

# **Trowbridge Town Council**

## **Wiltshire Housing Site Allocations Plan (WHSAP)**

### **Statement to the Examination**

**March 2019**

This statement has been prepared by Lance Allan, Town Clerk and Chief Executive on behalf of Trowbridge Town Council.

The statement provides a response to each of the Matters, Issues and Questions raised by the Inspector, with; No Comment, Yes, No with additional comments or General comments.

The statement is then followed by an edited extract of the main WHSAP document with some of Wiltshire Council's Changes and changes proposed by Trowbridge Town Council.

Both WC and TTC deletions are show as struck-through.

Where there are additions proposed by Trowbridge Town Council these are shown in red type.

This statement is in addition to and in some cases supersedes the previous comments and statements made by Trowbridge Town Council, including the Statements of 5<sup>th</sup> September 2017 and 5<sup>th</sup> June 2018.

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

### *Issue 1: Whether all Statutory and Regulatory requirements have been met?*

1.1 In preparing the Plan, has the Council complied with the Duty to Cooperate required by Section 33A of the Planning and Compulsory Purchase Act 2004 (as amended)?

**YES.**

1.2 Is the WHSAP compliant with the Council's Local Development Scheme in terms of its form, scope and timing?

**YES.**

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?

**YES.**

1.4 Has the Sustainability Appraisal (SA) been prepared having regard to the requirements of the Strategic Environmental Assessment Directive and Regulations and guidance in the PPG?

**NO COMMENT.**

Is it clear how the SA influenced the final plan and dealt with mitigation measures, and has it sufficiently evaluated reasonable alternatives?

**NO. There is a presumption that it was necessary to find as many sites as possible at Trowbridge, whilst excluding sites at Larger Villages in the Trowbridge Community Area and at other settlements in the HMA, without testing whether these alternative sites would have been more sustainable. The Plan should be found unsound and alternative sites at the Larger Villages in the Trowbridge Community Area and at other settlements in the N&WHMA should be considered.**

1.5 Have the Habitat Regulations Assessment (HRA) and relevant addenda been carried out in accordance with the appropriate Regulations?

**NO COMMENT.**

1.6 Are the policies of the Plan designed to secure that the development and use of land contribute to the mitigation of, and adaptation to, climate change in accordance with Section 19(1A) of the Act?

**NO COMMENT.**

1.7 Has the preparation of the WHSAP complied with the Planning and Compulsory Purchase Act 2004 Part 2 and the Town and Country Planning (Local Plan) (England) Regulations 2012 in all other respects?

**NO COMMENT.**