief that delivery will be slow (so as to get other land allocated in the HSAP). They are certainly not equipped with a crystal ball and cannot therefore accurately predict delivery ahead.

- 3.19 This is particularly relevant at the present time, which is one of great economic uncertainty, as the UK struggles with negotiations on Brexit. The share prices of housebuilders have been hard hit by Brexit (making it more difficult for them to raise finance for new housing projects) and many have announced that they are putting new projects on hold. Yet recent announcements by opposition parties in the UK suggest that Brexit, least of all a Hard Brexit, may not even happen. The truth is no one knows how Brexit will pan out, yet the HSAP would have us believe that housing developers can accurately predict delivery for up to 9 years ahead! This seems very unlikely, if not impossible. We then have to consider what would happen should the developers simply change their minds if circumstances change. This is not at all unlikely; should the Brexit logjam be suddenly released (for example if an agreement was reached to stay in the EU or at least the customs union) then the circumstances and attractiveness of development at Ashton Park could change dramatically and almost overnight. This would pump 1000 homes into the housing supply far earlier than the HSAP predicts.
- 3.20 Given the questionable basis on which the site allocation proposals are based – namely the actual need for the scale of development proposed – it has to be questioned whether the number and size of sites allocated is actually needed to meet the needs of Trowbridge.
- 3.21 **Failure to fully consider impact of sites proposed on setting of North Bradley**  
As shown in the Landscape Setting Report commissioned for the NDP, a *meaningful* gap between Trowbridge and North Bradley needs to be maintained in order to preserve the rural character and setting of the village. If this is not done, then it will lead to the inevitable coalescence of Trowbridge and North Bradley, creating an urban sprawl and destroying the village character for which this part of Wiltshire is famous and which the community loves.



3.22 While development must take place to provide necessary housing, this should not be at the expense of destroying character and sense of place. If repeated across Wiltshire this would lead to an anonymous sprawl with everywhere becoming simply 'somewhere on the way to somewhere else'. It is the individual character of settlements that residents value and which underpin the county's tourism and leisure industries. Development which destroys this is not sustainable since it involves handing on to our descendants something worse than what we ourselves inherited.

3.23 The Landscape Setting Report is given in full as Appendix 2.

**LANDSCAPE & VISUAL SETTING ANALYSIS**  
**PROPOSED LANDSCAPE GAP NORTH BRADLEY, TROWBRIDGE**



3.24 Nowhere in the supporting documentation (e.g. Topic Papers 2 and 4) of the HSAP is it clear that the impact of the proposed sites on North Bradley's setting was properly considered. Indeed the entire process seems to have been a 'top-down' strategic level exercise without the benefit of local knowledge that better integration with the neighbourhood plan process might have achieved.

3.25 **Faulty SA**

Part of the sites selection procedure is based on an SA (Sustainability Appraisal). The Sustainability Objectives for this were:

Table 5.1 Sustainability objectives

<b>Sustainability objectives</b>	
1.	Protect and enhance all biodiversity and geological features and avoid irreversible losses
2.	Ensure efficient and effective use of land and the use of suitably located previously developed land and buildings
3.	Use and manage water resources in a sustainable manner
4.	Improve air quality throughout Wiltshire and minimise all sources of environmental pollution
5.	Minimise impacts on climate change <ol style="list-style-type: none"> <li>a. through reducing greenhouse gas emission</li> <li>b. through reducing our vulnerability to future climate change effects.</li> </ol>
6.	Protect, maintain and enhance the historic environment
7.	Conserve and enhance the character and quality of Wiltshire's rural and urban landscapes, maintaining and strengthening local distinctiveness and sense of place
8.	Provide everyone with the opportunity to live in good quality, affordable housing, and ensure an appropriate mix of dwelling sizes, types and tenures
9.	Reduce poverty and deprivation and promote more inclusive and self-contained communities
10.	Reduce the need to travel and promote more sustainable transport choices.
11.	Encourage a vibrant and diversified economy and provide for long-term sustainable economic growth
12.	Ensure adequate provision of high quality employment land and diverse employment opportunities to meet the needs of local businesses and a changing workforce

3.26 Objective 7 should have enabled the plan makers to determine that two of the sites they proposed were harmful to the setting of North Bradley. However, in Section 7.10.74 of the SA itself (regarding Land Off A363 at WHBP) we find no mention of the impact on the setting of North Bradley at all, except for a statement that:

*'The site is situated to the immediate east of North Bradley village and west of the White Horse Business Park. The land comprises a series of agricultural fields / informal open space and, as such, would not maximise the use of previously developed land'.*

The score given for this site against Sustainability Objective 7 records only minor adverse effects on landscape. This completely ignores the sensitivity of the area in landscape setting terms as established by WCS paragraph 5.150, to which it fails to refer, and is clearly wrong in terms of actual impact as is proven by the Landscape Setting Report commissioned for the NDP. A similar error is made for the Southwick Court site. That the SA could have made such fundamental mistakes in scoring brings its entire credibility into question.

### 3.27 Value and Reputation of Localism

At the present time, contrary to the spirit of Localism, Wiltshire Council appear to be pursuing their traditional 'top-down' view of planning. This one way street involves lower tier plans conforming rigidly with those in higher tiers. There is little or no room for ideas to flow back upwards, from the community.

3.28 There can be little doubt that, should the HSAP proceed on its current basis, then this would cut directly across emerging neighbourhood plans and would impose sites upon them. At the present time conflicts between the HSAP and neighbourhood plans are known to exist at:

Hilperton  
Market Lavington  
North Bradley  
Southwick

It is known that these groups are currently considering making a joint submission to the Inspector should the HSAP be submitted in its current form. There will no doubt be many more groups with similar arguments. The cumulative effect of this will be to significantly degrade public confidence in the neighbourhood planning process in Wiltshire. As neighbourhood plans have so far proved to be at least as good as LPA's in delivering sites nationally (as DCLG Studies 2015 and 2016 confirm) the ironic effect of this could be to actually slow housing delivery.

3.29 **Conflict with WCS Policy 51 Landscape**

The two sites not included in the NDP (Land off A363 at White Horse Business Park and Southwick Court) also conflict with Wiltshire Core Strategy policy 51 (Landscape). This states:

*'Development should protect, conserve and where possible enhance landscape character and must not have a harmful impact upon landscape character, while any negative impacts must be mitigated as far as possible through sensitive design and landscape measures. Proposals should be informed by and sympathetic to the distinctive character areas identified in the relevant Landscape Character Assessment(s) and any other relevant assessments and studies. In particular, proposals will need to demonstrate that the following aspects of landscape character have been conserved and where possible enhanced through sensitive design, landscape mitigation and enhancement measures.'*

The proposal of these sites also make the invitation contained within the following part of Paragraph 5. 150 of the WCS very hard to carry through:

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

3.30 **Impact on Biodiversity**

Community engagement revealed that local people care about local wildlife. The SA however concludes that the impact of the Site off A363 at White Horse Business Park would not have a significant effect on Bechstein's Bat. However this seems like an error. Bechstein's Bat is rare and any impact on them must be regarded as serious. The NDP group will be conducting more local research into this issue, including a possible general biodiversity survey.



### 3.31 Value and Reputation of Localism

Localism, especially its more active arm – neighbourhood planning – has the potential to deliver many new homes and in many cases seems to be outstripping traditional local plans as a delivery mechanism. For example a DCLG study in October 2015 (*Neighbourhood Planning: progress on housing delivery*) suggested that Neighbourhood Plans frequently allocated more housing than did their Local Plans. A follow up study in 2016, confirmed this and suggested that the average plan allocated 10% more than their LPA.

3.32 Neighbourhood Planning is therefore valuable, not only because it allows the community a democratic input into the planning process, but because it actually works – delivering more sustainable homes than traditional top-down methods. It should follow therefore that LPA's should be carefully cultivating this new arm of the planning process. However, in Wiltshire this does not seem the case, with little meaningful engagement leading to confusion and delay. Given the extent of the housing crisis this is most regrettable. **Why was an audit of all neighbourhood plan sites not taken during the site selection process?**

3.33 The problem with the current approach is that it is already leading to dissatisfaction with the neighbourhood planning process in Wiltshire and in North Bradley in particular. If this spreads then collectively it could act as a major deterrent to the entire concept in Wiltshire, leading to substantially less delivery of new housing.



## 4.0 Conclusion

- 4.0 There is no desire on the part of the NDP team to have any conflict between the emerging HSAP and the NDP. The Parish Council accepts the need to contribute towards housing need to Trowbridge. However, it does not agree with the quantum proposed nor the locations of all of the proposed sites. Dialogue is sought with the LPA to discuss revisions which will enable a suitable landscape setting area to be retained, while contributing towards local housing need. This is permitted by planning Practice Guidance, which says:
- A neighbourhood plan can propose allocating alternative sites to those in a Local Plan, but a qualifying body should discuss with the local planning authority why it considers the Local Plan allocations no longer appropriate. In rural areas, all settlements can play a role in delivering sustainable development.* Paragraph: 044 AD: 41-044-20160519
- 4.1 The proposed Landscape Setting Policy for the NDP, based on the evidence of the Landscape Setting Report is given as Appendix 1.
- 4.2 It should be possible to accommodate the growth actually needed for Trowbridge with the desirability of preserving the character and setting of North Bradley, and to this end the NDP accepts one of the sites proposed, that at Elm Grove Farm (200 new homes), but has to reject the others because they conflict with the professional advice obtained by way of landscape appraisal and also with the wishes of the community. It is requested that these sites are withdrawn in order to resolve the conflict between the HSAP and NDP.
- Elm Grove Farm:**  
This site could deliver 200 homes. It is well located, being surrounded by development on 3 sides and is located to the north of the 363 (In landscape terms, as indicated in the North Bradley Landscape Setting Report, this site could be accommodated without significant negative effects on the setting of North Bradley or to biodiversity in the area. It is therefore supported, subject to landscaping conditions in the NDP).
- Southwick Court** (180 houses) and **Land off the A363 at White Horse Business Park** (150 houses) conflict directly with the biodiversity and landscape setting aims of the North Bradley NDP (for Policy 1 of the NDP – see Appendix 3 to this response). This is clearly demonstrated in the Landscape Setting Report given as Appendix 2.
- 4.3 While supporting the Elm Grove Farm site, the Parish Council therefore Objects to the two sites above.

4.4 **In summary** the Parish Council believes that the Housing Site Allocations HSAP, is, in its current form is clearly UNSOUND for the following reasons:

**The process of developing the HSAP demonstrates a failure in the Duty to Cooperate**

This not only a failure to comply adequately with the Localism Act 2011, but also conflicts with one of the Core Planning Principles of the NPPF, namely that; ‘development should be genuinely plan-led, empowering local people to shape their surroundings, with succinct local and neighbourhood plans setting out a positive vision for the future of the area’. NPPF paragraph 17.

**The HSAP demonstrates an incorrect approach to neighbourhood planning as a whole**

It is clear that Wiltshire Council does not properly engage with neighbourhood planning, seeing it as an additional, almost optional element that has to fit in with the traditional top-down model. There is no recognition that the process should be a dynamic one with real two-way conversation and close linkages. In particular the LPA seems to believe that neighbourhood plans can be safely ignored until they have been submitted for examination. This is incorrect, bad planning and conflicts with Government guidance. This attitude has directly led to the present conflict that exists between the NDP and HSAP.

**The HSAP is based on faulty argument for housing growth**

That housing is needed to support growth at Trowbridge is not disputed. However the quantum now being proposed is far higher than mentioned in the WCS and this seems to relate to the acceptance of an estimate submitted by an interested party. The assumption that Ashton Park will not be delivered in its entirety during the plan period is a fundamental flaw in the calculations used to determine the level of housing which should be allocated. This is particularly unsound given the economic uncertainty in the UK today.

**The HSAP clearly fails to fully consider the impact of the sites proposed on the setting of North Bradley**

The Wiltshire Core Strategy specifically invites neighbourhood plan groups around Trowbridge to consider the future of the landscape gap between them and Trowbridge stating in paragraph 5.150:

*‘Open countryside should be maintained to protect the character and identity of these villages as separate communities. The local communities may wish to consider this matter in more detail in any future community-led neighbourhood planning.’*

Having set the North Bradley NDP on this course, Wiltshire Council then allocate three large sites in the very area in question without any direct consultation with the NDP group.

**The SA on which site selection is based is faulty.**

Site selection in the SAP relies heavily on the SA. However this is faulty and fails to consider the landscape impact properly, nor the special circumstances and sensitivity established by paragraph 5.150 of the WCS. In the light of the Landscape Setting Report, the scoring is clearly wrong with the impact on the landscape setting of the village being largely ignored and the impact on landscape being greatly underestimated and scored too low.

**The Sites at Southwick Court and Land Off A363 at White Horse Business Park conflict with WCS Core Policy 51**

Core Policy 51 requires no harm to be done to landscape quality, yet as the Landscape Setting Report for the NDP clearly demonstrates harm would be caused by these two site were they to be permitted.

**Biodiversity**

The fields around North Bradley provide a home for many creatures well known to local residents including bats, mice, birds, rabbits badgers, deer and foxes. The impact on biodiversity seems to have been underestimated and the NDP will be gathering more evidence on this issue.

**Value and Reputation of Localism**

The HSAP as currently drafted is likely to seriously harm the credibility of neighbourhood planning in Wiltshire simply because it appears that neighbourhood plans have been paid scant regard in its creation. This will no doubt act as a deterrent to others currently considering making a plan. How real is Localism when it can be so easily ignored and over-ridden by traditional top-down planning? The lack of a specific site audit direct from the neighbourhood planning groups is a serious omission in the HSAP, and the failure of Wiltshire Council to ‘connect the dots’, linking maps supplied by themselves for a landscape protection area at North Bradley with their HSAP is a serious error.

**4.5**

**Finally:**

The Parish Council SUPPORTS the site at Elm Grove Farm, in order to deliver necessary housing for Trowbridge, but requests that the sites off the A363 at White Horse Business Park, and that at Southwick Court be removed in order to protect the landscape setting of North Bradley, local biodiversity and the reputation of neighbourhood planning in Wiltshire. Their selection is considered to be unsound for the reasons given.

**North Bradley Parish Council and North Bradley Neighbourhood Plan Steering Group. August 2017.**

## Appendix 1:

**From:** Parish Council [mailto:[parishcouncil@northbradley.org.uk](mailto:parishcouncil@northbradley.org.uk)]  
**Sent:** 19 April 2017 17:46  
**To:** West, Sasha; Spatial Planning Policy  
**Cc:** Burvill, Victoria  
**Subject:** More maps please?

Dear Sasha

I hope you had a good Easter. Could you possibly create two more for us?  
Could you use the attached scan, Recreation Areas 6 to create a map in the same format as others that you've done for us?  
Also, scan X, could we request as a proper map: North Bradley and Landscape Map.

Many thanks and kind regards **Karin Elder**

Clerk to North Bradley Parish Council  
T: 01373 823907  
e: [parishcouncil@northbradley.org.uk](mailto:parishcouncil@northbradley.org.uk) [www.northbradley.org.uk](http://www.northbradley.org.uk) Address: 50 Newtown, Westbury, Wiltshire, BA13 3EF

On 20 April 2017 at 16:42, Burvill, Victoria <[Victoria.Burvill@wiltshire.gov.uk](mailto:Victoria.Burvill@wiltshire.gov.uk)> wrote:  
Dear Karin,

I hope you are well.

I just wanted to let you know that we have received this request for maps. It might be a little while before we can do these, but I will find out when we might be able to do these for you and let you know.

Also, I copied you in on another e-mail to Carol at West Ashton. I'm not sure if I have already talked to you about this or if Dave Cox has, but we think it might be useful if you came in to a meeting with the West Ashton steering group. We would like to go through the neighbourhood planning process and see where you are with it and see where we can support you along the way.

We are looking at dates in the first and third weeks of May at the moment. You are welcome to come along with some other members of the neighbourhood planning steering group. Please could you find out if people think this would be useful and get back to us.

Kind regards  
Vicky



### Appendix 3: Draft Policy 1 North Bradley Landscape Setting and Housing Site at Elm Grove Farm

Context	References
North Bradley Plan Objectives	1
Wiltshire Core Strategy	CP 1, 2, CP 29 (see especially paragraph 5.150), CP 50, 51.
NPPF	73,74,75,109,184,185

7.8 Paragraph 5.150 of the Wiltshire Core Strategy states:

*'It is recognised that the villages surrounding Trowbridge, particularly Hilperton, Southwick North Bradley and character and identity of these villages as separate communities. The local communities may wish to consider this matter in more detail in any future community-led neighbourhood planning.'*

7.9 The Wiltshire Open Space Study (2015) advocates the preservation of existing Open Space. Strategic Option 1 states:

*'...It is therefore recommended that priority is placed on protecting those open spaces where there is an existing shortfall of supply as highlighted in the area profiles.'*

Regarding the role of neighbourhood plans, the Study notes:

*'One of the emerging priorities from localism is for there to be much more local decision making with regards to planning, and for local communities to develop neighbourhood plans. Although it is up to local communities to define their own priorities within neighbourhood plans, the information provided within the area profiles in this study will form a good basis to inform any decisions related to the provision of open space.'*

The area profile for Trowbridge Rural Areas Table (Table 17) shows that there is a shortfall of open space in the area - See Appendix 7.

7.10 The emerging Wiltshire Housing Site Allocations DPD proposes three sites that are in or partly in the Parish of North Bradley. These are as follows:

- Elm Grove Farm
- Land Off 363 at White Horse Business Park, and,
- Southwick Court

Maps and basic descriptions of these proposed sites are given below:

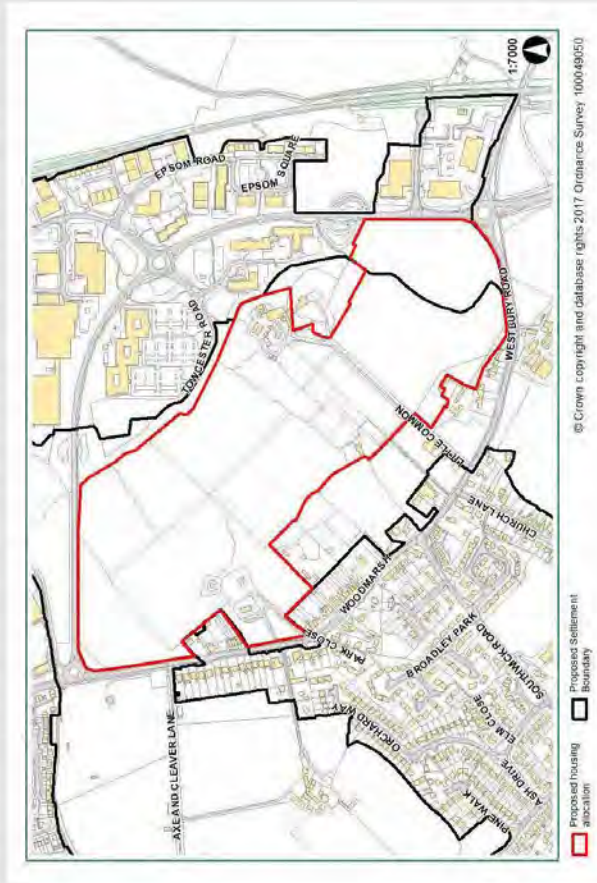
7.11 **Elm Grove Farm**

The site is approximately 14.33 ha, and is anticipated to accommodate 200 homes, a new primary school and community facilities.



7.12 Land off the A 363 at White Horse Business park

The site comprises 25.26ha of land and the anticipated number of new homes is approximately 150.





7.13 Southwick Court

This site is located mainly in Southwick Parish, but has a small component in North Bradley Parish. The site is approximately 18.17ha in size and it is suggested that 180 homes could be accommodated there.



7.14 While the need to accommodate some additional housing is accepted, this would not be sustainable if it destroyed the landscape setting of North Bradley. The Landscape Setting report given as Appendix 8 shows how evidence clearly differentiates between the impacts of these schemes. The conclusions of this report are accepted and taken forward by this NDP and form the evidential core backing this policy.



- 7.15 The site at Elm Grove Farm is on the north side of the A363 next to the built form of Trowbridge. In many ways, this is an ideally located site, which seems likely to deliver sustainable development for reasons given in the DPD and its evidence base. It is therefore duly supported by this NDP as an acceptable location for housing or mixed-use development. Because the site is already being taken forward in the Wiltshire Housing Site Allocations DPD it is not considered to be necessary to formally allocate it in this plan.
- 7.16 On the other hand, both the Land Off the A363 site and the one at Southwick Court involve considerable harm to the landscape setting of North Bradley - most particularly the former. Of the former site, there also seems to be likelihood of harm to local Bechstein's Bat (a rare and protected species) as evidenced by the DPD itself. These sites are therefore opposed by the DPD as they would conflict with the Landscape Setting Policy (Policy 1). The Parish Council has made a formal consultation response to this effect during the consultation on the HSAP.

7.17

**Policy 1: Landscape Setting and Housing Site at Elm Grove Farm**

The landscape setting of North Bradley village (being the open spaces between the village and Trowbridge on the one hand and the village and White Horse Business Park on the other, as shown edged green on the map below) will be preserved and if possible enhanced for both biodiversity and recreation as appropriate.

No significant development (for example medium or large scale housing schemes) will be permitted in the 'North Bradley Gap' shown on the policy map except in accordance with Wiltshire Core Strategy Policy and as envisaged in the Landscape Setting Report provided as Appendix 8 of this plan.

Where development is permitted in compliance with this policy, it must satisfy the following additional criteria;

- The openness and landscape value of the Gap must not be compromised nor the rural setting of North Bradley harmed
- Existing facilities for informal recreation must be preserved and enhanced
- The scheme should enhance local biodiversity and habitat in particular for Bechstein's bat.

- 7.18 Main Evidence Base**  
Wiltshire Council Core Strategy 2015 Policy 29 (especially paragraph 5.150)  
West Wiltshire Landscape Character Assessment 2007  
Wiltshire Open Space Study (2015)  
Wiltshire Housing Sites DPD Consultation Draft ad evidence base, including HRA  
Consultation Responses from Community Engagement  
Landscape Setting report given as Appendix 8 to this plan.
- 7.19 Justification**  
The chief aim of the policy is to take forward Wiltshire Core Strategy Policy in preserving the separate identity and landscape setting of North Bradley. However, the plan does not seek to impose a blanket restriction all around the village since this seems unreasonable. It is not the aim of the plan to stop all development around the village, but to preserve the openness of the rural setting between North Bradley and Trowbridge. More detailed justification is found in the Landscape Setting report given as Appendix 8.
- 7.20** The policy has secondary aims, reflecting the other important reasons why the spaces are so valued; as a resource for local biodiversity and recreation and sport (e.g. Trowbridge football ground which forms part of the 'Gap' to the north west). It is the aim of the policy to enhance these secondary elements of the Gap's importance for the benefit of the environment and community and in the interests of achieving sustainable development over the Parish as a whole.

## Appendix 9 Windfall development

Application	Site Address	Proposal	Houses Delivered
W06.3155	Adj 19 Church Lane	1 new dwelling	1
W08.3513	Adj 34A Church Lane	1 new dwelling	1
W08.3649	3 Drynham Lane	replacement dwelling	0
W08.2831	Grasshoppers, 12 Westbury Road	Conversion to Dwelling	1
W09.3666	Land adj 7 Southwick Road	New 4 x 2 Bed dwgs	4
W10.3315	54 Woodmarsh	replacement dwelling	0
W11.3132	Lakeside Cottage, Wood Road, Brokerswood	Conversion of building to dwelling	1
W13.1644	Hazlehurst Southwick Road	annex into separate dwelling	1
W13.6137	Rear of 2 Hawkeridge Road Westbury	Change of use shop and office to dwelling.	1
W14.3305	The Mash Tun, Woodmarsh	Change of use from Public House to private residential dwelling	1
W14.8661	Brokerswood House, Wood Road, Brokerswood	Conversion of dwelling to 2 flats. Ext of time limit of W12.0120.	1
W14.8934	9a The Rank	Demolish existing pre-fab dwelling and garage. Erection of new two storey dwelling	0
W15.10329	The Kicking Donkey Brokerswood	Public House to residential dwelling	1
W16.2052	3A Ireland North Bradley Wiltshire	conversion of pool building to a self-contained dwelling	1
W16.9269	Drynham Lane Farm, Drynham Lane	Erection of two dwellings	2
<b>10 Year TOTAL</b>			<b>16</b>

Windfall data from Wiltshire Council

## Appendix 10 The Neighbourhood Planning Team

In addition to assistance from PlanningStreet, a professional planning consultancy, the scoping researchers from the community were:

Wiltshire Councillor Horace Prickett

Mr. Roger Evans

Mrs. Lee Lee

Mrs. Gina Lunt

Mr. Mike Kettleby

Mr. David Feather

Ken McColl

Mrs. Karin Elder

The Consultant

David King Ba (hons.), Dip. TP, MRTPI

