

Wiltshire Local Plan Review Consultation Response

Local Plan Review link:

<https://www.wiltshire.gov.uk/planning-policy-local-plan-review-consultation>

Emerging Spatial Strategy link:

<https://www.wiltshire.gov.uk/planning-policy-local-plan-review-consultation#Emerging%20Spatial%20Strategy%C2%A0>

Planning for Trowbridge link:

<https://www.wiltshire.gov.uk/planning-policy-local-plan-review-consultation#Planning%20for%20Trowbridge>

Introduction

Trowbridge Town Council has considered the implications of the Wiltshire Council Local Plan review 2016-2036 for **Trowbridge**, at meetings of the Town Development Committee on 1st December and 22nd December 2020 and at an additional briefing meeting on Monday 14th December 2020.

These meetings were to ensure members were fully informed prior to the Policy & Resources Committee reaching a conclusion with regards to a response to the consultation. The Town Council concluded its position with regards to the response to the consultation at a meeting of the Policy & Resources Committee on 2nd March 2021.

Wiltshire Council is proposing allocations for up to 2600 houses in two parcels, separated by the Kennet & Avon Canal: one to the north of the **Large Village of Hilperton** (2100) and one to the east of the **Small Village of Staverton** (500).

Trowbridge Town Council considers that the proposals supported by Wiltshire Council are unsound for a number of reasons outlined below and also considers that alternative proposals should be considered and supported. Trowbridge Town Council has outlined such alternatives in this response to consultation and has identified the significant issues which make the current proposal unsound, including that they are contrary to the Core Strategy and in particular Core Policy 1.

NB: Underlining, **highlighting** and **colour change of text** in passages quoted is the Town Council's own.

Why is this proposal unsound?

The following outlines the reasons that Trowbridge Town Council considers that these proposals for the Trowbridge Community Area are unsound, unsustainable and will damage Trowbridge.

Failure to abide by the Settlement Strategy

These proposals are unsound because they are contrary to the adopted Core Strategy of Wiltshire Council and in particular the Settlement Strategy at Core Policy 1 and Core Policy 29. The proposed allocations are not 'at Trowbridge', they are at the Large Village of Hilperton and the Small Village of Staverton.

The Settlement Strategy was developed by Wiltshire Council as part of the development of the Core Strategy. This Local Plan review is based upon the Core Strategy, including the Settlement Strategy. Core Policy 1 of the Core Strategy covers the Settlement Strategy as follows:

Core Policy 1

Settlement Strategy

The Settlement Strategy identifies the settlements where sustainable development will take place to improve the lives of all those who live and work in Wiltshire.

The area strategies in Chapter 5 list the specific settlements which fall within each category.

Principal Settlements

Wiltshire's Principal Settlements are strategically important centres and the primary focus for development. This will safeguard and enhance their strategic roles as employment and service centres.

They will provide significant levels of jobs and homes, together with supporting community facilities and infrastructure, meeting their economic potential in the most sustainable way to support better self-containment.

The Principal Settlements are: Chippenham, Trowbridge and Salisbury.

Large and Small Villages

Large Villages are defined as settlements with a limited range of employment, services and facilities. Small Villages have a low level of services and facilities, and few employment opportunities.

Development at Large and Small Villages will be limited to that needed to help meet the housing needs of settlements and to improve employment opportunities, services and facilities.

And Core Policy 29 identifies the settlement category for each settlement in the Trowbridge Community Area as follows:

Core Policy 29

Spatial Strategy: Trowbridge Community Area

Development in the Trowbridge Community Area should be in accordance with the Settlement Strategy set out in Core Policy 1.

Principal Settlements: Trowbridge

Large Villages: Hilperton, North Bradley and Southwick

Small Villages: West Ashton and Yarnbrook

Topic paper 3: Settlement strategy – Addendum - Wiltshire Core Strategy: Consultation January 2012 provided additional background to the categorisation of Hilperton as follows:

Hilperton has in the past been considered part of a functional urban area of Trowbridge. This is due to the continuous urban of the two settlements and the extensive development along the canal road, at Staverton Marina and Paxcroft Mead. However, despite the village being physically connected it does retain a distinct physical form particularly around the old part of the village. The current settlement limits of Hilperton are expanded to include the Paxcroft Mead development, however it is debatable whether [sic]. Although the majority of Hilperton residents will rely on the services of Trowbridge, as with Berryfield there is no interrelationship. For this reason Hilperton is being considered an independent settlement in the same way that any other lower order rural settlements has been considered in the Core Strategy.

Hilperton has a sizeable population, a number of services and facilities. It also has good communications, transport and has a number of deliverable sites with a lack of constraints in terms of development. In using the defined methodology set in the original topic paper Hilperton is considered a large village.

Hilperton is therefore a Large Village, the proposed allocation at Hilperton is adjacent to the Large Village of Hilperton and is NOT adjacent to the Principal Settlement of Trowbridge. The Principal Settlement is defined through the above Core Policies and through the Settlement Boundary which was revised and confirmed as part of the Wiltshire Housing Sites Allocation Plan (WHSAP) process. The Settlement Boundary of Trowbridge is not adjacent to the proposed allocation at Hilperton.

It was argued by Wiltshire Council in 2018/19 prior to and at the Inspector's Enquiry into the WHSAP that the sites close to North Bradley had to be adjacent to the Trowbridge boundary to be classified as part of an 'at Trowbridge' allocation and that allocating that part of the site (H2.2) closest to North Bradley was not 'at Trowbridge' and was therefore unacceptable and contrary to policy.

The words 'Hilperton' and 'Staverton' do not appear in the Appendix 1 'Emerging Spatial Strategy of the Local Plan Review, suggesting that Wiltshire Council is struggling to find a way to propose land for an 'at Trowbridge' allocation in 'Hilperton' and not in 'Trowbridge', within the confines of the existing Settlement Strategy. In the Appendix 2 (part 1) Trowbridge Settlement Statement – Planning For Trowbridge of the Local Plan Review they appear as follows:

(WLP_Principal_Settlement_Planning_for_Trowbridge__26-01-2021_.pdf para 23 vii)

To balance the need to accommodate additional growth at the town with the need to respect, as far as is reasonably practicable, the individual identities of the villages of Hilperton, North Bradley, Southwick and West Ashton within the landscape setting of Trowbridge and their relationship to the town.

(WLP_Principal_Settlement_Planning_for_Trowbridge__26-01-2021_.pdf para 33)

*Indeed, as a result of the work undertaken to date **the most sustainable** options for accommodating growth lie to the north and east of the town on land with a close functional relationship with the village of Hilperton. However, it is also acknowledged that protecting the integrity and identity of Hilperton village will need to be a critical factor in terms of shaping how any future new development is planned. In this regard more recent development proposals and new communities (e.g. Paxcroft Mead) have sought to achieve.*

(WLP_Principal_Settlement_Planning_for_Trowbridge_26-01-2021_.pdf para 34)

Concept plans for each component of the proposed preferred development site show a way the land identified could be developed and still respect the key characteristics of the area, including the identity of Hilperton village. They show the undeveloped land, areas suggested for development and the location of uses within them.

(WLP_Principal_Settlement_Planning_for_Trowbridge_26-01-2021_.pdf para 41)

The proposed allocations are largely adjacent to Trowbridge town and will be able to provide walking and cycling links to and from the town centre, nearby settlements including Hilperton, Staverton and Semington and footbridges over the canal.

The proposed allocations are not largely adjacent to 'Trowbridge Town'.

This statement should be corrected.

If Wiltshire Council is seeking to define 'Trowbridge Town' as now including the Large Village Settlement of 'Hilperton' then Wiltshire Council should be proposing a change to the Settlement Strategy and should be adding significant additional policy to allow this unsustainable proposal to be taken forward.

The proposal fails to define 'Trowbridge' as a settlement any differently from the current Core Strategy. In the Core Strategy whilst Staverton Marina is currently included in the 'Trowbridge' Settlement Boundary the area adjacent to the proposed allocation at Hilperton is not.. 'Trowbridge' is distinct from Hilperton and it could therefore be argued that the allocation at Hilperton should be in the 'Rest of TROW HMA' figure and not in the 'Trowbridge Settlement' figure.

In respect of Trowbridge it must be accepted that the Settlement Strategy no longer applies and if the figures for the Trowbridge HMA were presented as follows, then it would be difficult to argue against the proposals.

	Core Strategy	Brownfield 2021-31	2016-2036	Residual 1/4/19	Employment (Hectares)
Bradford on Avon	595	70	350	80	0
Trowbridge	6810	370	5830	0	0
Warminster	1920	130	2050	60	0
Westbury	1500	90	1820	710	1
Rest of TROW HMA	665	0	950	2355	0

Such a change would fit into the NPPF requirement to provide each Neighbourhood Plan Area with an indicative figure to a much greater extent than the current proposals do.

PROPOSAL: That to make the proposals sound, Wiltshire Council should revise the Core Strategy Settlement Strategy to allow significant allocations at Large Villages which have a close functional relationship with the Principal Settlement, where the requirements of a Principal Settlement cannot be accommodated at or immediately adjacent to the Principal Settlement itself. As a result, the Trowbridge HMA housing figures in the Local Plan Review should be presented as in the table above with Trowbridge as Residual 0 and Rest of TROW HMA as Residual 2355.

Failure to correctly identify the location and purpose

The proposed sites are unsound because they are NOT located as described by Wiltshire Council. Appendix 2 (part 1) Trowbridge Settlement Statement – Planning For Trowbridge also says the following:

(WLP_Principal_Settlement_Planning_for_Trowbridge_26-01-2021_.pdf para 43)

The location of the schools and local centre to the west of Hilperton will allow for greater connectivity with the wider community of Trowbridge as well as the proposed residential development

The proposed schools and local centre are NOT to the west of Hilperton, they are to the north of Hilperton and therefore cannot be accurately described to 'allow for greater connectivity with the wider community of Trowbridge'. Trowbridge is to the south of Hilperton and the proposed location is to the north of Hilperton. They are therefore NOT closely connected to the town of Trowbridge.

It is NOT the role of strategic planning to set boundaries for the town. Appendix 2 (part 1) Trowbridge Settlement Statement – Planning For Trowbridge also says the following:

(WLP_Principal_Settlement_Planning_for_Trowbridge_26-01-2021_.pdf para 34)

The size of these preferred development sites is likely to see construction continuing beyond the end of the plan period (2036). However, the scale of proposals allows us to set in place a new long-term boundary for the town. It also provides long term certainty to infrastructure and other service providers.

It IS the role of strategic planning to define Settlement Boundaries and the existing Settlement Boundary adjacent to the proposed Hilperton allocation is the Settlement Boundary of the Large Village of Hilperton and it is therefore not adjacent to 'Trowbridge', neither is it adjacent to the boundary of Trowbridge Civil Parish, as defined through a Community Governance Review.

PROPOSAL: That to make the proposal sound, Wiltshire Council should correct it and confirm that it is not to the west of Hilperton, is detached from Trowbridge and will therefore NOT allow for greater connectivity with the wider community of Trowbridge, making it less sustainable and thus requiring that alternative options must be given significantly greater consideration. It should also be corrected to clarify which boundaries can and cannot be defined by a planning policy.

Failure of the five-year land supply

The proposal is unsound because the proposal will repeat the significant failure of the Ashton Park allocation. Ashton Park is an allocation of 2500 houses which has been delayed by many years in part due to its size and the dependence upon one promoter for the majority of the site. Wiltshire Council relied heavily on this allocation for the delivery of houses in the period 2006 - 2026 and so far not a single new house has been started at Ashton Park.

This failure to coordinate sufficiently all of the factors to deliver Ashton Park has led to speculative proposals being put forward and permitted in less sustainable locations across the county. The reliance on another allocation of over 2500 new houses in a single/linked location will risk a further failure of the five-year housing land supply in the future, resulting in more less sustainable developments taking place in inappropriate locations.

PROPOSAL: That to make these proposals sound, Wiltshire Council should consider a more dispersed proposal for accommodating the growth at Trowbridge which cannot be accommodated adjacent to the town itself, this should include consideration of sites at all of the Large Villages which are within 3 km of the town centre, including Southwick and North Bradley as well as Hilperton and should also include consideration of the Greenbelt adjacent to the town.

Failure to account for infrastructure

The proposals are unsound because they fail to account for recent infrastructure improvements and current proposals for infrastructure improvements as part of already allocated sites. Appendix 2 (part 1) Trowbridge Settlement Statement – Planning For Trowbridge also says the following:

(WLP_Principal_Settlement_Planning_for_Trowbridge_26-01-2021_.pdf para 44)

The shuttle working signals on the B3105 at Staverton cause delays.

Increased pressure on the highway network as a result of significant development growth could exacerbate congestion hot spots such as Staverton.

Wiltshire Council has admitted that Staverton Bridge is at capacity and requires significant investment and with a further 2600 houses close to the bridge this becomes even more significant. Whilst existing plans for the A350 at Chippenham, Melksham and West Ashton/Yarnbrook leave Westbury without a solution. A solution which could be delivered as part of a fair and equitable consideration of the alternatives.

No clear proposals for improvements at Staverton, within metres of the allocation are provided. Development in this part of the Community Area is the worst possible position in respect of likely traffic congestion and fails to recognise the improvements to infrastructure being implemented as part of the Ashton Park development and WHSAP such as the West Ashton and Yarnbrook Relief Road and the pressing needs for relief to Westbury which could be delivered through development to the south west of Trowbridge, including at North Bradley and Southwick.

PROPOSAL: That to make the proposal sound, Wiltshire Council should recognise the current and proposed infrastructure improvements around Trowbridge and make alternative proposals for future housing allocations which further develop those infrastructure improvements include allocations at North Bradley and Southwick which complement the West Ashton and Yarnbrook Relief Road and continue that route to provide a connection to the A36 which also provides significant traffic relief for Westbury.

What alternatives should be considered to make the proposal sound?

The proposals clearly do not 'represent a logical and sensible extension to the town'. Trowbridge Town Council demands that Wiltshire Council should therefore consider a range of other options on the basis that the current proposal is unsustainable, will damage the economic and structural integrity of the town of Trowbridge and is therefore unsound. The alternative options which must be considered include the following:

Green Belt.

The Town Council has previously expressed the view and continues to believe that the most sustainable location for further growth in the Trowbridge area is in the Green Belt to the North-West and West of the town. These options have been excluded by Wiltshire Council, without the required sustainability assessment. There are sites in the Green belt which are within close walking distance of the town centre, existing secondary schools, the College and the railway station. It is not correct to state the following:

(WLP_Principal_Settlement_Planning_for_Trowbridge_26-01-2021_.pdf para 33)

*Indeed, as a result of the work undertaken to date **the most sustainable** options for accommodating growth lie to the north and east of the town on land with a close functional relationship with the village of Hilperton. However, it is also acknowledged that protecting the integrity and identity of Hilperton village will need to be a critical factor in terms of shaping how any future new development is planned. In this regard more recent development proposals and new communities (e.g. Paxcroft Mead) have sought to achieve.*

The Green Belt provides the most sustainable location – in that it is the area closest to the town centre and existing infrastructure and services, and therefore it should be subject to a sustainability test in comparison to the sites proposed and other sites not yet assessed, such as those to the south of the town. It is not necessarily correct to say that the most sustainable locations are the ones chosen, as some sites have not been subject to a sustainability appraisal, such as the sites in the Green Belt.

Green Belt is a planning policy which is not justified on sustainability grounds, in fact it is a policy which was adopted (1966) 26 years prior to the idea of sustainability (Rio Earth Summit 1992). There are no specific ecology or travel issues upon which the Western Wiltshire Green Belt policy is based and in the case of Trowbridge it is arguably wholly anachronistic. If the sites in the Green Belt were subject to a sustainability appraisal they would clearly be identified as significantly more sustainable than the proposed ... sites. The Trowbridge Site Selection document describes the Green Belt in these terms:

(WLP_Principal_Settlement_Site_Selection_Report_Trowbridge_FINAL_26-01-2021_.pdf)

... to the east [sic] of Trowbridge forms the outer boundary area to the designated Western Wiltshire Green Belt and kept open in character to prevent urban sprawl.

The result of the continued implementation of this anachronistic policy is unsustainable urban sprawl to the north east of Trowbridge. The Green Belt is delivering exactly what it was intended to avoid. In fact, there is no significant settlement due west of Trowbridge (between latitude 58 and 57) for over 12km, (Peasdown St John). Conversely the proposed allocation is only just over 1km from Semington to the east and less than 3km from the outskirts of Melksham to the north west. The Greenbelt at Trowbridge is to avoid the coalescence of Trowbridge and Bradford of Avon, yet at WHSAP site 2.2 Wiltshire Council has argued that a single field is sufficient landscape gap to avoid the coalescence of North Bradley and Trowbridge.

PROPOSAL: That to make the proposals sound, Wiltshire Council should undertake a full sustainability appraisal of sites in the Greenbelt within 2km of the town centre and determine their relative sustainability irrespective of their Green belt status, relative to a range of other sites, include the proposed sites.

Southwick/North Bradley.

Making all the allocations at Hilperton/Staverton appears to ignore the possibility of doing something similar in the area to the south of the town adjacent to the other large villages of North Bradley and Southwick. Development at these locations could be delivered in combination with further road improvements which extend the A350 West Ashton and Yarnbrook improvement to the A361 at the County Boundary to the south of the two villages, offering an alternative to a Westbury by-pass. The consultation document includes the following:

(WLP_Principal_Settlement_Planning_for_Trowbridge__26-01-2021_.pdf para 24)

*Land around much of Trowbridge is being promoted for development by landowners or prospective developers. From this **large pool** of potential site options, the Council has focused its own assessment on a smaller pool of potential development sites and has selected preferred options in order to test whether the emerging Spatial Strategy is capable of meeting the forecast development needs for the town. **A map illustrating this pool of potential development sites and the preferred sites is provided below.** How these sites have been chosen is explained in a separate 'site selection report', published alongside this document.*

That map contained in the document does not show the '**large pool**' of potential development sites; it only shows the 'smaller pool'. It should be noted that the Trowbridge Site Selection does not consider ANY sites to the south of the town at Southwick and North Bradley and it could therefore be concluded that it has treated Hilperton and Staverton wholly unfairly and is therefore unsound.

In its response to a question from the Town Council, Wiltshire Council recently said: "*The approach has been to consider development on sites that extend the existing built up area. Sites adjoining other wholly detached settlements do not fit this criterion.*"

North Bradley is no longer wholly detached from Trowbridge as the allocation site WHSAP H2.2 borders the defined settlements of both Trowbridge and North Bradley. The proposal as it stands at the moment would be unsound as it has failed to assess other alternatives fairly and equitably. Sites at the villages of Southwick and North Bradley should be treated in the same way as sites at Hilperton and the Strategy changed to include these villages alongside Trowbridge.

If the South East of the town is excluded due to the existence of as-yet undeveloped allocations (Ashton Park, Elm Grove, White Horse Business Park) and the restrictions detailed in the Trowbridge Bat Mitigation Strategy and if, following the revised and proper consideration of sites in the Green Belt to the North West of the town these are still excluded, then, and only then, sites to the North East of the town and those to the South/South West should be considered fairly and equitably, their impact on existing communities, the integrity of the town and potential for infrastructure improvements to meet the needs of that development should be taken into account and not dismissed out of hand at this stage of the process.

PROPOSAL: That to make these proposals sound, Wiltshire Council should consider a more dispersed proposal for accommodating the growth at Trowbridge which cannot be accommodated adjacent to the town itself, including the Green Belt. This should include consideration of sites at all of the Large Villages which are within 3 km of the town centre, including Southwick and North Bradley as well as Hilperton.

Other towns.

The allocation to the north of Hilperton is not connected to the Trowbridge Settlement boundary and it could be argued therefore that the Settlement Strategy no longer works in respect of Trowbridge and as such more of the Trowbridge development should be allocated to Westbury and Melksham, possibly in combination with one of the outer Melksham outer by-pass routes. This may require further consideration of a revision the Settlement Strategy, recognising the capacity issues at Trowbridge and that these issues are significantly different from any such matters at the other two Principal Settlements.

PROPOSAL: That to make these proposals sound, **Wiltshire Council**, having undertaken a sustainability appraisal on sites in the Greenbelt, should consider a more dispersed policy, firstly to consider sites at all the Large Villages around Trowbridge and then it should consider other towns in the Trowbridge Housing Market Area and towns in other Housing Market Areas including Westbury and Melksham and revise the Settlement Strategy accordingly.

New/expanded settlement.

An alternative change to the Settlement Strategy would be a new or expanded settlement elsewhere in the county such as Hullavington, Pewsey or Lydeaway/Devizes in combination with proposed or existing railway stations.

A new settlement does not have to be in the Trowbridge Housing Market Area to meet the needs of Wiltshire, particularly if the Trowbridge Housing Market Area is unable to accommodate growth sustainably. The NPPF allows planning authorities to look elsewhere when their own areas have reached capacity and Trowbridge has clearly reached capacity therefore other alternatives such as the town council's preferred alternative of the Green Belt or Wiltshire Council's preferred alternative of at a Large Village close to Trowbridge or the other alternatives of other towns in the HMA or a new settlement elsewhere in the County would all meet the requirements and should be considered equitably and fairly. Without such fair and equitable consideration of the more sustainable options this plan is unsound.

PROPOSAL: That to make these proposals sound, Wiltshire Council should consider one or more new or expanded settlements.

Other Issues

If Wiltshire Council has already allocated a WHSAP site in Hilperton Neighbourhood Plan Area and is now proposing an allocation of 2100 in Hilperton NP area should Wiltshire Council not be asking the Hilperton Neighbourhood Plan to accommodate around 2500 houses rather than one house?

How can it be justified that further residential development at the Leap Gate/West Ashton Road triangle is not allowed due to its proximity to the bat roosts, when there are other housing allocations at Ashton Park which are closer to Biss Woods and Green Lane Woods and will therefore have greater impact on the bat habitat?

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APPENDIX

Responses submitted electronically

Trowbridge

Q7

The scale of growth is too high and the brownfield target is acceptable.

Q8

Resilience of the town centre cannot be achieved through the proposals. New housing development must be in locations closer to the town centre to allow the options for cycling and walking to the town centre or allocations should be transferred to other towns or New Settlements. Housing development should be allowed in the Leap Gate/West Ashton Road triangle and only non-housing to the south of Leap Gate and to the east of West Ashton Road, including employment and education. The individual identity of North Bradley has already been destroyed by the allocation of H2.2 without an adequate landscape gap and the integrity of Hilperton is being destroyed through the proposal to surround it by development - the doughnutting of Hilperton. If development cannot be delivered AT Trowbridge then it should be allocated to neighbouring Large Villages as part of the development of those villages. This should include Southwick, North Bradley and Hilperton equally and fairly in a balanced approach.

Q9

No - see full response document.

Q10

They are not and cannot be part of Trowbridge and therefore they should be re-planned as extensions to the villages of Staverton and Hilperton.

Q11

See full response document