

WILTSHIRE HOUSING SITE ALLOCATIONS PLAN (WHSAP) EXAMINATION
Written Statement 1 of 3 by North Bradley Parish Council

1.0 Introduction:

1.1 This statement is made against the soundness of the WHSAP and in particular its approach towards consultation with the North Bradley Neighbourhood Plan (NDP) Steering Group on the parallel development of the NDP and WHSAP.

1.2 Representations

Issue 1: Legal Compliance, Duty to cooperate, Sustainability Appraisal and consultation

1.3 *Has consultation on the Plan been carried out in accordance with the Council's adopted Statement of Community Involvement (SCI) and the minimum consultation requirements in the Regulations?*

1.3 Unfortunately, the North Bradley Neighbourhood Plan Steering Group, led by the Parish Council, has found Wiltshire Council largely unwilling to truly engage and help co-ordinate the WHSAP with the emerging Neighbourhood Plan (NDP). This is considered to be essential since, the NDP proposes sites of its own and is also being asked to accept large sites imposed on it by the WHSAP. It is also a key method of delivering the Localism Agenda. We have pointed out to Wiltshire Council that NPPF Paragraph 157 states: '*Crucially, Local Plans should ... be based on co-operation with neighbouring authorities, public, voluntary and private sector organisations*'. Logically, this must include a Parish Council developing a neighbourhood plan, since PPG 009 Reference ID: 41-009- 20160211, states: '*The local planning authority should work with the qualifying body to produce complementary neighbourhood and Local Plans. It is important to minimise any conflicts between policies in the neighbourhood plan and those in the emerging Local Plan, including housing supply policies*'.

1.4 Numerous attempts were made to engage with Wiltshire Council (see for example letter dated 11 June 2018, see Appendix 1) but they proved largely unwilling to help co-ordinate the emerging community-based NDP and their own top-down HSAP approach.

1.5 There are 3 Strategic WHSAP sites located in or partly in the area of North Bradley Parish Council:

- 'Elm Grove Farm' H2.1,
- 'Southwick Court', H2.6, and
- 'Land off the A363 at White Horse Business Park' H2.2.

While also allocating sites of its own, the NDP has accepted all of these, despite their large size and effects on the rural area, but has managed, with some difficulty, to negotiate a reduction in the number of homes on site H 2.2 to provide for a landscape gap. This change required the direct intervention of Wiltshire Council members at Cabinet (Tuesday, 3rd July, 2018 9.30 am (Item 257)).

1.6 While grateful for the belated amendment to the housing numbers, the Parish Council is frustrated to discover that the present draft of the WHSAP includes policy detail that contradicts the emerging NDP (see also representation concerning Issue 4), despite very strenuous efforts to avoid this in terms of e-mails, letters, meetings and discussions with Wiltshire Council.

1.7 In particular, the Parish Council responded with a detailed written submission to the WHSAP 'EXAM.01 Focussed Consultation on Schedule of Proposed Changes' in October 2018. This response is given here as Appendix 2.



NORTH BRADLEY PARISH COUNCIL

INCORPORATING

NORTH BRADLEY, BROKERSWOOD AND YARNBROOK

Reply to : 12 Churchlands, North Bradley, BA14 0TD

11 June 2018

Mr T Martienssen
Director of Economic Development & Planning
Wiltshire Council
Bythesea Road
Trowbridge

Dear Mr Martienssen

Meeting 12 noon 13th June

Thank you for your invitation to meet with you and the team on Wednesday 13th June at 12 noon to discuss our Neighbourhood Plan and its progress. Particular reference is to be given to the Trowbridge Community Area Topic Paper, WHSAP, recently issued.

We wish to discuss the fact that we responded to this document in mid August 2017 informing you of our Neighbourhood Plan and its progress with relation to HSAP. Our submission and comments were made well before 22nd September 2017, the closing date of the consultation, but Wiltshire Council have never acknowledged our submission or commented on our report. Furthermore, we were very surprised to find in the May 2018 Cabinet papers a HSAP update which made no reference to the Neighbourhood Plans or our suggestions for modification to the HSAP programme.

We find it unfortunate that despite our attempts to facilitate close working through the consultation period our efforts have been not only ignored but unacknowledged. We would like to see a much closer working relationship between our Neighbourhood Plan Steering Group, this Parish Council and yourselves. Currently both plans continue to progress but at odds with each other. This we would feel obliged to bring to the attention of the Inspector at the HSAP's Examination in Public. As you are aware the Government's Localism Agenda, from the Localism Act 2011, aimed to replace top down planning for housing with a more democratic system based on Neighbourhood Plans developed by communities such as ourselves.

In the main Neighbourhood Planning has been a great success and involved close working between Planning Authorities and local communities such as ours, with over 1,900 plans now adopted or under development nationally. There are around 100 in Wiltshire alone. A result of this closer working has often produced 10% more housing than local Councils original plans. We find it a great pity that this success has not been reflected by Wiltshire Council's attitude and lack of co-operative working in our case.

2.....

What we find even more disappointing is that North Bradley's Neighbourhood Plan agreed with your HSAP in two of the three sites proposed, HSAP site H2.1 Elm Grove Farm and site H2.6 Southwick Court, but rejected HSAP site H2.2 Land off White Horse Business Park.

Our Neighbourhood Plan has located and proposed several other sites which have been offered in the village but which have been ignored by your Spatial Planning.

Furthermore, apart from an initial meeting at County Hall, approximately 18 months ago, we have had no comment, support or liaison with our Case Officer, David Cox. Not once has he asked to discuss our progress or visited the group or Parish.

Briefing Note No. 355 on the HSAP requests that all comments and suggestions to amendments to the schedule should be submitted by 12 noon by Monday 11th June 2018. This group feel that we have adequately met this deadline by the work already submitted. For example our 'Formal Consultation Response to Wiltshire Housing Site Allocations DPD' dated August 2017, 'Our Community 2018-2026 SEA and HRA Screening Draft' May 2018, 'Our Community 2018-2026 Site Selection Report' May 2018. I would also refer to the letter from Cllr. Horace Prickett to Alistair Cunningham dated 21st March 2018 and a letter from North Bradley Parish Council, also to Alistair Cunningham, dated 19th March 2018.

At our meeting on Thursday we feel it is essential that any discussion must centre around the lack of co-operation and total lack of response to our Neighbourhood Plan Steering Group. In future we would hope to see far more co-operation and support from Wiltshire Council during the preparation and completion of our Neighbourhood Plan.

This letter supports the joint paper from ourselves and Market Lavington NPSG and fully commend this document and the comments it makes.

Yours sincerely

Cllr. Mrs Lee Lee
Vice Chair North Bradley Parish Council
Chair of Neighbourhood Plan Steering Group.

North Bradley Parish Council

Formal Consultation Response to Wiltshire Housing Site Allocations Plan EXAM.01 Focussed Consultation on Schedule of Proposed Changes

October 2018

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Appendix 2:	Site Map for HSAP Site 2.2.

Glossary of Terms

Acronym or Term	Definition
HSAP	Housing Site Allocations Plan
LPA	Local Planning Authority (Wiltshire Council)
NB	North Bradley
NDP	Neighbourhood Development Plan
NPPF	National Planning Policy Framework - 'The Framework' sets out planning policies for England
PPG	Planning Practice Guidance
SAC	Special Area of Conservation
WCS	Wiltshire Core Strategy

1.0 Introduction

- 1.0 This is the formal response of North Bradley Parish Council to the '*Focussed Consultation of the Schedule of Changes to the Wiltshire Housing Site Allocations Plan*' (HSAP). The Parish Council acknowledges the change in respect of the Strategic Site 298 H 2.2 '*Land off A363 at White Horse Business Park*' following submissions on behalf of the Parish Council. While the Parish Council would prefer that this site is not developed, it does not wish to impede the delivery of a strategic site and recognises the need to avoid conflict between higher level plans and the NDP. On this basis only it therefore SUPPORTS the allocation of all the proposed strategic sites ('*Elm Grove Farm*' (SHELAA Site 613, HSAP H2.1), '*Southwick Court*' (SHELAA Site 3565, HSAP H2.6) and '*Land off the A363 at White Horse Business Park*' (SHELAA Site 298, HSAP H2.2).
- 1.1 HOWEVER, while the revised HSAP indicates that the quantum of development on site 298 / H 2.2 has been reduced to facilitate the creation of a meaningful landscape gap between the site and Trowbridge, it does not take account of the work already done between the Neighbourhood Plan team, the team's professional planner, landscape architect and the LPA's own ecologist. The Parish Council therefore believes that it is necessary to add more detail to the plan text in order to:
- 1.2 This Response also comments on the proposed settlement boundary changes to North Bradley village, which the Parish Council SUPPORTS.

2.0 Policy H 2: HSAP Site H 2.2 / SHELAA 298 Land off White Horse Business Park

2.0 The proposed change indicated at PC60 in the Extended Consultation document reduces the number of homes at site H2.2 (land off the A363 south-west of the White Horse Business Park) from 225 to 175. The explanatory text says that this is;

'To reflect the resolution of Wiltshire Council's Cabinet, the capacity of allocation H2.2 is proposed to be amended. It was previously proposed through a schedule of proposed changes put before May Cabinet that the site capacity should be increased from 150 dwellings to 225 dwellings in order to maximise efficient use of land whilst protecting heritage and ecological interests. However, as a result of subsequent further consultation it was resolved by Cabinet in July 2018 that the figure of 225 should be reduced by 50 dwellings, to 175. This would better enable the provision of a strategic landscape buffer between Trowbridge and the village of North Bradley.'

2.1 This is welcome. However, in fact the resolution of the Cabinet reflected the emergence of the North Bradley Neighbourhood Plan, brought to Cabinet's attention by local councillors. This emerging Neighbourhood Plan establishes a defined landscape buffer between Trowbridge and the village of North Bradley. Through discussions with the county ecologist it also goes further than this and puts forward a specific general layout for site H 2.2, designed to provide a satisfactory landscape gap (as determined by professional landscape architect consultants) which is also optimal in respect of the flightpaths and foraging corridors for the protected bats of the Bath and Bradford on Avon SAC (as suggested by the County Ecologist).

2.2 As it stands, the allocation of site H 2.2 in the HSAP covers the following matters:

- a) Number of dwellings
- b) Need to separate Trowbridge and North Bradley and respect setting of the village
- c) Need to focus development proposals within the north-east of the site
- d) Improvements in walking and cycling infrastructure
- e) Retention of landscape features
- f) Need to create a 'dark corridor' for bats
- g) Contributions towards school and medical facilities.

2.3 However it does not include:

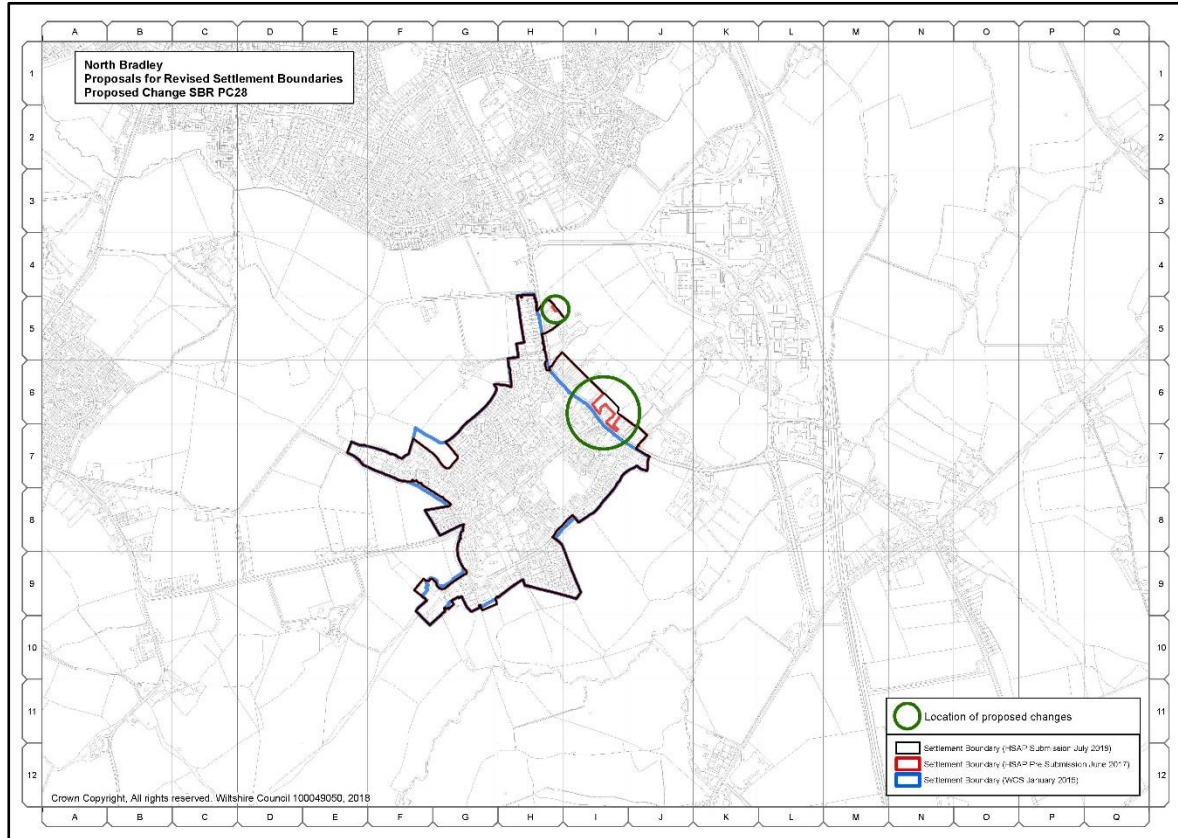
- a. The fact that a more detailed site layout is being developed by the North Bradley Neighbourhood Plan (NDP)
- b. That the NDP will contain a landscape setting policy covering the entire area.
- c. That the preferred layout in the NDP does NOT concentrate development in the north-east as proposed in the HSAP but west and south-west - adjacent to the village. This has been discussed and agreed between the landscape architects advising the NDP and the County Ecologist.

Of all the above points, point c) is the most critical. As presently written there is likely to be a conflict between the NDP and the HSAP on this point.

- 2.4 It is accepted that the North Bradley Neighbourhood Plan has not yet reached the Regulation 16 stage. However, it seems likely to do so before the HSAP is adopted. It should therefore be possible to make some mention of the link between the two plans, at least in general terms at this stage. This would not be putting too much weight on an emerging plan, simply improving co-ordination between community and council planning at an appropriate stage ('working constructively' as advised by PPG paragraph 43) and demonstrating awareness, support for Localism and good practice. It would also be allowing the NDP to achieve the role anticipated for it in NPPF paragraph 28 in adding value and detail to the Development Plan, something that would provide greater clarity and opportunity for engagement by the developers of Site H 2.2.
- 2.5 It is therefore suggested that the following changes (indicated in blue text) are made to the text of Policy H 2.2:
- 5.52 *Approximately 25.26 ha of land off the A363 south-west of the White Horse Business Park is allocated for the development of approximately 175 dwellings, as identified on the Policies Map. It is reasonably well located with regard to services and facilities. The site extends over a significant area of agricultural land used for a mix of grazing and arable cropping. It is contained, to a degree, by existing development to the east and west and fronts a 'gateway' route to the town. An objective of detailed design and layout will be to retain visual separation of the Town's urban area from North Bradley village. The issue of the setting of the village of North Bradley is currently being taken forward by the emerging North Bradley Neighbourhood Plan which aims to create a landscape setting policy and suggests a general site layout for this HSAP site. The NDP has yet to reach The Regulation 16 stage, when it will have significant weight, however it is already clear that to achieve a satisfactory design, creating a suitable landscape buffer while simultaneously conserving biodiversity, development proposals would need to be focussed within the **west and south-west of the site**, screened with new planting and provide improvements to walking and cycling routes through to the town.*
- 5.53 *The site is characterised by a distinctive pattern of mature and semi-mature hedgerows and trees that form a feature in the landscape. Development of the site would need to retain these features and thereby provide a layout that respects the setting of North Bradley village as an important element of detailed design. Existing hedgerows and trees also provide habitat for protected and non-protected species. These natural features therefore provide wildlife corridors that link habitat features within the local area; in particular, 'dark corridors' for foraging bats. This matter is addressed further in the emerging North Bradley Neighbourhood Plan and its supporting documents which include a landscape assessment and have involved the participation of the County Ecologist. These documents will achieve significant weight once they reach the Regulation 16 stage.*
- 5.54 *The site is in an area likely to be used by Bechstein's bats associated with the Bath and Bradford on Avon Bats SAC. Sensitive habitat features on / adjacent to the site include: woodland belts associated with the White Horse Business Park; a network of mature hedgerows/hedgerow trees; and the grounds of Willow Grove.*
- 5.55 *These features should be retained and / or buffered from development (including residential gardens) by wide (10-16m), dark (<1 lux), continuous corridors of native landscaping which will allow for their long-term protection and favourable management in order to secure continued or future use by Bechstein's bats. Development will be required to contribute towards the delivery of the Trowbridge ~~Bat Recreation Management~~ Mitigation Strategy.*

3.0 Boundary Changes

3.0 The revised HSAP proposes settlement boundary changes as indicated on the map below. The Parish Council support these changes which represent 'good housekeeping', tidying the boundary to reflect the current pattern of development.



4.0 Conclusion

4.0 The Parish Council generally does not object to the revised HSAP. However changes are necessary for the sake of clarity and to better co-ordinate two emerging Development Plan Documents. In particular a great deal of effort has been expended in discussions with the county ecologist and the landscape architect advising the NDP Steering Group to devise the best site layout that will achieve the twin objectives of:

- Best separating Trowbridge and North Bradley and providing a meaningful rural setting for the village, and at the same time,
- Protecting the habitat of protected bats from the SAC.

This site layout so devised is fundamentally different from the one put forward in the HSAP and this discrepancy needs to be corrected in order to prevent conflict later in the plan process for both HSAP and NDP and to best protect the bats of the SAC. Development at site H2.2 should be concentrated in the west and south west, not in north-east as proposed in the current HSAP draft.

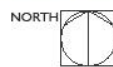
4.1 Maps showing both the proposed HSAP site H 2.2 and the proposed layout in the North Bradley NDP are given as appendices to this Response.

Appendix 1: Landscape Gap Area and Proposed General Site Layout for H 2.2 (Development concentrated in south and west of site to leave clear bat corridor)

LANDSCAPE & VISUAL SETTING ANALYSIS PROPOSED LANDSCAPE GAP, NORTH BRADLEY, TROWBRIDGE



0 250m 500m
METRES



- | | | |
|------------|--|--|
| KEY | Parish Council Boundary | Landscape buffer zones including the retention of mature trees and hedgerows, proposed green routes and informal open space |
| | Extent of North Bradley Landscape Gap | Landscape enhancement within the Landscape Gap delivered as part of future development including reinstating native hedgerows and new woodland structure (buffer) planting |
| | Potential Southwick Landscape Gap | Public Bridleway (Axe and Cleaver Lane) |
| | SHELAA site 298 / HSAP site H 2.2 Land off the A363 at White Horse Business Park | Public Footpath |
| | Areas of development within the SHELAA site 298 / HSAP site H 2.2 | Potential footpath / cycle routes delivered as part of new development |
| | Potential site access | Potential to reinstate public right of way should the football club be relocated in the future |
| | | Trowbridge FC area with potential for significant enhancement to restore land to countryside should the football club be relocated in the future |

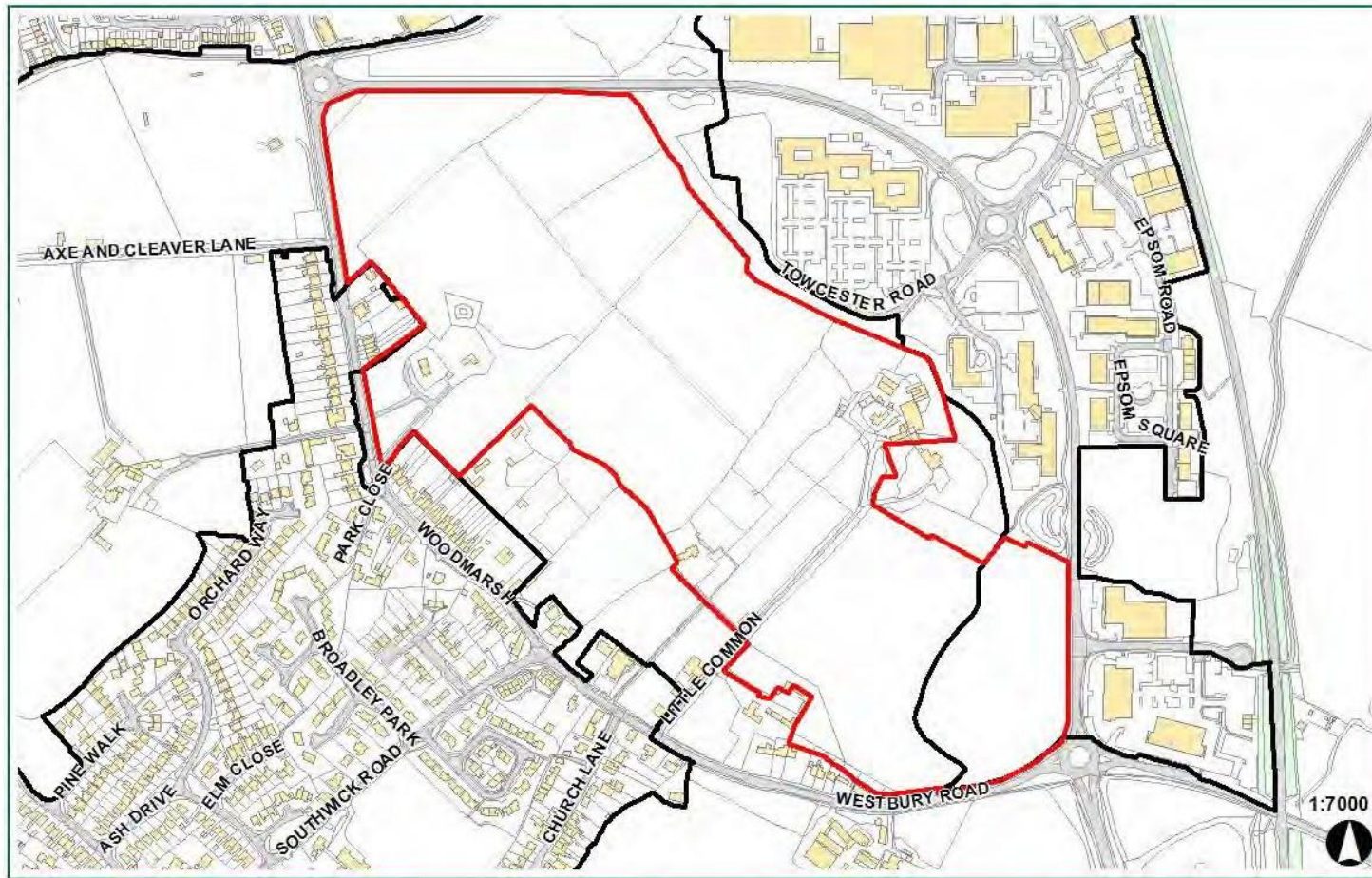
FIG. 7 - LANDSCAPE GAP RECOMMENDATIONS

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I N D I G O L A N D S C A P E A R C H I T E C T S L I M I T E D

Appendix 2

Land off the A 363 at White Horse Business park



Proposed housing allocation Proposed Settlement Boundary

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