

Wiltshire Housing Site Allocations Plan Examination in Public

Position Statement on Matter 3

Housing Site Allocations

H2.1 Elm Grove Farm, Trowbridge

PS/M3/15

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Matter 3: Housing Site Allocations

H2.1 Elm Grove Farm, Trowbridge

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

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

1. Yes. Policies H2 and H2.1 of the Wiltshire Housing Site Allocations Plan (WHSAP) Submission Document (WHSAP.01.01)¹ and supporting text, incorporating the Council's Schedule of Proposed Changes (EXAM.01.01)², when read in conjunction with the introductory supporting text in Chapter 5 of the Plan (paragraphs 5.1 to 5.12) provide sufficient detail. The introductory text to Chapter 5 clarifies that the policies of the Wiltshire Core Strategy (WCO.01)³ will also apply in considering the development of the site. When taken together with the Core Strategy, the Council considers the Plan provides sufficient detail on form, scale, access and quantity of development.
2. The quantity of development to be delivered is established in policy through the Schedule of Proposed Changes (EXAM.01.01) as being approximately 250 dwellings on a site area of approximately 17.78ha which is considered to be achievable for the site.
3. Moreover, Policy H2.1 identifies a number of important elements that will need to be delivered through a comprehensive masterplan to support any subsequent planning application. These include specific details in respect of access where a route is clearly identified from the A363 through to an improved junction of Drynham Lane and Wiltshire Drive that the Council considers would appropriately serve the site.
4. Therefore, when read as a whole, the Council considers that the level of detail provided in the Plan is sufficient for the purpose of providing the necessary certainty to local communities and developers without being overly prescriptive.

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

5. The Council considers that the amount of development proposed for the site (approximately 250 dwellings) is justified by the evidence base (TOP.02⁴, CATP.17a⁵, SA.01A.a⁶, SA.01A.9⁷) and has had full regard to site specific constraints including: drainage, flood risk and ecology.
6. In the light of identified constraints, assessments were undertaken to determine an appropriate scale of development. This was documented in the site selection process. The conclusions are reported in the Trowbridge Community Area Topic Paper (CATP.17a⁸ - Appendices D, F and G).
7. The Strategic Housing Land Availability Assessment (SHLAA - 2011 Methodology)⁹ site capacity was estimated at 253 dwellings for this site (SHLAA 2012 Trowbridge

¹ [WHSAP.01.01](#) Wiltshire Housing Site Allocations Plan - Submission Document July 2018

² [EXAM.01.01](#) Schedule of Proposed Changes (Sept 2018) (Part 1 of 46) Main Report

³ [WCO.01](#) Wiltshire Core Strategy

⁴ [TOP.02](#) WHSAP Topic Paper 2 - Site Selection Process Methodology July 2018 Submission version

⁵ [CATP.17a](#) Trowbridge Community Area Topic Paper - September 2018

⁶ [SA.01A.a](#) Sustainability Appraisal Report - revised September 2018

⁷ [SA.01A.9](#) Sustainability Appraisal Report Annex 1 - A.9 Trowbridge May 2018

⁸ [CATP.17a](#) Trowbridge Community Area Topic Paper - September 2018

⁹ [SHELAA.22](#) SHLAA Methodology - Sept 2011

Appendix)¹⁰, which formed a starting point for assessment using 30 dwellings per hectare and applying a multiplier to reduce the developable area to allow for non-housing uses.

8. Stage 2 of the WHSAP site assessment process then considered whether exclusionary criteria should result in a reduction of the SHLAA site capacity. In the case of H2.1, the site capacity was reduced from 253 to 251 dwellings due to part of the site being completed (Trowbridge Community Area Topic Paper (CATP), Table D.3 page 51 and 55) (CATP.17a)¹¹.
9. The more detailed assessment of constraints identified through the Sustainability Appraisal (pages 3 - 20) (SA.01A.9)¹² and subsequent assessment (CATP, Appendix G, p100 - 103) (CATP.17a) led to a further reduction.
10. Following the consideration of consultation responses to the Pre-submission plan, the site quantum was re-assessed and increased to approximately 250 dwellings. The results of this additional work led to the Council's Proposed Changes PC13, PC51 and PC60 (EXAM.01.01)¹³.
11. The Plan includes supporting text at paragraph 5.44 (including Proposed Change PC53) ensuring that primary school provision is delivered in a timely manner to accommodate the new developments at Trowbridge. However there has now been an update in education requirements for the town.
12. The Council has recently received the latest birth rate data from the health authority. This evidence shows that the birth rate in Trowbridge and the surrounding villages has significantly declined, which is both unexpected and unprecedented. The Council has revised its pupil forecasts accordingly and this shows that the requirement for a third new primary school has all but disappeared in Trowbridge. Indeed, it is considered that there is sufficient capacity within existing primary schools in Trowbridge to cater for the projected pupils on roll resulting from developments at the town over the period to 2026. Therefore, the Council considers that there is no longer sufficient additional demand to require a two-form primary school at Elm Grove Farm.
13. It is proposed that the Plan text is further amended to reflect this new evidence at Policy H2.1 and paragraph 5.44. Proposed changes are set out in Appendix 1. Should circumstances alter in respect of demographics at the town, the Council considers that existing policy will allow for up to date evidence at the time of a planning application to be used to determine appropriate contribution to any necessary infrastructure, in accordance with WCS Core Policy 3 (WCO.01)¹⁴. However, based on currently available evidence, the Council considers that latent capacity in existing primary schools within the town would not preclude or delay development at this site.
14. Other key infrastructure requirements are identified in the plan at paragraphs 5.43, 5.44, Policy H2.1 and paragraphs 5.50- 5.51, which includes the potential need for an increase in capacity of doctor surgeries and dentistry within the town (Trowbridge CATP - Appendix G, Table G.2, p86 - 88 and Sustainability Appraisal pages 17 - 18) (CATP.17a)¹⁵ (SA.01A.9)¹⁶. Again, the Council consider that such infrastructure

¹⁰ [SHLAA2012.16](#) SHLAA 2012 Appendix-3 Trowbridge

¹¹ [CATP.17a](#) Trowbridge Community Area Topic Paper - September 2018

¹² [SA.01A.9](#) Sustainability Appraisal Report Annex 1 - A.9 Trowbridge May 2018

¹³ [EXAM.01.01](#) Schedule of Proposed Changes (Sept 2018) (Part 1 of 46) Main Report

¹⁴ [WCO.01](#) Wiltshire Core Strategy, January 2015

¹⁵ [CATP.17a](#) Trowbridge Community Area Topic Paper - September 2018

¹⁶ [SA.01A.9](#) Sustainability Appraisal Report Annex 1 - A.9 Trowbridge May 2018

requirements will be appropriately assessed and delivered through the subsequent planning application process.

15. In Trowbridge, a comprehensive transport study has been carried out (Trowbridge Transport Strategy: Draft Strategy Refresh 2018 (4 May 2018)) (WHSAP.07)¹⁷. This study has assessed the cumulative impact of all the proposed sites and outlines a transport strategy which aims to provide for and mitigate the impact of proposed growth. It identifies nine objectives and schemes have been identified, assessed and categorised to meet these objectives and thereby address the current and forecast transport issues in Trowbridge.
16. In terms of ecological infrastructure, paragraph 5.49 in the WHSAP (WHSAP.01.01)¹⁸ states that development at Elm Grove Farm and around the town will also be required to contribute to the delivery of the Trowbridge Bat Mitigation Strategy (TBMS) (BIO.45)¹⁹ through financial contribution or direct provision of equivalent new green infrastructure to ensure there is no net loss of habitat for protected bat species, along with appropriate mechanisms for managing increased recreational pressure associated with an anticipated increased population at the town (CATP.17a, Appendix G, Table G.6, p100) (CATP.17a)²⁰. All forms of necessary infrastructure requirements associated with the development of the Elm Grove site will be confirmed through the planning application process according to up to date evidence at the time of submission in line with WCS Core Policy 3 (WCO.01)²¹.

Issue 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:

i. biodiversity, in particular but not restricted to European protected habitats and species

17. Any impacts of development on biodiversity can be successfully managed and mitigated, and would not preclude development of the site.
18. For sites in Trowbridge, a comprehensive strategy to deal with impacts on the Bath and Bradford on Avon Bats Special Area of Conservation (SAC) (BIO.04)²² has been derived following a full appropriate assessment and in consultation with Natural England.
19. A settlement level Habitats Regulation Assessment (HRA.01)²³ concluded that the relationship of the Elm Grove site with the Bath and Bradford on Avon Bats SAC could contribute to effects alone and in-combination with other plans and projects and that a full appropriate assessment would be required. Subsequently the council produced an Addendum under the Habitats Regulations (HRA.02)²⁴, and a further Addendum (HRA.02a)²⁵ to support the council's Schedule of Proposed Changes. All three assessment documents, each of which included an appropriate assessment, concluded that allocation sites at Trowbridge would need to comply with, and contribute to, a bespoke mitigation strategy for bats which addressed impacts arising from habitat loss / degradation as well as impacts which would be caused by recreational pressure.

¹⁷ [WHSAP.07](#) Trowbridge Transport Strategy Refresh May 2018 15052018 Cabinet

¹⁸ [WHSAP.01.01](#) Wiltshire Housing Site Allocations Plan - Submission Document July 2018

¹⁹ [BIO.45](#) Draft Trowbridge Bat Mitigation Strategy

²⁰ [CATP.17a](#) Trowbridge Community Area Topic Paper - September 2018

²¹ [WCO.01](#) Wiltshire Core Strategy, January 2015

²² [BIO.04](#) JNCC Bath and Bradford on Avon Bats Special Area of Conservation (SAC)

²³ [HRA.01](#) Habitats Regulations Assessment - Pre-submission draft plan June 2017

²⁴ [HRA.02](#) Addendum to the Assessment under the Habitat Regulations - Pre-submission draft plan May 2018

²⁵ [HRA.02.a](#) Addendum to the Assessment under the Habitat Regulations - Factual update September 2018

20. The Trowbridge Bat Mitigation Strategy (TBMS) (BIO.45)²⁶ has been developed specifically to ensure that all impacts arising from allocation sites at Trowbridge will be fully mitigated. The strategy has been developed in consultation with Natural England and with input from local bat ecologists familiar with the area and the requirements of the bat species concerned. The document is currently out for public consultation (21 February – 21 March 2019) and it is intended the document will be adopted as a SPD.
21. The TBMS sets out, at a strategic level, mitigation that will be required to be confident that adverse effects to the SAC will be prevented, addressing specifically:
 - (1) Effects of habitat loss within green field sites. Mitigation for impacts alone will be delivered within the development site itself. Mitigation for residual and in-combination effects will be secured by Section 106 contributions towards off-site provision delivered by the Council. This will be based on an amount per dwelling or the equivalent for non-residential development.
 - (2) Effects of recreational pressure arising from all residential development within a set radius from the key bat woodland sites. This cost will be funded through the Community Infrastructure Levy (CIL).
22. Paragraphs 5.44 and 5.49 in the WHSAP (WHSAP.01.01)²⁷ state that development will be required to contribute to the delivery of the TBMS through financial contribution or direct provision of equivalent new infrastructure over and above the Council's normal requirements (Trowbridge CATP, Appendix G, Table G.10, p117) (CATP.17a)²⁸. Infrastructure requirements will be confirmed through the planning application process according to up to date evidence at the time.
23. Natural England has responded favourably to the above consultation for the TBMS.
24. Biodiversity considerations were also assessed through the Sustainability Appraisal (pages 3 – 5) (SA.01A.9)²⁹, as summarised in Trowbridge CATP (CATP.17a)³⁰, Appendix G, Table G.6, p100). The assessment concluded that any subsequent development proposal will need to include protection measures for local habitats, due to the presence of Biodiversity Action Plan (BAP) Priority habitat³¹ and species within the site. It is considered that such matters are within the scope of WCS Core Policy 50 and can be adequately addressed through the consideration of ecological assessments accompanying a planning application.
25. When read as whole, alongside the policies of the WCS (WCO.01)³², the Council considers that the provisions of Policy H2.1 and associated supporting text are capable of ensuring that all necessary infrastructure requirements associated with protecting and enhancing biodiversity will be delivered.
26. Moreover, all infrastructure requirements associated with the development of the Elm Grove sites will be confirmed through any subsequent planning application process in line with up-to-date evidence at the time of submission.

²⁶ [BIO.45](#) Draft Trowbridge Bat Mitigation Strategy

²⁷ [BIO.45](#) Draft Trowbridge Bat Mitigation Strategy

²⁸ [CATP.17a](#) Trowbridge Community Area Topic Paper - September 2018

²⁹ [SA.01A.9](#) Sustainability Appraisal Report Annex 1 - A.9 Trowbridge May 2018

³⁰ [CATP.17a](#) Trowbridge Community Area Topic Paper - September 2018

³¹ Hedgerows and hedgerow trees

³² [WCO.01](#) Wiltshire Core Strategy, January 2015

27. For this site, the key impacts are habitat loss and recreational pressure associated with the Bath and Bradford on Avon Bat SAC (BIO.04)³³, and all mitigation requirements associated with the development of the Elm Grove site are considered to be achievable through implementation of the Trowbridge Bat Mitigation Strategy (BIO.45)³⁴, which sets out requirements for on-site green infrastructure and contributions to mitigate for recreational pressure.

ii. green infrastructure and agricultural land

28. Green infrastructure aspects were assessed through the Sustainability Appraisal (SA), (pages 14 – 15) (SA.01A.9)³⁵, and subsequent assessment at Stage 4 (Trowbridge CATP, Appendix G, pages 68, 101 - 103) (CATP.17a)³⁶ and mitigation measures were suggested to incorporate green infrastructure into development proposals.

29. The Sustainability Appraisal (pages 14 – 15) (SA.01A.9) states that development of the site offers potential to contribute towards the delivery of a comprehensive network of green infrastructure. Development proposals will be considered in the context of requirements set out in WCS Core Policy 52 (WCO.01)³⁷.

30. WHSAP Policy H2.1 and supporting text refers to green infrastructure that will enhance / create the following:

- A significantly improved and consolidated public open space area adjacent to the existing Queen Elizabeth II Field to provide a play area and junior level sports pitches for local community teams to utilise.

Notwithstanding the delivery of a significant public open space area, the Plan (paragraphs 5.47-5.49) also anticipates development will deliver landscape scale mitigation features in line with the TBMS. Whilst these features are designed to protect bat species, they will also provide synergistic benefits for the development in terms of drainage attenuation features, informal open spaces and walking corridors.

31. Agricultural land was considered and evaluated through the Sustainability Appraisal (page 6). The appraisals concluded that the impact of developing the site was considered to be minor to negligible in scale.

iii. landscape quality and character

32. Landscape considerations were assessed through the Sustainability Appraisal (pages 14 - 15) (SA.01A.9) and subsequent assessment at Stage 4 (Trowbridge CATP, Appendix G page 101) (CATP.17a)³⁸. Further landscape evidence can be found in the TEP Landscape Assessment report (pages 36 – 38) (PSCON.11B)³⁹.

33. The assessments consider that the site is well contained and offers scope for retaining a network of hedgerows and mature trees to enhance containment and maintain a strong local landscape character that enhances the existing urban fringe.

³³ [BIO.04](#) JNCC Bath and Bradford on Avon Bats Special Area of Conservation (SAC)

³⁴ [BIO.45](#) Draft Trowbridge Bat Mitigation Strategy

³⁵ [SA.01A.9](#) Sustainability Appraisal Report Annex 1 - A.9 Trowbridge May 2018

³⁶ [CATP.17a](#) Trowbridge Community Area Topic Paper - September 2018

³⁷ [WCO.01](#) Wiltshire Core Strategy, January 2015

³⁸ [CATP.17a](#) Trowbridge Community Area Topic Paper - September 2018

³⁹ [PSCON.11B](#) Stage 4a Site Landscape Assessment Part 2: Salisbury, Tidworth, Trowbridge, Warminster and Westbury Community - Pre-submission draft plan June 2017

34. Mitigation measures were recommended through the assessment process that include scope to retain Drynham Lane and its associated hedgerow boundaries to provide a local cycle and pedestrian route of rural character. The Plan recognises in paragraph 5.47 that any subsequent plans for developing the site should recognise that the existing natural features of the site are significant in the landscape and would need to be incorporated within a detailed layout. The size of the site is also considered capable of allowing for additional tree/hedgerow planting to synergistically enhance the character of the planned urban environment and provide mitigation to bolster Biodiversity Action Plan (BAP) Priority habitat for bats. Moreover, it is considered that a varied landscape treatment should be proposed within a development, with a mix of open ground, screen-planting, groups of trees, copses and individual specimen trees to help contribute to the sense of place.
35. In conclusion, it is considered that mitigation measures to address landscape quality and character are deliverable and capable of being fully addressed through landscape assessment informing development proposals and submitted as part of a planning application, in line with WCS Core Policy 51 (WCO.01)⁴⁰.

iv. heritage assets

36. The Council acknowledges that there are complexities surrounding the designated and non-designated heritage context of this site. Special regard has been given to the significance of these heritage assets and their settings throughout the site assessment process. Great weight has been applied to conserving and enhancing the assets and their setting. It is considered that the adjustments to the site area and reduction in site capacity, together with the specific policy requirements mean that the site can be brought forward in a manner that is acceptable from a historic environment perspective.
37. Heritage assets were assessed through the Sustainability Appraisal (pages 12 - 13) (SA.01A.9)⁴¹ and subsequent assessment at Stage 4 (CATP.17a, Appendix G, page 101) (CATP.17a)⁴². This identified that development of the site may harm the significance and setting of the Grade II Listed Drynham Lane Farmhouse, albeit the scale of such harm is considered to be less than substantial. Future development proposals would need to minimise the scale of potential harm.
38. Since the assessments, it has come to light that there is another Grade II Listed Building - Southview Farmhouse situated in the northern part of the allocation on the outer edge. However, it is considered that the development of the site may lead to harmful effects on the significance and setting of the Southview Farmhouse and development will need to minimise the potential harm, albeit the scale of such harm is considered to be less than substantial. The location of the asset and the measures required to minimise harm to the significance of the asset and its setting are set out in an amendment to PC 58 (see Appendix A) (EXAM.01.01)⁴³.
39. It is considered that impacts on designated and non-designated heritage assets are capable of being addressed through the process of detailed design and layout, informed by further detailed assessments (including heritage) to support any subsequent planning application, in line with WCS Core Policy 58 (WCO.01)⁴⁴.

⁴⁰ [WCO.01](#) Wiltshire Core Strategy, January 2015

⁴¹ [SA.01A.9](#) Sustainability Appraisal Report Annex 1 - A.9 Trowbridge May 2018

⁴² [CATP.17a](#) Trowbridge Community Area Topic Paper - September 2018

⁴³ [EXAM.01.01](#) Schedule of Proposed Changes (Sept 2018) (Part 1 of 46) Main Report

⁴⁴ [WCO.01](#) Wiltshire Core Strategy, January 2015

v. strategic and local infrastructure including transport

40. The requirement to consider strategic and local infrastructure requirements is set by WCS Core Policy 3. Core Policy 3 provides a sound and suitable approach to ensuring that the development of the Elm Grove site will provide for essential and place-shaping infrastructure where it is needed in a timely manner.
41. In Trowbridge, a comprehensive transport study has been carried out (Trowbridge Transport Strategy: Draft Strategy Refresh 2018 (4 May 2018) (WHSAP.07)⁴⁵. This study has assessed the cumulative impact of all the proposed sites and outlines a transport strategy which aims to provide for and mitigate the impact of proposed growth. It identifies nine objectives and schemes have been identified, assessed and categorised to meet these objectives and thereby address the current and forecast transport issues in Trowbridge.
42. Strategic and local infrastructure requirements were assessed through the Sustainability Appraisal (pages 17 - 19) (SA.01A.9)⁴⁶ and subsequent assessment at Stage 4 (Trowbridge CATP, Appendix G, p102 -103) (CATP.17a)⁴⁷ and mitigation measures were identified for development proposals.
43. In terms of site specific related infrastructure, development at this site would result in the need to mitigate pressure on educational facilities and ecology improvements:
 - The scheme will provide funding contributions for local school provision (Updated position February 2019 as discussed above in paragraphs 8 - 11) (SA pages 17 – 18) (SA.01A.9);
 - Policy H2.1 of the WHSAP⁴⁸ provides for a multi-purpose community facility (Wiltshire Playing Pitch Strategy) (STU.07)⁴⁹;
 - Policy H2.1 of the WHSAP provides for a significantly improved and consolidated public open space area adjacent to the existing Queen Elizabeth II Field to provide a play area and junior level sports pitches for local community teams (Wiltshire Playing Pitch Strategy) (STU.07);
 - A road from the A363 through to an improved junction of Drynham Lane and Wiltshire Drive (CATP17.a page 102) (CATP.17a⁵⁰);
 - Comprehensive approach to addressing recreational pressures resulting from ecological constraints at the town through TBMS (paragraph 5.49)⁵¹ (SA pages 3 – 5) (SA.01A.9)⁵² explain above in paragraphs 19 - 13; and
 - Policy H2.1 of the WHSAP⁵³ also provides new cycling and walking routes through the site to link into the existing network and the proposed Ashton Park Strategic Allocation site and the White Horse Business Park (SA pages 14 – 15 and 18 – 19) (SA.01A.9)⁵⁴

⁴⁵ [WHSAP.07](#) Trowbridge Transport Strategy Refresh May 2018 15052018 Cabinet

⁴⁶ [SA.01A.9](#) Sustainability Appraisal Report Annex 1 - A.9 Trowbridge May 2018

⁴⁷ [CATP.17a](#) Trowbridge Community Area Topic Paper - September 2018

⁴⁸ [WHSAP.01.01](#) Wiltshire Housing Site Allocations Plan - Submission Document July 2018

⁴⁹ [STU.07](#) Wiltshire Playing Pitch Strategy

⁵⁰ [CATP.17a](#) Trowbridge Community Area Topic Paper - September 2018

⁵¹ [BIO.45](#) Draft Trowbridge Bat Mitigation Strategy

⁵² [SA.01A.9](#) Sustainability Appraisal Report Annex 1 - A.9 Trowbridge May 2018

⁵³ [WHSAP.01.01](#) Wiltshire Housing Site Allocations Plan - Submission Document July 2018

⁵⁴ [SA.01A.9](#) Sustainability Appraisal Report Annex 1 - A.9 Trowbridge May 2018

(CATP pages 101- 102) (CATP.17a)⁵⁵.

44. The Council considers that existing policy will allow for up to date evidence at the time of a planning application to be used to determine appropriate contribution to any necessary infrastructure, in accordance with WCS Core Policy 3 (WCO.01)⁵⁶. However, based on currently available evidence, the Council considers that latent capacity in existing primary schools within the town would not preclude or delay development at this site.

vi. the efficient operation of the transport network, highway safety

45. The efficient operation of the transport network and highway safety were considerations in Stage 4 of the site selection process, and any concerns have been presented in the Trowbridge CATP (CATP.17a, Appendix G, pages 101 – 102) (CATP.17a).
46. In Trowbridge, a comprehensive transport study has been carried out (Trowbridge Transport Strategy: Draft Strategy Refresh 2018 (4 May 2018) (WHSAP.07)⁵⁷. This study has assessed the cumulative impact of all the proposed sites and outlines a transport strategy which aims to provide for and mitigate the impact of proposed growth. It identifies nine objectives and schemes have been identified, assessed and categorised to meet these objectives and thereby address the current and forecast transport issues in Trowbridge.

vii. air and water quality, noise pollution, odours, land stability, groundwater and flood risk

47. The Sustainability Appraisal (pages 6 - 12) (SA.01A.9) has identified wider considerations and constraints in relation to groundwater, air quality, noise and lighting, sustainable drainage and soakaways. All these issues are considered to be capable of being positively addressed through the development of planning applications.
48. With specific regard to air quality, the Sustainability Appraisal (page 8 – 10) (SA.01A.9⁵⁸) concludes that local air quality is likely to be affected through increases in vehicular emissions. The Council considers that mitigation measures in line with national and local plan policy, including WCS Core Policy 55 (WCO.01⁵⁹) and the Air Quality Strategy, are achievable on this site.
49. In light of the requirements of the NPPF⁶⁰ in relation to land stability, there are no known issues of concern in relation to this site.
50. Noise and odours have been considered (Sustainability Appraisal, pages 8 – 10) (SA.01A.9⁶¹) and the effects identified can be mitigated in accordance with local plan policy and regulations.
51. The site is located within Flood Zone 1, however parts of the site are prone to surface water ponding / flooding and minor watercourses flow through the site. The watercourses and surface water flows contribute to a wider drainage catchment associated with the River Biss. As such development proposals for the site should be considered on a wider catchment level basis to ensure that flood risk is not exacerbated on/off site and further downstream (Sustainability Appraisal, pages 11 – 12)

⁵⁵ [CATP.17a](#) Trowbridge Community Area Topic Paper - September 2018

⁵⁶ [WCO.01](#) Wiltshire Core Strategy, January 2015

⁵⁷ [WHSAP.07](#) Trowbridge Transport Strategy Refresh May 2018 15052018 Cabinet

⁵⁸ [SA.01A.9](#) Sustainability Appraisal Report Annex 1 - A.9 Trowbridge May 2018

⁵⁹ [WCO.01](#) Wiltshire Core Strategy

⁶⁰ [NPP.01A](#) National Planning Policy Framework (NPPF)

⁶¹ [SA.01A.9](#) Sustainability Appraisal Report Annex 1 - A.9 Trowbridge May 2018

(SA.01A.9)⁶².

52. Recognising the national and local planning policy imperative for the need to positively address flood risk, drainage and ground water protection, paragraph 5.57 (as amended by PC57) (EXAM.01.01)⁶³ of the WHSAP requires that any development proposal be supported by a Flood Risk Assessment (incorporating an assessment of the predicted effects of climate change), along with a comprehensive Drainage Strategy to ensure that development will result in improved drainage conditions.

viii. open space, recreational facilities and public rights of way

53. The provision, protection and enhancement of open space, recreational facilities and public rights of way have been assessed through the Sustainability Appraisal (pages 14 - 15) (SA.01A.9⁶⁴) and subsequent assessment at Stage 4 as set out in the Trowbridge CATP (page 68) (CATP.17a)⁶⁵.
54. Development of the site offers the opportunity to deliver green infrastructure through provision of open space, connections to and retention of existing footpath networks and green corridors, including the Queen Elizabeth II field. Therefore, development of this site offers significant positive benefits associated with improving connectivity to the existing urban form along Wiltshire Drive and delivering multi-functional open space/recreational facilities. This is supported by the existing green infrastructure requirements set out in WCS Core Policy 52 (WCO.01)⁶⁶.

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

55. Chapter 5 of the Plan including Policies H1 and H2.1 and their supporting text are considered to provide contextual detail that will guide future developers and decision makers and thereby inform mitigation measures required to support development. Reference is made to the need to develop proposals in accordance with existing policies set out in the Wiltshire Core Strategy also, such that there are already effective safeguards to ensuring acceptable forms of development are to be delivered. The requirement for a master plan will ensure that the site is developed in a comprehensive way taking into consideration detailed assessments appropriate to the site.
56. The Proposed Changes (PC57 and PC58) (EXAM.01.01⁶⁷) to the supporting text of the WHSAP provide further clarity for the user of the Plan by reinforcing the definition of mitigation considered necessary to ensure development will achieve an acceptable form of development.

Issue 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?

57. WHSAP (WHSAP.01.01⁶⁸ and EXAM.01.01⁶⁹) paragraphs 5.1 – 5.12 introduce a range of generic requirements that may be required for each site. Paragraphs 5.1 states that *'development will be required to provide for the necessary on-site and, where necessary,*

⁶² [SA.01A.9](#) Sustainability Appraisal Report Annex 1 - A.9 Trowbridge May 2018

⁶³ [EXAM.01.01](#) Schedule of Proposed Changes (Sept 2018) (Part 1 of 46) Main Report

⁶⁴ [SA.01A.9](#) Sustainability Appraisal Report Annex 1 - A.9 Trowbridge May 2018

⁶⁵ [CATP.17a](#) Trowbridge Community Area Topic Paper - September 2018

⁶⁶ [WCO.01](#) Wiltshire Core Strategy, January 2015

⁶⁷ [EXAM.01.01](#) Schedule of Proposed Changes (Sept 2018) (Part 1 of 46) Main Report

⁶⁸ [WHSAP.01.01](#) Wiltshire Housing Site Allocations Plan - Submission Document July 2018

⁶⁹ [EXAM.01.01](#) Schedule of Proposed Changes (Sept 2018) (Part 1 of 46) Main Report

off-site infrastructure requirements arising from proposals in accordance with [WCS] Core Policy 3 (Infrastructure requirements)'.

58. Requirements for infrastructure contributions will be subject to review through the consideration of future planning applications submitted on the site. It is considered that contributions specified for this site are necessary and justified by the evidence base and the plan is clear on how and when infrastructure will be provided.
59. The Plan clearly states at paragraph 5.51 that contributions will be sought from development of the site to secure funding contributions towards local school capacity, increased capacity at local doctor's surgeries and dentistry at the town. Appendix G of the Trowbridge Community Area Topic Paper has shown that the capacity of GP surgeries at the town is limited justifying the requirement for contributions toward improving this.
60. In terms of site specific related infrastructure, development at this site would result in the need to provide mitigation to address impacts in relation to ecology (in line with the emerging TBMS), as state at paragraph 5.49.
61. Policy H2.1 and Appendix G of the Trowbridge CATP⁷⁰ (Table G.6, page 101 – 102) states that a road from the A363 through to an improved junction of Drynham Lane and Wiltshire Drive and this can be achieved.
62. There is no longer a need for a primary school to be provided as part of the development of this site. Therefore, there are no items of critical infrastructure needed in order to support the development on the site.
63. In terms of site specific related infrastructure, development at this site will result in the need to provide mitigation to address impacts in relation to ecology in line with the emerging TBMS. Paragraph 5.51 of the WHSAP (July 2018) (WHSAP.01.01⁷¹) clearly states that contributions will be sought from development of the site to secure funding contributions towards local school capacity, increased capacity at local doctor's surgeries and dentistry at the town. These requirements are founded on evidence gathered through the plan making process and are therefore considered to be justified and necessary.
64. The Council considers that existing policy will allow for up to date evidence at the time of a planning application to be used to determine appropriate contribution to any necessary infrastructure, in accordance with WCS Core Policy 3.

Issue 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?

65. The Sustainability Appraisal and Trowbridge Community Area Topic Paper set out that the site is situated on edge of the current built framework, with good prospects for connecting to local services and facilities to the north of the site via sustainable transport, it is clear therefore that whilst on the edge of the market town it is in an accessible location with the ability to connect into existing facilities by a range of transport modes.

⁷⁰ [CATP.17a](#) Trowbridge Community Area Topic Paper - September 2018

⁷¹ [WHSAP.01.01](#) Wiltshire Housing Site Allocations Plan - Submission Document July 2018

66. The accessibility of the proposed allocation was appraised through the SHLAA, (613 incorporating 248) and assessed through the Sustainability Appraisal (SA.01A.9⁷²) and at Stage 4 of the site assessment process (CATP) (CATP.17a⁷³). The site assessment (Sustainability Appraisal page 5 and 19) (SA.01A.9) explains that the site is on the edge of town with good prospects for connectivity to local/town centre services and facilities.
67. The WSHAP (WHSAP.01.01)⁷⁴ Policy H2.1 and 5.50, also states that there will be new cycling and walking routes through the site to link into the existing network and the proposed Ashton Park Strategic Allocation site and the White Horse Business Park (CATP page 101-102) (CATP.17a).
68. While residents are likely to use private vehicles, there are existing bus stops along the adjacent Wiltshire Drive and Drynham Road that offer frequent connections to the town centre. In addition, opportunities will be explored through the planning application process (e.g. the Transport Assessment and Design and Access Statement) to ensure that development of the site incorporates infrastructure to improve cycling opportunities (such as garages, sheds and secure bike stands) in accordance with WCS Core Policy 60 (WCO.01⁷⁵).

Issue 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?

69. The submission version of the WHSAP (WHSAP.01.01⁷⁶) explains at paragraph 5.12 that allocations are proposed at some settlements that involve a mix of uses or site specific complexities and where it is more appropriate for development to be guided by a master plan approach as opposed to detailed matters being addressed through policy criteria. There are five sites, of which this site is one, that have been identified as requiring a master plan.
70. The remaining sites are allocated by policies H2 and H3. Due to their less complex nature these sites do not require a master planned approach, and thus do not require a specific policy. The supporting text to the policies will provide future developers and decision makers with important contextual information, and the together with existing policies set out in the Wiltshire Core Strategy (WCO.01⁷⁷) can be relied on to guide the proposals for the site.

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

71. Yes. The Council considers the proposed allocation can be delivered within five years. Moreover, the site promoters have confirmed that they envisage a planning application will be submitted in 2019.

Issue 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?

⁷² [SA.01.A9](#) Wiltshire Housing Site Allocations Plan Sustainability Appraisal Report Annex 1 A.9, May 2018

⁷³ [CATP.17a](#) Trowbridge Community Area Topic Paper - September 2018

⁷⁴ [WHSAP.01.01](#) Wiltshire Housing Site Allocations Plan - Submission Document July 2018

⁷⁵ [WCO.01](#) Wiltshire Core Strategy

⁷⁶ [WHSAP.01.01](#) Wiltshire Housing Site Allocations Plan - Submission Document July 2018

⁷⁷ [WCO.01](#) Wiltshire Core Strategy

72. For sites in Trowbridge, a comprehensive strategy to deal with impacts on the Bath and Bradford on Avon Bats SAC has been derived following a full appropriate assessment and in consultation with Natural England.
73. A settlement level Habitats Regulation Assessment (HRA.01⁷⁸) concluded that the relationship of the Elm Grove site with the Bath and Bradford on Avon Bats SAC could contribute to effects alone and in-combination with other plans and projects and that a full appropriate assessment would be required (HRA.01). Subsequently the council produced an Addendum under the Habitats Regulations (HRA.02⁷⁹), and a further Addendum (HRA.02a⁸⁰) to support the council's Schedule of Proposed Changes. All three assessment documents, each of which included an appropriate assessment, concluded that allocation sites at Trowbridge would need to comply with, and contribute to, a bespoke mitigation strategy for bats which addressed impacts arising from habitat loss / degradation as well as impacts which would be caused by recreational pressure.
74. The Trowbridge Bat Mitigation Strategy (TBMS) (BIO.45)⁸¹ has been developed specifically to ensure that all impacts arising from allocation sites at Trowbridge will be fully mitigated. The strategy has been developed in consultation with Natural England and with input from local bat ecologists familiar with the area and the requirements of the bat species concerned. The document is currently out for public consultation (21 February – 21 March 2019) and it is intended the document will be adopted as SPD alongside the WHSAP.
75. The TBMS sets out, at a strategic level, mitigation that will be required to be confident that adverse effects to the SAC will be prevented, addressing specifically:
- Effects of habitat loss within green field sites. Mitigation for impacts alone will be delivered within the development site itself. Mitigation for residual and in-combination effects will be secured by Section 106 contributions towards off-site provision delivered by the Council. This will be based on an amount per dwelling or the equivalent for non-residential development.
 - Effects of recreational pressure arising from all residential development within a set radius from the key bat woodland sites. This cost will be funded through the Community Infrastructure Levy (CIL).
76. Paragraphs 5.44 and 5.49 in the WHSAP (WHSAP.01.01⁸²) state that development will be required to contribute to the delivery of the TBMS through financial contribution or direct provision of equivalent new infrastructure over and above the Council's normal requirements (Trowbridge Appendix G, Table G.10, p117). Infrastructure requirements will be confirmed through the planning application process according to up to date evidence at the time.
77. Natural England has responded favourably to the above consultation for the TBMS.
78. Biodiversity considerations, including the presence of protected species were also assessed through the Sustainability Appraisal (pages 3 - 5), as summarised in Trowbridge CATP (CATP.17a⁸³, Appendix G, Table G.6, p100) (CATP.17a⁸⁴). Paragraphs 5.44 and 5.49 in the WHSAP (WHSAP.01.01⁸⁵) states that development will

⁷⁸ [HRA.01](#) Habitats Regulations Assessment - Pre-submission draft plan June 2017

⁷⁹ [HRA.02](#) Addendum to the Assessment under the Habitat Regulations - Pre-submission draft plan May 2018

⁸⁰ [HRA.02.a](#) Addendum to the Assessment under the Habitat Regulations - Factual update September 2018

⁸¹ [BIO.45](#) Draft Trowbridge Bat Mitigation Strategy

⁸² [WHSAP.01.01](#) Wiltshire Housing Site Allocations Plan - Submission Document July 2018

⁸³ [CATP.17a](#) Trowbridge Community Area Topic Paper - September 2018

⁸⁴ [CATP.17a](#) Trowbridge Community Area Topic Paper - September 2018

⁸⁵ [WHSAP.01.01](#) Wiltshire Housing Site Allocations Plan - Submission Document July 2018

also be required to contribute to the delivery of the Trowbridge Bat Mitigation Strategy (TBMS) through financial contribution or direct provision of equivalent new infrastructure over and above the Council's normal requirements to delivery new habitat and recreational opportunities in line with criteria in the Strategy (Trowbridge Appendix G, Table G.10, p117). Infrastructure requirements will be confirmed through the planning application process according to up-to-date evidence at the time.

Issue 5.14 - For Site H2.1, what, if any, are the implications for allocation and delivery of the site associated with Queen Elizabeth II Field?

79. Following on from the revised position and there being no need to provide a primary school on the Queen Elizabeth II (QEII) Field part of the site, known as Elm Grove Field, Policy H2.1 (as amended by PC55) will now need to be further amended to reflect the current evidence in respect of education needs at the town. The further proposed change to PCs 53 and 55 (EXAM.01.01⁸⁶) is set out in Appendix 1.
80. Currently the QEII Field includes a small play area in poor condition and a basketball hoop. The field has no marked-out pitches, is prone to water logging and thus unsuitable for team sports. It is envisaged that with drainage improvements the Queen Elizabeth II Field would provide a significantly enhanced open space area for the local community and deliver the much-needed playing pitches that the Town Council have identified as being needed at the town to support local football clubs (see the Playing Pitches Strategy).
81. The field remains part of Wiltshire Council's corporate property holding. The 2012 Deed of Dedication restricts use of the field to open space for recreational or sports facilities and requires Wiltshire Council to obtain the consent of Fields in Trust (FiT) for any disposal. This will include using the land for other purposes.
82. As there is no longer a need to site a school on the QEII Field, there is an opportunity to undertake a programme of comprehensive drainage works on both the QEII Field and adjacent land to serve the overall Elm Grove development. It is proposed to retain the inclusion of the QEII field within the site boundary as set out in PC53 to enable such drainage works to be undertaken. The delivery of an enhanced open space/play area along with junior level sports pitches, changing facilities and community facilities would not require any alteration to the Deed of Dedication covering the QEII Field. Indeed, comprehensively draining the QEII field would be supported by the Council and Fields in Trust and would be delivered via an agreement between the Council and the developer established at the planning application stage.

⁸⁶ [EXAM.01.01](#) Schedule of Proposed Changes (Sept 2018) (Part 1 of 46) Main Report

Appendix 1
Proposed Amendment to Proposed Changes

Proposed change ref number	Policy/Para reference	Key Issue/Rep numbers	Reason for Proposed Change	Proposed Change
PC55a PC53a	Policy H2.1		To accord with the latest evidence in respect of the need for a new primary school (i.e. on top of those already planned at the Ashton Park Strategic Site Allocation)	Delete 2nd bullet point entirely. Amend 4 th bullet point to read: <ul style="list-style-type: none"> • A <u>significantly improved and consolidated</u> ...
PC58a	Paragraph 5.50		Considerations should be given to Southview Farmhouse within supporting text	Amend fourth paragraph to read: in addition, development will need to minimise the potential to harm the significance of the Grade II Listed Drynham Lane farmhouse <u>along with Southview farm ...</u>