

# Wiltshire Housing Site Allocations Plan Examination

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## Matter 3 Housing Site Allocations

Rep Id: 840359 / 903369 Redrow Homes

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

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

- 1.1 Proposed allocation H2.2 (Land off the A363 at White Horse Business Park) refers to the need to provide a landscape buffer between the site allocation and North Bradley. This will be provided, it says, through detailed design. Despite this, the allocation has incorporated the vast majority of land between the White Horse Business Park within the proposed allocation boundary (Figure 5.6, WHSAP). It does not appear that the extent of this buffer is agreed, and therefore it is not known how this will affect the capacity of the site. More importantly, it is not clear or certain if the site could be developed at the capacity proposed (175 dwellings).

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

- 1.2 No. See our response to 5.1.
- 1.3 The very recently published Trowbridge Bat Mitigation Strategy (TBMS) Supplementary Planning Document (SPD) has stated that all sites located in areas of 'medium risk' to the identified bat species would be required to produce a parameter plan which identifies areas for bat habitat mitigation (Para. 141, TBMS SPD). The Council does not appear to have agreed any such plans for the proposed allocations at Trowbridge.
- 1.4 The SPD also provides a high-level estimate of the areas required on-site for bat mitigation. It is not clear if this has been agreed with the site promoters. Indeed, we note that the outline planning application at Church Lane seeks permission for 65 dwellings; an increase of 20 on the numbers in the WHSAP.
- 1.5 These considerations are relevant and will have a direct bearing on the capacity of the proposed site allocations.

**5.3 What is the likely impact of the proposed development on the following factors and do any of these indicate that the site should not be allocated:**

- **biodiversity, in particular but not restricted to European protected habitats and species;**
- **green infrastructure and agricultural land;**
- **landscape quality and character;**
- **heritage assets;**
- **strategic and local infrastructure including transport;**
- **the efficient operation of the transport network, highway safety;**
- **air and water quality, noise pollution, odours, land stability, groundwater and flood risk;**
- **open space, recreational facilities and public rights of way.**

- 1.6 All proposed site allocations at Trowbridge require the development of Greenfield and predominantly agricultural land. The cumulative development of allocations H2.1, H2.2, H2.4, H2.5 and H2.6 along with the Ashton Park site will see a significant expansion of Trowbridge's developed limits to the South and West and towards Southwick and North Bradley. We have queried the consistency of this approach, given the Council's comments about the need to maintain the separate identities of these Large Villages (Trowbridge Community Area Topic Paper – September 2018).
- 1.7 Proposed allocation H2.6 is located in very close proximity to Southwick Court, a Grade II\* listed Tudor manor. The allocation will bring the developed edge of Trowbridge much closer to Southwick Court. Proposed mitigation appears to take the form of planting and screening, although this would create a new boundary across a field which has historically been open, and would alter the experience of the setting of Southwick Court.
- 1.8 Proposed allocation H2.6 at Southwick Court is also considered within the Stage 4a Site Landscape Assessment Part 2 (June 2017) as being an 'attractive' and 'integral part of the settlement setting'. It further concludes that the site has a 'low' capacity to accommodate change with a 'high' overall magnitude of effect on landscape character.
- 1.9 We have questioned whether the impact of the proposed allocation this heritage asset and the wider landscape setting of Trowbridge has been fully considered and whether it is justified, having regard to reasonable alternatives for meeting local housing need.
- 1.10 Access to proposed allocation H2.6 is proposed to be gained from Frome Road, via a link and proposed bridge. It should be made clear that this key infrastructure is deliverable.
- 1.11 We have also noted that Trowbridge Town Council object to the proposed allocation due to the encroachment of development into the open countryside and the risk of coalescence of the town with neighbouring villages at North Bradley and Southwick. We also note the consultation summary shows that this site was shown to receive the greatest number of objections from those commenting on the Regulation 19 draft of the WHSAP.
- 1.12 In respect of biodiversity, please see our response to Question 5.10.

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

- 1.13 See our comment about proposed allocation H2.2 at question 5.1.

**5.5 What infrastructure is critical to the delivery of each site? Where contributions are specified, are they necessary and justified by the evidence base? Is the plan sufficiently clear on how and when infrastructure provision will be required?**

- 1.14 A number of the proposed allocations are situated in proximity to the Ashton Park allocation. The A350 Yarnbrook and West Ashton Relief Road is a critical piece of infrastructure which is required to mitigate the impact of the strategic allocation.
- 1.15 The Trowbridge Transport Strategy Refresh (May 2018) states that the road will be implemented by the developer of Ashton Park so there is potential for further delay.
- 1.16 The April 2018 Committee Report for the Ashton Park application includes as part of the Section 106 Heads of Terms a requirement that the Relief Road be completed within 5 years of the commencement of development or prior to the occupation of 1000 dwellings. By the Council's delivery trajectory for the site (which we have questioned) this could mean the road is delivered by 2023/24.
- 1.17 It is not clear how far the proposed allocations at the south of Trowbridge (particularly H2.1 and H2.2) will be impacted by the delivery timescales for the Relief Road. Further uncertainty is caused by the lack of outline planning permission at Ashton Park and the ongoing delay.
- 1.18 Proposed allocation H2.1 includes a requirement for 1.8 ha of land for a new primary school. Provision of a new link road is also required as part of the allocation. It should be made clear whether these infrastructure items are required to be delivered in advance of the proposed allocations at the south of Trowbridge.
- 1.19 The Wiltshire Infrastructure Delivery Plan 3 2011-2026 (last updated in December 2016) does not immediately appear to make allowance for this. It makes reference to the delivery of two new primary schools at the Ashton Park allocation, the delivery of a new school to the east of Trowbridge (although there are options proposed to deliver this elsewhere) and the expansion of existing schools. The funding and delivery mechanisms should be made clear to provide clarity and certainty.
- 1.20 Any delay to the delivery of the proposed allocations if the required infrastructure is delayed or not delivered will undermine the delivery of much needed housing in the Trowbridge Community Area. In this context there needs to be further allocations made in order to allow greater flexibility should there be any further delay.

**5.6 Is the site in an accessible location with good access to everyday facilities by a range of means of transport? Does the plan provide an adequate basis to address any areas of deficiency?**

- 1.21 No comment.

**5.7 In cases where allocations do not have specific policies, is the reliance on supporting text likely to be an effective means of delivering the Council's requirements for each site? What is the justification for some sites having specific policies and some not?**

- 1.22 It would be more robust for the Council to formalise their proposed allocations within clear policies, setting out the specific requirements of development. We do not consider that the provision of supporting text discussing the proposed allocation in general terms provides sufficient clarity over what the Council expects each to deliver.

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

- 1.23 We are expecting an update to the Housing Land Supply Statement in April 2019. We reserve the right to produce further comments on this when it is published by the Council.
- 1.24 The Housing Land Supply Statement (March 2018) provides the most recent published assumptions about the delivery rates of these allocations. The larger of the proposed allocations (H2.1, H2.2, H2.3, H2.6) are expected to provide a peak annual rate of output of between 50-80 units per annum.
- 1.25 Lichfields' research into the delivery of housing sites (Start to Finish) showed that each sales outlet on a development site will typically generate 30-40 sales per annum. If two outlets can be expected from these sites, then this rate of completion could be considered reasonable though this will be unlikely for all sites and is likely to be an over estimation of the delivery rates.
- 1.26 Proposed allocation H2.2 is expected to begin delivering housing by 2020/21. Whilst an outline application is currently submitted (18/10035/OUT) there is disagreement between the applicant and the Council about the quantum of development on the site. This application is submitted on behalf of the landowner. It is not therefore evident when this application will be determined, nor when Reserved Matters will be brought forward by a developer.
- 1.27 Other sites are expected to begin delivering units by 2021/22 (H2.1, H2.2, H2.3, H2.5, H2.6). Proposed allocations H2.1, H2.2, H2.3 and H2.6 appear to be promoted in full or in part by landowners or land promoters. None of these sites currently have a planning application submitted, and it is therefore uncertain whether it is realistic to expect completions within 2 years' time.
- 1.28 For proposed allocations H2.1 and H2.2, the Council should provide greater clarity as to whether these proposals are contingent on the delivery of the proposed primary school, the Ashton Park Relief Road and the A363/Drynam Lane link road as key items of infrastructure. If there is any co-dependency, the impact on delivery rates must be understood.
- 1.29 There is wider uncertainty about the delivery timescales of the proposed Trowbridge site allocations, noting the constraints on development arising from the Bath & Bradford-on-Avon SAC and impacts of the mitigation required by the draft Trowbridge Bat Mitigation SPD (see our response to Question 4.5).
- 1.30 These considerations give doubt as to the credibility of the Council's expected housing trajectory for the proposed allocations at Trowbridge.
- 1.31 The impact on the anticipated delivery rates by the mitigation requirements within the Trowbridge Bat Mitigation SPD should be clearly understood. This includes a need for detailed pre-application discussions on the anticipated delivery rates. Without further evidence to address the points above, there cannot be certainty that the proposed allocations will deliver the housing expected in the timescales envisaged. Overall, it is likely that the past under-delivery within Trowbridge will be perpetuated through the remainder of the plan period. Further allocations need to be made to provide greater flexibility particularly the context of increasing housing need.

**5.10 For sites in Trowbridge, will the plan be effective in ensuring adequate protection for bat habitats? What is the status of the Trowbridge Bat Mitigation Strategy referred to in the HRA and paragraph 5.44 of the WHSAP? How will this be implemented?**

- 1.32 The TBMS SPD was published for consultation on 21 February. Due to the limited time, we have not been able to review this document in detail, and reserve the right to provide further comment.
- 1.33 Our representations have previously questioned why this policy and guidance was not published and consulted on at an earlier stage in the plan-making process, and furthermore why choices about site allocations have been made in advance of this information being available. This seems a procedural anomaly given that this is a substantial factor in the delay to the delivery of the Ashton Park allocation.
- 1.34 Early production of this evidence could have ensured that impacts were fully understood and that all reasonable alternatives could have been considered, including directing development to sustainable locations in the Trowbridge Community Area Remainder.
- 1.35 All proposed site allocations in Trowbridge will be impacted by the SPD. Table 4 of the document provides a high-level assessment of the proposed site allocations. It is not clear if the extent of land required for mitigation has been agreed by the promoters of the proposed allocations.
- 1.36 To provide certainty in the delivery of housing at Trowbridge, it should be incumbent on the Council to provide clear evidence that the proposed site allocations in Trowbridge are deliverable at the capacity and form proposed. The Council must also provide clear evidence that the requirements of the SPD will not impact the expected rate of delivery.

**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?**

- 1.37 No Comment.

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

- 1.38 Our comments to Matter 2 have highlighted the inconsistency in the Council's site selection process. The Council has justified its decision not to assess sites at the Large Villages in the Trowbridge Community Area Remainder (including Southwick) as being to preserve the distinct identity of these settlements (Community Area Topic Paper – Trowbridge – July 2018).
- 1.39 The proposed allocation of these sites runs in direct contradiction to this statement, as it will lead to development which directly closes the gap between Trowbridge and Southwick and which risks the coalescence of these settlements in future.
- 1.40 The proposed allocation at Southwick Court (H2.6) is situated in proximity to the Grade II\* listed Tudor manor of the same name. Development could be brought as close as 180 metres to Southwick Court. Landscape mitigation appears to be proposed, in the form of planting and screening. This would markedly change the experience of the setting of the listed building, introducing a new boundary in a field which would historically have been open.

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The Church Lane Allocation (H2.4) is particularly exposed on its south west side, where development would adjoin the Lambrok Stream. This location is currently comparatively open and interfaces with Southwick Country Park, and there is potential for landscape impacts through the introduction of new built form or by closing off key views with screening and planting. We note the significant objections to the allocation from the Friends of Southwick Country Park group, who have expressed their concerns about the impact and deterioration of the Park as a natural habitat and a recreational community asset.