

1. Introduction

- 1.1. Savills represents Waddeton Park Ltd in relation to Land to the South of Trowbridge (herein 'the Site'). The site is a draft allocation in the Submission Plan – Reference H2.6 (Southwick Court).
- 1.2. Representations were submitted on behalf of Waddeton Park Ltd to the Pre-Submission Draft (dated September 2017), and the Focussed Changes (dated November 2018) consultations on the Wiltshire Housing Site Allocations Plan (herein 'the WHSAP'). These are referenced as required within this Hearing Statement (herein 'the Statement'), but they should be read in full to provide the wider context in regard to the representations made.
- 1.3. This Statement addresses the specific matters raised in relation to Matter 3 – Housing Site Allocations, as set out by the Inspector's in the Matters, Issues and Questions (dated 8th February 2019). The statement follows the Issues and Questions as set out in that document albeit only responds to those which are relevant to Waddeton Park's interests.

2. Issue 5: Are the Proposed Sites justified, effective and consistent with national policy?

Question 5.1: Does the plan provide sufficient detail on form, scale, access and quantity of development for each site?

- 2.1. Draft Site H2.6, as amended by PC72 and PC73, provides sufficient detail to guide future development proposals on the site. The draft policy must be read alongside the existing adopted policies set out in the Wiltshire Core Strategy which seek to manage development proposals; alongside the NPPF (2019) which will be a material consideration in the determination of any future development proposal. These provide further policy guidance in regard to design, open space standards etc. which will also be relevant to the form, scale, access and quantity of future development on the site.
- 2.2. Draft Site H2.6 confirms the scale of development, the acceptable extent of built form and that the policy pertains to residential development only, alongside the aspirations for delivery of public open space and strategic landscaping.
- 2.3. Whilst it is recognised that the WHSAP itself doesn't explicitly state that vehicular access to the site should be delivered from the A361; this is clear on reviewing the site. Draft Site H2.6 is however, explicit in its requirement that opportunities to improve existing, and provide new, pedestrian and cycle connections should be secured, and this is supported.

Question 5.2: Is the amount of development proposed for each site justified having regard to any constraints and the provision of necessary infrastructure?

- 2.4. Waddeton Park Ltd have completed the technical evidence base required to support an outline planning application on the site. The output of this evidence base, alongside the draft Site H2.6 requirements and supporting text, has informed an emerging Concept Plan for the site (Appendix 1). This is based upon a robust assessment of the technical evidence. In particular, a number of key design principles are secured on the Concept Plan, including:
 - A full Flood Risk and Drainage Assessment has been undertaken which confirms the size of required attenuation which is shown on the Concept Plan, and locates all development outside of flood zone 2 and 3;
 - Dark Wildlife Corridors are secured throughout the site in accordance with the WHSAP HRA design mitigation principles;
 - Enhanced and new pedestrian and cycle connections are identified including a new pedestrian/cycle crossing on Frome Road; and
 - Woodland buffer along the southern edge of the eastern part of the site – creating a new landscaped edge to the settlement, and providing ecological mitigation/enhancement.

- 2.5. As a result, the emerging Concept Plan is based upon a robust assessment of technical constraints and required infrastructure. The Concept Plan would deliver 185-195 dwellings depending on the housing mix, and as such, the amount of development proposed for the site is justified. It is noted that the policy is for 'approximately 180 dwellings' and as such, there is a degree of flexibility to respond at the detailed design stage when the housing mix is determined.

Question 5.3: What is the likely impact of the proposed development on the following factors and do any of these indicate that the site should not be allocated:

- **biodiversity, in particular but not restricted to European protected habitats and species;**
- **green infrastructure and agricultural land;**
- **landscape quality and character;**
- **heritage assets;**
- **strategic and local infrastructure including transport;**
- **the efficient operation of the transport network, highway safety.**
- **air and water quality, noise pollution, odours, land stability, groundwater and flood risk;**
- **open space, recreational facilities and public rights of way.**

- 2.6. There are no likely impacts of the proposed development which indicate that the site should not be allocated.

- 2.7. Biodiversity – A full suite of ecology surveys have been undertaken on the draft Allocation Site, including: Phase 1 Habitat Survey, bat activity and static detector surveys alongside systematic surveys for badgers, otters, great crested newts and water voles. In addition, a baseline lighting assessment has been undertaken. These surveys have confirmed that there are no ecological features or protected habitats which would preclude development on the site.

A full season of bat surveys have been undertaken on the site. These did not detect Myotis bats in large quantities but it is possible that some of these recordings were of Bechstein's bats given the difficulties in distinguishing this species within surveys. There are several mature trees with potential roosting features, but no tree roosts were recorded. The Allocation Site is capable of delivering the requirement mitigation and enhancement measures identified within the Habitat Regulations Assessment (and associated Addendums); discussed further below.

- 2.8. Green Infrastructure and Agricultural Land – the existing green infrastructure is located within the site boundaries, with a single oak tree (as referenced with draft Site H2.6), located within the field itself. Waddeton Park have undertaken a tree survey of the draft Allocation Site. Development on the site can be delivered in accordance with the draft policy without the loss of any arboricultural feature, and the loss of hedgerow to facilitate access will be minimised in accordance with local and national planning policy.

- 2.9. Landscape Quality and Character – the site is on the urban periphery of Trowbridge, and this urban influence is evident across the site, and in particular on the eastern side. There will be a loss of countryside in terms of delivering the allocation site, however, this is recognised as necessary to meet the housing need set out in the WCS.

Waddeton Park have undertaken a detailed LVIA which has identified a significant number of opportunities for landscape mitigation; including enhancement of existing landscape features, such as the northern landscape corridor, a substantial new landscape corridor along the southern and eastern edges of the proposed housing area creating a new landscaped edge to Trowbridge, retention of the open nature of the western side of the allocation site, and creation of a network of pedestrian links throughout the site contained within the green infrastructure. These provide natural extensions to the existing Southwick Country Park, and secure new connections to this local asset. These are illustrated on the emerging Concept Plan.

Wiltshire Council's assessment (PSCON11B) considered the delivery of development across the entire draft Allocation Site, and also did not take into account the potential for mitigation measures to be incorporated into future proposals on the site, and therefore overstated the potential landscape impacts of development. The emerging proposals would not give rise to any unacceptable landscape or visual impacts and, subject to the incorporation of the proposed mitigation measures, there is no landscape or visual justification as to why the proposed allocation of the site is unsound.

- 2.10. Heritage – there are two relevant heritage assets to the Allocation Site: the former water meadows (a non-designated heritage asset) and Southwick Court (Grade II* and the separately listed gatehouse and bridge). Cotswold Archaeology, on behalf of Waddeton Park, have undertaken a full Heritage Impact Assessment (HIA) which is supported by a field survey, LIDAR, geophysics and a detailed desk-based heritage assessment. This work has been shared with Wiltshire Council and Historic England, and has formed part of detailed pre-application discussions in relation to the Allocation Site. It provides a substantially more robust basis for the assessment of heritage harm than the earlier LUC Study (WHSAP05) which itself sets out that it is a strategic high-level review of sites based upon secondary material (section 1.11) and the 'maximum case' development scenario (section 1.13). The Cotswold Archaeology assessment meets the requirements of the proposed amendment to Policy H2.6 (PC72); and as such, provides the certainty now at the allocation stage, that the impacts of the emerging proposals on designated and undesignated heritage assets are acceptable; and as agreed with Historic England, "less than substantial". In accordance with paragraph 134 (NPPF 2012), this less than substantial harm must be weighed against the public benefits of the proposed development.

- 2.11. Highways – our comments to Hearing Statement 2 (paragraph 4.16-4.19) discuss the Trowbridge Transport Strategy Refresh (May 2018) (WHSAP07), and the associated strategic highway proposals. In relation to Site H2.6, pre-application discussions with the Highway Authority have confirmed the appropriate site access, a new priority junction onto the A361 as a right-left stagger junction to the Country Park car park with right turn islands; and this will be supported by further works including the provision of a 3m wide shared footway-cycleway on the eastern side of the A361, a new pedestrian crossing facility to provide access to the Country Park, a new southbound bus stop on the A361 and the re-location and improvement

of the existing northbound bus stop, enhanced and new pedestrian/cycle links from the site to the north, and an associated Travel Plan which seeks to maximise sustainable transport choices.

- 2.12. Pollution – there are not anticipated to be any impacts which indicate the site should not be allocated.
- 2.13. Flood Risk/Drainage – as set out in our response to Hearing Matter 2, the proposed development would be required to undertake a sequential approach to locating development in the Allocation Site, and would also require the proposed access road, which traverses flood zone 2 and 3, to ensure it remains safe for the lifetime of the development. The FRA concludes that the proposed drainage design will deliver a reduction in greenfield peak surface water runoff rates of in excess of 80% in the +40% climate change scenario; thus reducing the overall flood risk significantly.
- 2.14. Open Space, Recreation and Public Rights of Way – there are a number of existing PROWs on the Allocation Site which will be retained, and integrated into the proposals – as shown on the Concept Masterplan. In addition further pedestrian and cycle connections will be secured across the site. The site will deliver a significant quantum of open space, which will provide a variety of spaces, including natural green space, allotments, childrens play and informal open space.

Question 5.4: In relation to the above, does the plan contain effective safeguards or mitigation measures necessary to achieve an acceptable form of development?

- 2.15. Draft Site H2.6 identifies the key features, as identified above, which need to be considered in bringing forward development proposals on the site in the future, in doing so it confirms a number of specific safeguarding and mitigation measures, in addition to enhancement opportunities. The existing adopted policies of the Core Strategy, and the NPPF (2019), provide further safeguards and mitigation/enhancement requirements which will guide the form of development on the site.
- 2.16. It is recognised Historic England have requested further clarification within the text on the design of the proposed access road. Waddeton Park have no objection to this inclusion, albeit note that it is not necessary to make the policy sound for the purposes of paragraph 182 (NPPF, 2012).

Question 5.5: What infrastructure is critical to the delivery of each site? Where contributions are specified, are they necessary and justified by the evidence base? Is the plan sufficiently clear on how and when infrastructure provision will be required?

- 2.17. The planning application process will include the assessment of infrastructure requirements, both individually and cumulatively as appropriate. This will include consideration of CIL receipts, and further s106 Planning Obligations.

Question 5.6: Is the site in an accessible location with good access to everyday facilities by a range of means of transport? Does the plan provide an adequate basis to address any areas of deficiency?

2.18. Trowbridge is identified as a Principal Town in the Core Strategy and is the key location for growth within the North-West HMA. The site is located on the Principal Town's existing urban edge, and is well-placed to integrate with the existing urban form, and associated services and facilities. The site is well located, and there are a range of services and facilities in the immediate locality which will be accessible on foot or by bicycle. This is demonstrated by the information in the table below:

Table - Distance and Journey Time to Key Facilities

Facility / Destination	Location / Street	Shortest Route from Proposed Residences (km/m)	Journey Time on Foot (minutes/ secs)	Journey Time on bicycle (minutes/ secs)
Local Amenities / Community				
Bus stop	Marston Road	160m	2 minutes	<1 minute
Post office	College Road Post Office, 58 College Road, BA14 0JH	800m	10 minutes	3 minutes
One Stop	Marston Road	290m	4 minutes	1 minute
Retail shops	Spitfire Retail Park, Bradley Road, Trowbridge, BA14 0LY	900m	11 minutes	4 minutes
Healthcare				
GP Medical Practice	Widbrook Medical Practice, 72 Wingfield Road, Trowbridge, Ba14 9EN	2.2km	27 minutes	7 minutes
Dentist	Mortimer Dental Practice, 122 Mortimer Street, Trowbridge, BA14 8BN	2.2km	28 minutes	9 minutes
Employment				
White Horse Business Park	White Horse Business Park, Newmarket Ave, Trowbridge BA14 0XQ	1.6km	20 minutes	7 minutes
Meridian Business Park	Meridian Business Park, 8 A363, North Bradley, Trowbridge, BA14 0BJ	2.2km	27 minutes	8 minutes
Education				

Facility / Destination	Location / Street	Shortest Route from Proposed Residences (km/m)	Journey Time on Foot (minutes/ secs)	Journey Time on bicycle (minutes/ secs)
Primary School	Grove Primary School, Hazel Grove, Trowbridge, BA14 0JG	550m	7 minutes	2minutes
Primary School	Southwick Church of England Primary School, Hollis Way, Southwick, Trowbridge BA14 9PH	1.1km	14 minutes	5 minutes
College	Wiltshire College Trowbridge, College Road, Trowbridge, BA14 0ES	700m	9 minutes	3 minutes
Leisure				
Public House	Farmhouse Inn	650m	8 minutes	2 minute
Country Park	Southwick Country Park, Frome Road, Southwick, Trowbridge, BA14 9QD	50m	1 minutes	<1 minute

2.19. In addition, there are a number of bus stops in proximity to the site – at Southwick Country Park, on Marston Road (150m north of the Allocation Site), and A363 Bradley Road (850m east of the site). These provide services to Trowbridge Town Centre, Bath, Midsomer Norton, Chippenham, Frome, and further locations.

2.20. In accordance with Draft Site H2.6, the Concept Plan identifies a number of pedestrian and cycle connections for improvements, a new pedestrian crossing over the A361 to Southwick Country Park, provision of new/improved bus stops on the A361, and in addition, in accordance with Wiltshire’s adopted policies, any future planning application will be supported by a Travel Plan.

Question 5.7: In cases where allocations do not have specific policies, is the reliance on supporting text likely to be an effective means of delivering the Council’s requirements for each site? What is the justification for some sites having specific policies and some not?

2.21. The text associated with Site H2.6 provides an effective framework for the delivery of a future planning application on the Allocation Site. It addresses all the key considerations, and clearly sets out what Wiltshire Council are requiring for the site. Whilst we would not object to the inclusion of a specific policy, it is not considered necessary for the site to be considered sound.

Question 5.8: Is the development proposed for each site deliverable in the timescales envisaged?

2.22. The below timetable is considered deliverable for this site:

Stage	Time Period
Adoption of WHSAP	July 2019
Submission of Outline Planning Application	August 2019
Determination of Outline Planning Application	December 2019
Disposal of Site	Spring 2020
Discharge of Condition and Reserved Matter Approval	Winter 2020
First Completions	Summer 2021
Final Completions	Winter 2024

Question 5.10: For sites in Trowbridge, will the plan be effective in ensuring adequate protection for bat habitats? What is the status of the Trowbridge Bat Mitigation Strategy referred to in the HRA and paragraph 5.44 of the WHSAP? How will this be implemented?

- 2.23. A full set of bat surveys has been undertaken for the Allocation Site, and the output of these, alongside the design principles set out in the HRA, have resulted in the emerging Concept Plan including the provision of dark, landscaped buffers along the retained hedgerows, stream and field boundaries. Where the main access road passes through hedgerows, it has been sited to minimise habitat loss and a detailed lighting strategy brought forward through a future planning application would avoid illumination at relevant sensitive points by street lights.
- 2.24. In addition to the landscaped buffers, the site offers large areas of habitat creation in the west (the area of which has increased as a result of the removal of the school) and south of the site to benefit bats and other wildlife. This area includes provision for woodland planting, open grassland and ponds. This accords with the principles of the Addendum HRA, which sets out that habitat offsetting should be provided within the allocation sites themselves (paragraph 3.3.6). The availability of 12ha of open space on the site provides significant opportunities to deliver a range of enhanced and new habitats to offset any impacts on habitat loss/deterioration.
- 2.25. The emerging proposals include significant areas of green recreational space, above the adopted policy standards, ensuring that the allocation site provides additional opportunities to support recreational activities. The Concept Plan confirms the opportunities to link with existing PROWs and informal recreation routes within the locality, and confirms the provision of a new pedestrian link across the A361, providing a direct link into Southwick Country Park. As confirmed in the HRA, these measures represents a key objective in directing recreational pressure to Southwick Country Park, with the proposals on the allocation site providing an opportunity to deliver a number of the elements identified as opportunities for improvement within Figure 6 of the HRA.

- 2.26. The draft allocation policy – by virtue of the site area and development quantum, provides appropriate opportunities to deliver green links, new and enhanced habitats for bat foraging, and significant recreational open space in accordance with the requirements set out for the HRA and its Addendum. There is no indication that future development on the allocation site would be unacceptable on ecological grounds.

Question 5.12: The supporting text for sites H2.4, H2.5, H2.6, H2.9 and H3.3 refers to parts of the sites being within Flood Zones 2 and/or Flood Zones 2 and 3? Is this approach consistent with national policy? Will the plan be effective in addressing drainage issues on these sites?

- 2.27. We have made comments in relation to this in our Hearing Statement – Matter 2, and above in relation to potential impacts.

Question 5.15: For Sites H2.4, H2.5 and H2.6, has sufficient attention been paid to the cumulative effect of development on landscape character, biodiversity and heritage assets and Southwick Country Park?

- 2.28. Site H2.6 will not result in any significant effects on these in isolation, and as such, it is not anticipated that there would be cumulative effects.

- 2.29. Landscape Character – the sites combined will form a new urban edge to Trowbridge. Appropriate mitigation would be secured individually given the location and nature of the sites. In relation to the north-western boundary of Site H2.6, it is noted that the existing landscape edge will be enhanced and maintained by any future planning application, and alongside measures on Site H2.5 itself, will provide a new urban edge to Trowbridge.

- 2.30. Biodiversity – the HRA appropriately considers the cumulative impact of developments. Any shared ecological features, such as the Lambrok Stream, would be considered through the relevant ecological assessments based upon detailed surveys.

- 2.31. Heritage Assets – Site H2.6 will have a less than substantial impact on Southwick Court, and is the closest site to this development. As such, the development of the other sites would have no material impact on this assessment.

- 2.32. Southwick Country Park – Site H2.6 will deliver a new pedestrian crossing over the A361 providing access to the Country Park, in accordance with the objectives of the HRA. This will provide access to existing residents, and future residents on other sites in the vicinity.



Legend

- Application boundary (18.81 ha)
- Other land in applicants control or ownership
- Net developable area (6.33 ha) up to 180 dwellings

- Water pipe and easement
- 10 - 16m Ecological + wildlife corridor along the northern boundary

- A Frome Road (A361)
- B Silver Station Lane
- C Axe and Cleaver Lane
- D Southwick Court (Grade II* Listed bridge, farmhouse and gatehouse)
- E Grove Primary School
- F Wiltshire College
- G Southwick Country Park
- ~ Lambrok Stream
- ≡ Flood Zone
- 🚌 Existing bus stops
- Pedestrian / cycle link with low level, downward oriented, low luminance lighting. Footpath links with proposed new crossing point to extend recreational opportunities at Southwick Country Park.

- 1 Vehicular access
- 2 Bridge link over flood plain
- 3 Potential connections to existing areas
- 4 Proposed pedestrian / cycle crossing (Frome Road)
- 5 Potential emergency access - Westmead Crescent
- 6 Sensitively designed rural access road with minimal lighting and signage.

- 6 Green links along existing footpaths
- 7 Landscape buffer to existing development
- 8 Surface Water attenuation features
- 9 Land retained in agricultural use
- 10 New planting designed to provide a strong landscaped edge to the urban area
- 11 Recreational parkland / POS

Land at Southwick Court, Trowbridge		N
Concept Plan		DCC
150202 L 02 01	1:5000 @ A3	Oct 2018

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