

Wiltshire Housing Site Allocations Plan Examination in Public

Position Statement on Matter 3

Housing Site Allocations

H2.6 Southwick Court, Trowbridge

PS/M3/30

March 2019

Contents

Matter 3: Housing Site Allocations H2.6 Southwick Court, Trowbridge		Page number
<i>Issue No.</i>	<i>Issue</i>	
5	Are the proposed sites justified, effective and consistent with national policy?	4
5.1	Does the plan provide sufficient detail on form, scale, access and quantity of development for each site?	4
5.2	Is the amount of development proposed for each site justified having regard to any constraints and the provision of necessary infrastructure?	5
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 ii. green infrastructure and agricultural land iii. landscape quality and character iv. heritage assets v. strategic and local infrastructure including transport vi. the efficient operation of the transport network, highway safety vii. air and water quality, noise pollution, odours, land stability, groundwater and flood risk viii. open space, recreational facilities and public rights of way	6 8 9 9 10 12 12 13
5.4	In relation to the above, does the plan contain effective safeguards or mitigation measures necessary to achieve an acceptable form of development?	13
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?	14
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?	14

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?	15
5.8	Is the development proposed for each site deliverable in the timescales envisaged?	15
Area specific issues		
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?	16
5.12	The supporting text for sites H2.4, H2.5, H2.6, H2.9 and H3.3 refers to parts of the sites being within Flood Zones 2 and/or Flood Zones 2 and 3? Is this approach consistent with national policy? Will the plan be effective in addressing drainage issues on these sites?	17
5.15	For Sites H2.4, H2.5 and H2.6, has sufficient attention been paid to the cumulative effect of development on landscape character, biodiversity and heritage assets and Southwick Country Park?	18

Matter 3: Housing Site Allocations

H2.6 Southwick Court, 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. Policy H2 and supporting text for allocation H2.6 (paragraph 5.77 to 5.84) of the Wiltshire Housing Site Allocations Plan Submission Document (WHSAP.01.01)¹, incorporating the Council's Schedule of Proposed Changes (EXAM.01.01)², when read in conjunction with the introductory text to Chapter 5 of the Plan (paragraphs 5.1-5.12) 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 the draft Plan as being approximately 180 dwellings on a site area of approximately 18.17ha which is considered to be achievable for the site.
3. Moreover, supporting text identifies a number of important elements and issues where mitigation will be required through any subsequent planning application.
4. Highways access details have been considered for this site. Access considerations were assessed through the site selection process and it is considered that a safe and suitable access can be achieved at this site as set out in the Trowbridge Community Area Topic Paper (CATP.17a)⁴ (p58 and p114). Through collaborative working with Historic England and the promoters of the site it is also recognised that to avoid undue harm to the heritage significance of Southwick Court the design of the future road across the site and likely junction off the A361 (Frome Road) requires a sensitive approach and a rural estate typology with low level lighting and unobtrusive signage to minimise intrusion on the historic landscape. This is stated in the response from Historic England to the Focussed Consultation on the Schedule of Proposed Changes and referred to in the Report on that consultation (page 16, representation 186-190). Further collaborative work is continuing with Historic England and the promoters of the site and an agreed approach to the access will be considered in the statement of common ground with Historic England and the promoters of the site. Further consideration of access arrangements would be undertaken through any planning application and required transport assessment.
5. 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.

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

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

6. The Council considers that the amount of development proposed for the site (approximately 180 dwellings) is justified by the evidence base (TOP.02⁵, CATP.17a⁶, SA.01A.a⁷, SA.01A.9⁸) and has had full regard to site specific constraints including: drainage, flood risk, heritage and ecology.
7. 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.17a) (Appendices D, F and G).
8. The original site capacity for the site was estimated using the 2011 SHLAA methodology (SHELAA.22)⁹ at 273 dwellings for this site, which formed a starting point for assessment. This applied a capacity of 30 dwellings per hectare and a multiplier to reduce the developable area to allow for non housing uses. Stage 2 of the Plan site assessment process then considered whether exclusionary criteria (such as Flood Zones 2/3) should result in a reduction of the SHLAA site capacity. In the case of H2.6, the site capacity was reduced from 273 to 237 dwellings due to the site's partial location within a flood zone 2/3.
9. The amount of development proposed at this site was further reduced due to constraints identified through the Sustainability Appraisal, summarised in the Trowbridge CATP.17a (Appendix F, p82) and subsequent assessment (Appendix G, p114). This was primarily due to the impacts on heritage assets and their setting, the need to protect the habitat of Bechstein's bats and the presence of the Lambrok Stream and its flood plain to the west of the site. In light of these overlapping constraints the capacity of the site was reduced further to 180 dwellings.
10. The Plan includes supporting text at paragraph 5.44 and 5.84 (WHSAP.01.01)¹⁰ (including Proposed Change PC53, EXAM.01.01)¹¹ 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.
11. 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 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.
12. It is proposed that the Plan text is further amended to reflect this new evidence at policy H2.1 and 5.44. Proposed changes are set out in Appendix 1. Should circumstances alter

⁵ [TOP.02](#) WHSAP Topic Paper 2 - Site Selection Process Methodology July 2018 Submission version

⁶ [CATP.17a](#) Trowbridge Community Area Topic Paper - September 2018

⁷ [SA.01A.a](#) Sustainability Appraisal Report - revised September 2018

⁸ [SA.01A.9](#) Sustainability Appraisal Report Annex 1 - A.9 Trowbridge May 2018

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

¹⁰ [WHSAP.01.01](#) Wiltshire Housing Site Allocations Plan - Submission Document July 2018

¹¹ [EXAM.01.01](#) Schedule of Proposed Changes (Sept 2018) (Part 1 of 46) Main Report

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)¹². 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.

13. In terms of ecological infrastructure, paragraph 5.81 and 5.82 in the WHSAP (WHSAP.01.01)¹³ states that development at Southwick Court and around the town will also be required to contribute to the delivery of the Trowbridge Bat Mitigation Strategy (TBMS) through financial contribution or direct provision of new green infrastructure to ensure there is no net loss of habitat for protected bat species, along with appropriate measures for managing increased recreational pressure associated with an anticipated increased population at the town (CATP.17a, Appendix G, Table G.6, p117)¹⁴.
14. In terms of the heritage assets on the site and the importance of their setting allowance has also been made to ensure that the significance of Southwick Court and its setting is protected as set out in the response to issue 5.3iv.
15. Other infrastructure requirements are identified in the plan at paragraphs 5.83-5.84 and 5.44, which include 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 page 205).
16. Mitigation of constraints and delivery of infrastructure requirements are considered achievable for a site of this size and the amount of development at this site is capable of providing mitigation on site or supporting off-site measures.
17. 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. However, based on currently available evidence, the Council consider that the amount of development at the site is appropriate and has full regard to constraints and infrastructure requirements.

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**
18. Any impacts of development on biodiversity can be successfully managed and mitigated, and would not preclude development of the site.
19. 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)¹⁵ has been derived following a full appropriate assessment and in consultation with Natural England.
20. A settlement level Habitats Regulation Assessment (HRA.01)¹⁶ concluded that the relationship of the Southwick Court site with the Bath and Bradford on Avon Bats SAC

¹² [WCO.01](#) Wiltshire Core Strategy

¹³ [WHSAP.01.01](#) Wiltshire Housing Site Allocations Plan - Submission Document July 2018

¹⁴ [CATP.17a](#) Trowbridge Community Area Topic Paper - September 2018

¹⁵ [BIO.04](#) JNCC Bath and Bradford on Avon Bats Special Area of Conservation (SAC)

¹⁶ [HRA.01](#) Habitats Regulations Assessment - Pre-submission draft plan June 2017

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.02)¹⁷, and a further Addendum (HRA.02a)¹⁸ 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.

21. The Trowbridge Bat Mitigation Strategy (TBMS)¹⁹ 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.
22. 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).
23. Paragraphs 5.44 and 5.49 in the WHSAP (WHSAP.01.01)²⁰ 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)²¹. Infrastructure requirements will be confirmed through the planning application process according to up to date evidence at the time.
24. Natural England has responded favourably to the above consultation for the TBMS.
25. Biodiversity considerations were also assessed through the Sustainability Appraisal (SA.01A.9, pages –190-192)²², as summarised in Trowbridge CATP (CATP.17a, Appendix G, Table G.6, p111)²³. 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 habitat²⁴ 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. The assessment of the site also concluded that the Lambrok Stream and mature trees, hedgerows and hedgerow tress would require

¹⁷ [HRA.02](#) Addendum to the Assessment under the Habitat Regulations - Pre-submission draft plan May 2018

¹⁸ [HRA.02.a](#) Addendum to the Assessment under the Habitat Regulations - Factual update September 2018

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

²⁰ [BIO.45](#) Draft Trowbridge Bat Mitigation Strategy

²¹ [CATP.17a](#) Trowbridge Community Area Topic Paper - September 2018

²² [SA.01A.9](#) Sustainability Appraisal Report Annex 1 - A.9 Trowbridge May 2018

²³ [CATP.17a](#) Trowbridge Community Area Topic Paper - September 2018

²⁴ Hedgerows and hedgerow trees

appropriate mitigation in the form of buffers and and additional planting.

26. In summary any impacts on biodiversity can be successfully mitigated and managed. When read as whole, alongside the policies of the WCS, the Council considers that the provisions of Policy H2 and associated supporting text are capable of ensuring that all necessary infrastructure requirements associated with protecting and enhancing biodiversity will be delivered. Moreover, all infrastructure requirements associated with the development of the Southwick Court site will be confirmed through any subsequent planning application process in line with up-to-date evidence at the time of submission.

ii. green infrastructure and agricultural land

27. Green infrastructure aspects were assessed through the Sustainability Appraisal (SA), (pages 201-202), and subsequent assessment at Stage 4 (Trowbridge CATP (CATP.17.a), Appendix G, pages 83, 101 - 103) and mitigation measures were suggested to incorporate green infrastructure into development proposals.
28. The SA (pages 201-202) (SA.01A.9)²⁵ states that the site functions as a green infrastructure corridor. This green infrastructure includes that mature hedgerows and trees and the corridors which act as 'dark corridors' for foraging bats. The Plan (paragraph 5.80) (WHSAP.01.01)²⁶ recognises that mature hedgerows and trees on site provide key habitat for protected and non-protected species and that the natural features of the site should be incorporated into site layout. It recognises the role that green infrastructure plays in providing wildlife corridors and dark corridors for foraging bats and requires additional planting with native species to enhance this (paragraph 5.80). Development of the site offers potential to contribute towards the delivery of a comprehensive green infrastructure network. Any future planning application will also be considered in the context of requirements set out in WCS Core Policy 52 (WCO.01)²⁷.
29. The supporting text in the Plan requires any future potential scheme to ensure new homes are directed to the east of the Lambrok stream with land to the west becoming open space or remaining in agricultural use. This will have the combined benefits of providing open space, ensuring harm to the setting of Southwick Court is minimised, protecting the setting of Southwick Country Park along with enhancing the green infrastructure corridor that already exists on the site.
30. The Sustainability Appraisal (pages 201-202) for the site recognises the moderate adverse effect of loss of agricultural land however the focus of the development to the north east corner of the site means that the majority of the site will remain free from built development, protecting the agricultural land and maintaining the agrarian setting to Southwick Court.

iii. landscape quality and character

31. Landscape considerations were assessed through the Sustainability Appraisal (pages 14 - 15) and subsequent assessment at Stage 4 (Trowbridge CATP (CATP.17a), Appendix G page 101)²⁸. Further landscape evidence can be found in the TEP

²⁵ [SA.01A.9](#) Sustainability Appraisal Report Annex 1 - A.9 Trowbridge May 2018

²⁶ [WHSAP.01.01](#) Wiltshire Housing Site Allocations Plan - Submission Document July 2018

²⁷ [WCO.01](#) Wiltshire Core Strategy, January 2015

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

Landscape Assessment report (PSCON.11B) (pages 36 – 38)²⁹.

32. In landscape terms the fields are large and open, there is an important relationship with the Lambrok stream and the site provides an edge to Trowbridge in landscape terms. 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. Paragraph 5.79 of the Plan states that landscaping will be an important element of any scheme as the site represents an extension of the town into the surrounding countryside. The supporting text of the Plan continues to require a comprehensive landscape treatment that would provide an opportunity to improve the impact of the town on the wider landscape. The focus of development to the north east of the site will provide a landscaped edge to the urban area and will ensure the urban edge of Trowbridge and its relationship with the countryside is retained.
33. In conclusion, it is considered that mitigation measures to address landscape quality and character are deliverable and capable of being fully addressed through a landscape assessment informing development proposals and submitted as part of a planning application, in line with WCS Core Policy 51 (WCO.01)³⁰.

iv. heritage assets

34. 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.
35. Heritage assets were assessed through the Sustainability Appraisal (pages 199-200)³¹ and subsequent assessment at Stage 4 as set out in the Trowbridge CATP (CATP.17a) (appendix G p112)³². There are a number of heritage assets on and adjacent to the site which comprise the Grade 2* listed Southwick Court, moat and farmstead and the surrounding water meadows. Bearing in mind the significance of the Grade 2* listed Southwick Court and other assets and the surrounding historic water meadows it was concluded that the developable area of the site would likely need to be significantly reduced to allow mitigation measures to occur. The assessment concluded that development would need to occur to the east of Lambrok Street to protect the significance of the heritage assets (as well address flood risk) whilst land to the west would be open space or would remain in agricultural use. This will ensure the character of the area will therefore help to retain and enhance the high significance of this heritage asset and associated historic landscape.
36. Historic England subsequently commented through their formal response to the pre-submission consultation that further heritage evidence was required to ensure that the scale of harm to both designated and non designated assets was understood and that development could be accommodated on proposed allocations with particular heritage sensitivities. Through collaborative working it was agreed with Historic England that a

²⁹ [PSCON.11B](#) Stage 4a Site Landscape Assessment Part 2: Salisbury, Tidworth, Trowbridge, Warminster and Westbury Community - Pre-submission draft plan June 2017

³⁰ [WCO.01](#) Wiltshire Core Strategy, January 2015

³¹ [SA.01A.9](#) Sustainability Appraisal Report Annex 1 - A.9 Trowbridge May 2018

³² [CATP.17a](#) Trowbridge Community Area Topic Paper - September 2018

proportionate heritage impact assessment (HIA) would be carried out for these six sites. A HIA has been carried out for this site providing in depth evidence of the heritage assets and their settings and any potential impact on their significance is understood.

37. The HIA states for Southwick Court (pages 60-61) (WHSAP.05)³³ that the nature and extent of the setting of Southwick Court and the asset's relationship with the allocation area make it particularly sensitive to change. It concludes that a small area of development in the eastern area of the site could avoid the majority of effects.
38. The high importance of Southwick Court and its associated assets, and its high susceptibility to change due to the value of its setting and functional relationship with the non designated and degraded water meadows and wider agrarian landscape is recognised and reflected in the proposed changes (PC72) (EXAM.01.01)³⁴ made to the Plan. This ensures great weight is given to the heritage assets on site and that built development is contained in the top east corner of the site therefore resulting in less than substantial harm that can be mitigated.
39. Ongoing collaborative working has occurred and is continuing between the council, Historic England and the promoter of the site to ensure that potential development on the site will effectively protect and enhance the heritage assets, along with other constraints on the site.
40. 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)³⁵.

v. strategic and local infrastructure including transport

41. 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 Southwick Court site will provide for essential and place-shaping infrastructure where it is needed in a timely manner.
42. Each site has been assessed against an assessment which considered the following factors:
 - accessibility to local bus services, rail stations and service centres
 - likely impacts on the local road network
 - site access arrangements and impacts.
43. In Trowbridge, a comprehensive transport study have been carried out (*Trowbridge Transport Strategy: Draft Strategy Refresh 2018* (4 May 2018), (WHSAP.07)³⁶. This study has assessed the strategic impact of the proposed sites and outlines a transport strategy for Trowbridge which aims to mitigate the impact of proposed growth. The transport study considered both highway operation and highway safety and shows that the impact of the proposed growth for the town as a whole can be mitigated.

³³ [WHSAP.05](#) WHSAP Heritage Impact Assessment (LUC) March 2018

³⁴ [EXAM.01.01](#) Schedule of Proposed Changes (Sept 2018) (Part 1 of 46) Main Report

³⁵ [WCO.01](#) Wiltshire Core Strategy, January 2015

³⁶ [WHSAP.07](#) Trowbridge Transport Strategy Refresh May 2018 15052018 Cabinet

44. Strategic and local infrastructure requirements were assessed through the Sustainability Appraisal (pages 204-205) (SA.01A.9)³⁷ and subsequent assessment at Stage 4 (Trowbridge CATP, Appendix G, pages 112 -113) (CATP.17a)³⁸ and mitigation measures were identified for development proposals.
45. The Plan includes supporting text at paragraph 5.44 (WHSAP.01.01)³⁹ (included proposed change PC53 (EXAM.01.01)⁴⁰) ensuring that primary school provision is delivered in a timely manner to accommodate the new developments at Trowbridge. A recent update in evidence (February 2019) has shown that birth rates in Trowbridge are falling and a new primary school will not be needed. It is proposed that the Plan text is further amended to reflect this new evidence. 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 Core Policy 3, should circumstances alter. Based on available evidence Wiltshire Council is confident that school capacity would not preclude or delay development at this site.
46. The Plan also requires the following infrastructure:
- Funding contributions may be sought where needed to fund an increase in capacity at GP surgeries and dentistry in the town (paragraph 5.84 of the Plan) (WHSAP.01.01)⁴¹.
 - Comprehensive approach to addressing recreational pressures resulting from ecological constraints at the town through TBMS (BIO.45)⁴².
 - Opportunities to improve walking and cycling routes through the existing built framework to the wider countryside will be sought (paragraph 5.83 of the Plan).
47. Through collaborative working with Historic England and the promoters of the site it is recognised that to avoid undue harm to the heritage significance of Southwick Court the design of the future road across the site and likely junction off the A361 (Frome Road) requires a sensitive approach and a rural estate typology with low level lighting and unobtrusive signage to minimise intrusion on the historic landscape. As stated in the response to issue 5.1 for this site it is stated in the response from Historic England to the Focussed Consultation on the Schedule of Proposed Changes and referred to in the Report on that consultation (page 16, representation 186-190) (EXAM.01.01)⁴³. Further collaborative work is continuing with Historic England and the promoters of the site and an agreed approach to the access will be considered in the statement of common ground with Historic England and the promoters of the site.

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

48. 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 112-114)⁴⁴.
49. In Trowbridge, a comprehensive transport study have been carried out (*Trowbridge Transport Strategy: Draft Strategy Refresh 2018* (4 May 2018)(WHSAP.07))⁴⁵. This

³⁷ [SA.01A.9](#) Sustainability Appraisal Report Annex 1 - A.9 Trowbridge May 2018

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

³⁹ [WHSAP.01.01](#) Wiltshire Housing Site Allocations Plan - Submission Document July 2018

⁴⁰ [EXAM.01.01](#) Schedule of Proposed Changes (Sept 2018) (Part 1 of 46) Main Report t

⁴¹ [WHSAP.01.01](#) Wiltshire Housing Site Allocations Plan - Submission Document July 2018

⁴² [BIO.45](#) Draft Trowbridge Bat Mitigation Strategy

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

⁴⁴ [CATP.17a](#) Trowbridge Community Area Topic Paper - September 2018

⁴⁵ WHSAP.07 Trowbridge Transport Strategy Refresh May 2018 15052018 Cabinet

study has assessed the strategic impact of the proposed sites and outlines a transport strategy for Trowbridge which aims to mitigate the impact of proposed growth. The transport study considered both highway operation and highway safety and shows that the impact of the proposed growth for the town as a whole can be mitigated.

50. The site can be effectively and safely accessed.

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

51. The Sustainability Appraisal (SA.01A.9⁴⁶ pages 197-199) 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.

52. With specific regard to air quality, the Sustainability Appraisal (page 195 (SA.01A.9)⁴⁷) concludes that local air quality may be affected through increases in vehicular emissions but that the development is within 2km of facilities in Trowbridge and therefore also accessible by foot, cycle and buses which may limit the extent of additional traffic using the A361 to access the town. The Council considers that mitigation measures in line with national and local plan policy, including WCS Core Policy 55 (WCO.01)⁴⁸ and the Air Quality Strategy, are achievable on this site.

53. In light of the requirements of the NPPF in relation to land stability, there are no known issues of concern in relation to this site.

54. Noise and odours have been considered (Sustainability Appraisal, pages 195-197) and the effects identified can be mitigated in accordance with local plan policy and regulations.

55. Air quality, noise, odours and vibration associated with construction as well as any impacts caused by or affecting the residential use have also been considered and the effects identified can be fully mitigated through application of existing policy and regulations. Mitigation measures to limit the impacts of vehicular movements on local air quality would need to be developed and implemented in accordance with local plan policy and advice from relevant bodies.

56. The majority of the site is within Flood Zone 1 but the Lambrook stream does effectively divide the site into two. As such, the risk of flooding would need to be appropriately addressed through standoffs and coupled with the size of the site a Flood Risk Assessment (FRA) would be required in order to support a planning application. The land is also susceptible to surface water ponding but this can be addressed through appropriate mitigation measures. Comments made by the Environment Agency through the Pre-Submission Consultation in relation to flood risk and drainage for all sites have been taken into consideration, and the Plan is proposed to be changed (PC73) (EXAM.01.01)⁴⁹ to include additional text, as set out in the Schedule of Proposed Changes.

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

⁴⁷ [SA.01A.9](#) Sustainability Appraisal Report Annex 1 - A.9 Trowbridge May 2018

⁴⁸ [WCO.01](#) Wiltshire Core Strategy, January 2015

⁴⁹ [EXAM.01.01](#) Schedule of Proposed Changes (Sept 2018) (Part 1 of 46) Main Report

57. Recognising the national and local planning policy imperative for the need to positively address flood risk, drainage and ground water protection, paragraph 5.79 (WHSAP.01.01)⁵⁰ (as amended by PC73) 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

58. The provision, protection and enhancement of open space, recreational facilities and public rights of way have been assessed through the Sustainability Appraisal (pages 201-202) and subsequent assessment at Stage 4 as set out in the Trowbridge CATP (page 68) (CATP.17a)⁵¹.

59. The site acts as an important green infrastructure corridor and important bat habitat with existing links from the town providing access to the Southwick Country Park and wider countryside. The Plan requires opportunities for improving existing walking and cycling routes to be explored to promote further access to the wider countryside (paragraph 5.83) (WHSAP.01.01)⁵². Land to the west of Lambrok stream will be kept as either formal or informal open space or in agricultural use which offers further potential for enhancing access to recreational use of the countryside.

60. 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. This is supported by the existing green infrastructure requirements set out in WCS Core Policy 52⁵³.

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?

61. Chapter 5 of the Plan including policy H1 and supporting text for H2.6 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.

62. This includes proposed changes to the supporting text of the Plan to ensure that harm to the significance of Southwick Court and its setting is minimised including by ensuring that development is directed to the east of Lambrok Stream and built in a manner that reflects the topography and existing built form (PC72) (EXAM.01.01)⁵⁴; land to the west will be kept open and help retain the significance of Southwick Court and the heritage assets; and, in response to the Environment Agency ensure strengthened supporting text will ensure development on site occurs sequentially (PC73). Supporting text in the draft Plan also ensures that mitigation will occur to ensure development does not impact on the Bath and Bradford on Avon Bats Special Area of Conservation (paragraph 5.81).

⁵⁰ [WHSAP.01.01](#) Wiltshire Housing Site Allocations Plan - Submission Document July 2018

⁵¹ [CATP.17a](#) Trowbridge Community Area Topic Paper - September 2018

⁵² [WHSAP.01.01](#) Wiltshire Housing Site Allocations Plan - Submission Document July 2018

⁵³ [WCO.01](#) Wiltshire Core Strategy, January 2015

⁵⁴ [EXAM.01.01](#) Schedule of Proposed Changes (Sept 2018) (Part 1 of 46) Main Report

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?

63. There is no infrastructure that is critical to the delivery of the site. WHSAP (WHSAP.01.01⁵⁵ and EXAM.01.01) paragraphs 5.1 – 5.12 introduce a range of generic requirements that may be required for each site. Paragraph 5.1 states that *'development will be required to provide for the necessary on-site and, where necessary, off-site infrastructure requirements arising from proposals in accordance with [WCS] Core Policy 3 (Infrastructure requirements)'*.
64. 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 (BIO.45)⁵⁶), as well as contributions towards improvements for local health facilities and local schools where appropriate.
65. Appendix G of the Trowbridge Community Area Topic Paper (CATP.17a)⁵⁷ states that vehicular access will need to be planned holistically to conserve heritage assets in a manner appropriate to their significance and this can be achieved.
66. The Plan clearly states at paragraph 5.84 (WHSAP.01.01)⁵⁸ that contributions will be sought from development of the site to secure funding contributions towards local school capacity, increased capacity at local doctors 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
67. 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)⁵⁹.

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?

68. 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.
69. The Plan (paragraph 5.83) also states that opportunities will be sought for new cycling and walking routes through the site to link the existing built form with the wider countryside.
70. The Sustainability Appraisal concludes that there are good prospects for connecting to local and town centre services and facilities via sustainable transport although development will likely lead to a marginal increase in pressure on local highway routes.

⁵⁵ [WHSAP.01.01](#) Wiltshire Housing Site Allocations Plan - Submission Document July 2018

⁵⁶ [BIO.45](#) Draft Trowbridge Bat Mitigation Strategy

⁵⁷ [CATP.17a](#) Trowbridge Community Area Topic Paper - September 2018

⁵⁸ [WHSAP.01.01](#) Wiltshire Housing Site Allocations Plan - Submission Document July 2018

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

There is a bus stop within 400m and arrange of services within 800metres of the site. 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.

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?

71. The submission version of the WHSAP (WHSAP.01.01⁶⁰) 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.
72. The remaining sites are allocated by Policies H2 and H3. Due to their less complex nature, these sites were not considered to require a master planned approach, and thus do not have a specific policy. The supporting text to the allocated sites provides future developers and decision makers with important contextual information regarding matters that will need to be addressed through the planning application process. Indeed, as set out Chapter 5 of the WHSAP (WHSAP.01.01), the Council anticipates that development proposals relating to all allocations will be guided by relevant policies of the Wiltshire Core Strategy (WCO.01⁶¹).
73. In conclusion, the Council considers that the specific requirements for each allocation within the WHSAP can effectively be delivered as drafted through a combination of policies and supporting text that will all be read in conjunction with the WCS.

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

74. Yes. The Council considers the proposed allocation can be delivered within the Plan timeframe.
75. This position has been confirmed by the developer through representations received to consultations on the WHSAP where they have stated it can be delivered in the short-medium term.

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?

⁶⁰ [WHSAP.01.01](#) Wiltshire Housing Site Allocations Plan - Submission Document July 2018

⁶¹ [WCO.01](#) Wiltshire Core Strategy

76. 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.
77. A settlement level Habitats Regulation Assessment (HRA.01)⁶² concluded that the relationship of the Southwick Court 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.02)⁶³, and a further Addendum (HRA.02a) 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.
78. The Trowbridge Bat Mitigation Strategy (TBMS) (BIO.45)⁶⁴ 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.
79. 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).
80. Paragraphs 5.44 and 5.49 in the WHSAP (WHSAP.01.01)⁶⁵ 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) (CATP.17a)⁶⁶. Infrastructure requirements will be confirmed through the planning application process according to up to date evidence at the time.
81. Natural England has responded favourably to the above consultation for the Trowbridge Bat Mitigation Strategy (TBMS, BIO.45).
82. Biodiversity considerations were also assessed through the Sustainability Appraisal (pages 90, 106 and 123, as summarised in Trowbridge CATP (CATP.17a, Appendix G, Table G.3 and G4, p89-96). Paragraph 5.62 in the WHSAP states that development will also be required to contribute to the delivery of the TBMS (Trowbridge Appendix G, Table G.10, p117).

⁶² [HRA.01](#) Habitats Regulations Assessment - Pre-submission draft plan June 2017

⁶³ [HRA.02](#) Addendum to the Assessment under the Habitat Regulations - Pre-submission draft plan May 2018

⁶⁴ [BIO.45](#) Draft Trowbridge Bat Mitigation Strategy

⁶⁵ [WHSAP.01.01](#) Wiltshire Housing Site Allocations Plan - Submission Document July 2018

⁶⁶ [CATP.17a](#) Trowbridge Community Area Topic Paper - September 2018

Issue 5.12 - The supporting text for sites H2.4, H2.5, H2.6, H2.9 and H3.3 refers to parts of the sites being within Flood Zones 2 and/or Flood Zones 2 and 3? Is this approach consistent with national policy? Will the plan be effective in addressing drainage issues on these sites?

83. Yes. The WHSAP has been prepared in line with the NPPF, WCS, the Council's Strategic Flood Risk Assessment (SFRA⁶⁷) and all relevant information in respect of the management of flood risk from all sources.
84. Site options were initially screened through a high-level assessment process. As set out in Topic Paper 2 (July 2018) (TOP.02)⁶⁸, the site selection process considered the suitability of site options. A systematic assessment was applied that tested each SHELAA (SHLAA) site against a range of exclusionary criteria, as set out in Table 4.1. One such criterion was: "Is the site fully or partly with flood risk zones 2 or 3?". SHELAA (SHLAA) sites were either rejected outright, or saw their developable capacity reduced in the light of exclusionary constraints. This process was informed by the SFRA and mapped data in respect of flood risk from all sources. The Council is therefore satisfied that it has applied the sequential test as illustrated in Diagram 2 of the PPG.
85. Part of the allocated site H2.5 is within Flood Zones 2 and 3 (approx 0.5ha of the 2.27ha site). The site capacity was consequently reduced from 52 dwellings to 44 dwellings during Stage 2 of the site selection process, as documented on page 57 of the Trowbridge CATP (CATP.17a)⁶⁹. It should be noted that the site area was not reduced, just the capacity, in order that land unsuited to housing development could be useful within a scheme to deliver benefits such as open space or to mitigate adverse effects (as set out in the site selection methodology (TOP.02, paragraph 4.10).
86. The supporting text of the plan (as amended by PC71 (EXAM.01.01))⁷⁰ recognises that part of the site is in Flood Zone 2 and 3, and the amendment provides for additional reassurance that flood risk will be assessed, the developable footprint sequentially planned to ensure that no built form takes place in critical flood zones and the necessary mitigation measures incorporated into the proposals (which may take place on the high risk flood areas).
87. As set out in the Trowbridge CATP (CAPT.17a), the site selection process concluded that due to the proximity of the Lambrok Stream and the associated Flood Zones 2 and 3 at the southern margins of the site, proposals would need to incorporate Sustainable Drainage Systems (SuDS) in order to manage surface water drainage. This may include tree and hedgerow planting along the southern margins of the site to slow the flow of water into the stream, and will reduce the developable area of the site. The proposed changed to paragraph 5.73 (PC71) WHSAP paragraph 5.73 (WHSAP.01.01)⁷¹, contains the statement that 'as parts of the site lie within Flood Zone 2 and 3, development proposals will need to be sequentially planned and supported by a Flood Risk Assessment (incorporating an assessment of the predicted effects of climate change). In addition, development proposals will need to be supported by a comprehensive drainage strategy designed to help inform site layout and provide attenuation measures, including Natural Flood Management – i.e. tree and hedgerow planting along the southern margins of the site to slow the flow of surface

⁶⁷ [15.FR](#) Strategic Flood Risk Assessment documents.

⁶⁸ [TOP.02](#) WHSAP Topic Paper 2 - Site Selection Process Methodology July 2018 Submission version

⁶⁹ [CATP.17a](#) Trowbridge Community Area Topic Paper - September 2018

⁷⁰ [EXAM.01.01](#) Schedule of Proposed Changes (Sept 2018) (Part 1 of 46) Main Report

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

water into the Lambrok Stream' – this is considered to allow sufficient reassurance that development can take place on this site without increasing flood risk.

Issue 5.15 - For Sites H2.4, H2.5 and H2.6, has sufficient attention been paid to the cumulative effect of development on landscape character, biodiversity and heritage assets and Southwick Country Park?

88. Yes, sufficient attention has been given to the cumulative effect of development for these sites. For sites H2.4, H2.5 and H2.6 there are heritage sensitivities (as detailed in the HIA (WHSAP.05⁷²), biodiversity considerations linked to the Bath and Bradford Bats Special Area of Conservation (SAC) and landscape impacts on both the impact on the existing built up edge of Trowbridge and the wider countryside setting of Southwick Country Park to the south west of Trowbridge.
89. The impact on these assets has been fully assessed through the site selection process (as set out in the Council's response to issue 5.3 for each site). The Sustainability Appraisal also assessed the cumulative and synergistic effects related to the Plan in Chapter 8 of the Sustainability Appraisal Report (revised September 2018 (SA.01A.a)⁷³). Paragraphs 8.3.48-8.3.63 assess the impact of policy H2 which sets out all the allocations proposed in Trowbridge. Paragraph 8.3.48 states that some moderate adverse effects were common across a number of the allocations and that these 'cross-cutting' themes included biodiversity (protected bat species), landscape and the historic environment.
90. Cross cutting themes for Trowbridge have been recognised in paragraph 5.44 of the Plan (WHSAP.01.01)⁷⁴ and landscape character, biodiversity and heritage assets are recognised as key considerations for all three allocations.
91. Mitigation has been evidenced and required in the supporting text of the draft Plan to ensure that any harm to these assets is minimised and the form of development that will come from meeting these requirements will result in: retention of a 'green' river corridor across the sites, preservation of the rural setting to Southwick Country Park, better access between Trowbridge and the wider countryside, preservation of the setting of Southwick Court.
92. The following are examples of how the cumulative effects for development on landscape character, biodiversity and heritage assets and Southwick Country Park have been taken into account:
- The Trowbridge Bat Mitigation Strategy is an area wide strategy to address impacts on bat species associated with the Bath and Bradford-on-Avon Bats Special Area of Conservation.
 - The setting of Southwick Country Park and access to the wider countryside crosses all three sites and has been considered despite the country park being beyond the site boundaries.
 - The setting of Southwick Court in its agrarian landscape has also been considered within its wider context including the mosaic of water meadows that extends through H2.6 and H2.4.

⁷² [WHSAP.05](#) WHSAP Heritage Impact Assessment (LUC) March 2018

⁷³ [SA.01.A9](#) Wiltshire Housing Site Allocations Plan Sustainability Appraisal Report Annex 1 A.9, May 2018

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

93. The very nature of these issues mean that consideration has been given to wider impact beyond the proposed site allocations themselves.
94. Landscape character, biodiversity and heritage assets are also able to be addressed in an interlinked manner on the sites, for example, the provision of open space in H2.6 to the west of the site will protect the setting of Southwick Court and Southwick Country Park as well as providing open space for recreational use and ensuring that habitat is maintained for the bats.
95. It is considered that these considerations can be addressed through the process of detailed design and layout, informed by further detailed assessments to support any subsequent planning application, in line with the WCS (WCO.01⁷⁵).

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