

# **Trowbridge Town Council**

## **Wiltshire Housing Site Allocations Plan (WHSAP)**

### **Statement to the Examination**

**March 2019**

This statement has been prepared by Lance Allan, Town Clerk and Chief Executive on behalf of Trowbridge Town Council.

The statement provides a response to each of the Matters, Issues and Questions raised by the Inspector, with; No Comment, Yes, No with additional comments or General comments.

The statement is then followed by an edited extract of the main WHSAP document with some of Wiltshire Council's Changes and changes proposed by Trowbridge Town Council.

Both WC and TTC deletions are show as struck-through.

Where there are additions proposed by Trowbridge Town Council these are shown in red type.

This statement is in addition to and in some cases supersedes the previous comments and statements made by Trowbridge Town Council, including the Statements of 5<sup>th</sup> September 2017 and 5<sup>th</sup> June 2018.

## Matter 3: Housing Site Allocations

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

The following questions apply to all allocations:

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

**NO.** The Trowbridge Area Topic Paper suggests that for site H2.2 (SHELAA site 298); *'any development scheme on the allocation would not involve the whole SHLAA site'*, but has failed to provide any clear indication of which part or parts of the site is and is not being allocated. The Heritage Impact Assessment makes one proposal which is contradictory to the Landscape Assessment and probably contradictory to the TBMS. The North Bradley Neighbourhood Plan Consultation Draft does allocate parts of the site and Trowbridge Town Council supports the allocation of these parts of the site and retention of a strategic landscape buffer between the town and the village. The plan does not give details of access arrangements for a number of the Trowbridge sites. The Heritage Impact Assessment appears to suggest that H2.6 can only satisfactorily accommodate a very small number of houses.

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

**NO.** The proposed requirements of the Trowbridge Bat Mitigation Strategy indicate that each site will need to *'mitigate for all impacts on target bat species on site through retaining and enhancing wide swathes of unlit bat habitat'*. It is difficult to see how this can be achieved on these sites and still ensure that they are satisfactorily integrated into existing development.

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;  
**Parts of site H2.2 are not suitable for development. The North Bradley NP proposal appears to satisfy the requirements to protect biodiversity. It is unclear how site 2.3 is able to retain wide swathes of unlit bat habitat when Elizabeth Way is lit and the south west side is adjacent to the existing urban edge. It is difficult to see how H2.6 can provide adequate protection with a road and bridge proposed across the floodplain. Sites 2.3 and 2.6 should be deleted.**

- green infrastructure and agricultural land;  
**Site H2.3 is a significant green space on the urban edge and alternative sites elsewhere in Hilberton Parish should have been considered. Site 2.3 should be deleted.**

- landscape quality and character;  
**The WCS seeks to protect the buffer between the town and neighbouring villages. Sites 2.3 and 2.6 are contrary to this aim of the WCS. Site 2.2 can only be allocated in part to be in accordance with this aim of the WCS and the part proposed by the North Bradley Neighbourhood Plan Consultation Draft achieves this. The Stage 4a Site Landscape Assessment identifies site H2.6 as having a High adverse impact, the only one of the Trowbridge sites with this level and also Low Capacity to accommodate mitigation. Site 2.6 should be deleted.**

- heritage assets;

**Site H2.6 is the only Trowbridge site which is assessed as higher than Medium in the Heritage Impact Assessment with regards to the 'Susceptibility to setting change', for Southwick Court Farmhouse, Gatehouse and Moat.**

- 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.

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

**NO. At H2.6 with the floodplain covering the northern part of the western half of the site, any development on the western half of the site will be separated from the built environment of Trowbridge and will therefore result in significant harm to Southwick Court. Site 2.6 should be deleted.**

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?

**It is not clear how school places will be provided, given the lack of progress with the Ashton Park site. It is not clear which transport infrastructure schemes will be funded by the proposed sites nor the timescales for delivering the infrastructure which is dependent upon Ashton Park.**

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?

**The proposed sites are not in the most sustainable locations when considering access, as the Greenbelt to the north and west of the town would be significantly more accessible.**

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?

**NO. The lack of detail in respect of some of the Trowbridge sites means that the Plan as it stands will be ineffective in delivering the Council's requirements.**

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

**NO. The lack of; secondary school places, the West Ashton and Yarnbrook Relief Road and other infrastructure as well as the requirements to mitigate for other harmful effects mean that it is unlikely that all these sites will deliver within the timescale required.**

I expect most site specific issues can be addressed in response to Q5.1-Q5.7. However, in responding to these points, the Council is requested to ensure the following issues are specifically addressed:

5.9 N/A

5.10 For sites in Trowbridge, will the plan be effective in ensuring adequate protection for bat habitats?

**NO. H2.2 If this site were developed to a greater extent than is proposed in the North Bradley Neighbourhood Plan Consultation Draft it is unlikely that the mitigation requirements, when combined with site 2.1, would be adequate. Site H2.2 should be reduced in size and quantum of housing to be commensurate with the proposals contained in the North Bradley Neighbourhood Plan Consultation Draft.**

**H2.3 If this site were to accommodate the level of housing proposed and bounded by the lit Elizabeth Way, it is unlikely that it will be able to retain and enhance wide swathes of unlit bat habitat as well as be well connected to the town. Site 2.3 should be deleted.**

**H2.6 If this site were developed with the floodplain of the Lambrok stream to the north west of the site and a road across the site from the west, the natural corridor from North Bradley to Lambrok Stream and Southwick Country Park, which is through the floodplain, would be severed by the road, bridge and/or the development. Site 2.6 should be deleted.**

What is the status of the Trowbridge Bat Mitigation Strategy referred to in the HRA and paragraph 5.44 of the WHSAP?

**Now published but requiring explanation as to how it will be implemented and which developments it will impact upon.**

How will this be implemented?

**It remains unclear how the proposals contained in the Trowbridge Bat Mitigation Strategy impact upon small developments. Clarity needs to be given to ensure that it doesn't stop all development in the settlement boundary.**

5.11 N/A

5.12 The supporting text for sites H2.4, H2.5, H2.6, 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?

**NO. All three sites will require significant mitigation. For sites H2.4 and H2.5 the mitigation is unlikely to significantly impact upon other aspects of the sustainability of the sites. For site H2.6 though, the western part of the site is proposed to include the access road, which will have a significant impact on the historic Southwick Court and will require a bridge across the floodplain, together these will result in the site being unsustainable. Site H2.6 should be deleted.**

5.13 N/A

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?

**Now that WC have announced that this site is no longer required to provide a new primary school we anticipate that the developer will revert to their previous proposal which was to enhance, improve and extend the existing QEII Field, so that the recreation space forms a central focus between the existing development and the new development.**

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?

**NO. The less sustainable nature of site H2.6 and the difficulty of implementing the full range of mitigation measures indicated should also be a consideration in evaluating the cumulative effect of these developments together. Sites H2.4 and H2.5 are within and close to the built form of the town of Trowbridge with a natural boundary created by the Lambrok Stream, lower lying ground and Southwick Country Park, but H2.6 lies within the lower ground between Trowbridge and the villages of Southwick and North Bradley in the open countryside and will also have an unacceptable detrimental impact on the heritage assets at Southwick Court. Site H2.6 should be deleted.**

5.16 N/A

5.17 N/A

5.18 N/A

5.19 N/A

## Matter 4: Settlement Boundaries

### ***Issue 6: Are the proposed settlement boundaries justified, effective and consistent with national policy?***

#### General questions

6.1 What is the policy basis for use of settlement boundaries and their review?

**NO COMMENT.**

6.2 Is the Council's methodology for reviewing settlement boundaries soundly based?

**YES.**

6.3 Has the review of settlement boundaries been carried out in a consistent manner across the plan area?

**NO COMMENT.**

#### Specific settlements

6.4 For specific settlements, are there any factors which indicate the settlement boundary is not justified or effective?

**NO COMMENT.**

## **Matter 5: Monitoring and Implementation**

### ***Issue 7: Does the Plan have clear and effective mechanisms for implementation, delivery and monitoring?***

7.1 Is there a clear and robust framework for the delivery and monitoring of WHSAP policies?

**YES.**

## Schedule of Proposed Changes

### North and West Wiltshire Housing Market Area

**5.38** Land for housing development is identified to ensure supply, support the role of settlements in the North and West Wiltshire HMA, and improve choice and competition in the market for land.

**5.39** As a Principal Settlement, the WCS anticipates ~~identifies~~ that Trowbridge ~~will be~~ **is** a primary focus for development. Moreover, the role of the town as a significant employment and strategic service centre will be ~~expected to be~~ strengthened over the Plan period to 2026. Additional allocations are therefore made to support this role.

**Policy H2**

Land is allocated for residential development at the following sites, as shown on the policies map:

Table 5.3 North and West Wiltshire Housing Market Area

Community Area	Reference	Site Name	No of dwellings
Trowbridge	H2.1	Elm Grove Farm, Trowbridge	<del>200</del> 250
	H2.2	Land off the A363 at White Horse Business Park, Trowbridge	<del>150</del> <del>225</del> 175 100
	<del>H2.3</del>	<del>Elizabeth Way, Trowbridge</del>	<del>205</del> _
	H2.4	Church Lane, Trowbridge	45
	H2.5	Upper Studley, Trowbridge	<del>20</del> 45
	<del>H2.6</del>	<del>Southwick Court, Trowbridge</del>	<del>180</del> _

**5.41** How these sites were selected is explained in Community Area Topic Papers(18).

**5.42** The specific requirements and form development will take are described below for each site to ensure they are each appropriate in scale and character to their location and in accordance with WCS and national policy.



## Trowbridge

**5.43** The WCS envisages approximately 6,810 new dwellings at the Principal Settlement of Trowbridge over the Plan period (2006-2026). Whilst much of this has either been delivered, or is committed in the form of planning permissions and a strategic site allocation in the WCS (Ashton Park), ~~a significant volume of additional housing will be required in order to help address residual indicative requirements~~ **further allocations are limited due to a number of constraints, but Windfalls will deliver a significant proportion of further development.**

**5.44** In the face of the need to identify sites for additional housing at the town, there are significant ecological, landscape (Green Belt) and infrastructure constraints that significantly limit the choice of available sites. Assessment evidence demonstrates three considerations to be addressed in order for housing development to be accommodated:

- **Ecology:** an interconnected pattern of priority Biodiversity Action Plan (BAP) habitats such as mature hedgerows, trees and water features, along with designated woodland features around the town support significant populations of protected bat species associated with the Bath and Bradford-on-Avon Bats Special Area of Conservation (SAC). Additional housing development will increase the population of the town and thereby amplify the risk of recreational pressure on bats. To address this issue, the Habitats Regulations Assessment (HRA) for the Plan recommends developing a strategy for managing recreational pressure across the town. Detailed design and layout of schemes would need to consider additional planting and open space to protect and enhance these BAP priority habitats and thereby augment opportunities for bat foraging routes and roosting sites. This could include establishing dark corridors through sites to protect foraging routes and roosting areas for bats. Specific measures that will be required are explained for each site and funding contributions may be sought toward measures to be contained in the Trowbridge ~~Recreation Management~~ **Bat** Mitigation Strategy.
- **Education:** development will increase the number of pupils needing primary school places. A local lack of capacity across the town affects proposals allocated for development. With the majority of proposed housing being directed south/south-west of the town, ~~the evidence points directly to the need for a new primary school in this area. Therefore, in addition to land reserved for one new school,~~ funding contributions will be sought from developers to help provide adequate capacity.
- **Health Services:** development will also increase demand for primary health care and funding contributions may also be sought to expand the capacity of GP services and dentistry. Contributions will be justified on a site by site basis in discussion with Clinical Commissioning Group and NHS England.

**5.45** The proposed site allocations are capable of delivery and will provide a boost to local housing supply.

## H2.1 Elm Grove Farm

Figure 5.5 H2.1 Elm Grove Farm

### Policy H2.1

Approximately 14.33ha of land at Elm Grove Farm, as identified on the Policies Map, is proposed for mixed use development comprising the following elements:

- Approximately 200 250 dwellings;
- ~~At least 1.8ha of land for a two form entry primary school along with playing pitches;~~
- A multi-purpose community facility **including car-parking and changing rooms;**
- A consolidated public open space area incorporating, **improving** and augmenting the existing Queen Elizabeth II Field **to provide improved and additional football pitches;**
- A road from the A363 through to an improved junction of Drynham Lane and Wiltshire Drive; and
- 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.

Development will take place in accordance with a masterplan for the site approved by the Council as part of the planning application process.

**5.46** Approximately 14.33ha of land at Elm Grove Farm is allocated for the development of approximately 200 250 dwellings, as shown on the Policies Map. It is well located with regard to local facilities and services. Moreover, the site is enclosed to the north-west and south-east by existing development ~~and development proposed further south~~. Consequently, development of the site would not lead to a significant encroachment of further built form into the countryside. ~~In order to accommodate the educational needs of new development the site would accommodate a new primary school to serve the area alongside new housing. This with a~~ A multi-purpose community building geared toward use by sports and social groups in the area could provide a local centre to the development.

**5.47** Proposals to develop the site will need to be supported by a Flood Risk Assessment (incorporating an assessment of the predicted effects of climate change) and comprehensive drainage strategy. The existing natural features of the site are significant in the landscape and would need to be incorporated within a detailed layout. These features also provide wildlife corridors that link habitat features within the local area; in particular, 'dark corridors' for foraging bats. These elements should be protected and enhanced where possible by additional planting with native species.

**5.48** The site is in an area likely to be used by Bechstein's bats associated with the Bath and Bradford on Avon Bats SAC. Sensitive habitat features on and adjacent to the site. These would include Drynham Lane / Road, the railway line, woodland belts associated with the White Horse Business Park and the small tributary to the River Biss.

**5.49** These features should be retained and / or buffered from development (including residential gardens) by wide (10-16m), dark (<1 lux), continuous corridors of native landscaping which will allow for their long-term protection and favourable management in order to secure continued or future use by Bechstein's bats. Development will be required to contribute towards the delivery of the Trowbridge ~~Recreation Management~~ **Bat** Mitigation Strategy.

**5.50** Access to the site would need to be holistically planned with upgrades required to Drynham Lane, along with the construction of a connection to the A363 designed as a through-route anticipating future traffic growth. New and improved walking and cycling routes to existing and planned local services would encourage future residents to use sustainable forms of transport, The site has a medium potential for archaeological remains. Therefore any subsequent planning application should be informed by an archaeological assessment. In addition, development will need to minimise the potential to harm the significance of the Grade II Listed Drynham Lane Farmhouse and, where appropriate its setting. Measures may also be necessary to prevent potential noise pollution from the existing main road and railway. These considerations should be addressed through the process of detailed design and layout which should be informed ~~through a Heritage Impact Assessment~~ by detailed assessments (including heritage) to support any subsequent planning application..

**5.51** In order to facilitate development, appropriate contributions would be likely to be sought to help fund additional local school capacity. Funding contributions may also be sought where needed to increase capacity at local GP surgeries and dentistry at the town.

## H2.2 Land off the A363 at White Horse Business Park

Figure 5.6 H2.2 Land off the A363 at White Horse Business Park

**5.52** Approximately ~~25-26~~ 10ha of land off the A363 south-west of the White Horse Business Park is allocated for the development of approximately ~~150-225-175-100~~ dwellings, as identified on the ~~Policies Map~~ **North Bradley Neighbourhood Plan Consultation Draft**. It is reasonably well located with regard to services and facilities. The site extends over a significant area of agricultural land used for a mix of grazing and arable cropping. It is contained, to a degree, by existing development to the east and west in North Bradley Village and Hitachi and fronts a 'gateway' route to the town. An objective of detailed design and layout will be to retain visual separation of the Town's urban area from North Bradley village. To achieve this, development proposals would need to be focussed within the ~~north-east~~ **south and west** of the site, screened with new planting and provide improvements to walking and cycling routes through to the town **and Ashton Park**.

**5.53** The site is characterised by a distinctive pattern of mature and semi-mature hedgerows and trees that form a feature in the landscape. Development of the site would need to retain these features and thereby provide a layout that respects the setting of North Bradley village as an important element of detailed design. Existing hedgerows and trees also provide habitat for protected and non-protected species. These natural features therefore provide wildlife corridors that link habitat features within the local area; in particular, 'dark corridors' for foraging bats.

**5.54** The site is in an area likely to be used by Bechstein's bats associated with the Bath and Bradford on Avon Bats SAC. Sensitive habitat features on / adjacent to the site include: woodland belts associated with the White Horse Business Park; a network of mature hedgerows/hedgerow trees; and the grounds of Willow Grove.

**5.55** These features should be retained and / or buffered from development (including residential gardens) by wide (10-16m), dark (<1 lux), continuous corridors of native landscaping which will allow for their long-term protection and favourable management in order to secure continued or future use by Bechstein's bats. Development will be required to contribute towards the delivery of the Trowbridge ~~Recreation Management~~ **Bat Mitigation Strategy**.

**5.56** Proposals would need to provide for a high quality, sustainable development ~~that enhances a key gateway approach to the town, whilst~~ protecting the integrity of North Bradley as a village. In addition, any subsequent planning application will need to be supported by a Flood Risk Assessment (incorporating an assessment of the predicted effects of climate change) and comprehensive drainage strategy to help inform matters such as layout and design

**5.56a** As identified in the Council's Heritage Impact Assessment, the site is an historic agricultural landscape and comprises a cluster of historic farmsteads where the farm houses and ancillary buildings may be susceptible to setting change. This includes Kings Farmhouse (Grade II listed), Willow Grove (Grade II listed), Little Common Farm (non-designated asset), Manor Farmhouse (Grade 2 listed) and Woodmarsh Farm (non-designated asset). An area of the site also includes a Baptist cemetery with an ornamental gateway structure (Grade II listed) and curtilage listed perimeter walls. The archaeological potential of the site is likely to be high. At the planning application stage, the layout and design of the site would need to give great weight to conserving the significance of these heritage assets and their setting in order to minimise harm.

**5.57** In order to facilitate development, appropriate contributions would be likely to be sought to help fund additional local school capacity. Funding contributions may also be sought where needed to increase capacity at local GP surgeries and dentistry at the town.

## H2.3 Elizabeth Way

### Figure 5.7 H2.3 Elizabeth Way

**5.58** Approximately 16.33ha of land to the South West of Elizabeth Way is allocated for the development of approximately 205 dwellings, as identified on the Policies Map. The site extends over a significant area of agricultural land quite markedly enclosed by existing development and Elizabeth Way distributor road. The character of the land within the site is relatively open and offers views through the existing urban edge of the town and the village of Hilperton. The dominant feature in the landscape is Elizabeth Way which would serve as access to the site.

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

**5.60** This site may be used by Bechstein's bats associated with the Bradford and Bath Bats SAC. Potentially sensitive habitat features on / adjacent to the site include: mature trees; hedgerows; and stream (minor watercourse) at the northern end of the site

**5.61** These features should be retained and / or buffered from development (including residential gardens) by wide (10-16m), dark (<1 lux), continuous corridors of native landscaping which will allow for their long-term protection and favourable management in order to secure continued or future use by Bechstein's bats.

**5.62** Development will also be required to contribute towards the delivery of the Trowbridge Recreation Management Mitigation Strategy through a financial contribution or direct provision of equivalent new infrastructure over and above normal Council requirements to deliver new habitat and recreational opportunities in line with criteria in the Strategy.

**5.63** An important measure will be the provision of landscaping between Elizabeth Way and new housing in order to attenuate noise and reduce the visual impact of this road. Consideration of drainage patterns and flood risk from all sources would need to inform any subsequent layout. In addition, surface water attenuation measures and improvements to existing on-site water infrastructure would need to be provided to support a comprehensive development of the site.

**5.64** The layout and design of the site would need to give great weight to the significance of nearby heritage assets and their setting. Where necessary, stand-offs to existing development in Victoria Road, Albert Road and Wyke Road, along with the incorporation of appropriate boundary treatment would need to be considered through detailed layout and design.

**5.65** There are opportunities to provide new routes for walking and cycling that would also serve the existing built-up area and that could improve connectivity for a wider area of the town. These should be explored and, wherever practicable, provided in order to encourage a reduction in private car journeys.

**5.66** In order to facilitate development, appropriate contributions would be likely to be sought to help fund additional local school capacity. Funding contributions may also be sought where needed to increase capacity at local GP surgeries and dentistry at the town.

## H2.4 Church Lane

Figure 5.8 H2.4 Church Lane

**5.67** Approximately 3.72 5.93ha of land at Church Lane is allocated for the development of approximately 45 dwellings, as identified on the Policies Map. The site lies on the edge of existing built form and the Southwick Country Park. It is an open site that slopes to the south-west towards the Lambrok Stream. As parts of the site lie within Flood Zones 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 south-west margins of the site to slow the flow of surface water into the Lambrok Stream

**5.68** ~~Development proposals would need to ensure that the significance and setting of the Grade II Listed St John's Church would be appropriately protected. To achieve this objective, access to the site would need to be secured via a new junction arrangement off the A361, rather than improvements to Church Lane.~~ The site is adjacent to the Church of St John (Grade II listed), associated church school and schoolmasters house and is enclosed from the road by two rows of buildings at White Row Hill and Frome Road including Rose Villa (Grade II listed), 344 Frome Road (Grade II listed) and paddocks. There are key views across the site to St John's spire from Southwick Country Park. The site comprises the degraded fragmentary remains of a post medieval water meadow system. The layout and design of the site would need to give great weight to conserving the significance of these heritage assets and their setting to minimise harm. Access to the site must be sensitively designed and accommodated in manner that minimises harm to heritage assets. This would need to be secured via a new junction arrangement off the A361, rather than improvements to Church Lane

**5.69** Proposals would need to provide a design and layout that enhances the urban edge of the town. Existing hedgerows and trees would need to be retained and enhanced through new landscaping features along the line of the Lambrok Stream. Such features would need to be of sufficient scale to protect and enhance the character and amenity provided by Southwick Country Park. Links between the site, the Country Park and existing built form would be achieved through improvements to the local footpath network TROW8.

**5.70** The site is in an area likely to be used by Bechstein's bats associated with the Bath and Bradford on Avon Bats SAC. Sensitive habitat features on / adjacent to the site include: Framfield; boundary hedgerows; and the Lambrok Stream.

**5.71** These features should be retained and / or buffered from development (including residential gardens) by wide (10-16m), dark (<1 lux), continuous corridors of native landscaping which will allow for their long-term protection and favourable management in order to secure continued or future use by Bechstein's bats. Development will be required to contribute towards the delivery of the Trowbridge Recreation Management Bat Mitigation Strategy.

**5.72** In order to facilitate development, appropriate contributions would be likely to be sought to help fund additional local school capacity. Funding contributions may also be sought where needed to increase capacity at local GP surgeries and dentistry at the town.

## H2.5 Upper Studley

Figure 5.9 H2.5 Upper Studley

**5.73** Approximately ~~2-33~~ 2.27 ha of land at Upper Studley is allocated for the development of approximately ~~20~~ 45 dwellings, as identified on the Policies Map. The site has a physical relationship to the Lambrok Stream and recently built developments at Silver and Spring Meadows. The land slopes towards the stream and is bound to the south by tall, mature poplar trees. As parts of the site lie within Flood Zones 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 water into the Lambrok Stream.

**5.74** An objective of detailed design and layout will be to provide an attractive frontage to Firs Hill and enhance this approach to the town. The existing natural features of the site are significant in the landscape and would be incorporated within a detailed layout and Lambrok Stream should be enhanced as a local amenity feature of the site ~~in conjunction with development proposed at Southwick Court.~~

**5.75** The site is in an area likely to be used by Bechstein's bats associated with the Bath and Bradford on Avon Bats SAC. Sensitive habitat features on / adjacent to the site include: boundary hedgerows / tree lines; and the Lambrok Stream.

**5.76** These features should be retained and / or buffered from development (including residential gardens) by wide (10-16m), dark (<1 lux), continuous corridors of native landscaping which will allow for their long-term protection and favourable management in order to secure continued or future use by Bechstein's bats. Development will be required to contribute towards the delivery of the Trowbridge Recreation Management ~~Recreation Management~~ Bat Mitigation Strategy.



## H2.6 Southwick Court

### Figure 5.10 H2.6 Southwick Court

**5.77** Approximately 18.17ha of land at Southwick Court is allocated for the development of approximately 180 dwellings, as identified on the Policies Map. The site extends over a significant area of agricultural land. The character of the land is relatively open and offers views to the north towards the existing urban edge of the town and south over land that forms a natural buffer to maintain the separate identity of the village of Southwick.

**5.78** The area is of historic significance as water meadows associated with the Grade II\* Listed Southwick Court Farmstead. An essential objective of detailed design will be to minimise harm to its significance. The setting to this heritage asset will be preserved, to the greatest extent possible, informed by the results of more detailed Heritage Impact Assessment. Taking account of the weight attached to the significance of the asset any residual harm requires a clear and convincing justification and should not be substantial. The social and economic advantages of the development, including the provision of additional homes, achieve substantial public benefits. A comprehensive development scheme will need to ensure that new homes are directed to the east of the Lambrok Stream. Land to the west may become either formal or informal open space or remain in agricultural use, but will not be developed for new homes. The character of the area will therefore help to retain the high significance of this heritage asset.

**5.79** Landscaping will be an important element of any subsequent scheme. The site represents an expansion of the town into the countryside. Development would therefore replace a substantial length of the town's existing urban edge. To address the impact of change in the landscape a comprehensive landscape treatment would provide an opportunity to improve the impact of the town on the wider landscape and in so doing protect and enhance the Southwick Court Farmstead. The Lambrok Stream and its respective flood plain should be enhanced as a local amenity feature of the site in conjunction with development proposed at Upper Studley above.

**5.80** Mature hedgerows and trees (including a solitary veteran Oak tree) are a key feature in the landscape and provide habitat for protected and non-protected species. The existing natural features of the site are significant in the landscape and would be incorporated within a detailed layout. These features also provide wildlife corridors that link habitat features within the local area; in particular, 'dark corridors' for foraging bats. These elements should be protected and enhanced where possible by additional planting with native species.

**5.81** The site is in an area likely to be used by Bechstein's bats associated with the Bath and Bradford on Avon Bats SAC. Sensitive habitat features on / adjacent to the site include: boundary hedgerows / tree lines; Axe and Cleaver Lane; the Lambrok Stream; and the moat and grounds at Southwick Court.

**5.82** These features should be retained and / or buffered from development (including residential gardens) by wide (10-16m), dark (<1 lux), continuous corridors of native landscaping which will allow for their long term protection and favourable management in order to secure continued or future use by Bechstein's bats. Development will be required to contribute towards the delivery of the Trowbridge Recreation Management Mitigation Strategy.

**5.83** Opportunities to improve walking and cycling routes through the existing built framework should be explored and, wherever practicable, new and improved routes provided in order to encourage a reduction in private car journeys and, in particular, to promote access to the wider countryside.

**5.84** In order to facilitate development, appropriate contributions would be likely to be sought to help fund additional local school capacity. Funding contributions may also be sought where needed to increase capacity at local GP surgeries and dentistry at the town.



Working towards a core strategy for Wiltshire

# Wiltshire Core Strategy

## Updated Habitats Regulations Assessment

April 2014

## 2. Scope of this assessment

2.1 The council is now proposing further modifications to the WCS in response to the Inspector's 10<sup>th</sup> Procedural Letter<sup>7</sup>, as set out in EXAM/101. It is therefore considered timely for the council to review the HRA of the WCS in order to ensure any such proposed modifications are compliant with the relevant requirements of the Habitats Regulations. Given the increasingly complex series of documents, changes and associated assessments, it is considered prudent to clarify the scope of this assessment:

- The starting point is the March 2013 HRA and the pre-submission documents which that assessment was based upon.
- It will focus on relevant changes, rather than repeat the findings of the March 2013 HRA where there are no significant changes.
- This assessment incorporates the finding of the August 2013 HRA review.
- It will assess the effects of all proposed modifications to the plan made since the March 2013 assessment, including both the post-hearing modifications (EXAM/56) and those currently presented in EXAM/101.
- It will update the in-combination assessment based on knowledge of any relevant plans or projects at the current time.

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<sup>7</sup> Letter from Andrew Seaman to Alistair Cunningham dated 2<sup>nd</sup> December – [EXAM/75](#)

### 3. Methodology

- 3.1 This assessment assesses the effects of the proposed modifications including both the post-hearing modification (EXAM/56) and the current proposed modifications (EXAM/101). Each policy has first been rescreened for Likely Significant Effects (LSE) in light of the proposed modifications, as shown in Appendix 1. Where those modifications are likely to contribute towards an identified LSE upon a Natura 2000 site the conclusions of the HRA with respect to that LSE have been reviewed. Given that several of the policies will contribute to the same LSE, an appropriate assessment of the plan, including all relevant policies, has been carried out as shown in Section 4 below. In particular, the effectiveness of any mitigation measures has been reviewed to ensure that they would continue to address relevant LSE and ensure no residual adverse effects upon the integrity of a Natura 2000 site.
- 3.2 The in-combination assessment has been carried out by identifying and reviewing all changes to relevant Local Plans (taken to be those Local Planning Authority area bordering Wiltshire), and associated updates to the relevant HRAs as shown in Appendix 2. Where there has been no update to the HRA since the last iteration of the WCS HRA (March 2013), it is assumed that any in-combination effects have already been considered in that assessment. Where a neighbouring Local Plan HRA has been updated this has been reviewed to identify any LSE which might potentially be caused by both that plan and the WCS, and therefore potentially act in-combination to affect the integrity of the Natura 2000 network. The effects of the WCS have then been reassessed in combination with all relevant plans and policies in Section 5 below.
- 3.3 In addition to new and revised Local Plan documents, the in-combination assessment also pays particular attention to the Salisbury Plain Army Rebasing plans, which are now significantly advanced. This will involve the relocation of approximately 4,000 troops to Salisbury Plain by 2020 and will require significant growth in training facilities and Single Living Accommodation (SLA) at the garrisons of Tidworth, Larkhill, Bulford and Perham Down, while there will also be a need for approximately 1,400 dwellings for Service Family Accommodation (SFA) dwellings outside the wire at the settlements of Ludgershall, Tidworth, Bulford and Amesbury. The MoD will publish a masterplan in May and will be undertaking a HRA of that plan. The masterplan will also be endorsed by the council as a material planning consideration in determining the applications for the planning applications for that development. The first applications are anticipated in September 2014, with work due to commence in 2015 and be completed by 2020. There is therefore a very close relationship between the plans in terms of timescales and geography.

## 4. Appropriate assessment of the Proposed Modifications

Each of the policy changes has been considered in detail in Appendix 1. This section provides a discussion of the relevant LSE identified through that process.

### 4.1 Water abstraction

#### River Avon SAC

4.1.1 This issue is addressed in Section 3 of the March 2013 HRA (p18-20). Proposed modifications to the following policies which could potentially contribute to this LSE are:

- CP2 – Delivery Strategy
- CP4 – Amesbury
- CP17 – Mere
- CP24 – Southern Wiltshire
- CP26 – Tidworth and Ludgershall
- CP31 – Warminster

4.1.2 Collectively, the proposed modifications to these policies would result in approximately 830 additional dwellings in the River Avon SAC catchment (based on the uplift in numbers at the above Community Areas) which will increase the demand for water and contribute towards additional abstraction across the catchment. Abstraction is known to have the potential to damage notified features of the SAC through reduced flows, however such impacts are localised with some stretches being more sensitive than others. The impact of these policies is therefore dependent not only upon the housing numbers but also upon the environmental capacity at each of the relevant abstraction points.

4.1.3 The water resources required to supply the housing proposed under these policies will be supplied by utility companies, which will abstract the necessary resources under the terms of an abstraction licence. All of the abstractions in the River Avon SAC catchment have recently been reviewed by the relevant competent authority, the Environment Agency (EA)<sup>8</sup>. As a result of that 'Review of Consents' (RoC) several of the licences were modified to include reduced abstraction limits and targeted augmentation, allowing the EA to conclude that these consents (based on maximum abstraction) would not have an adverse effect upon the River Avon SAC either alone or in combination. Wiltshire Council is confident in the conclusions of the EA's RoC and is satisfied that it can rely on the conclusions of that assessment for the purposes of this HRA, provided the water resources required to supply the proposed WCS housing can be delivered within the licensed headroom for relevant abstractions boreholes.

4.1.4 The majority of public water supplies within the River Avon SAC catchment are provided by Wessex Water with the exception of Tidworth and Luggershall, where public water is supplied by Veolia. Wessex Water has confirmed that sufficient capacity is available within existing abstraction licences to serve the additional water supply demand for the revised Community Area housing figures. Although Veolia has not confirmed its position, no additional dwellings

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<sup>8</sup> Environment Agency (2010) River Avon SAC Stage 4 Review of Consents and Site Action Plan



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## Appendix E – Representations received on Habitats Regulation Assessment

with officer comments

June 2014

<b>Comment ID:</b>	158	<b>Consultee</b> Mr Stephen Davis Wiltshire Wildlife Trust  <b>Person ID:</b> 840470	<b>Agent</b>   <b>Person ID:</b>
<b>Please give details of why you support or do not support the updates to the Habitat Regulations Assessment.</b>	<p>Wiltshire Wildlife Trust does not support the updates to the Habitat Regulations Assessment</p> <p>Wiltshire Wildlife Trust is enormously concerned at the indication provided in the Wiltshire Core Strategy Update (EXAM/89/A) Page 26 that an additional approximately 950 houses will be delivered at Trowbridge Town, and that the additional housing will be directed towards Green/Lane/Biss Woods, with no limit on the Ashton Park extension. The HRA appears to accept that 'this significant uplift in housing numbers for Trowbridge appears to direct them towards Green Lane/Biss Woods. Likely to increase pressure on Bechstein's maternity roosts in this area through habitat loss/fragmentation from housing and infrastructure and recreational pressures on the woods'</p> <p>The Trust believe that imposing this additional pressure on these two woodland nature reserves (and the European protected species they support) is unacceptable and unsustainable. The Trust would like to refer Wiltshire Council to the recently published National Planning Practice Guidance, specifically para's 007, 008, 009, where clear statements are provided regarding the statutory basis for planning to seek to minimise impacts on biodiversity and provide net gains in biodiversity where possible. It is clearly stated in para 007 that; The National Planning Policy Framework is clear that pursuing sustainable development includes moving from a net loss of biodiversity to achieving net gains for nature, and that a core principle for planning is that it should contribute to conserving and enhancing the natural environment and reducing pollution.</p> <p>This additional allocation should be re-considered and re-evaluated and withdrawn.</p> <p>Ref: <a href="http://planningguidance.planningportal.gov.uk/">http://planningguidance.planningportal.gov.uk/</a></p>		
<b>Does your representation relate to a previous one you submitted. If so, has the Council satisfied your objection through the proposed changes</b>			
<b>Attached files (Please see Objective)</b>			
<b>Officer Response</b>	<p>This issue is dealt with in more detail in section 4.4 of the Habitats Regulation Assessment (HRA) Update, which makes it clear that the Wiltshire Core Strategy does not define the location of the additional 950 houses. This quantum of housing could be accommodated at the town without adversely affecting the Bechstein's, however the impact will ultimately be dependent upon the location of the development which will be defined through a subsequent Development Plan Document. A policy safeguard has also been inserted, ensuring that the impacts upon bat populations is taken into account in the planning of future strategic growth at Trowbridge, and there is also now greater flexibility in the strategic housing target for the town. It is therefore more appropriate that these impacts are further assessed at a later stage (see Para.4.4.7, HRA Update).</p>		