

**Wiltshire Site Housing Site Allocations Plan
EIP**

**Matter 2: Consistency with the Wiltshire Core
Strategy**

Statement on Behalf of Castlewood Property
Ventures Ltd (Respondent no 1130975)

March 2019

1. Introduction

- 1.1 This Statement is submitted on behalf of Castlewood Property Ventures Ltd. This particular Statement addresses Matter 2 'Consistency with the Wiltshire Core Strategy (WCS)' as set out in the 'Inspector's Initial Matters, Issues and Questions to the Council', dated 8 February 2019.
- 1.2 We have prepared this Statement in respect of our client's land interest at Land off the A363 at White Horse Business Park Trowbridge, which is proposed allocation H2.2 in the Wiltshire Housing Site Allocations Plan (WHSAP) [doc ref. WHSAP/01/01].
- 1.3 By way of introduction, the Proposed Allocation site H2.2 comprises 18.96ha and extends from Bradley Road at the north to Westbury Road at the south (hereafter referred to 'The Proposed Allocation'). There are several land interests relating to Proposed Allocation H2.2. Castlewood's interests relate to a 8.37ha parcel at the northern end of the allocation site, closest to the Trowbridge settlement. This northern parcel of land (hereafter referred to 'The Site') is identified below. The Site fronts onto the A363 to the north where the proposed access to the residential development is to be secured.



- 1.4 This Statement should also be read in combination with those from parties who also have an interest in the H2.2 site, on land to the south of Castlewood's parcel.
- 1.5 Castlewood are committed to engaging with the development plan process and have submitted representations to the WHSAP consultations, including:

- Pre-Submission consultation (September 2017)
 - Focused consultation on the Schedule of Proposed Changes (October 2018)
- 1.6 These representations included a suite of technical documents which demonstrate that there are no significant constraints to delivery of residential development in the site. The documents also demonstrated the capability of the Proposed Allocation to deliver at least 300 dwellings, of which around 140 dwellings can be provided on the Site.
- 1.7 The following technical documents accompanied these representations:
- Baseline Landscape and Visual Appraisal (referred to hereafter as LVA);
 - LVIA Constraints and Opportunities Plan
 - Flood Risk and Surface Water Drainage Technical Note;
 - Highways and Transport Technical Note;
 - Heritage Technical Note;
 - Ecology Technical Note;
 - Heritage Technical Note;
 - Vision Document;
 - Indicative Masterplan;
- 1.8 We do not seek to extensively repeat the analysis set out previously, but will draw out the relevant sections of our previous representations in relation to the ‘Inspector’s Initial Matters, Issues and Questions to the Council’, where appropriate.
- 1.9 Castlewood welcomes the opportunity to participate in the Matter 2 hearing sessions, on the dates as set out in the Inspectors Programme.

2. Comments on Inspector's Initial Matters, Issues and Questions to the Council

Matter 2. Consistency with the Wiltshire Core Strategy (WCS)

2.1 Matter 2 is divided into a number of questions, and we respond accordingly below.

3.1 Is the overall distribution of housing allocations consistent with the spatial strategy set out in the WCS?

2.2 In summary, we consider that the overall distribution is consistent with the WCS spatial strategy. Relevant to this discussion we consider that proposed allocation H2.2 has been correctly planned as an extension to Trowbridge rather than North Bradley.

2.3 By way of background, Core Strategy Core Policy 2 defines the overall housing requirement for Wiltshire as *at least* 42,000 homes to be delivered in the plan period (2006-2026), with this figure being expressed as a minimum.

2.4 WCS Core Policy 1 sets out the settlement strategy for Wiltshire and defines Trowbridge as one of the Principle Settlements, which are the primary focus for development. Core Strategy Core Policy 29 states that approximately 6,810 dwellings are to be delivered at Trowbridge. A proportion of this has already been identified or provided for as set out in Table 5.17 of the Core Strategy, including the Ashton Park strategic site delivering 2,600 dwellings.

2.5 To supplement this, allocations are proposed through the WHSAP in Trowbridge for approximately 1,050 dwellings (or 1,400 dwellings accounting for the proposed delivery trajectory post 2026 Plan period). This, however, still leaves a shortfall of the Core Strategy requirement for Trowbridge of approximately 1,297 dwellings (doc. Ref EXAM/01/01). Focussed consultation on the Schedule of Proposed Changes, October 2018). Therefore whilst the overall distribution of housing allocations is broadly consistent with the spatial strategy, the WHSAP proposed allocations do not go far enough to meet the needs of Trowbridge.

2.6 In contrast, North Bradley is defined as a large village where development is limited to that needed to help meet the housing needs of the settlement. Accordingly WCS Core Policy 29 goes on to state that only approximately 165 dwellings will be provided in the rest of the community area (including North Bradley).

2.7 Therefore we consider that the overall distribution is broadly consistent with the WCS spatial strategy (albeit the WHSAP proposed allocations do not go far enough to meet the needs of Trowbridge) and that proposed allocation H2.2 has been correctly planned as an extension to Trowbridge rather than North Bradley.

3.4 Are the differences between overall provision identified in the WHSAP and the WCS justified? Should any shortfalls in provision within particular settlements be compensated for with development in other locations?

- 2.8 By way of background, Core Strategy Core Policy 2 defines the overall housing requirement for Wiltshire as *at least* 42,000 homes to be delivered in the plan period (2006-2026).
- 2.9 Core Strategy Core Policy 29 states that approximately 6,810 dwellings are to be delivered at Trowbridge. The WHSAP allocates sites to deliver the Core Strategy's housing requirement. As discussed above, six allocations are proposed for Trowbridge for approximately 1,050 dwellings (within the Plan period). However this still leaves a shortfall of the Core Strategy requirement for Trowbridge of approximately 1,297 dwellings.
- 2.10 As discussed in 3.1, there is a shortfall of the Core Strategy 6,810 dwelling requirement for Trowbridge by approximately 1,297 dwellings, after taking account of the allocations proposed for Trowbridge in the WHSAP.
- 2.11 By failing to allocating sufficient quantum of new housing in the WHSAP, the Council is currently failing to fully meet its identified housing needs. The Plan has not therefore been positively prepared.
- 2.12 To ensure a sound Plan, which is consistent with national planning policy, it is essential that either:
- a) additional sites are identified and allocated; or
 - b) greater quantum of housing is allocated on existing / proposed allocations.
- 2.13 We consider that shortfalls should not be compensated for in other locations where it can be met within the same settlements.
- 2.14 As has been demonstrated by submitted Representations, there are no technical constraints which preclude a greater quantum of development than currently proposed at H2.2. Indeed, the Council have previously identified the potential of this allocation to accommodate c 300 dwellings, and the proposed reduction to 175 has not been justified by an updated evidence base. The technical work undertaken, and submitted to the Council during the WHSAP process demonstrate that the Proposed Allocation is capable of accommodating at least 300 dwellings alongside the incorporation of necessary mitigation measures.
- 2.15 Additionally, we consider that the shortfall for Trowbridge cannot be met elsewhere within the settlement as Trowbridge lacks genuine, alternative options to extend the settlement due to constraints, including Green Belt designations and Flood Zone primarily to the north and west. Consideration should therefore be given to intensify allocations proposed by the WHSAP, where technical constraints do not preclude this. Proposed Allocation H2.2 is an entirely suitable and appropriate location in which to provide a greater quantum of development than currently identified in the WHSAP, of at least 300 dwellings

4.2 *Were reasonable alternatives considered and tested? Are the reasons for selecting the preferred sites and rejecting others clear?*

- 2.16 We agree that reasonable alternatives were considered and tested, and that the reasons for selecting the preferred sites and rejecting others were clear. However, the reasons for selecting capacities for the proposed allocations is not clear.
- 2.17 By way of background, the site was submitted to the SHLAA and was assessed under site reference 298. The site passed stage 4a with a stated capacity of 338 dwellings and was progressed as a 'preferred site', however the stated capacity was reduced to 150 dwellings in the WHSAP pre-submission draft consultation (September 2017) [doc ref PSCON/01/01].
- 2.18 Subsequent to this consultation, the Council proposed to increase the capacity of the site. This amendment to proposed allocation H2.2 referred to a capacity increase from approximately 150 to 300 dwellings in the Council's Cabinet Papers of 15th May 2018, pages 294, 365 [doc ref. DEM/02A and DEM/02B). This demonstrates that the Council consider that a capacity of approximately 300 dwellings is appropriate for the H2.2 allocation site. However as the Plan progressed the quantum subsequently dropped to 225 and again to 175, as the result of a resolution at Council Cabinet on 3 July 2018 [doc ref DEM/03A and DEM/03B]. It is understood this reduction in capacity to 175 units relates to elected Members concerns regarding alleged coalescence between Trowbridge and North Bradley, although key documents within the Councils evidence base have not been updated to justify this lower quantum.
- 2.19 Therefore whilst the reasons for selecting the preferred sites and rejecting others were clear, the reasons for selecting final capacities for the proposed allocations are not clear. The reduction in dwelling numbers for Proposed Allocation H2.2 does not represent positive preparation of the WHSAP. There is an identified housing need in the Trowbridge Community Area and the WHSAP as currently proposed does not meet the full requirement. Proposed Allocation H2.2 has been previously identified for a greater quantum of development, and now technical evidence has been provided to justify the reduction to 175. As such, in order to remedy the deficiency in housing allocations in Trowbridge and make the WHSAP sound, we request that the capacity of the Proposed Allocation H2.2 is reinstated as "at least 300 dwellings".