

RESPONDENT REFERENCE NUMBER: 1131752 and 1131750

WILTSHIRE HOUSING SITE ALLOCATIONS PLAN EXAMINATION

Hearing Statement on behalf of HGT Developments LLP

Matter 3: Housing Site Allocations

Introduction

- 1.1 This statement has been prepared on behalf of HGT Developments LLP in response to the Inspector's Questions for the following hearing session Matter 3: Housing Site Allocations.
- 1.2 HGT Developments LLP has land interests at the western portion of the site - allocated as allocation reference H2.3 Elizabeth Way, which is for 355 dwellings (Table 5.3 Policy H2 in EXAM.01 Schedule of Proposed Changes – Consultation document).
- 1.3 HGT Developments LLP have submitted an outline planning application on part of the proposed allocation (for the western portion of the allocation). The Urban Design Framework Plan submitted as part of the planning application indicatively shows how this part of the site could be developed to deliver up to 170 residential units. The application was validated on 5 February 2016 and given the reference number 16/00672/OUT. The Urban Design Framework Plan is attached (APP 1).
- 1.4 Submissions have been made at previous consultations on the draft Local Plan and these representations should be viewed in the context of previous comments. A draft Statement of Common Ground has been prepared with Wiltshire Council (WC).
- 1.5 The proposals for the site, including the draft masterplan, have also been discussed with officers at the Council.

Matter 3: Housing Site Allocations

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

The following questions apply to all allocations:

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

1.6 Yes, it is submitted that the plan provides sufficient detail of form, scale access and quantity of development for the subject site.

5.2 Is the amount of development proposed for each site justified having regard to any constraints and the provision of necessary infrastructure?

1.7 HGT Developments LPP support the allocation but do however have concerns regarding the soundness of the policy and have therefore suggested minor text revisions that they consider would address these concerns. These are considered necessary to ensure that the Site Allocations Plan is sound, that the development aspirations of the site are correctly defined and to ensure that the suggested criteria of the proposed allocation retains sufficient flexibility to enable a sustainable development to be delivered on the site.

1.8 Specifically, the second bullet point of paragraph 14 of the Framework requires that for plan making Local Plans should meet objectively assessed needs, with sufficient flexibility to adapt to rapid changes. As currently drafted, the policy set approximate numbers for the amount of development. It is considered that this approach is contrary to objectives of the Framework (paragraphs 17 and 47) and that the capacity for the H2.3 Elizabeth Way site should be expressed as a 'minimum' figure instead. In doing so, this would ensure that the policy was positively prepared, be effective and consistent with national policy, and would enable the Local Plan to be flexible and respond to changing circumstances.

1.9 The proposed quantum of 355 dwellings currently associated with allocation H2.3, does not meet the full potential capacity of the site, therefore proving that the plan is not justified as it does not make efficient use of land to be allocated through the Site Allocations Plan.

1.10 The site at Elizabeth Way has been identified for the allocation of 355 dwellings, which is considerably lower than what the site could sustainably deliver. This raises the issue of under-development of the site which, in combination with the required housing figures, highlights the fact that the current proposed allocation has not been positively prepared or justified.

1.11 The HGT Developments LLP site can accommodate 170 dwellings, on the adjoining site to the east Barratts have submitted earlier representations stating that they can sustainably accommodate approximately 175 dwellings and Persimmon Homes have submitted earlier representations to suggest that they can deliver circa 150 homes on land to the east of the proposed allocation, meaning that the overall delivery on site could potentially deliver circa 480 dwellings.

1.12 Although the examination of the plan is based on the old NPPF, the revised NPPF (2018) focuses on the importance of making the most efficient use of land. Paragraph 123 of the revised NPPF states that, *“Where there is an existing or anticipated shortage of land for meeting identified housing needs, it is especially important that planning policies and decision avoid homes being built at low densities and ensure that development make optimal use of the potential of each site. In these circumstances:*

- a) *Plans should contain policies to optimise the use of land in their area and meet as much of the identified need for housing as possible. This will be tested robustly at examination and should include the use of minimum density standards for city and town centres and other locations that are well served by public transport. These standards should seek a significant uplift in the average density of residential development within these areas, unless it can be shown that there are strong reasons why this would be inappropriate.” [emphasis added]*

1.13 This ‘direction of travel’ as set out within revised national policy needs to be considered or in order for the plan to be sound.

1.14 In order to make the plan sound, the allocation for land at Elizabeth Way should be increased to appropriately reflect the true capacity of the site or in order to ensure that the emerging plan contains the necessary level of flexibility that is required, whilst enabling the allocation to be deliverable and the Plan as a whole to be effective, the text in Table 4.5 and Table 5.3 within Policy H2 should be amended as follows:

| Site | Ref. | Site Name | No. of Dwellings |
|------------|---------|---------------|-------------------------|
| Trowbridge | 297/263 | Elizabeth Way | a minimum of 355 |

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:

- **biodiversity, in particular but not restricted to European protected habitats and species;**

- green infrastructure and agricultural land;
- landscape quality and character;
- heritage assets;
- strategic and local infrastructure including transport;
- the efficient operation of the transport network, highway safety.
- air and water quality, noise pollution, odours, land stability, groundwater and flood risk;
- open space, recreational facilities and public rights of way.

1.15 The outline planning application submitted by HGT Development LLP was accompanied by a by a full suite of technical assessments including:

- Planning Statement;
- Design and Access Statement (DAS);
- Transport Assessment and draft Travel Plan;
- Flood Risk Assessment;
- Statement of Community Involvement;
- Archaeological Impact Assessment [updates x] (and an updated Archaeological Evaluation which was produced following the excavation of 41 trenches on the site. The evaluation reports confirms there is very little archaeology on the site)
- Ecological Appraisal (including updates reports and surveys)
- Flood Risk Assessment (and addendums)
- Foul Drainage Assessment [updates]
- Geotechnical Report
- Heritage Statement
- Landscape & Visual Impact Assessment
- Noise Assessment (and supplementary noise impact assessments)
- Phase 1 Contamination and Drainage report
- Transport Assessment
- Air Quality Assessment (and updated report)
- Tree Survey
- Utilities Report

1.16 The draft Statement of Common Ground is attached (**APP 2**), this summarises the impacts of the proposed development on the site and the measures proposed to mitigate the impacts (in relation, inter alia, to ecology, landscape, agricultural land, heritage assets, transport, air and water quality, and noise pollution).

1.17 Appendix 3 as attached, provides a summary of the likely impact of the development.

1.18 HGT Developments LLP confirm that there are no 'show stoppers' in terms of delivery and there is nothing indicating that the site should not be allocated.

5.4 In relation to the above, does the plan contain effective safeguards or mitigation measures necessary to achieve an acceptable form of development?

1.19 No comment.

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?

1.20 Financial contributions will be secured through S106 Agreements and via the Community Infrastructure Levy and pooled where necessary, to deliver on site or off site infrastructure across the allocation in accordance with the IDP. The level of contributions will be agreed with the relevant authorities.

1.21 As the site is predominantly agricultural land, there are no significant site preparation works anticipated. No significant technical constraints have been identified, all land is available now and capable of early delivery to help meet the housing requirements set out in within the emerging Plan.

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?

1.22 The site is sustainable and a local area of growth being highly accessible to local opportunities for employment, accessible to retail and community provision, has high quality road and public transport access.

1.23 It is submitted that the site represents one of the more sustainable location for development within Trowbridge which is in turn a highly sustainable location for growth within Wiltshire. Trowbridge as a principal settlement (at the top of WC's hierarchy for the location of development) is the primary focus for development, i.e. Trowbridge is the most sustainable location for new development. The role of the town is as a significant employment and strategic service centre and the proposed allocation supports this role.

1.24 The allocation site is located south of Elizabeth Way which provides a connection between Wyke Road roundabout and Hilperdon roundabout. This relief road was built as part of the WC's long-

standing ambition to relieve traffic congestion from Hilperton and from central Trowbridge via the provision of a relief road located to the north and east of Trowbridge.

1.25 Pedestrian and cycle movements are catered for by means of an existing 3m wide shared footway / cycleway along Elizabeth Way on the site frontage.

1.26 The table below summarises key local facilities with distances measured from the centre of the GHT Developments LLP site to the nearest point on the local highway or pedestrian network and then along the highway / pedestrian network.

Table 1 Accessibility to Local Facilities

| NAME | FACILITY TYPE | LOCATION | DISTANCE FROM THE CENTRE OF THE SITE | JOURNEY TIME ON FOOT (MINUTES) |
|---|-------------------------------|------------------------------|--------------------------------------|--------------------------------|
| Canal Road Industrial Estate | Employment | Canal Road | 500m | 6 |
| Hilperton Marsh Sub-Post Office and General Stores | Post Office and General Store | Wyke Road | 800m | 10 |
| Diamond News Newsagent | Newsagent | St Thomas's Road | 1.3km | 16 |
| Hilperton Village Hall | Recreational Area | Whaddon Lane | 1.3km | 16 |
| Lidl | Supermarket | Canal Road | 1.3km | 16 |
| ADP Trowbridge Dental Centre | Dentist | Meadow Court | 1.3km | 16 |
| Hilperton Church of England Primary School | Primary School | Newleaze Hilperton | 1.7km | 21 |
| Staverton Primary School | Primary School | School Lane Staverton | 1.7km | 21 |
| Hackett Place (Budgens, Lloyds Pharmacy, Red Admiral pub/restaurant, Busy Bees nursery, Paxcroft Mead Community Centre) | Local Centre | Hackett Place, Paxcroft Mead | 1.7km | 21 |
| Aldcroft Surgery | GP Practice | Prospect Place | 1.7km | 21 |

1.27 All of the facilities identified in Table 1 above can be reached in fewer than 25 minutes on foot and seven minutes by bicycle. In addition, all of the facilities shown are located on or near to bus routes.

1.28 There are three secondary schools in Trowbridge, all of which are located south west of Trowbridge town centre:

- The John of Gaunt School is located on B3106 Wingfield Road, approximately 3km from the centre of the site and can be accessed in approximately 11 minutes by bicycle. There is also the option of taking the X34 bus service from Tin Church or Wyke Farm House bus stop to Trinity Church (a six to seven minute journey), followed by a seven minute walk to the school.
- Saint Augustine’s Catholic College is also located on B3106 Wingfield Road approximately 3km from the centre of the site. The college can be accessed in around 11 minutes by bicycle. Again, there is also the option of the X34 bus service from Tin Church or Wyke Farm House bus stop to Trinity Church (a six to seven minute journey), followed by a seven minute walk to the school.
- The Clarendon Academy is located on Frome Road 3.3km from the centre of the site and can be accessed within 12 minutes by bicycle.

1.29 In addition to the nearby facilities listed in Table 1 above, there are many additional facilities found in central Trowbridge which are also accessible to the site. This includes larger supermarkets and national chain stores. Trowbridge town centre is approximately 2.2km from the centre of the site, a distance that can be covered in less than 30 minutes on foot and less than 10 minutes by bicycle. The bus journey on the X34 into Trowbridge Town Centre is approximately 10 minutes from the nearest bus stops to the site.

1.30 Pedestrian and cyclist facilities in the vicinity of the site. These include:

- National Cycle Route 4 (NCR 4) is a long-distance cycle route between London and Fishguard that runs to the north-west of the site at a distance of 800m. The route runs alongside the Kennet and Avon Canal. The route provides cyclists with a connection to the nearby town of Bradford-on-Avon, which is approximately 5.6km from the centre of the site. The distance can be covered in approximately 21 minutes at a typical cycling speed of 16 kph.
- The route of NCR 4 in the vicinity of the site is also classified as a footpath and forms part of an off-road route for pedestrians and cyclists to Trowbridge town centre running adjacent to the River Biss. The route covers a distance of 3.9km, taken from the centre of the site, which can be covered in 15 minutes at a typical cycling speed of 16 kph.

- A further pedestrian route into Trowbridge town centre is via Fore Street and is a distance of approximately 2.1km from the centre of the site, and can be covered in approximately 25 minutes on foot.
- There is one Public Footpath running through the site, HILP8, and another Public Footpath HILP5 runs along the southern boundary of the site. These connect to Public Footpath TROW54 which in turn connect to the local highway network.

1.31 In summary, the local highway and PROW networks provide good opportunities for pedestrian and cyclists on low speed residential roads with good connectivity to the local area.

1.32 There are several bus stops in the vicinity of the site. The nearest bus stops are as follows:

- Horse Road (bus stop name Tin Church), a distance of approximately 450m from the centre of the site and via the local pedestrian network. The Tin Church bus stop can be accessed on foot in less than six minutes at a typical walking speed of 4.8kph. This bus stop is served by the X34 service and the 68 service;
- Wyke Road (bus stop name Wyke Farm House), a distance of approximately 650m from the centre of the site via the local pedestrian network, which can be reached in approximately eight minutes on foot at a typical walking speed of 4.8kph. The bus stop is served by the X34 service.

1.33 The 68 service is operated by Faresaver and Frome Minibuses and travels in and around Trowbridge. It calls at the Tin Church east bound bus stop on Horse Road, offering a daytime service to Trowbridge Hospital and Trowbridge Town Hall via Staverton. The journey takes approximately 14 minutes to Trowbridge Hospital and approximately 18 minutes to the Trowbridge Town Hall bus stop in the town centre.

1.34 A connection to Trowbridge town centre, Frome and Chippenham is provided by the X34 service run by Faresaver. This service calls at the Wyke Farm House and Tin Church bus stops, and stops at Trowbridge town centre en route to Frome. The journey to Trowbridge town centre takes approximately four minutes, or around six minutes to the Trinity Church bus stop near Trowbridge Railway Station. The journey to Chippenham takes approximately 45 to 50 minutes and the journey to Frome approximately 40 minutes.

1.35 In addition to the services listed in Table 1 above two bus operators provide a service to Bath city centre from the Tin Church west-bound bus stop on Horse Road. This bus stop is approximately 450m from the centre of the site. The services are as follows:

- Bus Service 64, operated by Beeline Coaches, departs every Friday at 09:18, arriving in Bath at 10:00 and leaves Bath at 12:40, arriving at Tin Church at 13:11;
- Bus Service X88, operated by Real Coach Hire, departs every Wednesday at 10:00, arriving in Bath at 10:35, and leaves Bath at 13:35, arriving at Tin Church at 14:03.

1.36 In summary, the bus services detailed in this section, in particular the X34, provide a regular opportunity to travel to local centres including Trowbridge town centre, Chippenham and Frome.

1.37 The nearest railway station is Trowbridge Railway Station, located approximately 2.7km south west of the centre of the site. Given a typical cycling speed of 16kph, the station can be accessed in 10 minutes by bicycle. Alternatively, the X34 bus service takes 6 minutes from Tin Church bus stop to Trinity Church bus stop, approximately 100m from the railway station.

1.38 Trowbridge Railway Station provides frequent services to leisure and employment centres in the region, ensuring that public transport is an attractive mode of transport to these destinations. Trowbridge Railway Station also benefits from direct connections to local destinations including Bradford-on-Avon, Melksham and Westbury. Trowbridge Railway Station also has three direct services to London Waterloo during the course of the day with corresponding return services, and one direct early morning service to London Paddington with a return service in the evening. It is considered that the site benefits from the opportunities offered by railway connections.

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?

1.39 It is submitted that the supporting text is an effective means of delivering the Council's requirements.

5.8 Is the development proposed for each site deliverable in the timescales envisaged?

1.40 HGT Developments LLP can confirm that their land proposed for allocation is available now, as they control all the land required to deliver the proposals. Subject to the necessary planning permission being granted, development will be deliverable within the early part of the plan period. In summary the site is sustainable, suitable, available and deliverable for residential development.

1.41 A development trajectory for the HGT Developments LLP site is set out below. This sees first residential completions in 2020/2021 at 50 units per annum thereafter (assuming one outlet):

- 2018/19 -
- 2019/20 -
- 2020/21 – 50
- 2021/22 – 50
- 2022/23 – 50
- 2023/24 – 50
- 2024/25 – 70
- 2025/26 –
- 2026/27 –
- 2027/28 –
- 2028/29 –
- 2029/30 –

1.42 The lead-in times for the site are primarily associated with the planning process. The trajectory reflects the fact there is a current outline planning application submitted on the site.

1.43 The build out rates indicate that annual completions will peak at 50 (or so) dwellings per annum.

1.44 HGT Developments LLP can confirm that following commencement of the development the allocation would have the capacity of deliver an average of 50 (or so) additional homes per year from one outlet.

1.45 It is therefore submitted that the development proposed at the site allocation is deliverable in the timescales proposed.

I expect most site specific issues can be addressed in response to Q5.1-Q5.7.

However, in responding to these points, the Council is requested to ensure the following issues are specifically addressed:

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?

1.46 The Trowbridge Bat Mitigation Strategy has only recently been published for consultation. HGT Developments LLP will be submitting comments on it.

Appendix 3

Summary of likely impact of the proposed development and mitigation measures

Biodiversity

- 1.1 The vast majority of the allocation site comprises mainly of pasture fields bordered by intensively managed hedgerows that would not preclude or prevent development subject to appropriate protection and enhancement of features of interest.
- 1.2 No part of the allocation site is subject to any statutory conservation designations. The Bath and Bradford Bats Special Area of Conservation (SAC) is located within 10 km of the site.
- 1.3 The nearest designations are Ancient Woodland Designations at Great Bradford Wood, 1.5km west of the site at its closest point; and Ancient Woodland – Green Lane Wood, 1.9km south-east of the site at its closest point.
- 1.4 Paragraph 5.59 and 5.63 in the supporting text for H2.3 states:

“Mature and semi-mature hedgerows and trees are also a key feature in the landscape and provide habitat for protected and non-protected species. The existing natural features of the site are significant in the landscape and would be incorporated within the detailed layout. These features also provide wildlife corridors that link habitat features within the local area; in particular, ‘dark corridors’ for foraging bats. These elements should be protected and enhanced where possible by additional planting with native species.

An important measure will be the provision of landscaping between Elizabeth Way and new housing in order to attenuate noise and reduce the visual impact of this road.”

- 1.5 Consistent with the policy, the masterplan proposals indicatively provide approximately 2.96 hectares of public open space, forming a comprehensive Green Infrastructure

Network that protects, enhances and links into adjacent networks and utilises existing habitats where possible.

- 1.6 A 'Landscape Corridor' is proposed along the site allocation boundary to Elizabeth Way. The width of this landscape is up to a maximum of 20 metres. This is considered to be a sufficient width to accommodate noise mitigation, and reduce the visual impact of this road.

Green Infrastructure and Agricultural Land

- 1.7 DEFRA mapping shows that the site has a Grade 3a and 3b agricultural land classification.
- 1.8 The DEFRA mapping shows that typically agricultural land around Trowbridge has a Grade 3 agricultural land classification.
- 1.9 Consistent with the policy, the masterplan proposals indicatively provide approximately 2.96 hectares of public open space, forming a comprehensive Green Infrastructure Network that protects, enhances and links into adjacent networks and utilises existing habitats where possible. Key components include:

- Formal and Informal Open Space;
- Children's Play Areas;
- Habitat Creation and Improvement Areas & Native Tree and Hedgerow Planting;
- Sustainable Drainage Systems (SUDS); and
- Improved Footpath and Cycleways.

Landscape Quality and Character

- 1.10 The character of the land within the site is relatively open and offers views through the existing urban edge of the town and eastwards to the village of Hilperton. The dominant feature in the landscape is Elizabeth Way which would serve as access to the site. Mature and semi-mature hedgerows and trees are also a feature in the landscape.

1.11 Hilperton Brook crosses the north-west portion of the site.

1.12 The allocation site itself is not subject of any specific landscape planning designations.

The site is located in the following landscape character areas:

- National level – NCA 117 Avon Vales (also with reference to adjacent area NCA 10 Cotswolds);
- County level – Wiltshire Landscape Character Assessment (2005), the Open Clay Vale LCT and Avon Open Clay Vale LCA; and
- District and local level – West Wiltshire Landscape Character Assessment (2007), “C” Open Clay Vale LCT and “C2” Semington Open Clay Vale LCA.

1.13 The Council’s Landscape Assessment for the site (ref. PSCON 11b) concludes for the site (pages 25-27) that:

“ The site is on the southern edge of Landscape Character Area (LCA) 12B Avon Open Clay Vale (County Landscape Character Assessment, 2005). The key characteristics of LCA 12B are described as:

- *Level land form with wide open skies and views to ridges and downs. Pastoral land use with some arable.*
- *Large scale geometric fields with hedgerows or open drainage channels defining boundaries.*
- *Presence of rivers, tributaries, drainage channels and open water bodies.*
- *Watercourses lined with riparian vegetation with prominent lines of willows (some pollarded).*
- *Floristically rich hay meadows.*
- *Settlement pattern varies from large towns and small scattered villages to sparse farmsteads.*
- *Buildings in varied materials of brick, render and stone.*
- *Crossed by major transport corridors, and a network of minor roads linking settlements.*
- *Historic use for transport evident in canals.*

The southern site boundary is adjacent to LCA 11C Trowbridge Rolling Clay Lowland, but this part of the LCA is occupied by urban development and is not representative of the wider LCA”

1.14 The reports concludes with respect of ‘capacity to Accommodate Change:

“Moderate-high

*Whilst development of this site would result in the loss of some farmland, remaining farmland would retain the gap between Trowbridge and Hilperton. Although the site is prominent, there is scope to screen and filter views from adjacent land-uses and PRoWs in the site and to improve the appearance of Trowbridge’s northeast settlement edge in views from the north and northeast, provided that development is sensitively designed within a greenspace framework, which allows space for mitigation planting. The greenspace framework should allow for the retention of existing landscape features such as field boundary vegetation and watercourses, the incorporation of PRoWs crossing the site within greenspace corridors, the retention of the parkland character at the southern end of the site through its incorporation in green space, and the retention of vistas toward St Michael and All Angels Church. Additional planting should consist of new hedgerows, individual trees and tree groups with the aim of creating varied planting. It is recommended that consideration is given to the function of the narrow piece of farmland between the Hilperton Relief Road and the site. It would be beneficial for this to be incorporated into the green space network. This land would provide additional space for planting, which would soften the appearance of housing in the site and also the appearance of the new road. **Overall the capacity to accommodate change is moderate-high.***

It is recommended that as the southeast site boundary adjoins the Hilperton Road Conservation Area and grounds of the Listed Buildings at Highfield, a study of their setting should be undertaken as per the method in ‘The Setting of Heritage Assets – Historic Environment Good Practice Advice in Planning, Note 3. ‘ [emphasis added]

Heritage Assets

1.15 There are no designated heritage assets (as defined in Annex 2 of the National Planning Policy Framework (NPPF)) such as world heritage sites, scheduled monuments, registered parks and gardens or registered battlefields, within the allocation site.

- 1.16 The south-eastern boundary of the allocation site is adjacent to the Hilperton Road Conservation Area. The church of St Michael and All Angels lies within a western projection of the Hilperton Conservation Area (a grade II listed Anglican Parish Church dating from the late 15th (or possibly 12th) century).
- 1.17 Three further listed buildings are located approximately 150m southwest of southern extreme of the allocation site and comprise Rock Villa and its associated boundary (Grade II) and next door to the east, Nos 15 and 17 Victoria Road (Grade II). Fieldways Highfield (Grade II*) and its boundary wall (Grade II) are located adjacent to the south of the allocation site.
- 1.18 The Trowbridge General Cemetery (Historic Parks & Gardens) is located 130m south of the site.
- 1.19 There is a Scheduled Ancient Monument (SAM) designation at Great Bradford Wood approximately 1.5km west of the site.
- 1.20 The Heritage assets, set out above, should not constrain the development of the allocation site subject to adequate buffers being put in place as part of the development scheme.
- 1.21 For the HGT Developments LLP site trial trenching has confirmed that there is no presence of any surviving archaeological remains of interest.
- 1.22 Heritage and Archaeology are not therefore considered to be a constraining factor in the development of the allocation site, in particular for the HGT Developments LLP part of the allocation.

The efficient operation of the transport network, highway safety.

- 1.23 The allocation site is located south of Elizabeth Way which provides a connection between Wyke Road roundabout and Hilperton roundabout. This relief road was built as part of the WC's long-standing ambition to relieve traffic congestion from Hilperton

and from central Trowbridge via the provision of a relief road located to the north and east of Trowbridge.

1.24 Pedestrian and cycle movements are catered for by means of an existing 3m wide shared footway / cycleway along Elizabeth Way on the site frontage.

1.25 Pedestrian and cyclist facilities in the vicinity of the site include:

- National Cycle Route 4 (NCR 4) is a long-distance cycle route between London and Fishguard that runs to the north-west of the site at a distance of 800m. The route runs alongside the Kennet and Avon Canal. The route provides cyclists with a connection to the nearby town of Bradford-on-Avon, which is approximately 5.6km from the centre of the site.
- The route of NCR 4 in the vicinity of the site is also classified as a footpath and forms part of an off-road route for pedestrians and cyclists to Trowbridge town centre running adjacent to the River Biss. The route covers a distance of 3.9km, taken from the centre of the site, which can be covered in 15 minutes at a typical cycling speed of 16 kph.
- A further pedestrian route into Trowbridge town centre is via Fore Street and is a distance of approximately 2.1km from the centre of the site, and can be covered in approximately 25 minutes on foot.
- There are three public footpaths running through the site, including HILP8, HILP5 and HILP 54.

1.26 In summary, the local highway and PROW networks provide good opportunities for pedestrians and cyclists on low speed residential roads with good connectivity to the local area.

1.27 There are several bus stops in the vicinity of the site. The nearest bus stops are as follows:

- Victoria Road;
- Horse Road;
- Wyke Road;

- Hilperton Road

- 1.28 The nearest railway station is Trowbridge Railway Station, located approximately 2.7km south west of the centre of the site.
- 1.29 The allocation of the site can facilitate a comprehensive and integrated pedestrian and cycle network improving connectivity to Trowbridge town centre and surrounding areas. There are no highways objections to the HGT Developments LLP planning application proposals subject to contributions to off site highways works.

Air and water quality, noise pollution, odours, land stability, groundwater and flood risk

- 1.30 Traffic along Elizabeth Way is the key source of noise to the site. The development will be able to respond appropriately to this potential source of noise through consideration of the proximity of dwellings to the road and the provision, as necessary, of appropriate mitigation e.g. buffers to achieve acceptable noise levels within homes and outside amenity areas.
- 1.31 The effects of the allocation itself on the local noise climate are likely to be restricted to noise from traffic that is generated by new development. Noise during the construction phase of the project will need to be assessed and managed as part of a Construction Environment Management Plan in the normal way. Noise is not therefore considered to be a constraining factor in the development of the allocation site.
- 1.32 The site is not located in an AQMA. The potential impacts of development will be assessed and appropriate mitigation incorporated into the final proposals as necessary. Air Quality is not therefore considered to be a constraining factor in the development of the allocation site.
- 1.33 With regards water quality, a robust and sustainable drainage strategy will protect the water quality in the area.
- 1.34 The online Environment Agency (EA) flood map confirms that the vast majority of the allocation site lies within Flood Zone 1, appropriate for residential development.

- 1.35 There are small areas shown to lie within Flood Zones 2 and 3 with a medium or high probability of fluvial flooding. The majority of the site is therefore appropriate for development, with small areas which would be maintained as flood storage areas.
- 1.36 Flood Risk and Drainage are therefore not considered to be a constraining factor to the development of the site.
- 1.37 The Geotechnical Site Investigation Report submitted for the HGT Developments LLP site confirms that the site is a greenfield site with no history of development. The site does not lie within an area affected by underground mining activities and does not lie within a radon affected area.
- 1.38 The site is underlain by natural in-situ soils, comprised of a layer of topsoil overlaying highly weathered bedrock by the Cornbrash Limestone and Oxford Clay formations. No made ground or significant contamination has been identified during the site investigation work.
- 1.39 No significant constraints to the proposed residential development at the site have been identified.