

Wiltshire Housing Site Allocations Plan Examination in Public

Position Statement on Matter 3

Housing Site Allocations

H2.3 Elizabeth Way, Trowbridge

PS/M3/22

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Matter 3: Housing Site Allocations

H2.3 Elizabeth Way, Trowbridge

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

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

1. Yes. Policy H2 of the Wiltshire Housing Site Allocations Plan (WHSAP) Submission Document (WHSAP/01/01)¹ 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 the 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 (EXAM.01.01) as being approximately 355 dwellings on a site area of approximately 16.33ha which is considered to be achievable for the site.
3. The WHSAP includes specific details about access at paragraph 5.58, identifying that that Elizabeth Way would serve as access for the site.
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 355 dwellings) is justified by the evidence base (TOP/02⁴, CATP/17a⁵, SA/01A.a⁶, SA/01.09⁷) and has had full regard to site specific constraints including: drainage, flood risk and ecology.
6. In the light of identified constraints, assessments were undertaken to determine an 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).
7. The Strategic Housing Land Availability Assessment (SHLAA – 2011 Methodology)⁸ site capacity was estimated at 384 dwellings for this site (SHLAA 2012 Trowbridge Appendix)⁹, 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.

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

² [\[EXAM.01.01\]](#) Schedule of Proposed Changes (Sept 2018) (Part 1 of 46) Main Report

³ [\[WCO.01\]](#) Wiltshire Core Strategy

⁴ [\[TOP.02\]](#) WHSAP Topic Paper 2 - Site Selection Process Methodology July 2018 Submission version

⁵ [\[CATP.17a\]](#) Trowbridge Community Area Topic Paper - September 2018

⁶ [\[SA.01A.a\]](#) Sustainability Appraisal Report - revised September 2018

⁷ [\[SA.01A.9\]](#) Sustainability Appraisal Report Annex 1 - A.9 Trowbridge May 2018

⁸ [\[SHELAA.22\]](#) SHLAA Methodology - Sept 2011

⁹ [\[SHLAA2012.16\]](#) SHLAA 2012 Appendix-3 Trowbridge

8. Stage 2 of the Plan site assessment process then considered whether exclusionary criteria (such as Flood Zones 2/3) should result in a reduction of the SHLAA site capacity. In the case of H2.6, the site capacity was reduced from 384 to 376 dwellings due to the site's partial location within a flood zone 3. (Trowbridge CATP, Table D.3 page 53-54) (CATP/17a)¹⁰.
9. The amount of development proposed at this site was further reduced due to constraints identified through the Sustainability Appraisal, (pages 90 - 138) (SA.01A.9)¹¹ and subsequent assessment Trowbridge CATP (Appendix F, pages 74 - 78 and Appendix G, pages 89 - 96) (SA/01A.9) (CATP/17a).
10. This was primarily due to the need to protect the habitat of Bechstein's bats, landscape, surface water drainage, air quality and environmental pollution and impacts on the historic environment. In light of these overlapping constraints the capacity of the site was reduced further to 205 dwellings.
11. The site quantum was increased to approximately 355 dwellings and re-assessed accordingly. The results of this additional work led to the Council's Proposed Changes PC13, PC51 and PC64 (EXAM/01/01)¹². Wiltshire Council considers that the development will be achievable within Flood Zone 1, at a density appropriate for this area of Trowbridge, and allowing for the necessary mitigation in relation to surface water drainage and green infrastructure as set out in the supporting text.
12. 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.
13. 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.
14. 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 (WCO/01)¹³. 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.
15. Other key infrastructure requirements are identified in the plan at paragraphs 5.44, and in paragraph 5.66, which includes storm water/foul water drainage capacity, the potential

¹⁰ [\[CATP.17a\]](#) Trowbridge Community Area Topic Paper - September 2018

¹¹ [\[SA.01A.9\]](#) Sustainability Appraisal Report Annex 1 - A.9 Trowbridge May 2018

¹² [\[EXAM.01.01\]](#) Schedule of Proposed Changes (Sept 2018) (Part 1 of 46) Main Report

¹³ [\[WCO.01\]](#) Wiltshire Core Strategy, January 2015

need an increase in capacity of doctor surgeries and dentistry within the town within the town (Trowbridge CATP (Appendix G, Table G.2, p86 – 88) (CATP/17a)¹⁴ and Sustainability Appraisal pages 102, 119/120 and 135-136) (SA.01A.9)¹⁵. Again, the Council consider that such infrastructure requirements will be appropriately assessed and delivered through the subsequent planning application process.

16. In terms of ecological infrastructure, paragraph 5.62 in the WHSAP states that development at Elizabeth Way and sites around the town 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, p117) (CATP/17a).
17. In Trowbridge, a comprehensive transport study has been carried out (Trowbridge Transport Strategy: Draft Strategy Refresh 2018 (4 May 2018)) (WHPAP.07)¹⁷. 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.
18. Other infrastructure requirements are identified in the plan at paragraphs 5.58-5.66 and 5.44, which include the potential need for an increase in capacity of doctor surgeries and dentistry within the town (Trowbridge CATP, Appendix G, Table G.2, p86 – 88 (CATP/17a) and Sustainability Appraisal page 102, 120 and 136 (SA.01A.9)).
19. All forms of necessary infrastructure requirements associated with the development of the Elizabeth Way site 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

20. Any impacts of development on biodiversity can be successfully managed and mitigated, and would not preclude development of the site.
21. For sites in Trowbridge, a comprehensive strategy to deal with impacts on the Bath and Bradford on Avon Bats Special Area of Conservation (SAC) (BIO.04)¹⁹ has been derived following a full appropriate assessment and in consultation with Natural England.
22. A settlement level Habitats Regulation Assessment (HRA.01)²⁰ concluded that the relationship of the Elizabeth Way site with the Bath and Bradford on Avon Bats SAC could

¹⁴ [\[CATP.17a\]](#) Trowbridge Community Area Topic Paper - September 2018

¹⁵ [\[SA.01A.9\]](#) Sustainability Appraisal Report Annex 1 - A.9 Trowbridge May 2018

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

¹⁷ [\[WHSAP.07\]](#) Trowbridge Transport Strategy Refresh May 2018 15052018 Cabinet

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

¹⁹ [\[BIO.45\]](#) JNCC Bath and Bradford on Avon Bats Special Area of Conservation (SAC)

²⁰ [\[HRA.01\]](#) Habitats Regulations Assessment - Pre-submission draft plan June 2017

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)²¹, and a further Addendum (HRA.02a)²² 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.

23. The Trowbridge Bat Mitigation Strategy (TBMS)²³ 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.
24. 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).
25. Paragraphs 5.44 and 5.62 in the WHSAP (WHSAP/01/01)²⁴ state that development will be required to contribute to the delivery of the TBMS through financial contribution or direct provision of equivalent new infrastructure over and above the Council's normal requirements (Trowbridge CATP, Appendix G, Table G.10, p117) (CATP/17a)²⁵.
26. Natural England has responded favourably to the above consultation for the TBMS.
27. Biodiversity considerations were also assessed through the Sustainability Appraisal (pages 90, 106 and 123) (SA.01A.9)²⁶, as summarised in Trowbridge Community Area Topic Paper (Appendix G, Table G.3 and G4, p89-96) (CATP/17a). The assessment concluded that any subsequent development proposal will need to include protection measures for local habitats, due to the presence of Biodiversity Action Plan (BAP) Priority habitat²⁷ and species within the site. It is considered that such matters are within the scope of WCS Core Policy 50 (WCO/01)²⁸ and can be adequately addressed through the consideration of ecological assessments accompanying a planning application.

²¹ [\[HRA.02\]](#) Addendum to the Assessment under the Habitat Regulations - Pre-submission draft plan May 2018

²² [\[HRA.02.a\]](#) Addendum to the Assessment under the Habitat Regulations - Factual update September 2018

²³ [\[BIO.45\]](#) Draft Trowbridge Bat Mitigation Strategy

²⁴ [\[WHSAP.01.01\]](#) Wiltshire Housing Site Allocations Plan - Submission Document July 2018

²⁵ [\[CATP.17a\]](#) Trowbridge Community Area Topic Paper - September 2018

²⁶ [\[SA.01A.9\]](#) Sustainability Appraisal Report Annex 1 - A.9 Trowbridge May 2018

²⁷ Hedgerows and hedgerow trees

²⁸ [\[WCO.01\]](#) Wiltshire Core Strategy, January 2015

28. When read as whole, alongside the policies of the WCS, the Council considers that the provisions of Policy H2 and associated supporting text are capable of ensuring that all necessary infrastructure requirements associated with protecting and enhancing biodiversity will be delivered. Moreover, all infrastructure requirements associated with the development of the Elizabeth Way 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

29. Green infrastructure aspects were assessed through the Sustainability Appraisal (page 9, 116 and 133) (SA.01A.9)²⁹ and subsequent assessment at Stage 4 (Trowbridge CATP, Appendix G, p75 and 76) (CATP/17a)³⁰ and mitigation measures were suggested to incorporate GI into proposals.

30. The Sustainability Appraisal, at pages 99, 116 and 133 (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).

31. Agricultural land is discussed in the Sustainability Appraisal (page 91, 108 and 125) (SA.01A.9). A large part of the site appears to be underlain by Grade 3a Best and Most Versatile agricultural land. The remainder of the land appears to be underlain by Grade 3b Best and Most Versatile agricultural land. Development of the site would result in the permanent loss of agricultural land.

iii. landscape quality and character

32. Landscape considerations were assessed through the Sustainability Appraisal (pages 99 - 100, 116 - 117 and 132 - 133) (SA.01A.9) and subsequent assessment at Stage 4 (Trowbridge CATP, Appendix G pages 90 and 94) (CATP.17a). Further landscape evidence can be found in the Landscape Assessment report (pages 25 – 32)³¹.

33. It is recognised that the recently constructed Elizabeth Way has fundamentally altered the character and appearance of this area of land and that the road introduced a hard urbanising feature into what was agricultural land.

34. Mitigation measures were recommended through the assessment process so that the development proposals will need to be carefully designed so as to protect the character and appearance of surrounding residential stock and a greenspace framework should allow for the retention for the retention of the parkland character and incorporation of a green space network. The WSHAP recognises in paragraph 5.59 and 5.63 that development recognises the existing natural features of the site are significant in the landscape and would be incorporated within the detailed layout. It is considered that mitigation measures are possible and subsequently the area of the site was reduced to the proposed area of the allocation.

35. 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

²⁹ [\[SA.01A.9\]](#) Sustainability Appraisal Report Annex 1 - A.9 Trowbridge May 2018

³⁰ [\[CATP.17a\]](#) Trowbridge Community Area Topic Paper - September 2018

³¹ [\[PSCON.11A\]](#) Stage 4a Site Landscape Assessment Part 1

application, in line with WCS Core Policy 51 (WCO/01)³².

iv. heritage assets

36. 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 site area and level of development mean that the site can be brought forward in a manner that is acceptable from a historic environment perspective.
37. Heritage assets were assessed through the Sustainability Appraisal (pages 97 - 98, 114 - 115 and 130 - 132) (SA.01A.9)³³ and subsequent assessment at Stage 4 (Trowbridge CATP, Appendix G, pages 90 - 91 and 94) (CATP.17a)³⁴.
38. Historic England subsequently commented through their formal response to the pre-submission consultation 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.
39. Through collaborative working it was agreed with Historic England that a proportionate Heritage Impact Assessment (HIA) would be carried out for the six identified sites. An HIA has been carried out for this site providing in depth evidence of the heritage assets and their settings.
40. The Heritage Impact Assessment (HIA) (WHSAP.05)³⁵ noted that development would be in close proximity to the Grade II* Listed Buildings Highfield and the designed landscape in which it sits; and the Hilperton Conservation Area, Grade II Listed Buildings Church of St. Michael and All Angels, seven funerary monuments in the churchyard of St. Michael and All Angels, Rock Villa, Victoria Road, walls and gatepiers listed separately, 1 and 3 Victoria Road and 15 and 17 Victoria Road.
41. This concluded that whilst the site would not be adversely affect nearby Listed Buildings and conservation area, the layout and design of the site would need to give great weight to the significance of nearby heritage assets and their setting, and a detailed heritage assessment (building on the high-level Heritage Impact Assessment prepared as part of the evidence of the WHSAP plan) would be required to support any subsequent planning application (WHSAP paragraph 5.64, Proposed Change PC65) (EXAM.01.01)³⁶.

v. strategic and local infrastructure including transport

42. The requirement to consider strategic and local infrastructure requirements is set by WCS Core Policy 3. Core Policy 3 provides a sound and suitable approach to ensuring that the development of Elizabeth Way site will provide for essential and place-shaping infrastructure where it is needed in a timely manner.

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

³³ [\[SA.01A.9\]](#) SA Report Annex 1 A9 Trowbridge

³⁴ [\[CATP.17a\]](#) Trowbridge CATP – Updated September 2018

³⁵ [\[WHSAP.05\]](#) Heritage Impact Assessment (LUC) March 2018

³⁶ [\[EXAM.01.01\]](#) Schedule of Proposed Changes (Sept 2018)

43. The site has been assessed against the following factors:
- accessibility to local bus services, rail stations and service centres
 - likely impacts on the local road network
 - site access arrangements and impacts.
44. In Trowbridge, a comprehensive transport study has been carried out (Trowbridge Transport Strategy: Draft Strategy Refresh 2018 (4 May 2018) (WHSAP.07)³⁷. 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 102 - 104, 119 – 121 and 135 - 137) (SA.01A.9)³⁸ and subsequent assessment at Stage 4 (Trowbridge CATP, Appendix G, p116-118) (CATP/17a)³⁹ and mitigation measures were identified for any subsequent development proposals.
46. In terms of site specific related infrastructure, development at this site would result in the need to mitigate pressure on educational provision, sewage, drainage, ecology and transport/highways improvements:
- The scheme will provide funding contributions for local school provision;
 - 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 (WHSAP para 5.63) (Sustainability Appraisal pages 96 - 97, 119 - 120 and 129 – 130) (SA.01A.9);
 - Comprehensive approach to addressing recreational pressures resulting from ecological constraints of the town through TBMS (WHSAP para 5.62) (WHSAP.01.01)⁴⁰ (Sustainability Appraisal pages 89- 90, 105 – 107 and 122 – 124) (SA.01A.9); and
 - Paragraph 5.65 of the WHSAP 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 pages 100, 103, 117, 121, 133 and 137) (SA.01A.9).
47. The Plan includes supporting text at paragraph 5.44 (including proposed change PC53) (EXAM.01.01)⁴¹ 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 Plan text is further amended to reflect this new evidence at paragraphs 5.44 and 5.57.
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

³⁷ [\[WHSAP.07\]](#) Trowbridge Transport Strategy Refresh May 2018

³⁸ [\[SA.01A.9\]](#) SA Report Annex 1 A9 Trowbridge

³⁹ [\[CATP.17a\]](#) Trowbridge CATP – Updated September 2018

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

⁴¹ [\[EXAM.01.01\]](#) Schedule of Proposed Changes (Sept 2018)

infrastructure, in accordance with WCS Core Policy 3 (WCO/01)⁴². 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 91 and 95) (CATP/17a)⁴³.
50. 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.
51. The site can be effectively and safely accessed.

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

52. The Sustainability Appraisal (pages 91-99, 107-114 and 124-130) (SA.01A.9)⁴⁴ has identified wider considerations and constraints for 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.
53. With specific regard to air quality, the Sustainability Appraisal 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) and the Air Quality Strategy (WCO.24)⁴⁵, are achievable on this site.
54. In light of the requirements of the NPPF (NPP.01A)⁴⁶ in relation to land stability, there are no known issues of concern in relation to this site.
55. Noise and odours have been considered (Sustainability Appraisal, pages 93 – 95, 110 – 111 and 127 - 128) (SA.01A.9) and the effects identified can be mitigated in accordance with local plan policy and regulations.
56. Air quality, noise, odours and vibration associated with construction as well as any impacts caused by or affecting the residential use have also been considered and the effects identified can be fully mitigated through application of existing policy and regulations. Mitigation measures to limit the impacts of vehicular movements on local air quality would need to be developed and implemented in accordance with local plan policy and advice from relevant bodies.

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

⁴³ [\[CATP.17a\]](#) Trowbridge CATP – Updated September 2018

⁴⁴ [\[SA.01A.9\]](#) SA Report Annex 1 A9 Trowbridge

⁴⁵ [\[WCO.24\]](#) Air Quality Strategy for Wiltshire

⁴⁶ [\[NPP.01A\]](#) National Planning Policy Framework (NPPF) March 2012)

57. The site is located within flood zone 1 however parts of the site are prone to surface water ponding / flooding and minor watercourses flow through the site. The watercourse and surface water flows contribute to a wider drainage catchment. As such development of the site should be considered considering the wider catchment level (Sustainability Appraisal, pages 96 – 97, 112 – 114 and 129 - 130) (SA.01A.9)⁴⁷.
58. Recognising the national and local planning policy imperative for the need to positively address flood risk, drainage and ground water protection, paragraph 5.63 requires 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. It goes on to say, as amended by PC66 (EXAM.01.01)⁴⁸, that the WHSAP requires that developments be supported by a Flood Risk Assessment (incorporating an assessment of the predicted effects of climate change) and a comprehensive Drainage Strategy to help inform matters of layout and design.

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

59. The provision, protection and enhancement of open space, recreational facilities and public rights of way have been assessed through the Sustainability Appraisal (p100, 117 and 133) (SA.01A.9). The WSHAP (para 5.65) states that there 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 (Trowbridge CATP pages 103, 120 and 137(CATP.17a)⁴⁹).
60. Development of the site offers positive benefits and 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)⁵⁰.

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?

61. The Plan contains effective mitigation mechanisms through paragraphs 5.44 and 5.66 (WSHAP.01.01)⁵¹ 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)⁵²), as set out in paragraph 5.62 (WSHAP.01.01).
62. 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)⁵³.
63. 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

⁴⁷ [\[SA.01A.9\]](#) SA Report Annex 1 A9 Trowbridge

⁴⁸ [\[EXAM.01.01\]](#) Schedule of Proposed Changes (Sept 2018)

⁴⁹ [\[CATP.17a\]](#) Trowbridge CATP – Updated September 2018

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

⁵¹ [\[WHSAP.01.01\]](#) Wiltshire Housing Site Allocations Plan (July 2018)

⁵² [\[BIO.45\]](#) Draft Trowbridge Bat Mitigation Strategy SPD

⁵³ [\[WCO.01\]](#) Wiltshire Core Strategy

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.

64. The Proposed Changes (PC65 and PC66) (EXAM.01.01)⁵⁴ 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.

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?

65. WHSAP (WHSAP/01.01⁵⁵ and EXAM/01.01) 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)'*.
66. 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.
67. 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.
68. There is no item of critical infrastructure needed in order to support development on the site.
69. 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) (BIO/45)⁵⁶, as set out in paragraph 5.44 and paragraphs 5.62 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 stated in paragraph 5.66. These requirements are founded on evidence gathered through the plan making process and are therefore considered to be justified and necessary.
70. The Council considers that existing 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)⁵⁷.

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?

71. The accessibility of the proposed allocation was appraised through the SHLAA, (combination of sites 297, 263 and partially 293) and assessed through the

⁵⁴ [\[EXAM.01.01\]](#) Schedule of Proposed Changes (Sept 2018)

⁵⁵ [\[WHSAP.01.01\]](#) Wiltshire Housing Site Allocations Plan (July 2018)

⁵⁶ [\[BIO.45\]](#) Draft Trowbridge Bat Mitigation Strategy SPD

⁵⁷ [\[WCO.01\]](#) Wiltshire Core Strategy

Sustainability Appraisal and at Stage 4 of the site assessment process. The site assessment (Sustainability Appraisal page 103, 121 and 137) (SA.01A9)⁵⁸ explains that the site is on the edge of town with good prospects for connectivity to local/town centre services and facilities.

72. The WSHAP (para 5.65) also states that there 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 (Trowbridge CATP pages 103, 120 and 137) (CATP.17a)⁵⁹.
73. While residents are likely to use private vehicles, there is a bus stop north west of the site on Wyke Road which provided a regular access to local services. 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)⁶⁰.

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?

74. The submission version of the WSHAP (WHSAP.01.01)⁶¹ 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.
75. 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 WSHAP (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).
76. In conclusion, the Council considers that the specific requirements for each allocation within the WSHAP 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?

77. Yes. The Council considers the proposed allocation can be delivered within five years. Moreover, there are several site promoters. There is one application already submitted to the Council (planning application no.16/00672/OUT) (PH/11)⁶² and the other developers have confirmed that they envisage that a planning application will be submitted within the next 5 years.

⁵⁸ [\[SA.01A.9\]](#) SA Report Annex 1 A9 Trowbridge

⁵⁹ [\[CATP.17a\]](#) Trowbridge CATP – Updated September 2018

⁶⁰ [\[WCO.01\]](#) Wiltshire Core Strategy

⁶¹ [\[WHSAP.01.01\]](#) Wiltshire Housing Site Allocations Plan (July 2018)

⁶² [\[PH11\]](#) Planning Application 16/00672/OUT - Land West of Elizabeth Way (Land SW of Hilperon Marsh) (HILPERTON GAP), Trowbridge (site H2.3)

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?

78. For sites in Trowbridge, a comprehensive strategy to deal with impacts on the Bath and Bradford on Avon Bats SAC⁶³ has been derived following a full appropriate assessment and in consultation with Natural England.
79. A settlement level Habitats Regulation Assessment (HRA.01)⁶⁴ 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)⁶⁵, and a further Addendum (HRA.02a)⁶⁶ 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.
80. The Trowbridge Bat Mitigation Strategy (TBMS)⁶⁷ 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.
81. 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).
82. Paragraphs 5.44 and 5.62 in the WHSAP (WHSAP/01/01)⁶⁸ state that development will be required to contribute to the delivery of the TBMS (BIO/45)⁶⁹ through financial contribution or direct provision of equivalent new infrastructure over and above the Council's normal requirements (Trowbridge CATP Appendix G, Table G.10, p117) (CATP/17a)⁷⁰.

⁶³ [\[BIO.04\]](#) JNCC Bath and Bradford on Avon Bats Special Area of Conservation (SAC)

⁶⁴ [\[HRA.01\]](#) Habitat Regulation Assessment Pre0submission draft plan June 2017

⁶⁵ [\[HRA.02\]](#) Addendum to the Assessment under the Habitat Regulations (May 2018)

⁶⁶ [\[HRA.02.a\]](#) Addendum to the HRA May 2018 – Factual Update September 2018)

⁶⁷ [\[BIO.45\]](#) Draft Trowbridge Bat Mitigation Strategy SPD

⁶⁸ [\[WHSAP.01.01\]](#) Wiltshire Housing Site Allocations Plan (July 2018)

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

⁷⁰ [\[CATP.17a\]](#) Trowbridge CATP – Updated September 2018

83. Natural England has responded favourably to the above consultation for the TBMS (BIO/45).
84. Biodiversity considerations were also assessed through the Sustainability Appraisal (pages 90, 106 and 123 (SA.1A.9)⁷¹, as summarised in Trowbridge CATP (CATP/17a)⁷², Appendix G, Table G.3 and G4, p89-96). Paragraph 5.44 and 5.62 in the WHSAP (WHSAP.01.01)⁷³ states that development will also be required to contribute to the delivery of the Trowbridge Bat Mitigation Strategy (TBMS)(BIO/45)⁷⁴ (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.

⁷¹ [\[SA.01A.9\]](#) SA Report Annex 1 A9 Trowbridge

⁷² [\[CATP.17a\]](#) Trowbridge CATP – Updated September 2018

⁷³ [\[WHSAP.01.01\]](#) Wiltshire Housing Site Allocations Plan (July 2018)

⁷⁴ [\[BIO.45\]](#) Draft Trowbridge Bat Mitigation Strategy SPD