

Wiltshire Housing Site Allocations Plan Examination in Public

Position Statement on Matter 3

Housing Site Allocations

H2.2 Land off the A363 at White Horse Business Park, Trowbridge

PS/M3/18

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Matter 3: Housing Site Allocations

H2.2 Land off the A363 at White Horse Business Park, Trowbridge

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| Issue 5: Are the proposed sites justified, effective and consistent with national policy? |
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Issue 5.1 - Does the plan provide sufficient detail on form, scale, access and quantity of development for each site?

1. Yes. Policy H2 and paragraphs 5.52 – 5.57 of the Wiltshire Housing Site Allocations Plan (WHSAP.01.01)¹ Submission Document and supporting text, incorporating the Council's Schedule of Proposed Changes (EXAM.01.01)², when read in conjunction with the introductory supporting text in Chapter 5 of the Plan (paragraphs 5.1 to 5.12) provide sufficient detail. The introductory text to Chapter 5 clarifies that policies of the Wiltshire Core Strategy (WCO.01)³ will also apply in considering the development of the site. When taken together with the Core Strategy, the Council considers the Plan provides sufficient detail on form, scale, access and quantity of development.
2. The quantity of development to be delivered is established in policy through the Schedule of Proposed Changes (WHSAP.03.01)⁴ as being approximately 175 dwellings on a site area of approximately 23ha which is considered to be achievable for the site.
3. In the Trowbridge CATP, Table G.5 (page 98) (CATP.17a)⁵ it is stated that vehicular access would need to be holistically planned, but technically feasible from the A363.
4. Therefore, when read as a whole, the Council considers that the level of detail provided in the Plan is sufficient for the purpose of providing the necessary certainty to local communities and developers without being overly prescriptive.

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

5. The Council considers that the amount of development proposed for the site (approximately 175 dwellings) is justified by the evidence base (TOP.02⁶, CATP.17a, SA.01A.a⁷, SA.01.9⁸) and has had full regard to site specific constraints including: biodiversity, landscape and historic environment.
6. In light of identified constraints, detailed assessments were undertaken to determine appropriate scale of development. This was documented in the site selection process. The conclusions are reported in the Trowbridge Community Area Topic Paper (CATP) (Appendices D, F and G) (CATP.17a).

¹ [WHSAP.01.01](#) Wiltshire Housing Site Allocations Plan - Submission Document, July 2018

² [EXAM.01.01](#) Wiltshire Housing Site Allocations Plan Schedule of Proposed Changes – Focussed Consultation Document, September 2018

³ [WCO.01](#) Wiltshire Core Strategy, January 2015

⁴ [WHSAP.03.01](#) Schedule of Proposed Changes (Sept 2018) (Part 1 of 46) Main Report

⁵ [CATP.17a](#) Trowbridge Community Area Topic Paper - September 2018; SA.01A.a Sustainability Appraisal Report - revised September 2018; SA.01A.09 Sustainability Appraisal Report Annex 1 - A.9 Trowbridge May 2018

⁶ [TOP.02](#) WHSAP Topic Paper 2 - Site Selection Process Methodology July 2018 Submission version

⁷ [SA.01A.a](#) Sustainability Appraisal Report - revised September 2018

⁸ [SA.01.9](#) Sustainability Appraisal Report Annex 1 - A.9 Trowbridge May 2018

7. The SHELAA (2011 Methodology) (SHELAA 22)⁹ site capacity was estimated at 379 dwellings for this site (SHLAA 2012 Trowbridge Appendix) (SHLAA2012 16)¹⁰, which formed a starting point for assessment using 30 dwellings per hectare and applying a multiplier to reduce the developable area to allow for non-housing uses.
8. Stage 2 of the WHSAP site assessment process then considered whether exclusionary criteria (should result in a reduction of the SHLAA site capacity. In the case of H2.2, the site capacity was reduced from 379 to 338 dwellings due to part of the site being completed (Trowbridge CATP, Table D.3 page 54) (CATP.17a)¹¹.
9. The amount of development proposed at this site was further reduced due to constraints identified through the Sustainability Appraisal, (172 – 189) and subsequent assessment Trowbridge CATP.17a (Appendix F, p81/82 and Appendix G, pages 97 - 99) (SA.01A.9)¹² (CATP.17a).
10. Following the consideration of consultation responses to the Pre-submission plan, the site quantum was re-assessed and increased to approximately 175 dwellings. The results of this additional work led to the Council's Proposed Changes PC13, PC51 and PC60 (EXAM.01.01)¹³.
11. The Plan includes supporting text at paragraph 5.44 (including Proposed Change PC53) (EXAM.01.01) ensuring that primary school provision is delivered in a timely manner to accommodate the new developments at Trowbridge. However there has now been an update in education requirements for the town.
12. The Council has recently received the latest birth rate data from the health authority. This evidence shows that the birth rate in Trowbridge and the surrounding villages has significantly declined, which is both unexpected and unprecedented. The Council has revised its pupil forecasts accordingly and this shows that the requirement for a third primary school has all but disappeared in Trowbridge. Indeed, it is considered that there is sufficient capacity within existing primary schools in Trowbridge to cater for the projected pupils on roll resulting from developments at the town over the period to 2026. Therefore, the Council considers that there is no longer sufficient additional demand to require a two-form primary school at Elm Grove Farm.
13. It is proposed that the Plan text is further amended to reflect this new evidence at Policy H2.1 and paragraph 5.44. Should circumstances alter in respect of demographics at the town, the Council considers that existing policy will allow for up to date evidence at the time of a planning application to be used to determine appropriate contribution to any necessary infrastructure, in accordance with WCS Core Policy 3. However, based on currently available evidence, the Council considers that latent capacity in existing primary schools within the town would not preclude or delay development at this site.
14. Other key infrastructure requirements are identified in the plan at paragraphs 5.44, and in paragraph 5.57, of the WHSAP (WHSAP.01.01)¹⁴ which includes the potential need for an increase in capacity of doctor surgeries and dentistry within the town (Trowbridge CATP (Appendix G, Table G.5, p97-99) (CATP.17a) and Sustainability Appraisal (pages

⁹ [\[SHELAA 22\]](#) SHLAA Methodology – Sept 2011

¹⁰ [\[SHLAA2012 16\]](#) SHLAA 2012 Appendix 3 Trowbridge

¹¹ [\[CATP 17.a\]](#) Trowbridge Community Area Topic Paper - September 2018; SA.01A.a Sustainability Appraisal Report - revised September 2018

¹² [\[SA.01A.9\]](#) Sustainability Appraisal Report Annex 1 - A.9 Trowbridge May 2018

¹³ [\[EXAM.01.01\]](#) Schedule of Proposed Changes (Sept 2018) (Part 1 of 46) Main Report

¹⁴ [\[WHSAP.01.01\]](#) Wiltshire Housing Site Allocations Plan - Submission Document July 2018

186) (SA.01A.9). Again, the Council consider that such infrastructure requirements will be appropriately assessed and delivered through the subsequent planning application process.

15. In Trowbridge, a comprehensive transport study has been carried out (Trowbridge Transport Strategy: Draft Strategy Refresh 2018 (4 May 2018)). This study has assessed the cumulative impact of all the proposed sites and outline a transport strategy for each settlement which aim to provide for and mitigate the impact of proposed growth. It identifies nine objectives which are specific to Trowbridge. Schemes have been identified, assessed and categorised to meet these objectives and thereby address the current and forecast transport issues in Trowbridge.
16. In terms of ecological infrastructure, paragraph 5.55 in the WHSAP (WHSAP.01.01)¹⁵ states that development at Land off A363 at White Horse Business Park will also be required to contribute to the delivery of the Trowbridge Bat Mitigation Strategy (TBMS) (BIO.45)¹⁶ through financial contribution or direct provision of equivalent new green infrastructure to ensure there is no net loss of habitat for protected bat species, along with appropriate measures for managing increased recreational pressure associated with an anticipated increased population at the town (Trowbridge CATP Appendix G, Table G.10, p97) (CATP.17a)¹⁷. All forms of necessary infrastructure requirements associated with the development of the Land off A363 at White Horse Business Park will be confirmed through the planning application process according to up to date evidence at the time of submission in line with WCS Core Policy 3 (WCO.01)¹⁸.

Issue 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:

- i. biodiversity, in particular but not restricted to European protected habitats and species**
17. Any impacts of development on biodiversity can be successfully managed and mitigated, and would not preclude development of the site.
18. For sites in Trowbridge, a comprehensive strategy to deal with impacts on the Bath and Bradford on Avon Bats SAC has been derived following a full appropriate assessment and in consultation with Natural England.
19. A settlement level Habitats Regulation Assessment (HRA.01)¹⁹ concluded that the relationship of the Elizabeth Way site with the Bath and Bradford on Avon Bats SAC could contribute to effects alone and in-combination with other plans and projects and that a full appropriate assessment would be required (HRA.01). Subsequently the council produced an Addendum under the Habitats Regulations (HRA.02)²⁰, and a further Addendum (HRA.02a)²¹ to support the council's Schedule of Proposed Changes. All three assessment documents, each of which included an appropriate assessment, concluded that allocation sites at Trowbridge would need to comply with, and contribute to, a bespoke mitigation strategy for

¹⁵ [\[WHSAP.01.01\]](#) Wiltshire Housing Site Allocations Plan - Submission Document July 2018

¹⁶ [\[BIO.45\]](#) Draft Trowbridge Bat Mitigation Strategy

¹⁷ [\[CATP.17a\]](#) Trowbridge Community Area Topic Paper - September 2018

¹⁸ [\[WCO.01\]](#) Wiltshire Core Strategy, January 2015

¹⁹ [\[HRA.01\]](#) Habitats Regulations Assessment - Pre-submission draft plan June 2017

²⁰ [\[HRA.02\]](#) Addendum to the Assessment under the Habitat Regulations (May 2018)

²¹ [\[HRA02.a\]](#) Addendum to the HRA May 2018 – Factual Update (September 2018)

bats which addressed impacts arising from habitat loss / degradation as well as impacts which would be caused by recreational pressure.

20. The Trowbridge Bat Mitigation Strategy (TBMS) (BIO.45) has been developed specifically to ensure that all impacts arising from allocation sites at Trowbridge will be fully mitigated. The strategy has been developed in consultation with Natural England and with input from local bat ecologists familiar with the area and the requirements of the bat species concerned. The document is currently out for public consultation (21 February – 21 March 2019) and it is intended the document will be adopted as SPD.
21. The TBMS sets out, at a strategic level, mitigation that will be required to be confident that adverse effects to the SAC will be prevented, addressing specifically:
 - (1) Effects of habitat loss within green field sites. Mitigation for impacts alone will be delivered within the development site itself. Mitigation for residual and in-combination effects will be secured by Section 106 contributions towards off-site provision delivered by the Council. This will be based on an amount per dwelling or the equivalent for non-residential development.
 - (2) Effects of recreational pressure arising from all residential development within a set radius from the key bat woodland sites. This cost will be funded through the Community Infrastructure Levy (CIL) (WCO.08A)²².
22. Paragraphs 5.44 and 5.55 in the WHSAP (WHSAP.01.01)²³ state that development will be required to contribute to the delivery of the TBMS (BIO.45)²⁴ through financial contribution or direct provision of equivalent new infrastructure over and above the Council's normal requirements (Trowbridge Appendix G, Table G.10, p117). Infrastructure requirements will be confirmed through the planning application process according to up to date evidence at the time.
23. Natural England has responded favourably to the above consultation for the TBMS.
24. Biodiversity considerations were also assessed through the Sustainability Appraisal (pages 172 - 173) (SA.1A.9)²⁵, as summarised in Trowbridge CATP (Appendix G, Table G.5, pages 97) (CATP.17a)²⁶. The assessment concluded that any subsequent development proposal will need to include protection measures for and of local habitats, due to the presence of Biodiversity Action Plan (BAP) Priority habitat²⁷ and species²⁸ within the site. It is considered that such matters are within the scope of WCS Core Policy 50 (WCO.01)²⁹ and can be adequately addressed through the consideration of ecological assessments accompanying a planning application.
25. When read as whole, alongside the policies of the WCS, the Council considers that the provisions of Policy H2.1 and associated supporting text are capable of ensuring that all necessary infrastructure requirements associated with protecting and enhancing

²² [\[WCO.08A\]](#) Wiltshire Council Community Infrastructure Levy - Charging Schedule May 2015

²³ [\[WHSAP.01.01\]](#) Wiltshire Housing Site Allocations Plan (July 2018)

²⁴ [\[BIO.45\]](#) Draft Trowbridge Bat Mitigation Strategy SPD

²⁵ [\[SA.01A.9\]](#) Sustainability Appraisal Report Annex 1 - A.9 Trowbridge May 2018

²⁶ [\[CATP.17a\]](#) Trowbridge Community Area Topic Paper - September 2018

²⁷ Hedgerows and grassland

²⁸ Great Crested Newts, Grass snake and slow worm

²⁹ [\[WCO.01\]](#) Wiltshire Core Strategy, January 2015

biodiversity will be delivered. Moreover, all infrastructure requirements associated with the development of the Land off the A363 at White Horse Business Park site will be confirmed through any subsequent planning application process in line with up-to-date evidence at the time of submission.

ii. green infrastructure and agricultural land

26. Green infrastructure aspects were assessed through the Sustainability Appraisal (pages 183-184) (SA.01A.9)³⁰ and subsequent assessment at Stage 4 (Trowbridge CATP, Table F.14, p82) (CATP.17a)³¹ and mitigation measures were suggested to incorporate green infrastructure into development proposals.
27. The Sustainability Appraisal (pages 183-184) (SA.01A.9) states that development of the site offers potential to contribute towards the delivery of a comprehensive network of green infrastructure. Development proposals will be considered in the context of requirements set out in WCS Core Policy 52 (WCO.01)³².
28. Paragraphs 5.54 – 5.55 of the Plan (WHSAP.01.01)³³ incorporates a comprehensive approach to addressing recreational pressures resulting from ecological constraints of the town that accord with the provisions of the emerging TBMS (BIO.45)³⁴.
29. Agricultural land was considered and evaluated in the Sustainability Appraisal (page 175) (SA.01A.9). The appraisals concluded that the impact of developing the site was minor to negligible in scale.

iii. landscape quality and character

30. Landscape considerations were assessed through the Sustainability Appraisal (pages 183 - 184) (SA.01A.9) and subsequent assessment at Stage 4 (Trowbridge CATP, Appendix G page 97) (CATP.17a). Further landscape evidence can be found in the Stage 4a Site Landscape Assessment report pages 33 – 35 (PSCON.11A)³⁵.
31. The assessments conclude that the site is generally well contained bordered by the residential edge of North Bradley and the business park. The mature hedgerows to the fields within the site should be retained wherever possible within landscape buffers/ GI corridors or open space forming a landscape framework for the proposed development. There is an opportunity to strengthen the northern boundary adjacent to Bradley Road (A363) with new tree planting.
32. The WSHAP (WHSAP.01.01) recognises in paragraph 5.53 that development would need retain the distinctive pattern of mature and semi-mature hedgerows and trees that form a feature in the landscape and provide a layout that respects the setting of North Bradley village.
33. In conclusion, it is considered that mitigation measures to address landscape quality and character are deliverable and capable of being fully addressed through landscape assessment informing development proposals and submitted as part of a planning

³⁰ [\[SA.01A.9\]](#) Sustainability Appraisal Report Annex 1 - A.9 Trowbridge May 2018

³¹ [\[CATP.17a\]](#) Trowbridge Community Area Topic Paper - September 2018

³² [\[WCO.01\]](#) Wiltshire Core Strategy, January 2015

³³ [\[WHSAP.01.01\]](#) Wiltshire Housing Site Allocations Plan - Submission Document July 2018

³⁴ [\[BIO.45\]](#) Draft Trowbridge Bat Mitigation Strategy SPD

³⁵ [\[PSCON.11A\]](#) Stage 4a Site Landscape Assessment Part 2: Salisbury, Tidworth, Trowbridge, Warminster and Westbury Community - Pre-submission draft plan June 2017

application, in line with WCS Core Policy 51 (WCO.01).

iv. heritage assets

34. The Council acknowledges that there are complexities surrounding the designated and non-designated heritage context of this site. Special regard has been given to the significance of these heritage assets and their settings throughout the site assessment process. Great weight has been applied to conserving and enhancing the assets and their setting. It is considered that the adjustments to the site area and reduction in site capacity mean that the site can be brought forward in a manner that is acceptable from a historic environment perspective.
35. Heritage assets were assessed through the Sustainability Appraisal (pages 181 - 182) (SA.01A.9)³⁶ and subsequent assessment at Stage 4 (Trowbridge CATP, Appendix G, p97) (CATP.17a)³⁷. There are several heritage assets on and adjacent to the site which comprise of the Grade II Listed Buildings of the Baptist burial ground, Kings Farmhouse, Willow Grove and Manor farm, together with Little Common Farm (non-designated asset).
36. Historic England subsequently commented through their formal response to the pre-submission consultation (WHSAP.11)³⁸ that further heritage evidence was required to ensure that the scale of harm to both designated and non-designated assets was understood and that development could be accommodated on proposed allocations with particular heritage sensitivities.
37. Through collaborative working it was agreed with Historic England that a proportionate Heritage Impact Assessment (HIA) (WHSAP.05)³⁹ would be carried out for the six identified sites. An HIA (WHSAP.05) has been carried out for this site providing in depth evidence of the heritage assets and their settings.
38. The HIA (WHSAP.05) concluded that development conserving the relationships between Kings Farmhouse, Willow Grove, Little Common Farm and the Baptist burial ground could reasonably be prioritised to secure both the settings of the assets and a representative section of the historic agricultural landscape that provides the context for North Bradley more generally.
39. As the designated assets are essentially clustered in the south-eastern half of the site, the report considers that development should be concentrated in the north-east end of the site. Such an approach would help conserve the relationships between the local farmsteads and still deliver a reasonable developable area.
40. Existing landscape structure could be strengthened to further reduce effects with a further option to increase the area of development, with appropriate landscape design to reduce visual effects – but greater risk of harm to the setting of the Baptist burial ground.
41. The principles of the WHSAP (WHSAP.01.01)⁴⁰ will ensure that development on site does not cause a high degree of harm and that any impact on the historic environment is sensitively mitigated. At the planning application stage, the layout and design of the site

³⁶ [\[SA.01A.9\]](#) Sustainability Appraisal Report Annex 1 - A.9 Trowbridge May 2018

³⁷ [\[CATP.17a\]](#) Trowbridge Community Area Topic Paper - September 2018

³⁸ [\[WHSAP.11\]](#) Consultation Statement Regulation 22 (1) (c) Appendices M-P (July 2018)

³⁹ [\[WHSAP.05\]](#) Heritage Impact Assessment (LUC) March 2018

⁴⁰ [\[WHSAP.01.01\]](#) Wiltshire Housing Site Allocations Plan - Submission Document July 2018

would need to give great weight to conserving the significance of these heritage assets and their setting in order to minimise harm (Proposed Change PC 61) (EXAM.01.01)⁴¹.

42. Any future planning application will also be considered in the context of requirements set out in WCS Core Policy 58 (WCO.01)⁴².

v. strategic and local infrastructure including transport

43. The requirement to consider strategic and local infrastructure requirements is set by WCS Core Policy 3 (WCO.01) and identified within the supporting text paragraphs 5.52 to 5.57. Core Policy 3 (WCO.01) provides a sound and suitable approach to ensuring that the development of Land off A363 White Horse Business Park will provide for essential and place-shaping infrastructure where it is needed in a timely manner.

44. In Trowbridge, a comprehensive transport study has been carried out (Trowbridge Transport Strategy: Draft Strategy Refresh 2018 (4 May 2018) (WHSAP.07)⁴³. This study has assessed the cumulative impact of all the proposed sites and outline a transport strategy for each settlement which aim to provide for and mitigate the impact of proposed growth. It identifies nine objectives which are specific to Trowbridge. Schemes have been identified, assessed and categorised to meet these objectives and thereby address the current and forecast transport issues in Trowbridge.

45. Strategic and local infrastructure requirements were assessed through the Sustainability Appraisal (pages 186 - 188) (SA.01A.9)⁴⁴ and subsequent assessment at Stage 4 (Trowbridge CATP, Appendix G, p97 - 99) (CATP.17a)⁴⁵ and mitigation measures were identified for development proposals.

46. In terms of site specific related infrastructure, development at this site would result in the need to mitigate pressure on educational facilities and ecology improvements:

- The scheme will provide funding contributions for local school provision (Sustainability Appraisal page 187) (SA.01A.9);
- Comprehensive approach to addressing recreational pressures resulting from ecological constraints of the town through TBMS (Sustainability Appraisal pages 172-174) (SA.01A.9); and
- Paragraph 5.52 of the WHSAP (WSHAP.01.01)⁴⁶ also sets out the are opportunities to provide new routes for walking and cycling that would serve the existing built-up area and that could improve connectivity for a wider area of the town (Sustainability Appraisal page 188) (SA.01A.9).

47. The WHSAP (WHSAP.01.01) includes supporting text at paragraph 5.44 (including Proposed Change PC53) (EXAM.01.01) ensuring that primary school provision is delivered in a timely manner to accommodate the new developments at Trowbridge. As stated above in paragraphs 7 – 11, it is proposed that the WHSAP (WHSAP.01.01) text is further amended to reflect this new evidence at paragraphs 5.44 and 5.57.

⁴¹ [\[EXAM.01.01\]](#) Schedule of Proposed Changes (Sept 2018) (Part 1 of 46) Main Report

⁴² [\[WCO.01\]](#) Wiltshire Core Strategy, January 2015

⁴³ [\[WHSAP.07\]](#) Trowbridge Transport Strategy Refresh May 2018

⁴⁴ [\[SA.01A.9\]](#) Sustainability Appraisal Report Annex 1 - A.9 Trowbridge May 2018

⁴⁵ [\[CATP.17a\]](#) Trowbridge Community Area Topic Paper - September 2018

⁴⁶ [\[WHSAP.01.01\]](#) Wiltshire Housing Site Allocations Plan - Submission Document July 2018

48. The Council considers that existing policy will allow for up to date evidence at the time of a planning application to be used to determine appropriate contribution to any necessary infrastructure, in accordance with WCS Core Policy 3 (WCO.01). However, based on currently available evidence, the Council considers that latent capacity in existing primary schools within the town would not preclude or delay development at this site.

vi. the efficient operation of the transport network, highway safety

49. The efficient operation of the transport network and highway safety were considerations in Stage 4 of the site selection process, and any concerns have been presented in the Trowbridge CATP (Appendix G, pages 98) (CATP.17a)⁴⁷.

50. In Trowbridge, a comprehensive transport study has been carried out (Trowbridge Transport Strategy: Draft Strategy Refresh 2018 (4 May 2018) (WHSAP.07)⁴⁸. This study has assessed the cumulative impact of all the proposed sites and outline a transport strategy for each settlement which aim to provide for and mitigate the impact of proposed growth. It identifies nine objectives which are specific to Trowbridge. Schemes have been identified, assessed and categorised to meet these objectives and thereby address the current and forecast transport issues in Trowbridge.

vii. air and water quality, noise pollution, odours, land stability, groundwater and flood risk

51. The Sustainability Appraisal (pages 177 - 181) (SA.01A.9)⁴⁹ has identified wider considerations and constraints in relation to groundwater, air quality, noise and lighting, sustainable drainage and soakaways. All these issues are considered to be capable of being positively addressed through the development of planning applications.

52. With specific regard to air quality, the Sustainability Appraisal (pages 177 – 179) (SA.01A.9) concludes that local air quality is likely to be affected through increases in vehicular emissions. The council considers that mitigation measures in line with national and local plan policy, including WCS Core Policy 55 (WCO.01)⁵⁰ and Air Quality Strategy (WCO.24)⁵¹, are achievable on this site.

53. In light of the requirements of the NPPF (NPP.01A)⁵² in relation to land stability, there are no known issues of concern in relation to this site.

54. Noise and odours have been considered (Sustainability Appraisal, pages 177 – 178) (SA.01A.9) and the effects identified can be mitigated in accordance with local plan policy and regulations.

55. Recognising the need to positively address flood risk, drainage and ground water protection, paragraph 5.56 as amended by proposed Change PC62 (EXAM.01.01)⁵³, of the WHSAP (WHSAP.01.01)⁵⁴ requires that development proposals for the site should be supported by a Flood Risk Assessment (incorporating an assessment of the

⁴⁷ [\[CATP.17a\]](#) Trowbridge Community Area Topic Paper - September 2018

⁴⁸ [\[WHSAP.07\]](#) Trowbridge Transport Strategy Refresh May 2018

⁴⁹ [\[SA.01A.9\]](#) Sustainability Appraisal Report Annex 1 - A.9 Trowbridge May 2018

⁵⁰ [\[WCO.01\]](#) Wiltshire Core Strategy, January 2015

⁵¹ [\[WCO.24\]](#) Air Quality Strategy for Wiltshire

⁵² [\[NPP.01A\]](#) National Planning Policy Framework (NPPF) (March 2012)

⁵³ [\[EXAM.01.01\]](#) Schedule of Proposed Changes (Sept 2018) (Part 1 of 46) Main Report

⁵⁴ [\[WHSAP.01.01\]](#) Wiltshire Housing Site Allocations Plan - Submission Document July 2018

predicted effects of climate change) and a comprehensive Drainage Strategy to ensure that development will result in improved drainage conditions.

viii. open space, recreational facilities and public rights of way

56. The provision, protection and enhancement of open space, recreational facilities and public rights of way have been assessed through the Sustainability Appraisal (p183-184) (SA.01A.9)⁵⁵ and subsequent assessment at Stage 4 as set out in the Trowbridge CATP (page 82) (CATP.17a)⁵⁶.
57. The WHSAP (para 5.52) (WHSAP.01.01)⁵⁷ states that 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 (Trowbridge CATP page 98) (CATP.17a).
58. Development of the site offers positive benefits associated with the opportunity to deliver green infrastructure through provision of open space, connections to and retention of existing footpath networks and green corridors. This is supported by the existing green infrastructure requirements set out in WCS Core Policy 52 (WCO.01)⁵⁸.

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

59. The Plan contains effective mitigation mechanisms through paragraphs 5.44 and 5.57 that contributions will be sought from development of the site to secure funding contributions towards local school capacity, increased capacity at local doctor's surgeries and dentistry at the town. In terms of site specific related infrastructure, development at this site would result in the need to provide mitigation to address impacts in relation to ecology (in line with the emerging TBMS) (BIO.45)⁵⁹, as set out in paragraph 5.55.
60. The Council considers that existing policy will allow for up to date evidence at the time of a planning application to be used to determine appropriate contribution to any necessary infrastructure, in accordance with WCS Core Policy 3 (WCO.01).
61. Chapter 5 of the Plan including Policies H2 and H2.1 and their supporting text are considered to provide contextual detail that will guide future developers and decision makers and thereby inform mitigation measures required to support development. Reference is made to the need to develop proposals in accordance with existing policies set out in the Wiltshire Core Strategy also, such that there are already effective safeguards to ensuring acceptable forms of development are to be delivered.
62. The Proposed Changes (PC 61 and PC62) to the supporting text of the WHSAP provide further clarity for the user of the Plan by reinforcing the definition of mitigation considered necessary to ensure development will achieve an acceptable form of development.

⁵⁵ [\[SA.01A.9\]](#) Sustainability Appraisal Report Annex 1 - A.9 Trowbridge May 2018

⁵⁶ [\[CATP.17a\]](#) Trowbridge Community Area Topic Paper - September 2018

⁵⁷ [\[WHSAP.01.01\]](#) Wiltshire Housing Site Allocations Plan - Submission Document July 2018

⁵⁸ [\[WCO.01\]](#) Wiltshire Core Strategy, January 2015

⁵⁹ [\[BIO.45\]](#) Draft Trowbridge Bat Mitigation Strategy SPD

Issue 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?

63. WHSAP (WHSAP.01.01⁶⁰ and EXAM.01.01⁶¹) paragraphs 5.1 – 5.12 introduce a range of generic requirements that may be required for each site. Paragraphs 5.1 states that *'development will be required to provide for the necessary on-site and, where necessary, off-site infrastructure requirements arising from proposals in accordance with [WCS] Core Policy 3 (Infrastructure requirements)'*.
64. Requirements for infrastructure contributions will be subject to review through the consideration of future planning applications submitted on the site. It is considered that contributions specified for this site are necessary and justified by the evidence base and the plan is clear on how and when infrastructure will be provided.
65. WHSAP (WHSAP.01.01 and EXAM.01.01) paragraph 5.44 set out the various strategic and local infrastructure requirements for this site, all of which are considered to be achievable and justified by the evidence base.
66. There is no item of critical infrastructure needed in order to support development on the site.
67. In terms of site specific related infrastructure, development at this site will result in the need to provide mitigation to address impacts in relation to ecology (in line with the emerging TBMS), as set out in paragraph 5.44 and paragraphs 5.55 of the WHSAP (WHSAP.01.01). Paragraph 5.44 clearly states that contributions will be sought from development the sites proposed at Trowbridge to secure funding contributions towards local school capacity, increased capacity at local doctor's surgeries and dentistry at the town, as also stated in paragraph 5.57. These requirements are founded on evidence gathered through the plan making process and are therefore considered to be justified and necessary.
68. The Council considers that the planning application process will allow for up to date evidence at the time of a planning application to be used to determine appropriate contribution to any necessary infrastructure, in accordance with WCS Core Policy 3 (WCO.01)⁶².

Issue 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?

69. The accessibility of the proposed allocation was appraised through the SHLAA, (298) and assessed through the Sustainability Appraisal and at Stage 4 of the site assessment process. The site assessment (Sustainability Appraisal page 188) (SA.01A9)⁶³ explains that the site is on the edge of town with good prospects for connectivity to local/town centre services and facilities.
70. The WSHAP (para 5.52) (WHSAP.01.01) also states that there are opportunities to provide improvements to walking and cycling routes through to the town (Trowbridge CATP page 98) (CATP.17a)⁶⁴.

⁶⁰ [\[WHSAP.01.01\]](#) Wiltshire Housing Site Allocations Plan - Submission Document July 2018

⁶¹ [\[EXAM.01.01\]](#) Schedule of Proposed Changes (Sept 2018) (Part 1 of 46) Main Report

⁶² [\[WCO.01\]](#) Wiltshire Core Strategy, January 2015

⁶³ [\[SA.01A.9\]](#) Sustainability Appraisal Report Annex 1 - A.9 Trowbridge May 2018

⁶⁴ [\[CATP.17a\]](#) Trowbridge Community Area Topic Paper - September 2018

71. While residents are likely to use private vehicles, there are existing bus stops on the A363 serving the White Horse Business Park that offer regular connections throughout the day. In addition, opportunities will be explored through the planning application process (e.g. the Transport Assessment and Design and Access Statement) to ensure that development of the site incorporates infrastructure to improve cycling opportunities (such as garages, sheds and secure bike stands) in accordance with WCS Core Policy 60 (WCO.01)⁶⁵.

Issue 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?

72. The submission version of the WHSAP (WHSAP.01.01) explains at paragraph 5.12 that allocations are proposed at some settlements that involve a mix of uses or site specific complexities and where it is more appropriate for development to be guided by a master plan approach, as opposed to detailed matters being addressed through policy criteria. There are five sites that have been identified as requiring a master plan.
73. The remaining sites are allocated by Policies H2 and H3. Due to their less complex nature, these sites were not considered to require a master planned approach, and thus do not have a specific policy. The supporting text to the allocated sites provides future developers and decision makers with important contextual information regarding matters that will need to be addressed through the planning application process. Indeed, as set out Chapter 5 of the WHSAP (WHSAP.01.01), the Council anticipates that development proposals relating to all allocations will be guided by relevant policies of the Wiltshire Core Strategy (WCO.01).
74. In conclusion, the Council considers that the specific requirements for each allocation within the WHSAP can effectively be delivered as drafted through a combination of policies and supporting text that will all be read in conjunction with the WCS.

Issue 5.8 - Is the development proposed for each site deliverable in the timescales envisaged?

75. Yes. The Council considers the proposed allocation can be delivered within five years. Moreover, the site promoters have confirmed that they envisage a planning application will be submitted in 2019.

Issue 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?

76. For sites in Trowbridge, a comprehensive strategy to deal with impacts on the Bath and Bradford on Avon Bats SAC has been derived following a full appropriate assessment and in consultation with Natural England.
77. A settlement level Habitats Regulation Assessment (HRA.01)⁶⁶ concluded that the relationship of the Elm Grove site with the Bath and Bradford on Avon Bats SAC could contribute to effects alone and in-combination with other plans and

⁶⁵ [\[WCO.01\]](#) Wiltshire Core Strategy, January 2015

⁶⁶ [\[HRA.01\]](#) Habitats Regulations Assessment - Pre-submission draft plan June 2017

projects and that a full appropriate assessment would be required (HRA.01). Subsequently the council produced an Addendum under the Habitats Regulations (HRA.02)⁶⁷, and a further Addendum (HRA.02a)⁶⁸ to support the council's Schedule of Proposed Changes. All three assessment documents, each of which included an appropriate assessment, concluded that allocation sites at Trowbridge would need to comply with, and contribute to, a bespoke mitigation strategy for bats which addressed impacts arising from habitat loss / degradation as well as impacts which would be caused by recreational pressure.

78. The Trowbridge Bat Mitigation Strategy (TBMS) (BIO.45)⁶⁹ has been developed specifically to ensure that all impacts arising from allocation sites at Trowbridge will be fully mitigated. The strategy has been developed in consultation with Natural England and with input from local bat ecologists familiar with the area and the requirements of the bat species concerned. The document is currently out for public consultation (21 February – 21 March 2019) and it is intended the document will be adopted as SPD.
79. The TBMS sets out, at a strategic level, mitigation that will be required to be confident that adverse effects to the SAC will be prevented, addressing specifically:
 - (1) Effects of habitat loss within green field sites. Mitigation for impacts alone will be delivered within the development site itself. Mitigation for residual and in-combination effects will be secured by Section 106 contributions towards off-site provision delivered by the Council. This will be based on an amount per dwelling or the equivalent for non-residential development.
 - (2) Effects of recreational pressure arising from all residential development within a set radius from the key bat woodland sites. This cost will be funded through the Community Infrastructure Levy (CIL) (WCO.08A)⁷⁰.
80. Natural England has responded favourably to the above consultation for the TBMS (BIO.45).
81. Biodiversity considerations were assessed through the Sustainability Appraisal (pages 172 - 174) (SA.01A.9)⁷¹, as summarised in Trowbridge CATP (Appendix G, Table G.5, p97) (CATP.17a)⁷².
82. Paragraph 5.44 and 5.55 in the WHSAP (WHSAP.01.01) states that development will also be required to contribute to the delivery of the TBMS (BIO.45) through financial contribution or direct provision of equivalent new infrastructure over and above the Council's normal requirements to delivery new habitat and recreational opportunities in line with criteria in the Strategy (Trowbridge CATP Appendix G, Table G.10, p117) (CATP.17a). Infrastructure requirements will be confirmed through the planning application process according to up to date evidence at the time.

⁶⁷ [\[HRA.02\]](#) Addendum to the Assessment under the Habitat Regulations (May 2018)

⁶⁸ [\[HRA02.a\]](#) Addendum to the HRA May 2018 – Factual Update September 2018)

⁶⁹ [\[BIO.45\]](#) Draft Trowbridge Bat Mitigation Strategy SPD

⁷⁰ [\[WCO.08A\]](#) Wiltshire Council Community Infrastructure Levy - Charging Schedule May 2015

⁷¹ [\[SA.01A.9\]](#) Sustainability Appraisal Report Annex 1 - A.9 Trowbridge May 2018

⁷² [\[CATP.17a\]](#) Trowbridge Community Area Topic Paper - September 2018