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# Wiltshire Housing Site Allocations Development Plan Document

Hearing Statement on Behalf of Barratt Homes  
Matter 3 – Housing Site Allocations

March 2019



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Development Plan Document**

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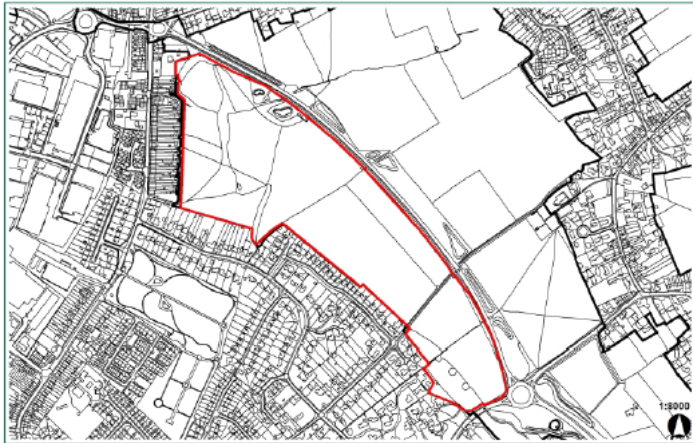
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## 1.0 INTRODUCTION

1.1 This Hearing Statement has been prepared on behalf of Barratt Homes in relation to the Wiltshire Housing Site Allocations Development Plan Document (WHSAP), and their land interests at Elizabeth Way for around 175 homes as a new strategic allocation to the north of Trowbridge.

1.2 The proposed allocation at Elizabeth Way has not been formally included as a policy and is instead identified within the Wiltshire Housing Site Allocations Plan (July 2018) for approximately 205 dwellings. This figure has since been amended within the Trowbridge Topic Paper (updated September 2018) to deliver approximately 355 dwellings, which was consulted upon through the Focussed Consultation in September 2018. It is assumed that the policy wording below will supersede that set out within the submitted Wiltshire Housing Site Allocations Plan (July 2018) and therefore at this stage the policy proposes the delivery of approximately 355 dwellings, our representations are made on this basis.

<b>Policy H2.3</b>	<b>Elizabeth Way</b>
<b>Site area:</b> Approx. 16.33 hectares	<b>Allocation:</b> Approximately 355 dwellings
	
<p><b>Supporting text:</b></p> <ul style="list-style-type: none"> <li>• Approximately 16.33ha of land to the South West of Elizabeth Way is allocated for the development of approximately 355 dwellings, as identified on the Policies Map. The site extends over a significant area of agricultural land quite markedly enclosed by existing development and Elizabeth Way distributor road. The character of the land within the site is relatively open and offers views through the existing urban edge of the town and the village of Hilperton. The dominant feature in the landscape is Elizabeth Way which would serve as access to the site.</li> <li>• Mature and semi-mature hedgerows and trees are key features in the landscape and provide habitat for protected and non-protected species. The existing natural features of the site are significant in the landscape and would be incorporated within the detailed layout. These features also provide wildlife</li> </ul>	

corridors that link habitat features within the local area; in particular, 'dark corridors' for foraging bats. These elements should be protected and enhanced where possible by additional planting with native species.

- This site may be used by Bechstein's bats associated with the Bradford and Bath Bats SAC. Potentially sensitive habitat features on / adjacent to the site include: mature trees; hedgerows; and stream (minor watercourse) at the northern end of the site;
- 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 also be required to contribute towards the delivery of the Trowbridge Recreation Management Mitigation Strategy through a financial contribution or direct provision of equivalent new infrastructure over and above normal Council requirements to deliver new habitat and recreational opportunities in line with criteria in the Strategy.
- An important measure will be the provision of landscaping between Elizabeth Way and new housing in order to attenuate noise and reduce the visual impact of this road. Consideration of drainage patterns and flood risk from all sources would need to inform any subsequent layout. In addition, surface water attenuation measures and improvements to existing on-site water infrastructure would need to be provided to support a comprehensive development of the site.
- The layout and design of the site would need to give great weight to the significance of nearby heritage assets and their setting. Where necessary, stand-offs to existing development in Victoria Road, Albert Road and Wyke Road, along with the incorporation of appropriate boundary treatment would need to be considered through detailed layout and design.
- There are opportunities to provide new routes for walking and cycling that would also serve the existing built-up area and that could improve connectivity for a wider area of the town.
- These should be explored and, wherever practicable, provided in order to encourage a reduction in private car journeys.
- In order to facilitate development, appropriate contributions would be likely to be sought to help fund additional local school capacity. Funding contributions may also be sought where needed to increase capacity at local GP surgeries and dentistry at the town.

1.3 Elizabeth Way is located within a suitable and sustainable location for residential development to the north of Trowbridge. The land is immediately available for development and can provide a strategic location for growth to meet the housing needs of Trowbridge and Wiltshire.

## **2.0 RESPONSE TO MATTER 3 – Housing Site Allocations**

### **Issue 5: Are the proposed sites justified, effective and consistent with national policy?**

#### **Capacity of site**

- 2.1 Since submission of the Site Allocations Plan in July 2018, the capacity of the proposed allocation site at Elizabeth Way (H2.3) has increased from 205 dwellings (July 2018) to 355 dwellings identified within the Trowbridge Topic Paper (updated September 2018). A number of potential site constraints have been taken into consideration in order to calculate this capacity such as heritage assets, drainage and the impact on protected Bats within the area. Yet it would seem that even the updated figure of 355 dwellings is still based on broad assumptions of density for the site. Having undertaken detailed assessment work on the site we consider that the overall capacity is higher than what has been proposed by Wiltshire Council and should be around 450 dwellings.
- 2.2 On behalf of Barratt Homes we have produced a masterplan for the entire allocation site that has been informed by technical assessments, and so we consider that the Council should rely on our capacity analysis as it is justified and therefore currently the best available information. The Councils approach is not well informed by robust technical evidence and therefore

#### **Biodiversity**

- 2.3 The Elizabeth Way site is located within proximity to the Bath and Bradford on Avon Bats Special Area of Conservation (SAC) and therefore it was considered that the proposed development may have an impact. Through production of the technical reports it is clear that these impacts can be mitigated against. The Trowbridge Bat Mitigation Strategy has now been drafted and is out for consultation therefore any planning application submitted will be required to take this into consideration.
- 2.4 The ecological work undertaken by BSG Ecology Ltd has been used to inform the Concept Masterplan, and this is reflected through the design of open space on site. The ecological investigations (including Badger and Bat surveys) carried out to date have not raised any detrimental issues which would affect the delivery of the site or preclude the site from development.



- 2.5 Paragraph 5.62 of the Wiltshire Housing Site Allocations Plan (July 2018) refers to contributions being sought towards the delivery of the 'Trowbridge Recreation Management Mitigation Strategy', it is not clear whether this relates to the current consultation of the Trowbridge Bat Mitigation Strategy SPD or is something completely different. We would request that Wiltshire Council consolidate the terms of reference to ensure clarity. Furthermore, the current wording is not justified without setting out the extent of the contributions required. Barratt Homes do not consider that it would be possible to ensure the viability and deliverability of the scheme without this specific information being made available and specifically set out within the policy.

### **Green Infrastructure/Agricultural Land**

- 2.6 The land is currently used for agricultural purposes with mature and semi-mature hedgerows and trees located on the site. The design and layout of the site will help to mitigate any potential impact through the inclusion of appropriate boundary treatments, noise bunds and areas of public open space. Through the planning application stage, the provision of walking and cycling routes will also be incorporated into the masterplan for each land parcel to provide connectivity with local services and bus stops.

### **Landscape character**

- 2.7 The site lies within well-defined landscape character areas and it is not considered that the development of this site would have any significant impact on the LCA's. The proposed site allocation has no designations and lies within the lowest scale of agricultural value.
- 2.8 Since the Elizabeth Way distributor road was built along the northern boundary of this allocation, it has physically separated the site from 'Hilperton Gap' and created stronger urban links to the existing residential development to the south, along Albert Road. Distant views to the north and west are restricted principally by the urban edge of Hilperton.
- 2.9 For these reasons, we do not consider that the proposed allocation for residential development would have a negative impact on the existing landscape or character therefore it should be considered suitable for residential development.

### **Heritage Assets**

- 2.10 The eastern section of the proposed site allocation at Elizabeth Way is located close to the Conservation Area to the west of the A361. The site allocation is situated outside of

the Conservation but due to its proximity there will need to be measures put in place to mitigate the impact on any local heritage assets. As the heritage impacts are considered to be limited, it is therefore considered that the overall impact on the capacity of the site is low.

- 2.11 We object to the wording of paragraph 5.64 (bullet point 7 set out above) of the supporting text, which places a great deal of emphasis on the design of the allocation yet does not make it clear that the heritage constraints only relate to the most southernly parcel of land due to its close proximity to the Conservation Area.

### **Local Infrastructure and Sustainable Access**

- 2.12 Each of the proposed parcels of land will be accessed from Elizabeth Way itself and due to the capacity of the site this should not cause any highway issues. Technical work has been undertaken which shows that the off-site highway network may be subject to network constraints at peak travel times, but none are considered to be sufficiently acute so as to frustrate development from coming forward.
- 2.13 Furthermore, the site is situated within a sustainable and accessible location to a range of local services and facilities by foot or cycle. In order to encourage a reduction in private car journeys the development will seek to provide pedestrian and cycle links that will connect onto Victoria Road and Albert Road where there are a number of bus stops. Elizabeth Way accommodates a footway and cycleway on the southern side of the carriageway facilitating movement along this route. The closest bus stops are located on the A361 and Victoria Road, providing regular connection to Trowbridge town centre, and other local destinations such as Frome and Chippenham.

### **Noise**

- 2.14 Detailed technical work has been undertaken for the site which will inform the design for any subsequent planning application and ensure that those areas close to Elizabeth Way will be appropriately mitigated through measures typical of those implemented for new developments where road traffic noise is a potential constraint.

### **Drainage**

- 2.15 We would like to object to the wording of Paragraph 5.63 of the supporting text which places the need on a comprehensive development. Barratt Homes have been in discussion

with Wiltshire Council Policy Officers and Drainage Team in order to appropriately deal with drainage issues on the site.

- 2.16 Barratt Homes have appointed drainage consultants to review and prepare evidence which has proven that the drainage strategy for this allocation does not need to be comprehensive, and individual drainage strategies work sufficiently. A drainage strategy for the Barratt Homes land parcel has been prepared and submitted as part of the Statement of Common Ground between Barratt Homes and Wiltshire Council.

### **Open Space & PROW**

- 2.17 A sufficient amount of Open Space will be maintained across the site. There is a Public Right of Way bridleway which runs long the eastern boundary of the Barratt land from north to south called Middle Lane. Furthermore, there are two PROW footpath which run directly through the site east to west, and along the western boundary from north to south. These elements will be maintained but will need to be reviewed through the design process and redirected.

### **Contributions**

- 2.18 Further to the contributions being sought for Bat Mitigation, paragraph 5.66 of the supporting text mentions that contributions are likely to be sought for local school and GP Surgeries. Wiltshire Council must provide evidence which proves that the increase in homes at this location would mean that more spaces are sought.
- 2.19 Again, it is important that Wiltshire Council ensure that the wording is clear as to the amount required, or provision of a formula which aids in the calculation based on the total number of homes built. For these reasons, it would be prudent of the Council to include a section or point based on viability and include this within the policy going forward.

### **Delivery**

- 2.20 We consider that the overall site allocation is deliverable within the timescales envisaged. There is already an application submitted on part of the site which seeks to deliver 170 new homes. The land controlled by Barratt Homes is immediately available and deliverable with the potential to deliver up to 175 homes. As previously mentioned, Barratt Homes have been in discussion with Wiltshire Council and are currently at an advanced stage of preparing a Statement of Common Ground which will be submitted as part of the

Examination process and signed by both Barratt Homes and Wiltshire Council to highlight the deliverability of the scheme.

- 2.21 In this case, as previously mentioned, we do not consider that the supporting text is an effective means for delivering the requirements for each site and would suggest that Wiltshire Council prepare specific policies for each of the proposed site allocations. It is unclear at this stage what the Councils justification was for preparing the plan in such a way.

### **Policy Requirements**

- 2.22 The site known as 'H2.3 Elizabeth Way' within Trowbridge has not been identified as a formal policy within the plan document and instead the site specific details are set out within the supporting text. We consider that in order for Wiltshire Council to ensure appropriate delivery of this site in line with the aspirations currently set out within the text at planning application stage, they must put this information into a formalised policy.

### **Trowbridge Bat Mitigation Strategy**

- 2.23 The Elizabeth Way site will be effective in ensuring adequate protection for bat habitats. Commuting and foraging corridors along the south-east and north-west boundaries of the site will be retained, and bat habitat enhanced along the north-east boundary. The proposed masterplan design has been informed by bat survey work undertaken by BSG Ecology in 2017 in accordance with Bat Conservation Trust (Collins, 2016) best practice guidance.
- 2.24 The site falls within the "Yellow Risk Zone" as identified in the draft Trowbridge Bat Mitigation Strategy SPD. Section 7.1 SPD states that *"It will be expected that habitat features of importance for greater horseshoe, lesser horseshoe and Bechstein's bat, including roosts, foraging areas and commuting routes, are retained and enhanced in-situ ensuring full functionality"*. There are no bat roosts or potential roost features within the site. Commuting routes and foraging areas will be retained along the site boundaries in accordance with Section 8 of the SPD. This will include a dark, bat habitat zone along the north-east boundary of the site of at least 15 m in width separated from the development by a buffer zone of at least 15 m as required by the SPD. The bat habitat zone has been located to link seamlessly to green corridors proposed for adjacent land parcels to the west of Elizabeth Way.

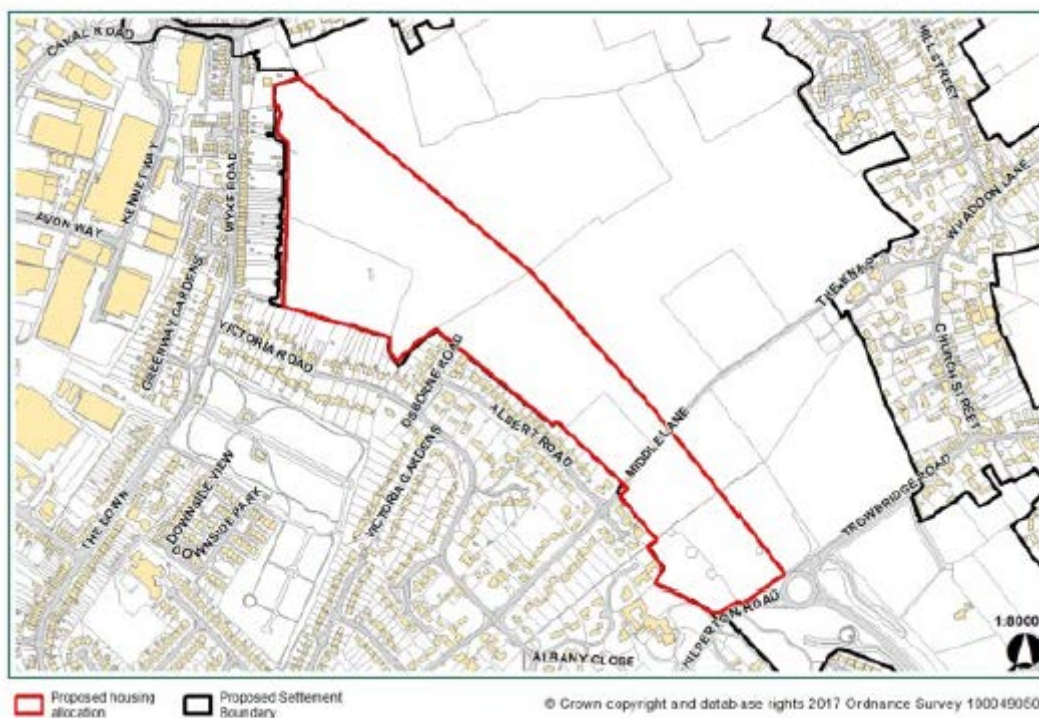
2.25 The Trowbridge Bat Mitigation Strategy SPD has now been published in draft for consultation (February 2019). The Site Allocations Plan must ensure that it is in accordance with those proposals set out within the Bat Mitigation SPD.

### 3.0 TRACKED CHANGES TO POLICY WORDING

3.1 We have set out below the proposed wording in **red** which we suggest is included in order to provide clarity on a number of points, as mentioned in the previous section of this report. The main point of contention which we would like to be rectified through the examination process is that this Site Allocation is made into a specific policy rather than just including it within the supporting text.

#### 3.2 **Policy** H2.3 Elizabeth Way

Figure 5.7 H2.3 Elizabeth Way



3.3 Approximately 16.33ha of land to the South West of Elizabeth Way, **as identified on the Policies Map, is allocated for residential development comprising the following elements:**

~~of approximately 355 dwellings, as identified on the Policies Map. The site extends over a significant area of agricultural land quite markedly enclosed by existing development and Elizabeth Way distributor road. The character of the land within the site is relatively open and offers views through the existing urban edge of the town and the village of Hilperton. The dominant feature in the landscape is Elizabeth Way which would serve as access to the site.~~

- **Approximately 450 dwellings;**

- **Enhanced routes for cycling and walking through the site to link into the existing network and town centre;**
- **Diversion of PROW to be more in keeping with proposed masterplans.**

**Development will be subject to the following requirements:**

- 1. Surface water management that achieves equivalent or less than current Greenfield rates of run-off**
- 2. Enhanced routes for cycling and walking through the site to existing networks**
- 3. A design and layout that preserves and enhances the importance and setting of designated heritage assets located to the southern boundary of the site**
- 4. Strategic landscaping and open space to retain and reinforce existing hedgerows and establish new areas of planting**

**All other aspects of development will take place in accordance with masterplans to be approved by the Council as part of the planning application process. These masterplans will be informed by detailed evidence which will include a Landscape Visual Impact Assessment, Heritage Assessment, Biodiversity Report, Drainage Strategies for each land parcel and Highways Statement.**

- 3.4 Mature and semi-mature hedgerows and trees are key features in the landscape and provide habitat for protected and non-protected species. The existing natural features of the site are significant in the landscape and would be incorporated within the detailed layout. These features also provide wildlife corridors that link habitat features within the local area; in particular, 'dark corridors' for foraging bats. These elements should be protected and enhanced where possible by additional planting with native species.
- 3.5 This site may be used by Bechstein's bats associated with the Bradford and Bath Bats SAC. Potentially sensitive habitat features on / adjacent to the site include: mature trees; hedgerows; and stream (minor watercourse) at the northern end of the site;
- 3.6 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.
- 3.7 Development will also be required to contribute towards the delivery of the **Trowbridge Bat Mitigation Strategy** ~~Recreation Management Mitigation Strategy~~ through a financial

contribution or direct provision of equivalent new infrastructure over and above normal Council requirements to deliver new habitat and recreational opportunities in line with criteria in the Strategy.

- 3.8 An important measure will be the provision of landscaping between Elizabeth Way and new housing in order to attenuate noise and reduce the visual impact of this road. Consideration of drainage patterns and flood risk from all sources would need to inform any subsequent layout. In addition, surface water attenuation measures and improvements to existing on-site water infrastructure would need to be **incorporated into the design of each phase of development for the site.** ~~provided to support a comprehensive development of the site.~~
- 3.9 The layout and design of the site would need to give great weight to the significance of nearby heritage assets and their setting. Where necessary, stand-offs to existing development in Victoria Road, Albert Road and Wyke Road, along with the incorporation of appropriate boundary treatment would need to be considered through detailed layout and design.
- 3.10 There are opportunities to provide new routes for walking and cycling that would also serve the existing built-up area and that could improve connectivity for a wider area of the town.
- 3.11 These should be explored and, wherever practicable, provided in order to encourage a reduction in private car journeys.
- 3.12 In order to facilitate development, appropriate contributions would be likely to be sought to help fund additional local school capacity. Funding contributions may also be sought where needed to increase capacity at local GP surgeries and dentistry at the town.