

# **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 2: Consistency with the Wiltshire Core Strategy (WCS)

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

2.1 The WCS contains housing figures at a County, HMA and settlement level. Which is the most appropriate scale at which to consider provision in order to assess consistency with the WCS?

**The WCS contains housing figures at a County, HMA, Community Area and settlement level. The most appropriate scale at which to consider provision in order to assess consistency with the WCS is at the HMA level.**

2.2 Based on the most up-to-date evidence, what is the residual level of development required to meet the housing requirement identified in the WCS? What component of this is the WHSAP expected to meet?

**The HLSS 2017 gives a figure of 2230 and the WHSAP is proposing sites for 1050. But, the WCS says that 950 will not be delivered until new secondary school provision is forthcoming. The level of windfalls in Trowbridge is likely to be at least 950, so the requirement for Trowbridge should be 330 (2230-950-950). Topic Paper 3, the Housing Land Supply Addendum (July 2018) gives a revised figure for the Trowbridge Community Area of 2107 which therefore leaves a requirement of 207 (2107-950-950). The WHSPA at para 4.1 indicates that the total required to be allocated in the HMA is 571.**

2.3 Are the components of delivery identified in the Plan, including completions, committed developments and windfalls, justified and realistic?

**NO. Trowbridge Town Council considers that Windfalls should not be a catch all for any site or development inside the Settlement Boundary and the Windfalls figure should be broken down and specifically identified against particular settlements and specific sites within settlement boundaries. Trowbridge Town Council has provided details of specific sites within the Settlement Boundary which should be considered; 5<sup>th</sup> September 2017 and 5<sup>th</sup> June 2018.**

2.4 In light of the above, does the WHSAP make adequate overall provision to ensure the delivery of the minimum housing requirement as set out in the WCS?

**NO. The April 2014 Housing Land Supply Statement published July 2014 on page 19 indicated that Ashton Park or 'South East Trowbridge would deliver 2350 houses'. A shortfall of 249 or 250 houses. This was 6 months before the WCS was adopted by Wiltshire Council (20<sup>th</sup> January 2015). Even so the WCS allocated this site at Core Policy 2 to accommodate 2600 houses within the plan period. Ashton Park is the largest Strategically important site identified in the WCS, twice the size of the next largest (Amesbury 1300) and represented over 26% of the total for Strategically important sites, but was already known to be unable to deliver the allocated level of development within the plan period. The allocation for Trowbridge as a whole of 6810 and the Trowbridge Community Area total of 6975 was wholly reliant upon the delivery of Ashton Park, and Wiltshire Council knew at the time of adoption of the WCS that it was undeliverable. The un-achievability of the Trowbridge total is further compounded by the fact that the requirement for Chippenham, the other Principal Settlement in the N&WHMA, at 4510 was only 300 more than the Trowbridge excluding Ashton Park (4210); and that Salisbury (the other Principal Settlement) had a requirement at adoption of only 2310 in addition to Strategically important sites. The WCS was never going to be achievable at Trowbridge and therefore the WHSAP, in seeking to address the shortfall at Trowbridge, by further allocations on less sustainable sites, remains unachievable and the reallocation of some of the Trowbridge total to other settlements in the HMA is required.**

2.5 Is the predicted delivery of allocated sites realistic in terms of the contribution they would make through the Plan period?

**NO. The less sustainable nature of one or more proposed allocation sites around Trowbridge and the continuing delay in delivering a package of affordable mitigation measures including those which satisfy the Bath & Bradford on Avon Bats SAC mean that the sites proposed for allocation at Trowbridge are unrealistic in comparison to the likely sustainability and deliverability of sites at other settlements in the HMA. Referring to Core Policy 29: With no progress at Ashton Park expected before 2020 it is unrealistic to expect that the secondary school provision will be forthcoming during the plan period and therefore the delivery of any additional dwellings at Trowbridge which are part of the 950 would be contrary to the WCS. The WHSAP should recognise this and be making allocations in other parts of the HMA to accommodate the 950 as well as other shortfall from Trowbridge.**

## **Issue 3: Does the distribution of site allocations accord with the spatial strategy in the WCS?**

3.1 Is the overall distribution of housing allocations consistent with the spatial strategy set out in the WCS?

**NO. Chippenham has a percentage increase of around 29%, Salisbury 33% and Trowbridge 40%. They should be more similar and higher than the uplifts at the Market Towns, but Malmesbury (37%) and Melksham (30%) have higher percentages than Chippenham. With Windfalls, completions and allocations Trowbridge will still deliver an appropriate level of growth for a Principal Settlement.**

3.2 Is the distribution within each HMA consistent with the WCS?

**NO. It is not acceptable, when the plan is based upon HMAs, to make the statement in the Trowbridge Area Topic Paper, Appendix G para. G.2, when the sustainability of other sites in other places in the HMA have not been assessed in comparison to the less sustainable sites at Trowbridge. The resulting plan is inflexible and ineffective, contrary to the statement in the WCS at para 4.30.**

3.3 Is the approach set out in Stages 1 and 2 of the site selection process justified? In particular, has a consistent and justified approach been taken to excluding specific locations from the scope of the exercise, including:

- Principal Settlements, Market Towns, Local Service Centres and Large Villages;

**NO. Other locations in the HMA including sites in the Trowbridge Community Area at the Large Villages should be assessed as well as sites at Trowbridge.**

- areas where housing needs in the WCS are indicated to have been met; and

**NO. As above.**

- areas with made or emerging Neighbourhood Plans?

**Trowbridge Town Council is aware that the North Bradley Neighbourhood Plan is at Regulation 14 Consultation Draft and that consultation has been ongoing recently. The Town Council supports many of the proposals contained in that plan and in particular the allocation of part of H2.2 SHELAA site 298 whilst retaining a strategic landscape buffer between the town and North Bradley in accordance with the WCS.**

3.4 Are the differences between overall provision identified in the WHSAP and the WCS justified?

**NO.**

Should any shortfalls in provision within particular settlements be compensated for with development in other locations?

**YES. It has been shown that due to a range of reasons, particularly the environmental constraints which have delayed the progress of Ashton Park and resulted in other sites around Trowbridge being discounted, other locations in the N&WHMA should be considered to accommodate the now excessive numbers allocated to Trowbridge, which can no longer be accommodated within the plan period at Ashton Park or on sites close to Green Lane Wood. Trowbridge is the only settlement where (according to the *Wiltshire Housing Site Allocations Plan Topic Paper 3 Housing Land Supply Addendum July 2018 Submission version*), the 'Residual indicative requirement' has increased each year from 2014 to 2017.**

## **Issue 4: Has the site selection process for housing allocations been soundly based?**

4.1 Have the site allocations been undertaken on a consistent basis having regard to the strategic objectives and policies of the WCS, the policies of the NPPF and the evidence base?

**NO. Areas of Search have only considered those settlements “where land supply needs to be supplemented” and have not considered other settlements in the HMA which offer much more sustainable sites, thereby ignoring the indicative and flexible nature of the original WCS housing numbers by settlement.**

4.2 Were reasonable alternatives considered and tested?

**NO. Even though the WCS (para. 4.20) clearly says that a flexible approach is allowed; The WHSAP has failed to consider a flexible redistribution from Trowbridge to other settlements in the HMA which can deliver more sustainably.**

Are the reasons for selecting the preferred sites and rejecting others clear?

**NO. The reasons for not allocating the site at the junction of Leap Gate and West Ashton Road which is allocated for employment and is subject to a mixed use application are not clear.**

4.3 Have the site allocations been made in accordance with Diagrams 2 and 3 of the Planning Practice Guidance on Flood Risk and Coastal Change, including the application of the sequential and exception tests?

**NO. Sites in other parts of the HMA can be allocated in preference to sites such as H2.6 where the cumulative effects resulting from mitigation to avoid the flood zone are significant so as to make the site unsustainable.**

4.4 Have the cumulative transport related implications of allocated sites been fully assessed and are measures to address them sufficiently clear and deliverable?

**NO. The Trowbridge Transport Strategy Refresh contains no clear conclusions, only a list of ‘Preferred Mitigation Package – Schemes’, which do not include the H07 A361- A363 link road scheme associated with Site H2.6. Our proposal to delete Site H2.6 is in accordance with the omission of this scheme from the Preferred Schemes list.**

4.5 Have the cumulative effects of development on protected habitats and species been fully assessed?

Will the plan be effective in ensuring their protection and/or mitigating any effects?

**NO. The Trowbridge Bat Mitigation Strategy (TBMS) has only just been published and raises some serious concerns and questions relating to the impact it will have on any development proposals in the area and the cumulative impact that developments will have on the bats.**

4.6 Have the cumulative infrastructure requirements of allocated sites been fully assessed, including the need for education facilities, and are measures to address them sufficiently clear and deliverable?

**NO. Wiltshire Council has now announced that no additional schools are required over and above the schools which are proposed at Ashton Park but the development at Ashton Park has not commenced, the Secondary School provision is unlikely to come forward during the plan period and it is unclear what the plan for school places now is.**