

1. Introduction

- 1.1. Savills represents Waddeton Park Ltd in relation to Land to the South of Trowbridge (herein 'the Site'). The site is a draft allocation in the Submission Plan – Reference H2.6 (Southwick Court).
- 1.2. Representations were submitted on behalf of Waddeton Park Ltd to the Pre-Submission Draft (dated September 2017), and the Focussed Changes (dated November 2018) consultations on the Wiltshire Housing Site Allocations Plan (herein 'the WHSAP'). These are referenced as required within this Hearing Statement (herein 'the Statement'), but they should be read in full to provide the wider context in regard to the representations made.
- 1.3. This Statement addresses the specific matters raised in relation to Matter 2 – Consistency with the Wiltshire Core Strategy, as set out by the Inspector's in the Matters, Issues and Questions (dated 8th February 2019). The statement follows the Issues and Questions as set out in that document albeit only responds to those which are relevant to Waddeton Park's interests.
- 1.4. For the avoidance of doubt, this Statement references the National Planning Policy Framework (NPPF) as published in March 2012, unless otherwise explicitly stated. The references made to Planning Practice Guidance (PPG) reflect those correct at the date of drafting this Statement.
- 1.5. The Wiltshire Core Strategy (WCS) sets out the spatial strategy and housing requirement for Wiltshire over the plan period to 2026. It was subject to a full consultation exercise, and found sound in accordance with the National Planning Policy Framework (the 'Framework') (2012). The WHSAP will be assessed against the same Framework (2012) by virtue of the transitional arrangements set out in the revised NPPF (2019).
- 1.6. The WCS was adopted in 2015 and therefore has not yet passed the five year review requirement set out at paragraph 33 (NPPF, 2019). Notwithstanding this, Wiltshire Council has already commenced the review process, having published a consultation with Swindon Borough Council, and associated emerging evidence base, alongside a Local Plan Review consultation.
- 1.7. It is recognised that a number of parties have raised more strategic comments in regard to the WHSAP – including in respect to the housing requirement and spatial strategy. However, as per above, it remains in date for the purposes of plan-making. Secondly, as confirmed in the New Forest Part II Plan Inspector's Report:

“The Council could have chosen to use this Plan to review certain strategic matters, but it is not obliged to do so. Reviewing strategic matters along with making the necessary allocations would have made the Plan a more complex document and would have further delayed its adoption. The limited task the Council set itself to achieve in this document is clear - to advance housing delivery by making housing allocations, particularly to increase the delivery of affordable housing. There is a public interest in this being done sooner rather than later. A Council can choose how to divide up and progress elements of its overall local plan given that the Local Development Scheme (LDS) is not a matter for Examination. There is no justification to require the Council to change the intended scope of the submitted Plan.” (paragraph 11, March 2014).

- 1.8. The objectives of the WHSAP are clearly identified by Wiltshire Council in their site selection process: being the delivery of housing to maintain a rolling five year supply of deliverable land for housing development, and to allocate sites at the settlements across Wiltshire which support the spatial strategy of the WCS (#2.1, TOP02).

2. Issue 2: Does the WHSAP make adequate provision to meet housing requirements as set out in the WCS?

- 2.1. The Wiltshire Core Strategy (WCS) sets out the housing requirement for Wiltshire over the plan period to 2026, and is based upon a minimum housing requirement found sound in accordance with paragraph 182 (NPPF, 2012).
- 2.2. Since the adoption of the WCS in 2015, the housing land supply has fluctuated above and below the five year requirement, particularly in the North West Housing Market Area (HMA). The WHSAP therefore has a critical role in addressing the housing requirements of the WCS over the remaining plan period.
- 2.3. Trowbridge is identified as the 'Principal Settlement' within the North West HMA, and is the key location for growth over the plan period. The WCS is based upon a vision predicated upon sustainable patterns of development focussing on the settlement hierarchy (WCS Inspector's Report, 2014 #16). Trowbridge is identified as a location to support the delivery of 6,810 dwellings over the plan period; which as identified by Core Policy 29 seeks to strengthen its role as a principal service centre.
- 2.4. Trowbridge's housing land supply is identified below:

	Requirement	6,810
Supply	Completions (2006-17)	3,019
	Commitments	1,561
	Residual Requirement	2,230

- 2.5. The WHSAP identifies allocations within Trowbridge, including Southwick Court, for 1,050 dwellings, and therefore there remains a shortfall in identified housing land supply for Trowbridge over the remaining nine years of the plan period. This is confirmed in Addendum Topic Paper 4 – which sets out a shortfall of 19% against the Core Strategy target (Table 5.8): equating to 1,297 units. Against adopted Core Strategy Policy 43, this would equate to a shortfall of 390 affordable units in the town.
- 2.6. This shortfall is significant and, when considered against Trowbridge's role as the Principal Settlement, emphasises the considerable importance of the draft allocations in delivering the needs of the town and the wider HMA.

3. Issue 3: Does the distribution of Site Allocations accord with the Spatial Strategy in the WCS?

- 3.1. The WCS's distribution strategy was found sound; with the Inspector confirming that it supports sustainable patterns of development based upon an appropriate settlement hierarchy ((WCS Inspector's Report, 2014 #40). In accordance with the New Forest, referenced above, it is not the role of the WHSAP to reconsider the Spatial Strategy and its distribution strategy, with this to be addressed in the currently emerging Plans (Swindon and Wiltshire Spatial Framework Plan, and Wiltshire Local Plan Review).
- 3.2. It is therefore entirely appropriate for the Stage 1 of the site selection process to identify Broad Areas where there remains a residual housing need from the WCS as defined by the relevant 'Community Areas'; this accords with the objectives of the WHSAP (identified above) and accords with the distribution strategy from the WCS which has been found sound at Examination, and subject to appropriate public consultation.
- 3.3. The Stage 2 identified and evaluated all available sites within the search areas. This ensured that the reasonable alternatives for the delivery of the WCS Spatial Strategy were identified through the site assessment process.
- 3.4. Stage 2 provides a high level assessment of the sites' suitability, availability and that the relevant site is developable – this accords with paragraph 47 (NPPF, 2012). This is entirely appropriate, as the NPPF requires these tests to be passed in order for sites to be identified within the supply.
- 3.5. The Stage 2's 'Exclusionary Criteria' (Table 4.1, TOP02) provides a high level framework to be used as part of this assessment, and the criteria identified are consistent with national planning policy which indicates policies/designations where development may be restricted. The subsequent assessments considers the criteria in the round – considering whether their impact on any site would exclude it completely from further consideration, or result in a reduction in the potential capacity. This ensures that the sites taken forward to Stage 3 include those sites where constraints could be overcome in accordance with national planning policy.
- 3.6. Site H2.6 falls into two NDPs areas: Southwick and North Bradley. In summary:

North Bradley: NDP published at Regulation 14 Stage in January 2019. This confirms 'support' for the Southwick Court Strategic Site subject to appropriate landscaping, and the proposed 'Landscape Protection Area' excludes land falling within Site H2.6.

Southwick: preliminary documents published, including a Site Selection Report (March 2018) which distinguishes Site H2.6 as a strategic site in the WHSAP from their own site assessments to meet the village's own local needs assessment (supported by Southwick Parish Housing Needs Survey – January 2018).

4. Issue 4: Has the Site Selection Process for Housing Allocations been soundly based?

Site Selection and Reasonable Alternatives

- 4.1. For the reasons set out above, the selection of sites, and the assessment of reasonable alternatives, is undertaken within the existing spatial framework – with the WCS already identifying the appropriate Spatial Strategy, and associated housing distribution.
- 4.2. As such, the identification of site options – and the resultant consideration of reasonable alternatives, is appropriately restricted to the Broad Areas as identified at Stage 1 of the site selection process.
- 4.3. In regard to Trowbridge, Wiltshire Council confirmed that “*all known alternative sites have been assessed*” (#21.72, WHSAP11). CATP17a (Topic Paper – Trowbridge) provides a clear overview of the site selection process in the town; including those sites considered as reasonable alternatives, and confirms whether these were excluded at Stage 2 or 3 of the site selection process. This Topic Paper has been published with a number of the statutory consultations on the WHSAP, and has been iterative in nature – being revised as further sites are identified as available, and as further information is made available on any sites. It has therefore provided a transparent process of site selection, and offers clear reasons for the selection, and rejection, of sites.
- 4.4. This overview is supported by a robust technical evidence base set out in the Sustainability Appraisal, which considers all sites which reached Stage 3 of the site selection process.
- 4.5. In particular regard to Trowbridge, it is noted that the site selection process has failed to identify a sufficient number of sites to meet the existing housing shortfall in the town. The delivery of the draft allocations will still leave a shortfall within Trowbridge against the WCS Spatial Strategy, at 1,297 units. As such, the process of site selection in the town has not been based upon the ‘preferable site’ strategy, but rather the individual, and cumulative, suitability of sites for development. The ‘reasonable alternatives’ to the site selection are the inclusion of additional sites within the town, as opposed to alternative allocations.

Sequential/Exception Tests

- 4.6. The WHSAP is supported by a comprehensive evidence base, including the Stage 2 site selection process and subsequent Sustainability Appraisal. These processes both included consideration of the flood risk and the tests were indirectly applied through these processes. The PPG is clear that there is no requirement for a standalone sequential test and that this can be undertaken indirectly in the site allocation process alongside the consideration of other sustainability criteria (PPG: 7-022-20140306).

- 4.7. As already identified, the objective of the WHSAP is to deliver housing allocations in accordance with the WCS. The Stage 1 therefore identifies the Broad Areas for site searching which accords with the Spatial Strategy set out in the WCS. This Spatial Strategy is predicated on a detailed assessment of sustainable development as part of the WCS plan-making process, and was considered the “most appropriate strategy” in accordance with paragraph 182 of the NPPF.
- 4.8. The site selection process therefore already has an inherent sustainability assessment within it, in that the locations identified are predicated on a sustainable development strategy informed by a detailed assessment of the relative sustainability criteria. On this basis, it is entirely appropriate that the WHSAP’s search area for allocating land for the purposes of the sequential test is restricted to the relevant community areas – on the premise of the WCS Spatial Strategy and its broader consideration of sustainability.
- 4.9. The Stage 2 and Stage 3 processes identified where sites contained areas of Flood Zone 2 and 3; and responded by considering the ability to deliver mitigation/enhancement, any required reductions in the quantum of development to enable a sequential approach to be delivered on the sites in terms of siting development outside of the flood zones, and as part of the final assessment process considers the wider sustainability benefits of any site relative to any potential harm.
- 4.10. This represents a logical and robust process. The alternative, excluding all sites which contain any areas of Flood Zone 2 or 3, would be disproportionate, unnecessary and lead to the exclusion of sites otherwise deemed suitable for housing and sustainable.
- 4.11. Notwithstanding, there are a number of inherent design measures which will ensure this – with the relevant site policies including a requirement to sequentially plan development within the allocation site. The policies also set out the requirement for appropriate Flood Risk Assessments, and this is further supported by adopted policies in the WCS – Core Policy 67 (Flood Risk) and the policies of the NPPF (2019) which will be relevant to the determination of any future planning applications.
- 4.12. Waddeton Park Ltd are the promoters on site H2.6, which contains land which falls within Flood Zone 2 and 3. These flood zones relate to the Lambrok Stream which traverses the site. WHSAP, as amended by PC73, specifically requires a sequential approach to locating development within the site, and requires the submission of a comprehensive drainage strategy.
- 4.13. Within Site H2.6, there will be no development within the flood zones, however, it will require the vehicular access, which will also include pedestrian and cycle access to pass through the flood zones to access the eastern part of the site. This will be delivered via a new bridge structure over the Lambrok Stream, which will be designed to ensure safe access including within the flood levels plus climate change scenarios.

- 4.14. A Flood Risk Assessment (FRA) has been undertaken in relation to Site H2.6 by TeignConsult on behalf of Waddeton Park, and this is informed by a Ground Investigation Report including infiltration testing. The FRA has assessed the impact of development, including the 40% climate change scenario, and this has informed the scale of the attenuation basins identified on the emerging Concept Plan (see Hearing Statement - Matter 3). Opportunities to provide enhancements have been identified in the FRA, which concludes that the proposed drainage design will deliver a reduction in greenfield peak surface water runoff rates of in excess of 80% in the +40% climate change scenario; thus reducing the overall flood risk significantly as per paragraph 102 (NPPF, 2012). In addition, in accordance with PC73, any future planning application will also consider opportunities to further reduce runoff through the provision of natural flood management.
- 4.15. The PPG confirms that in considering flood risk when preparing local plans, that Authorities should take advice from the Environment Agency (PPG: 7-006-20140306). It is therefore material that the Environment Agency do not object to the WHSAP, and their comments to the Pre-Submission Consultation informed the subsequent proposed changes to the WHSAP.

Transport and Highways

- 4.16. The WCS was supported by the Trowbridge Transport Strategy (2012), and the Wiltshire Local Transport Plan 2011-2026. As part of the WHSAP, Wiltshire Council published the Trowbridge Transport Strategy Refresh (May 2018) (WHSAP07).
- 4.17. The Refresh confirms that the study has a strategic role; considering existing transport-related issues within the town and wider strategic transport objectives alongside the potential impacts of the draft allocation sites on the local transport network. The Refresh doesn't indicate any significant transport concerns in regard to the town following the delivery of the draft allocations; notably with the "without mitigation" scenario not resulting in any junctions becoming over capacity, and with the combined allocations only anticipated to have a "marginal impact on the network performance".
- 4.18. The Refresh identifies the relationship between the strategic schemes, either directly or cumulatively, with the various draft allocation(s); but doesn't indicate that the schemes are all necessary to make the allocations acceptable – with the objective of the Refresh to result in no negative impacts on residents (#3.2) as opposed to the NPPF's threshold of severe. Nevertheless, strategic transport improvements are supported, and contributions from developers can be secured through the Community Infrastructure Levy (CIL); which currently has a number of schemes listed from the earlier 2012 Trowbridge Transport Study listed on the Regulation 123.

The Refresh notes that future planning applications will be required to consider whether a direct contribution to any of the schemes would be appropriate. This can come forward through the future detailed planning application, supported by the Transport Assessment.

Protected Habitats and Species

- 4.19. The WHSAP is supported by a Habitat Regulation Assessment (and associated Addendums) which considers the potential for cumulative effects on the relevant protected species and habitats. The response of Site H2.6 to the HRA is set out in our response to Hearing Statement – Matter 3.
- 4.20. In relation to other protected species and habitats, these reflect more site specific considerations, and will be identified through the planning application process following appropriate surveys. In accordance with local planning policy, and the NPPF (2019), future planning applications will be required to assess the impact of development on biodiversity and set out appropriate mechanisms to avoid, mitigate, and as a last resort, compensate for impacts.