

Trowb_P335

An aerial photograph showing a mix of agricultural fields and a residential area. The fields are large and rectangular, with some showing signs of being recently plowed or planted. The residential area is on the right side, with a grid of streets and numerous houses. The overall tone is muted, with a dark green and brown color palette.

Vistry Homes

LAND SOUTH OF WESTWOOD ROAD, TROWBRIDGE

VISION DOCUMENT

MARCH 2021



THE CONSULTANT TEAM



Masterplanning, Landscape, Ecology,
Archaeology and Heritage



Transport and Highways



Planning

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Vistry Group is one of the country's leading housebuilders, with well-known brands that have an established reputation for quality that runs through their homes' design, build, specification and customer service. The range of properties across the Linden and Bovis Homes brands is wide and flexible – with designs that can be adapted to the changing needs of the market, the customer and the environment in which we build.

We build homes based on the following key design principles:

- Arrival: from designing external elevations and creating attractive street scenes through maximising the flow and size of the rooms to meet modern lifestyle needs, we aim to create well-designed places that are functional, accessible and sustainable.*
- Proportion: the relocation of cloakrooms and kitchens has enabled deeper windows to be used on the property fronts creating well-proportioned, balanced elevations that maximise solar gain.*
- Light: the size, positioning and number of windows has created bright and airy homes which relate positively to the private and public spaces around them.*
- Movement: careful consideration has been given to the flow and layout of new homes to accommodate today's lifestyles and facilitate flexibility in the way rooms can be used.*
- Quality: the homes have been created to embrace modern design and styling, whilst retaining the classic architectural traditions on which Vistry, through Bovis Homes and Linden Homes, has built its heritage and brand since 1885.*

1. Introduction

Vistry Group has commissioned the preparation of this document to support the promotion of its Land between Westwood Road and the A366 (Wingfield Road), Trowbridge, Wiltshire for a residential led development through the preparation of the Wiltshire Local Plan Review.

As is demonstrated within this document, the site represents an opportunity to sustainably deliver a distinct, well-connected new neighbourhood reflecting the logical direction of growth west of Trowbridge. Preliminary environmental and design analysis suggests the site is capable of delivering:

- Up to 670 new homes comprising a range of house types, sizes and tenures to cater for people with different incomes and at different stages of their lives;
- A new community facility to serve both the existing and proposed new community;
- An expansive landscape network to include formal play areas, sports pitches, linear parks and informal parkland areas;
- Vehicular access points off Westwood Road and Wingfield Road together with opportunities for improved east - west pedestrian and cycle connectivity; and
- A suite of on-site mitigation proposals that address potential heritage, drainage, transport and environmental concerns.



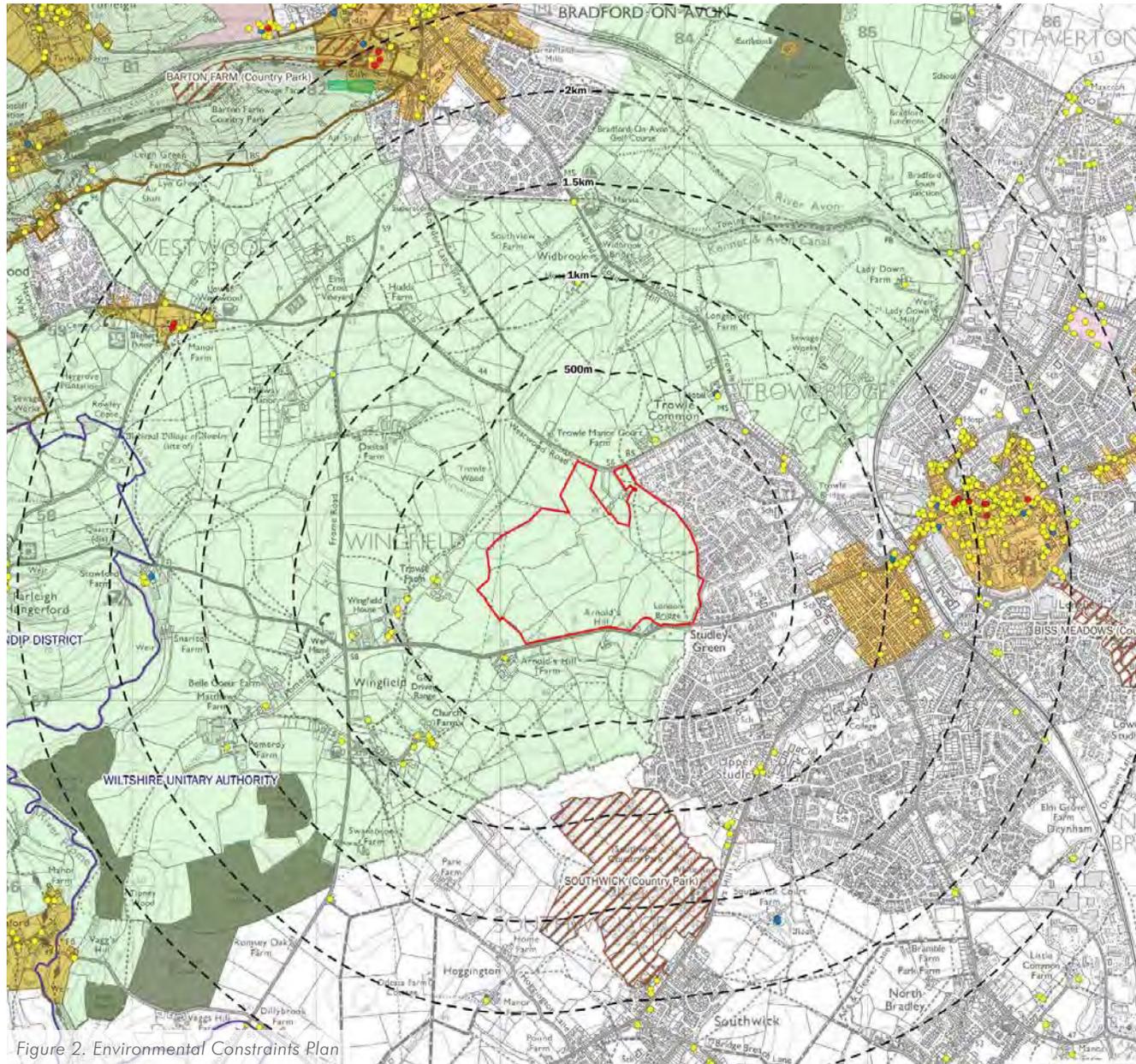
Figure 1. Aerial red line plan

The Site

The site, as shown in Figure 1 above extends to approximately 74.7 hectares (ha) and is currently in agricultural use. It is located at the western edge of Trowbridge, and the south east edge of the site lies approx. 1.2km from the town centre. The existing urban edge of Trowbridge abuts the eastern edge of the site and offers

opportunities to connect into the existing pedestrian and cycle network via existing green routes. The Lambrook Stream crosses the site in the south east corner and continues in a southerly direction. To the north, west and south of the site lies further agricultural land. At present there is no planning history associated with the site.

2. Constraints and Opportunities



The primary constraints and opportunities in relation to the site are highlighted in Figure 2 with further information provided over the following pages. These are based on the findings of preliminary desk-based studies and a site walkover by the EDP environmental team.

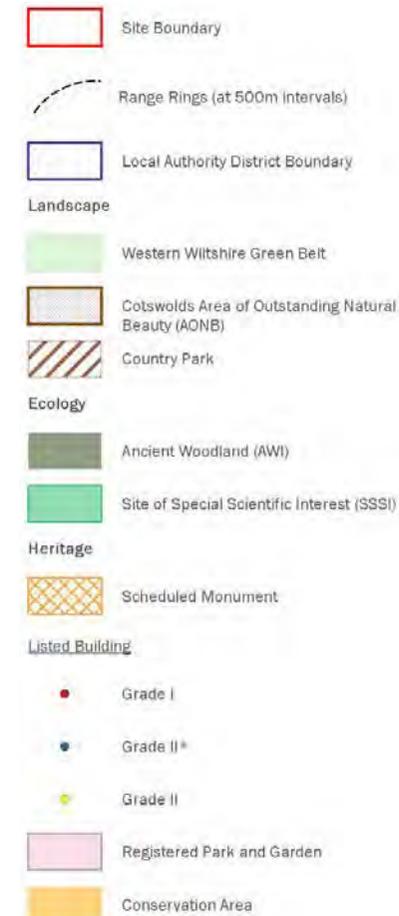


Figure 2. Environmental Constraints Plan

Landscape

The site does not contain or fall within any designated landscape, and there are no such landscapes within 2km of the site. Cotswold AONB falls over 2km to the north-west but there is no apparent intervisibility between the site and the AONB. The site does, however, lie within the Western Wiltshire Green Belt, which is protected by Section 13 of the National Planning Policy Framework (NPPF) with reference to Planning Practice Guidance – Green Belt (22 July 2019).

The West Wiltshire Landscape Character Assessment (1:25,000) (2007) places the site within the 'E1: Wingfield Rolling Clay Lowland' Landscape Area. This area is described as gently rolling farmland with a largely rural character with extensive views. The description notes some deterioration in the condition of the landscape fabric together with detractors including: busy roads, plentiful pylons, and large-scale industrial buildings on the outskirts of Trowbridge.

EDP's field assessment found that the site is generally consistent with this broader description with gently undulating pasture and arable land falling across the top and south-east facing slopes of a local watershed. The medium sized fields are defined by a mixture of mature hedgerows, cut hedges and a semi mature tree belt located on the highest land. There are some mature trees scattered across the north-western site field; several ponds, most of which are surrounded by trees and shrubs; and Lambrok Stream runs along the south-eastern boundary.

However, at the site level the adjacent settlement edge and roads, and the crossing pylons and overhead cables, detract from the rural character. The urban area is a prominent feature to the east, which provides a recent unsympathetic edge to the town that exerts an urbanising influence over the eastern site area.

Development on the site would be visible from a small number of locations from the surrounding landscape, notably the historic settlement and landscape setting of Wingfield, to the south-west, and the masterplanning exercise has taken account of this by limiting visibility to the proposals, whilst also being mindful of integrating the development into its landscape and visual context.

Greenbelt Assessment

The Green Belt (GB) assessment formed part of the environmental appraisal insofar as it attempted to test whether bringing forward sustainable development on this site would allow the key purposes of the GB, in the context of the wider settlement of Trowbridge, to be maintained, or possibly even enhanced. The assessment considered the extent to which a continued sense of openness could be maintained within the tract of land between Trowbridge and settlements within the wider landscape to the north, north-west, and south-west particularly Bradford-on-Avon, Westwood, and Wingfield.

The GB assessment concludes that development can occur in this location without compromising the NPPF essential functions of the GB at this western edge of Trowbridge: preventing merging of settlements, encroachment, and unrestricted sprawl; or the relevant principal purposes of the GB as stated in the Wiltshire Core Strategy Local Adopted Plan (2015).

This conclusion is due, primarily, to the relatively limited proportion of the existing gap between settlements that the site represents; the limited intervisibility between the site and closest settlements across the GB; and the comparatively effective defensible edge that the site would provide. The Concept Masterplan shows development limited to the eastern site area so further reducing the proportion of the GB represented by these proposals and utilising topography and existing vegetation to limit visibility to the settlement from the Green Belt.

It is considered that the site could reasonably be removed from the GB and, developed in accordance with the principles of the Concept Masterplan, without harm to the integrity of the GB overall and with potential benefits in terms of creation of a defensible GB boundary.



Transport & Access

The scheme will be served by primary access points from Westwood Road to the north and from the A366 Wingfield Road to the south. A secondary access point onto the A366 or Brook Road could also be provided.

There is the potential to provide a link road through the development site that would connect the A366 in the south to Westwood Road in the north. This could alleviate traffic at the A363 Bradford Road junction to the east of the site. This would be subject to detailed capacity assessments in due course.

Within the vicinity of the site Westwood Road is subject to a 60mph speed limit, which reduces to 40mph around 20 metres east of the site boundary. The A366 Wingfield Road is also subject to a 60mph speed limit. It is anticipated that a gateway feature or sequence of features will be provided on Westwood Road and the A366 to provide an element of traffic calming and management and that the existing 60mph speed limits could be reduced to 40mph or 30mph past the site.

There are currently no footways provided on Westwood Road or the A366 in the vicinity of the site. As such, pedestrian and cycle links are proposed to be provided with the Meadway cul-de-sac and Brook Road on the eastern boundary of the site to facilitate access to existing pedestrian networks in the adjacent residential area and local services and amenities located in Trowbridge town centre.

Footways with dropped kerbs are provided throughout the residential roads located adjacent to the site. These footways provide access to the local bus stops and also link to routes towards Trowbridge Railway Station and the town centre. Consideration will be given to making improvements as appropriate.

Public Rights of Way crossing the site will be retained within the development and the possibility of improvements and links to the site will be explored.

The intention is to work collaboratively with Wiltshire Council and other relevant stakeholders to develop a detailed Transport Strategy with consideration given to the wider planning and transport infrastructure proposals

in the local area in due course. Focus will be given to any need for off-site mitigation to address the potential increase in traffic on nearby roads and also the potential for improved public transport links in the vicinity of the site.

Ecology

The site is not covered by any statutory designations. There are two internationally important designated sites within 15km of the site boundary: the Bath and Bradford-on-Avon SAC, 4.6 km north-west and Salisbury Plain SAC/SPA 9km south-east. In terms of nationally and locally important statutory designations, there are no designations within 2km of the site boundary.

Approximately half of the area within the site comprises agriculturally improved, species-poor grassland. The other half of the site comprises arable land.

The site is supported by a strong hedgerow network, comprising predominantly mature, species-rich hedgerows and a number of mature trees.

Habitats of ecological value present on site relate primarily to the Lambrook stream, ponds, mature trees within and adjacent to the site and the hedgerow network. It is considered that appropriate habitat retention, enhancement and creation measures can be sufficiently incorporated within any future, proposed residential development of the site.

Any forthcoming planning application for the site will be informed by a robust suite of protected species surveys, the findings of which will be utilised to inform mitigation and enhancement strategies for the site to ensure no net loss to biodiversity.

There are significant opportunities on site to deliver a net gain in biodiversity through the creation of diverse new habitats and enhancing the existing green infrastructure network. Extensive tree planting, meadow landscapes and sustainable drainage features designed for nature will provide a resilient landscape safeguarding against future climate change.

Archaeology and Heritage Matters

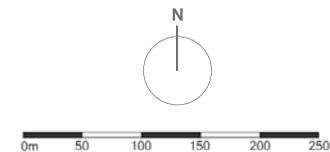
The site does not contain any designated heritage assets where there would be a presumption in favour of preservation in situ. There are no scheduled monuments, registered parks and gardens, registered battlefields or world heritage sites within 2km of the proposed development. Designated heritage assets within 2km of the site comprise 326 listed buildings and Trowbridge Conservation Area.

The majority of the listed buildings within the study area are contained within the Trowbridge Conservation Area, which is situated c.600m to the east of the site. The conservation area is separated from the site by a substantial buffer of modern housing. Therefore, it is unlikely that development within the site will have a substantial effect on the setting of these assets.



Figure 3. Site level constraints plan

- Site Boundary (74.7ha)
- Potential Primary Vehicular Access
- Potential Secondary Vehicular Access
- Existing Green Infrastructure
- Potential Extension to Green Infrastructure
- Existing Hedgerow/Vegetation of Potential Value
- Mature Trees (REF Aerial Imagery and Site Walkover)
- Lambrok Stream
- Existing Pond
- Flood Area Zone 2 (EA flood mapping)
- Potential Noise Constraints from A366 (Subject to Engineers Inputs)
- Amenity Offset to Existing Properties
- Public Right of Way (PRoW)
- Potential Pedestrian Access
- Power Lines
- Parish Boundary
- High Point of the Site with Views out Towards Elevated Downland
- Listed Building
- Bus Stop



3. Concept Masterplan

After considering the primary constraints and opportunities for the site, a concept masterplan (Figure 4) was prepared demonstrating how the site could be brought forward. The concept masterplan illustrates a residential developable area of 19.1 hectares which could deliver approximately 475 - 670 units @ 25-35 dwellings per hectare.



Existing green route along Lambrok Stream

Key features of the concept masterplan (opposite) are as follows:

1. Primary vehicular access from Westwood Road - subject to Highway Engineers design.
2. Primary vehicular access from A366 - subject to Highway Engineers design.
3. Potential secondary vehicular access points off Westwood Road and A366- subject to Highway Engineers design.
4. Opportunity for pedestrian/cycle connection into site from Brook Road.
5. Existing Public Right of Way retained within generous green corridor.
6. Opportunity for range of formal play areas to be located within green corridors.
7. Opportunity to extend existing green corridors westwards into the site providing multiple opportunities for pedestrian and cycle connectivity and provide wildlife corridors for species dispersal across the site.
8. Opportunity for community/retail use at entrance to site to serve existing and proposed community.
9. Attenuation ponds located in south east corner at lowest part of site - size and location to be confirmed by Drainage Engineer. Potential for new wildlife ponds to be integrated with SuDS provision.
10. Development pulled back from southern boundary to help retain views to Holy Trinity Church and help to retain rural character of A366 when entering Trowbridge from the west.
11. Potential area for sports pitches on flattest part of site - subject to Local Authority requirements.
12. Opportunity for western portion of site to become natural parkland area with a range of new habitats created to the benefit of local biodiversity and for enjoyment by the local community
13. Native woodland planting belt along western extent of developable area to help screen development of site when viewed from west. This to comprise enhanced existing hedge, to north and new planting, to south.
14. Opportunity for range of pedestrian/cycle loop routes across the site.



Existing gated access to site off Brook Road



Westwood Road forms the northern boundary to the site



Figure 4. Concept Masterplan

4. Conclusion

The preparation of the Wiltshire Local Plan Review necessitates the release of greenfield sites around Trowbridge to accommodate future housing needs. In order to identify the most sustainable locations for future housing development around Trowbridge, a review of the Green Belt around Trowbridge has been undertaken. That concludes that land south of Westwood Road, Trowbridge represents a sustainable location for additional development either individually or combined with land to the south at Arnold Hill Farm.

The site offers a unique opportunity to provide a high quality residential development at a scale that is appropriate to its surroundings. The site has limited physical constraints and is able to accommodate development that reflects the prevailing settlement pattern, protects key views and introduces a range of landscape enhancements, which would greatly increase the ecological and community functions of the land. The release of the land will provide a new defensible boundary to the Green Belt to the west of Trowbridge.

Available, Suitable and Developable

In NPPF terms, the site is available, suitable and developable and therefore should be considered as an appropriate allocation to meet future housing requirements.

The site represents a logical development opportunity that is contiguous with existing settlement boundaries, close to existing services and employment opportunities, and has the potential to be well served by public transport and the surrounding road networks.

In addition to the general over-arching sustainability of the site, this document demonstrates a site-specific approach to sustainable development and an enhanced development framework resulting from a landscape-led design evolution process.

This document sets out the site-specific approach to creating a sustainable and deliverable residential led development, working with the grain of the existing landscape and taking account of site features and context. It proposes a development that would form a logical extension to the local community, is outward-looking and forms a strong and logical edge to the town.

Vistry Group trust the content of this document provides a useful overview of the development potential of its land at Trowbridge, Wiltshire. This statement represents an indicative guide and Vistry Group would welcome an opportunity to discuss the site and its potential development in more detail with Wiltshire County Council.





The Environmental Dimension Partnership

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Project name	Arnolds Hill Farm, Trowbridge		
Design note title	Access and Connectivity Appraisal		
Document reference	10711-HYD-XX-XX-RP-TP-1002		
Author/Approver	[REDACTED]		
Revision	P02		
Date	5 March 2021	Approved	✓

1. INTRODUCTION

- 1.1.1 The following document offers an access and connectivity appraisal for the potential delivery of housing on the western edge of Trowbridge, Wiltshire.
- 1.1.2 The site comprises of two parcels of land to the north and south of the A366 respectively. The northern parcel (Vistry) shares a border with the north-western residential boundary of Trowbridge. The southern parcel (Barratts) is located to the north of Southwick Country Park and also borders Trowbridge’s western residential area.
- 1.1.3 This access and connectivity appraisal summarises the sustainable accessibility of the site with regard to walking and cycling connections, access to local facilities within the surrounding area, and vehicular access.

2. SUSTAINABLE CONNECTIONS

2.1 Walking

Existing Facilities

- 2.1.1 There are a number of Public Rights of Way (PRoWs) within the vicinity of the site. To the south-east of the southern parcel, a footpath connects Lambrok Road to the site and up to the A366 as well as to Wingfield to the south-west. This footpath is currently unsurfaced and crosses over Lambrok Stream. It is recommended that this route be upgraded to accommodate pedestrian movements associated with the site.
- 2.1.2 Another footpath PRoW runs north-south through the eastern side of the northern parcel of land, connecting the A366 to Westwood Road directly north of the site. This provides a pedestrian and cycle link through the northern site, linking two of the key transport routes in the vicinity of the site. This PRoW takes the form of an unsurfaced footpath.
- 2.1.3 The PRoW's within the vicinity of the site are displayed at Figure 2.1.



Figure 2.1: PRow's within the vicinity of the site.

- 2.1.4 There is currently no footway provision along the A366 until it enters the suburban area of Trowbridge in line with the eastern boundary of the site. Likewise, there is no footway provision along Westwood Road to the north of the site until it enters the Trowle Common residential area 200m to the east.
- 2.1.5 Within the surrounding residential area to the east there is an established network of pedestrian footways on either side of the local streets. These connect with surrounding local facilities and amenities within the local area, including Studley Green primary school, local convenience stores and Trowbridge town centre.

Potential Pedestrian Facility Enhancements

- 2.1.6 As identified, the sites are not currently served with footways in the immediate vicinity of both parcels of land, notably along the A366 and Westwood Road. It is recommended that upgrades to the pedestrian infrastructure will be required to realise development potential therefore.
- 2.1.7 Pedestrian connection points will be focussed on the eastern side of the sites, reflecting the desire line to travel eastwards towards the local services/facilities in Trowbridge. Within the sites themselves, the internal pedestrian networks would facilitate travel westwards, meaning that pedestrian footways on the A366 along the entirety of the site frontage to reach the west of the site is not deemed necessary.
- 2.1.8 However, it is recommended that pedestrian infrastructure is upgraded and a footway installed on the A366 from the eastern boundaries to connect to the existing infrastructure which commences east of Lambrok Stream. This would require the installation of c.360m of footway in order to connect to the southern site vehicular access.
- 2.1.9 Highway verge exists on both sides of the carriageway, which could be utilised to realign the road and install a footway. It is noted that a drainage ditch exists on the southern side, and a strategy will need to be developed to accommodate this. The provision of a footway on the eastern stretch of the A366 is subject to further investigation regarding third party land ownership and highway constraints.

- 2.1.10 Similarly, potential pedestrian links from the northern parcel's Westwood Road vehicular access points would require c.340m of footway installation, albeit it is recognised this route is unlikely to experience significant footfall.
- 2.1.11 Beyond the sites themselves, there are few pedestrian attractors to the west and hence limited desire for existing residents to walk westwards. The pedestrian infrastructure will predominantly serve travel to/from the east therefore.
- 2.1.12 In addition, pedestrian access could be achieved through the east of the northern parcel into the neighbouring residential area as per the EDP Masterplan displayed at Figure 3.1. Similar provision could be considered for the southern parcel, providing access through the east of the site onto the neighbouring Lambrok Road. However, access of this nature is already available to the south of the site via an existing PRow that crosses Lambrok Stream and as such further pedestrian access points may not be required. It is recommended that this footpath be upgraded in order to accommodate pedestrian movements to and from the site.
- 2.1.13 A pedestrian crossing could be considered between the two vehicular access points in order to provide access from the northern parcel to the southern parcel. This would connect the two site's PRow's and internal road/pedestrian networks and allow for through access for both sites, enhancing the accessibility of both sites and their adjoining pedestrian networks.

Local Walking Routes

- 2.1.14 Given the sites' locations on the western edge of Trowbridge, the majority of walking routes are generally within Trowbridge to the east of the site.
- 2.1.15 The following represents a selection of potential key routes to local attractors within close proximity to the site which are considered suitable as walking routes:
- Route 1 - Southern parcel to the Manor Road Stores, Clarendon Academy (Secondary School), Wiltshire College, Studley Green Primary School, Green Shoots day nursery and Trowbridge Sports Centre via the existing PRow southern pedestrian access and Manor Road.
 - Route 2 - Both parcels to the Town Centre and railway station via Studley Green Community Centre, St John's Primary School, Wildbrook Medical Practice and the John of Gaunt School and St Augustine's College. Accessed via A366 vehicular access points (if pedestrianised) and the A366 Wingfield Road.
 - Route 3 - Northern parcel to Walwayne Court Primary School and Tesco Express via pedestrian central eastern access onto Sherborne Road and link to Brook Road or via Brook Road access for those situated further south within the site.
 - Route 4 – Northern parcel secondary access at Brook Road connecting to Route 2 (A366 Wingfield Road). Quiet, pedestrian friendly connection south from Brook Road access and along Fairleigh Avenue, joining up with route 2.

2.1.16 These routes are displayed at Figure 2.2.

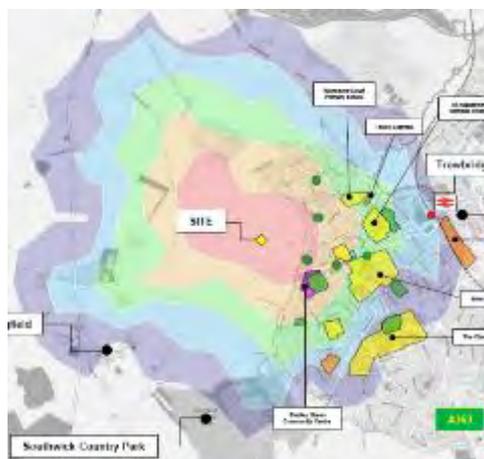


Figure 2.2: Local walking routes

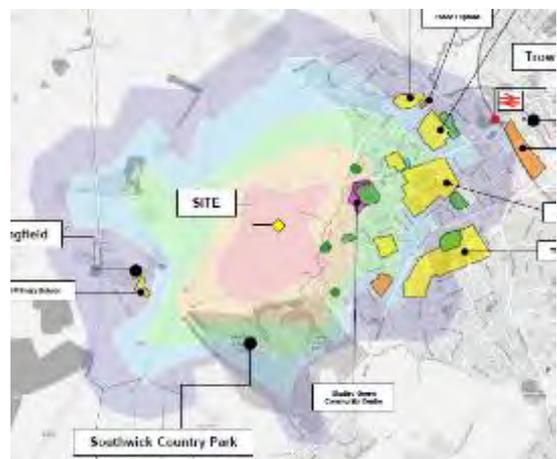
Walking time analysis isochrone plans

2.1.17 An analysis of walking journey times has been undertaken using TRACC Basemap software. This provides an illustrative output in isochrone form as to the potential connectivity of the site and their journey times to local destinations/facilities.

2.1.18 An extract of this analysis is provided below, with the full plans included at Appendix B and Appendix C respectively.



Northern site: walking time analysis extract (2km)



Southern site: walking time analysis extract (2km)

2.1.19 As is demonstrated, a range of local services and facilities are located within recommended walking distances.

2.2 Cycling

2.2.1 There are a number of dedicated national, regional and local cycle routes within the vicinity of the site. Furthermore, as the site is located on the edge of Trowbridge, residential suburbs to the east of the site are considered suitable for on-street cycling including the A366 Wingfield Road to the east of the site, which contains a shared pedestrian footway and cycleway.

2.2.2 The National Cycle Network (NCN) Route 4 passes through to the south of Bradford-on-Avon, within 3km north of the site. There is an NCN link which provides access to the route from Trowbridge approximately 2.8km east of the site.

2.2.3 In addition to this, Wiltshire cycleway joins up with NCN 4 at a point 3km north of the site, before deviating from the route, instead passing some 4km west of the site. The Wiltshire cycleway is a ring route around Wiltshire, passing through areas including Malmesbury, Bradford-on-Avon and Salisbury.

2.2.4 Cycling routes in the vicinity of the site are displayed at Figure 2.3.

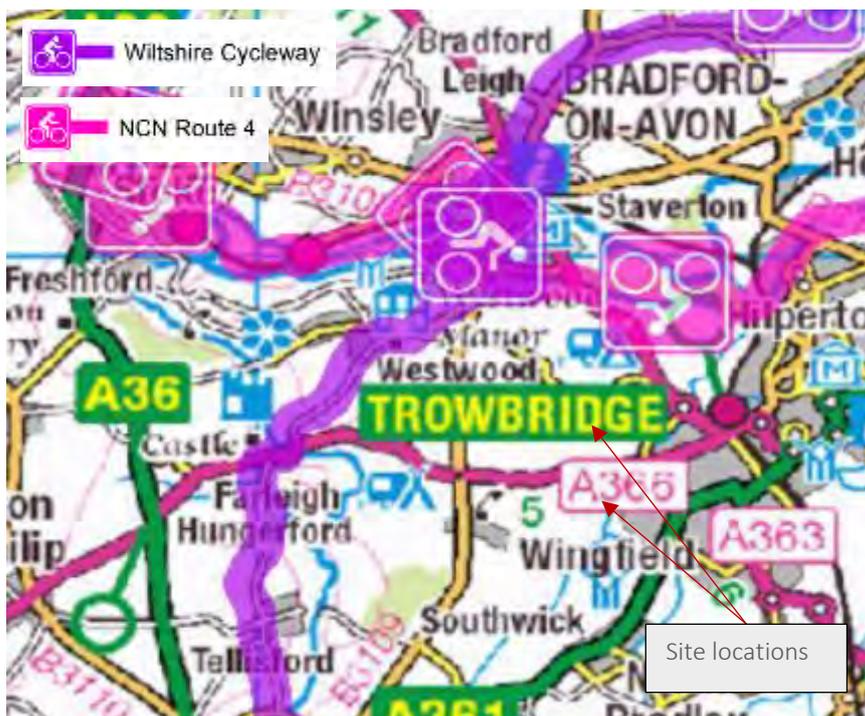


Figure 2.3: Cycling Routes in the vicinity of Trowbridge

2.2.5 In addition to the existing cycle infrastructure within the vicinity of the site, the Wiltshire Local Plan Transport Review (January 2021) proposes a series of new radial cycle routes that focus on connecting new developments with the town centre and Trowbridge railway station. These routes consist of on-carriageway cycle lanes as well as segregated two-way cycle tracks, facilitating cycle transport from the site to a range of attractors to the east, enhancing the site's overall cycling connectivity. Proposed routes within the vicinity of the site include the A366 on-carriageway cycle lane less than 100m from the site's eastern boundary, and the Frome Road on-carriageway cycle lane just 600m south-east of the southern parcel's south-eastern boundary.

2.2.6 A map of the proposed routes has been extracted from the Wiltshire Local Plan Transport Review and provided at Figure 2.4.

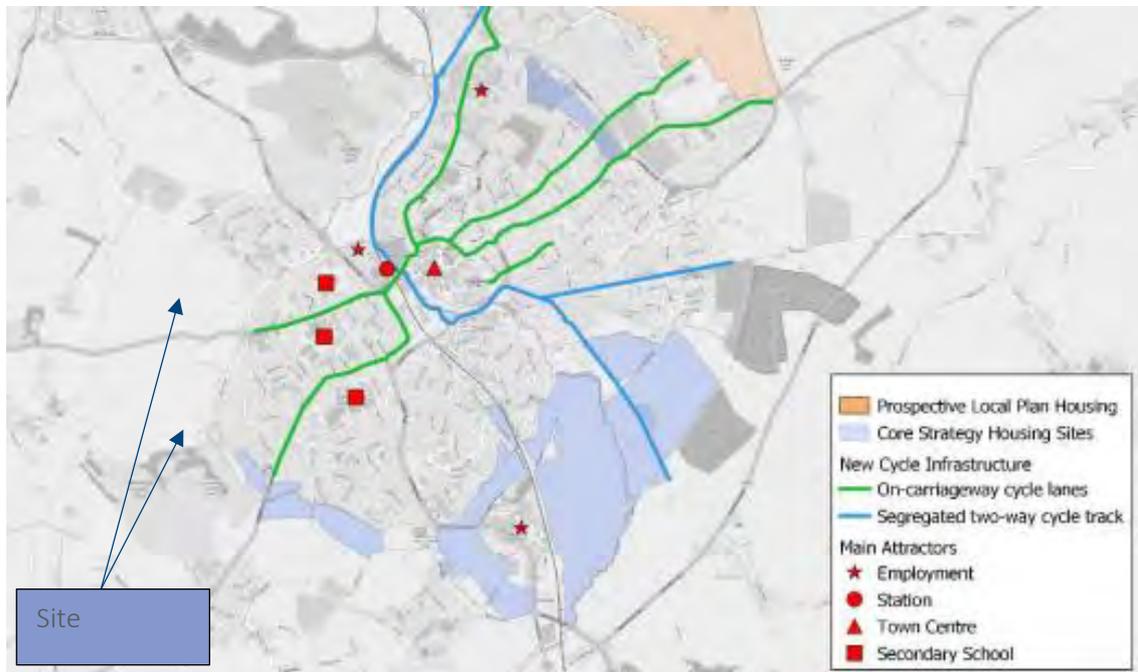
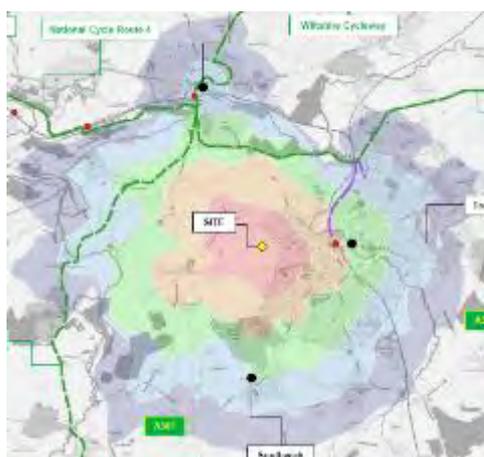


Figure 2.4: Proposed cycling routes as shown in Wiltshire Local Plan Transport Review

Cycle time analysis isochrone plans

2.2.7 An analysis of cycle journey times has been undertaken using TRACC Basemap software. This provides an illustrative output in isochrone form as to the potential connectivity of the site and their journey times to local destinations/facilities.

2.2.8 An extract of this analysis is provided below, with the full plans included at Appendix B and Appendix C respectively.



Northern site: cycle time analysis extract (5km)



Southern site: cycle time analysis extract (5km)

2.2.9 As is demonstrated, a range of local services and facilities are located within recommended cycle distances.

2.3 Local Facilities and Services

- 2.3.1 Manual for Streets (paragraph 4.4.1) states that ‘walkable neighbourhoods’ are typically characterised by having a range of facilities within 10 minutes (up to 800m) walking distance of residential areas which residents may access comfortably on foot.
- 2.3.2 Paragraph 2.2 of TA91/05 Provision for Non-Motorised Users states that 2 miles is ‘a distance that could easily be walked by the majority of people’. Paragraph 2.3 also continues by stating that ‘Walking is used to access a wide variety of destinations including educational facilities, shops, and places of work, normally within a range of up to 2 miles’ (3.2km).
- 2.3.3 In relation to shorter trips in particular, the CIHT publication Planning for Walking (section 2.1) states that across Britain about ‘80% of journeys shorter than 1 mile (1.6km) are made wholly on foot’.
- 2.3.4 As it is located on the periphery of the town of Trowbridge, the site is within recommended walking distance to a range of services and facilities.
- 2.3.5 With regard to cycling, TA91/05 goes on to state (in paragraph 2.11) that ‘Cycling is used for accessing a variety of different destinations, including educational facilities shops and places of work, up to a range of around 5 miles. Cycling is also undertaken as a leisure activity, often over much longer distances.’ At paragraph 2.9, TA91/05 states that 5 miles (8km) is a distance ‘that could easily be cycled by the majority of people’.
- 2.3.6 This is consistent with the statement in LTN1/20 Cycle Infrastructure Design (in paragraph 2.2.2) that ‘Two out of every three personal trips are less than five miles in length – an achievable distance to cycle for most people’.
- 2.3.7 Table 2.1 provides a summary of the local facilities and amenities within the vicinity of the site, and a local services and facilities plan (reference: 10711-HYD-XX-XX-DR-TP-0601) is included at Appendix A.
- 2.3.8 For the purpose of this exercise the site has been divided into the respective northern and southern parcels and distances have been measured from the centre point of each site, though in practice a significant proportion of housing will be closer to facilities and amenities than the figures given.

Table 2.1: Key Local Facilities and Amenities

	Distance (m)		Walking Time (min) (80 metres per minute)		Cycling Time (min) (320 metres per minute)	
	North	South	North	South	North	South
Local Public Transport						
Farleigh Avenue Bus Stops	570	900	7	11	2	3
St Johns Crescent Bus Stops	1,200	400	5	15	4	1
Hungerford Avenue Bus Stops	900	1,000	11	12	3	3
Kingswood Chase Bus Stop	1,300	500	16	6	4	2
Trowbridge Rail Station	1,900	2,000	24	25	6	7
Local Shops/Supermarkets						
One Stop	1,300	1,000	16	12	4	3
Manor Road Stores	950	500	12	6	3	2

Brook Road Local Centre; Tesco Express, chemist and takeaway	1,250	1,600	16	20	4	5
Tesco Express	2,200	1,100	27	14	7	4
Asda	2,000	2,000	25	25	7	7
Aldi	2,500	2,200	31	27	8	7
The Gateway Shopping Centre	2,000	1,900	25	23	7	6
Town Centre	2,000	1,900	25	23	7	6
Education						
YMCA Green Shoots Nursery	1,300	1,000	16	12	4	3
The John of Gaunt School	1,300	1,300	16	16	4	4
Studley Green Primary School	1,300	1,000	16	12	4	3
Wiltshire College	1,900	1,200	23	15	7	4
The Mead Primary School	2,500	1,250	31	15	8	4
Walwayne Court Primary School	1,200	1,600	15	20	4	5
Upper Studley Pre-School	1,900	1,200	23	15	7	4
See Saw Nursery	1,600	1,600	20	20	5	5
Healthcare						
Widbrook Medical Practice	1,100	1,100	13	13	3	3
BUPA Dentalcare	1,800	1,800	22	22	6	6
Mortimer St Dental Practice	2,500	2,500	31	31	8	8
Trowbridge Community Hospital	2,700	2,800	34	35	9	9
Community Use / Leisure						
Studley Green Community Centre	800	900	10	11	2	3
Southwick Country Park	1,800	800	23	10	6	3
Trowbridge Sports Centre	2,100	1,600	26	20	7	5
Employment						
Trowbridge Town Centre	2,000	2,000	25	25	7	7
County Hall and Civic Buildings	2,400	2,400	30	30	8	8
Riverway Industrial Estate	2,200	2,400	28	30	7	8
White Horse Business Park	4,000	3,300	50	41	13	10

*-Providing for Journeys on Foot (CIHT, 2000)

**- Department for Transport, Local Transport Note 2/08

2.3.9 There are a number of services and amenities within acceptable walking and cycling distances of the site. These are accessible via a mix of pedestrian footways and on road cycle facilities. The close proximity of these uses will encourage walking and cycling for potential residents. The location of the

site on the edge of the existing settlement of Trowbridge allows the site to take advantage of the existing, well established residential connections. This will reduce the reliance on the private car and encourage sustainable, active modes of transport.

2.4 Public Transport

- 2.4.1 Farleigh Avenue bus stop is located approximately 650m east of the two sites' main vehicular access points and is adjacent to the northern parcel's proposed Brook Road secondary access. It currently consists of a bus stop flag and no additional infrastructure. It is served by bus services 65 and 65a.
- 2.4.2 Kingswood Chase bus stop is located in close proximity to the southern parcel, near to the existing PRoW that crosses over Lambrok Stream and provides pedestrian access to the southern site. This stop also currently consists of a bus stop flag and no additional infrastructure. It is served by bus services 60 and 65a.
- 2.4.3 Bus service 60 provides an hourly connection to Trowbridge town centre (16 minute travel time) between 0846 and 1646. This bus service only operates during weekdays. Bus Service 65A provides a similar service to service 60 on a Saturday.
- 2.4.4 Hungerford Avenue bus stops are located just 800m east of the site's vehicular access points. Again, these stops consist of bus stop flags and no additional infrastructure. These stops are served by routes 65, 65A, 94, 98 and X47.
- 2.4.5 A summary of the local bus services is provided at Table 2.2.

Table 2.2: Summary of Local Bus Services

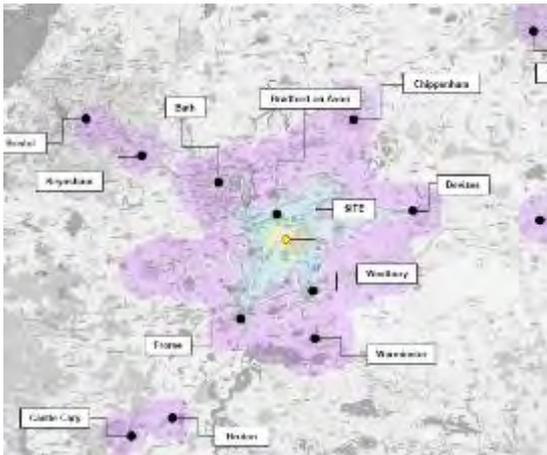
Bus Stop	Service	Route	Weekday First/Last Bus	Weekday Frequency	Weekend Frequency
Farleigh Avenue	65	Trowbridge Town Hall - Broadmead Estate	09:13/14:13	6 Services	-
	65a	Trowbridge Town Hall - Broadmead Estate	-	-	6 Services (Saturday Only)
Kingswood Chase	60	Trowbridge Town Hall - Studley Green via Wiltshire Drive	08:37/17:10	9 Services	-
	65a	Trowbridge Town Hall - Broadmead Estate	-	-	6 Services (Saturday Only)
Hungerford Avenue West Bound	65	Trowbridge Town Hall - Broadmead Estate	09:13/14:13	6 Services	-
	65a	Trowbridge Town Hall - Broadmead Estate	-	-	6 Services (Saturday Only)
	94	Trowbridge - Bath City Centre	11:11/15:16	3 Services	-
Hungerford Avenue East Bound	94	Bath City Centre - Trowbridge	08:50/12:59	3 Services	-
	X47	Frome - Trowbridge	08:19	1 Service	-

Rail

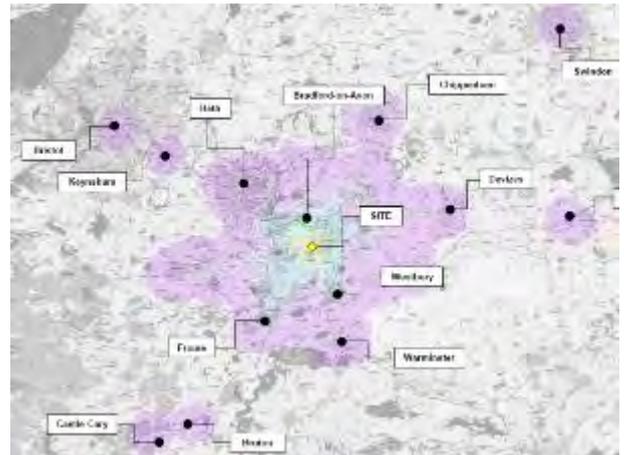
- 2.4.6 Trowbridge railway station is located 1.3km to the east of the site. The railway station offers frequent Great Western Railway (GWR) services to a range of commuting destinations including Bristol, Swindon, Gloucester and Chippenham.

Public transport journey time analysis isochrone plans

- 2.4.7 An analysis of public transport journey times (bus and rail) has been undertaken using TRACC Basemap software. This provides an illustrative output in isochrone form as to the potential connectivity of the site and their journey times to local destinations/facilities.
- 2.4.8 An extract of this analysis is provided below, with the full plans included at Appendix B and Appendix C respectively.



Northern site: public transport journey time analysis extract (60 minutes)



Southern site: public transport journey time analysis extract (60 minutes)

- 2.4.9 As is demonstrated, a range of key destinations are located within 60 minutes of the site by public transport, including Bristol, Bath, Chippenham and Swindon.

3. VEHICULAR ACCESS

3.1 Overview

3.1.1 Vehicular access to both the northern and southern parcels of land can be achieved in a number of locations, as both sites have a significant highway frontage. Primarily, vehicular access options are from the A366 for both sites, and additionally Westwood Road for the northern parcel.

3.2 Northern Parcel

3.2.1 The concept masterplan prepared by the Environmental Dimension Partnership (EDP) provides details of the locations in which vehicular access could be taken for the northern parcel of land, as displayed at Figure 3.1.



Figure 3.1: EDP Concept Masterplan (Northern Parcel)

3.2.2 Vehicular access is achievable and could be taken from Westwood Road to the north of the site as well as along the A366 at the south-east corner of the site. There is also the option to provide a further vehicular access along Brook Road at the south-eastern corner of the site. Internal roads within the site could connect these three vehicular access points.

3.2.3 It is assumed that the A366 vehicular access point would likely be the most utilised access among those travelling to and from the site due to the wider connectivity of the A366 as opposed to Westwood Road. This includes connections directly to Trowbridge town centre and Trowbridge railway station to the east as well as the B3109, A36 and the A362 to the west.

3.2.4 A fourth vehicular access point could be achieved within the south-west corner of the site where there are two extant gated access points to the field.

- 3.2.5 Provision of multiple access points is beneficial in that it would provide permeability and allow residents/visitors to travel along desire lines. In addition, alternative access options are beneficial in an emergency event.
- 3.2.6 An access onto the A366 is likely to take the form of a ghost island right turn priority junction. This junction arrangement would be dependent on traffic flows along the A366. A signalised junction could be considered if high two-way flows on the A366 cause significant queues to arise from a priority junction arrangement.

3.3 Southern Parcel

- 3.3.1 The southern parcel and the potential vehicular access options are displayed below at Figure 3.2.



Figure 3.2: Indicative Site Location and Vehicular Access Options

- 3.3.2 An access at either of the locations displayed at Figure 3.2 would likely take the form of a ghost island right turn priority junction. Again, this would be dependent upon two-way flows on the A366 as these could potentially impact on inbound and outbound movements to and from the development. If two-way flows are considered too high on the A366 to allow for these movements without causing significant queues, then a signalised junction may have to be considered instead. Providing an access in both locations would aid permeability.
 - 3.3.3 Access A is beneficial in that the stretch of road upon which it is situated has a straight alignment. Therefore, it is likely to be able to comfortably offer adequate visibility splays of 215m in either direction.
- ### 3.4 Other Access Considerations
- 3.4.1 To allow for access to the northern and southern parcels along the same stretch of the A366, it would likely be required that the 40mph speed limit which commences to the east of the site is extended to include this stretch of the road adjacent to the site access points. This would allow for suitable visibility splays at the site access points and reduce vehicle speeds past the site frontage.

3.4.2 The location of all of these potential access points provides a direct beneficial connection with one of the key arterial routes into Trowbridge.

4. CONCLUSION

4.1.1 This Technical Note concludes that the sites are considered to be accessible and sustainable. They are located within appropriate walking/cycling distance or public transport journey time of a range of local services and facilities within Trowbridge and beyond.

4.1.2 The sites are greenfields currently, with the desire line for neighbouring residents being predominantly to the east. As such, there is limited pedestrian infrastructure serving the sites. However, upgrades have been identified to connect the sites to existing infrastructure.

4.1.3 A range of vehicle access options exists to serve the respective sites, with both sites being able to achieve access via the A366 and the northern parcel having additional highway frontage onto Westwood Road and Brook Road. Further investigation is needed in terms of highway boundary information, and designs progressed, but no in-principle constraints have been identified.

4.1.4 In summary the sites can be accessed by sustainable means including walking, cycling and public transport. It is demonstrated that the sites can be connected to key local facilities and amenities within the surrounding area via an established network of walking and cycling routes.

Appendix A Services and facilities plan

OS NORTH



Bradford-on-Avon
700 metres

2km catchment - southern parcel

2km catchment - northern parcel

2km Town Centre Catchment

2km catchment

Enhancements required to connect to this route



Key		Key Walking Routes (distances shown taken from centre of site)	
	Site Boundary		Route 1: Educational uses from southern parcel
	Retail		Route 2: Town Centre and associated uses from both parcels
	Community Use		Route 2: Section requires additional footways to provide connection
	Health		Route 3: Brook Road facilities from northern parcel
	Education		Route 4 - Northern Parcel Secondary Access (Brook Rd)
	Leisure / recreation		Local bus stops
	Employment		Approximate Location for Vehicular Access Option
	Town Centre		Potential pedestrian and cycle connections

NOTES

- Plan is for information purposes only
- Plan has been based on latest mapdata information (Ref: EDP282208)
- Walking times are based on an 80 metres per minute pace
- Distances are indicative only, calculated using google maps and are taken from a location within the centre of the site

NOTES (CONTINUED)

NOTES (CONTINUED)

REVISIONS (CONTINUED)

REVISIONS

Rev	Date	Description	By	Old App	GP	RM	RM
PO1	01/03/2021	First Issue					

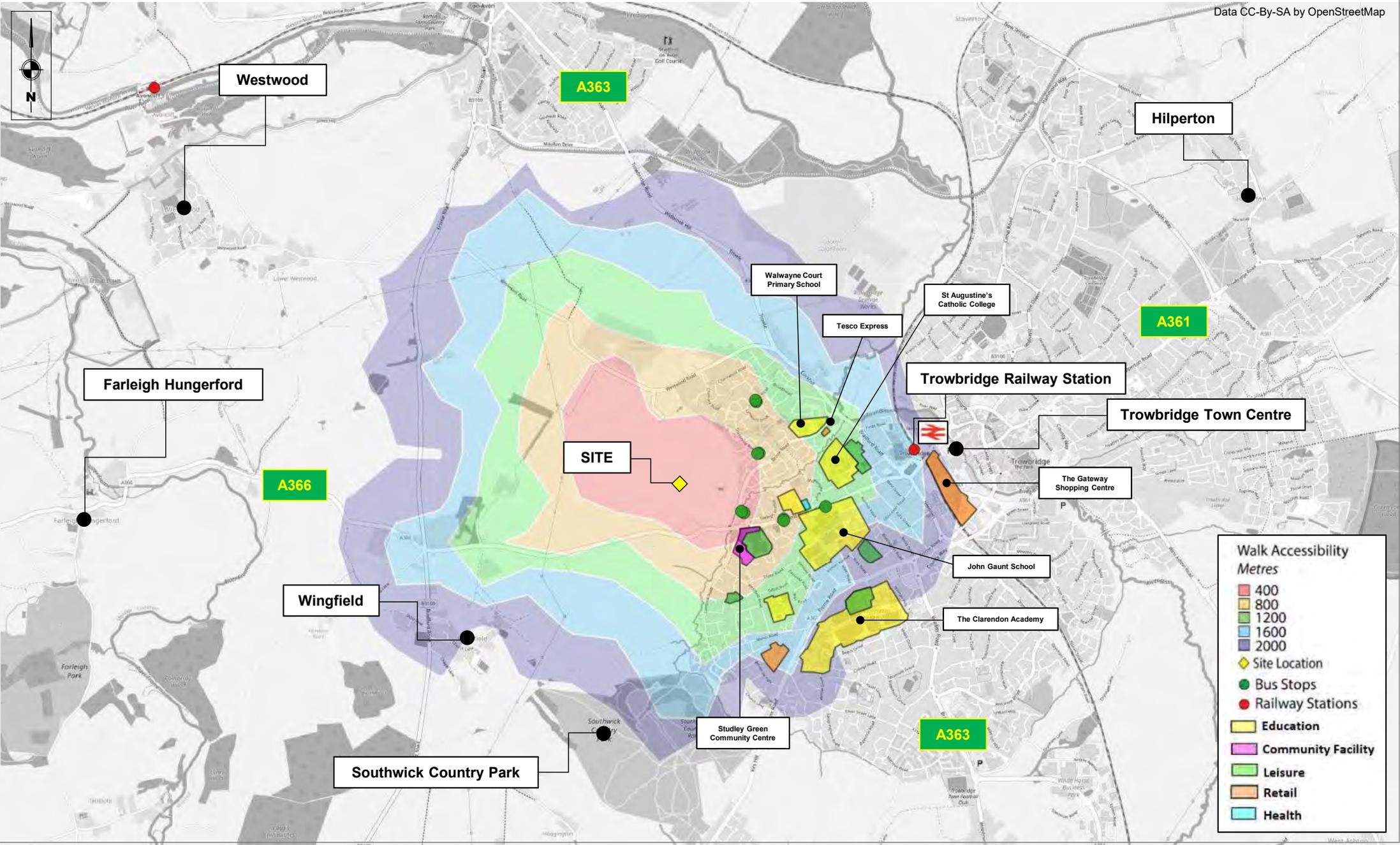
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CLIENT
Barratt Homes Bristol / Vistry

PROJECT
Arnold's Hill Farm Trowbridge

TITLE Existing Local Facilities and Services Plan		HYDROCK PROJECT NO. C-10711-C	SCALE @ A2 1:1000	STATUS S2
FOR INFORMATION		DRAWING NO. 10711-HYD-XX-XX-DR-TP-0601	REVISION PO1	

Appendix B Northern site journey time analysis plans (TRACC)



Project Title
**Arnolds Farm, Trowbridge
 (Vistry Northern Parcel)**

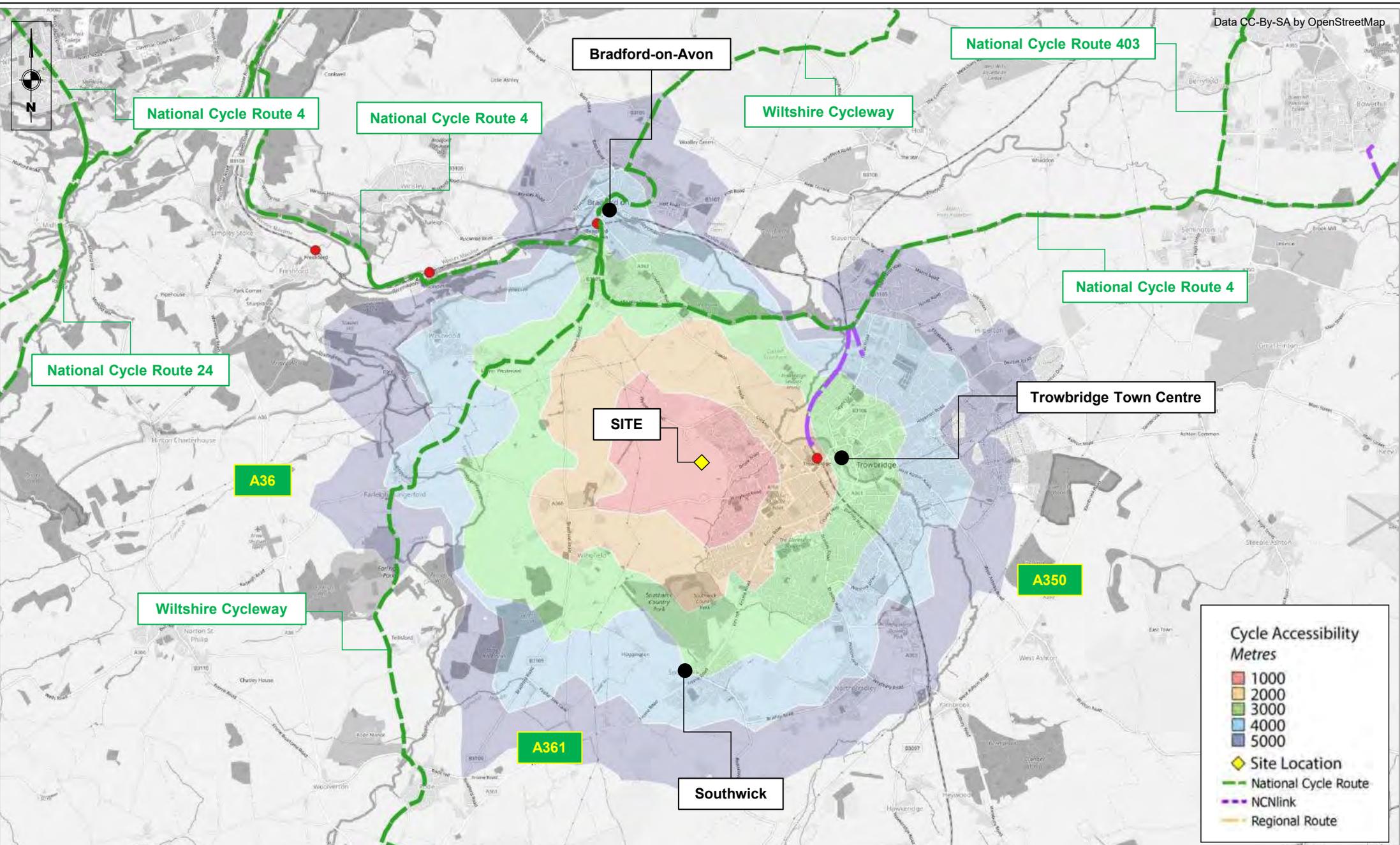
Drawing Title
**Accessibility: 2km Walking
 Catchment**

Job Number	10711	By	SG
Date	26.02.2021	Checked	CR
Scale	NTS	Status	-

Rev	Description	Date	By
P01	2km Walking Catchment	26/02/21	SG
-	-	-	-
-	-	-	-
-	-	-	-

Drawing No.
0001

Figure
1



Project Title
 Arnolds Farm, Trowbridge
 (Vistry Northern Parcel)

Drawing Title
 Accessibility: 5km Cycling
 Catchment

Job Number
 10711

Date
 26.02.2021

Scale
 NTS

By
 SG

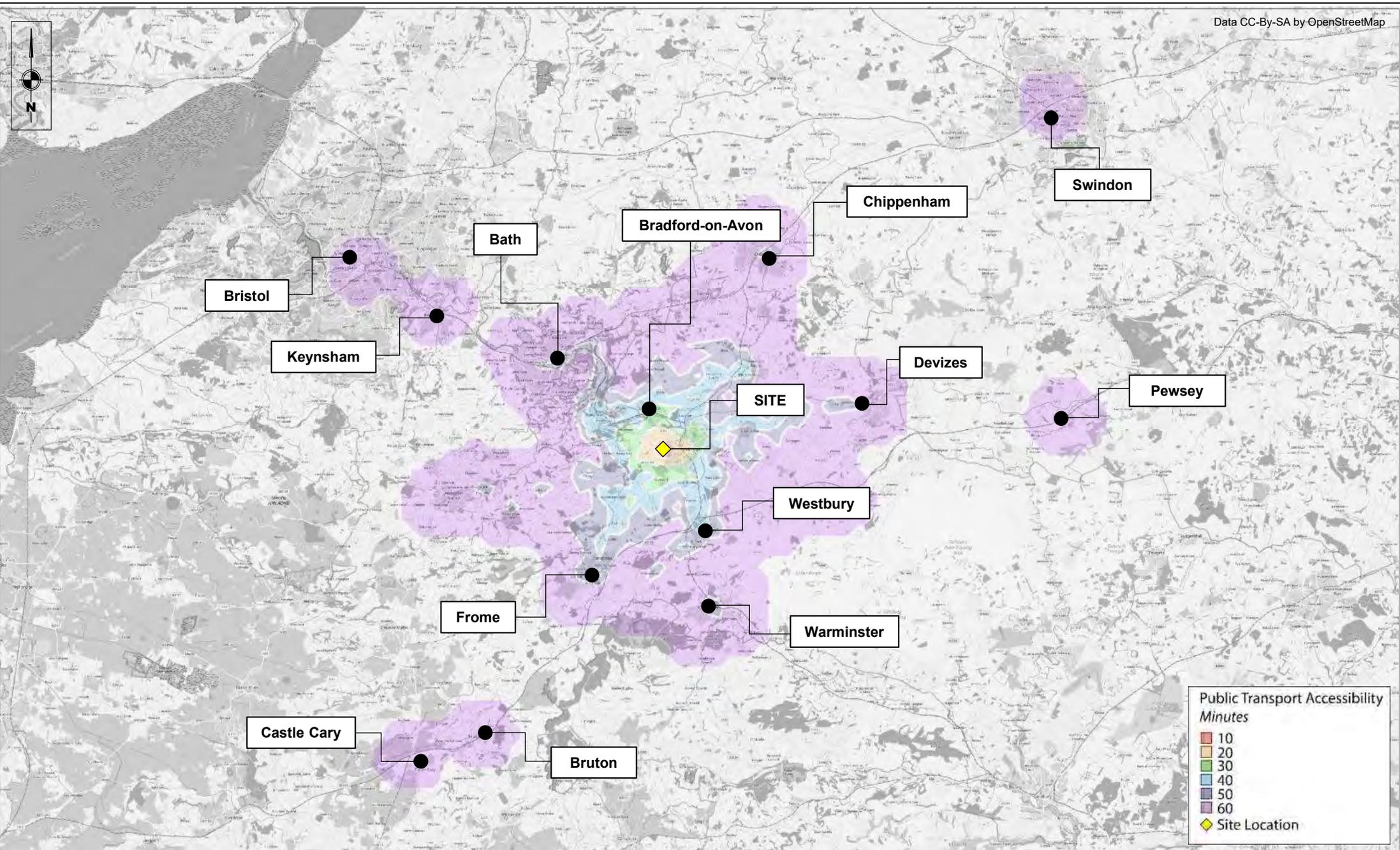
Checked
 CR

Status
 -

Rev	Description	Date	By
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-	-	-	-

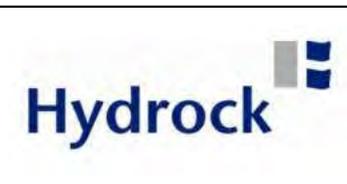
Drawing No.
 0002

Figure
 2



Public Transport Accessibility Minutes

- 10
- 20
- 30
- 40
- 50
- 60
- Site Location



Project Title
Arnolds Farm, Trowbridge (Vistry Northern Parcel)

Drawing Title
Accessibility: 60minute Public Transport Catchment

Job Number
10711

Date
26.02.2021

Scale
NTS

By
SG

Checked
CR

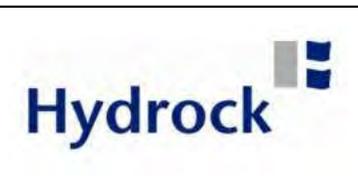
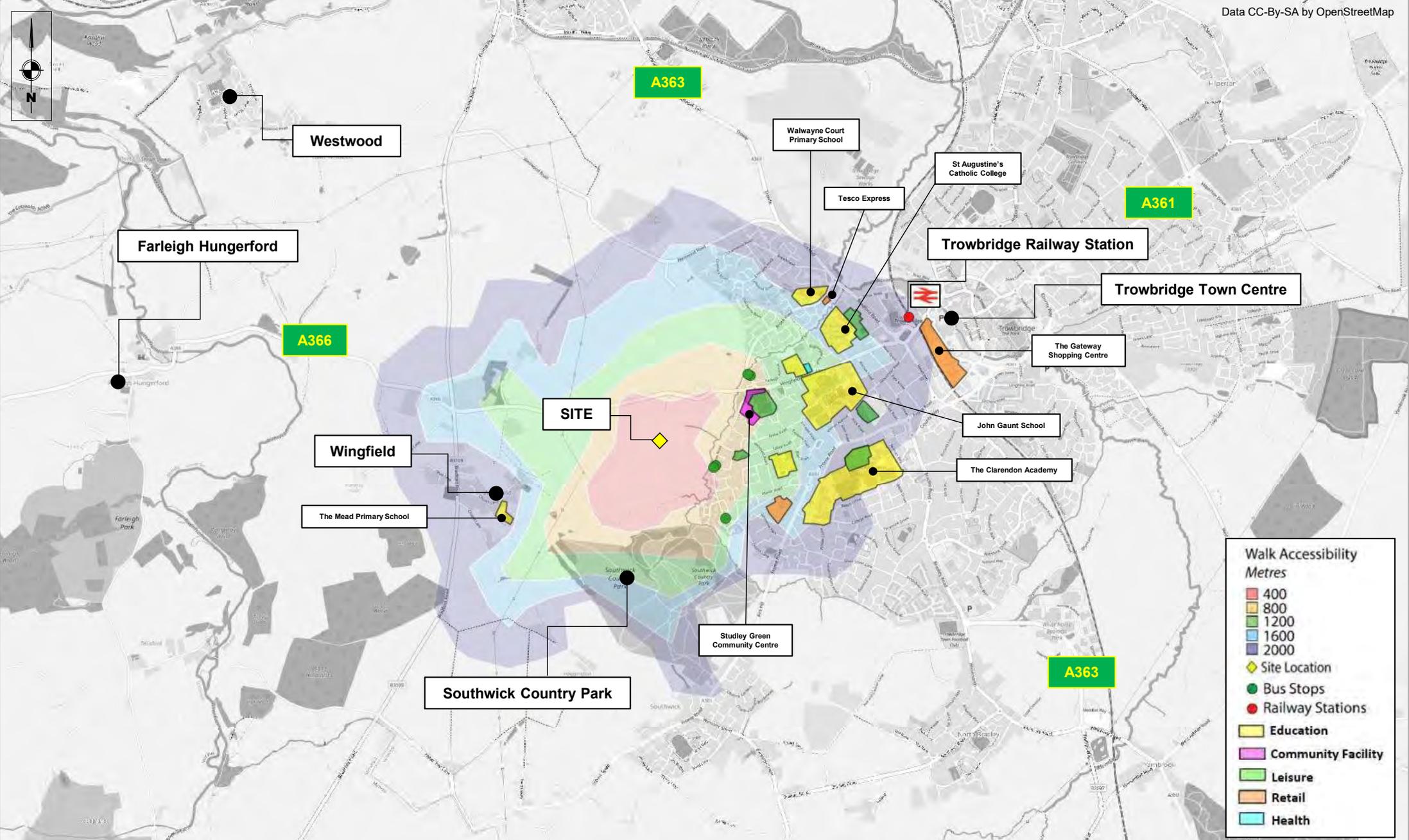
Status
-

Rev	Description	Date	By
P01	Public Transport Catchment	26/02/21	SG
-	-	-	-
-	-	-	-
-	-	-	-

Drawing No.
0003

Figure
3

Appendix C Southern site journey time analysis plans (TRACC)



Project Title
**Arnolds Farm, Trowbridge
 (Barratts Southern Parcel)**

Drawing Title
**Accessibility: 2km Walking
 Catchment**

Job Number
10711

Date
26.02.2021

Scale
NTS

By
SG

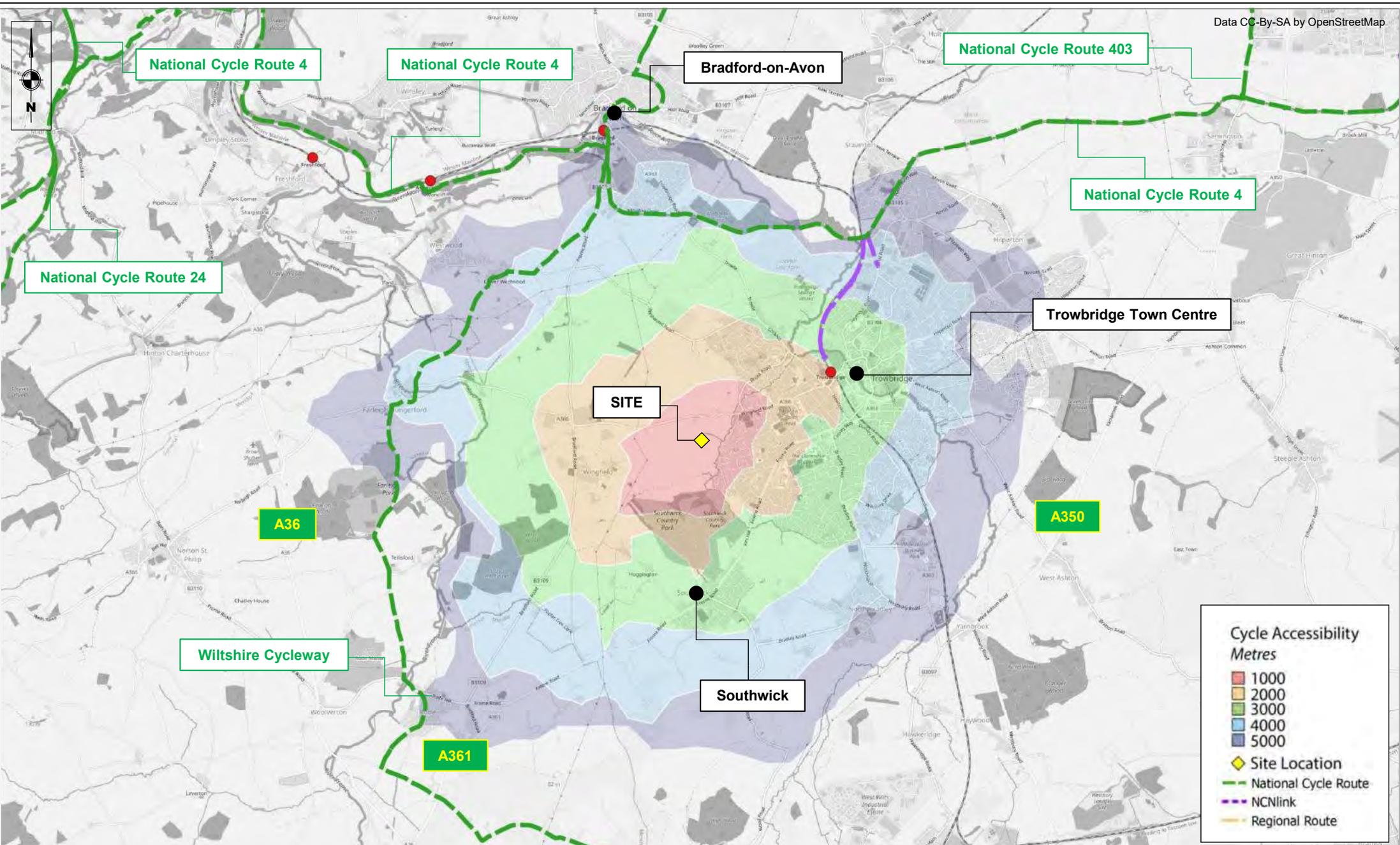
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Status
-

Rev	Description	Date	By
P01	2km Walking Catchment	26/02/21	SG
-	-	-	-
-	-	-	-
-	-	-	-

Drawing No.
0004

Figure
4



Cycle Accessibility Metres

- 1000
- 2000
- 3000
- 4000
- 5000

- Site Location
- National Cycle Route
- NCNlink
- Regional Route



Project Title
 Arnolds Farm, Trowbridge
 (Barratts Southern Parcel)

Drawing Title
 Accessibility: 5km Cycling
 Catchment

Job Number
 10711

Date
 26.02.2021

Scale
 NTS

By
 SG

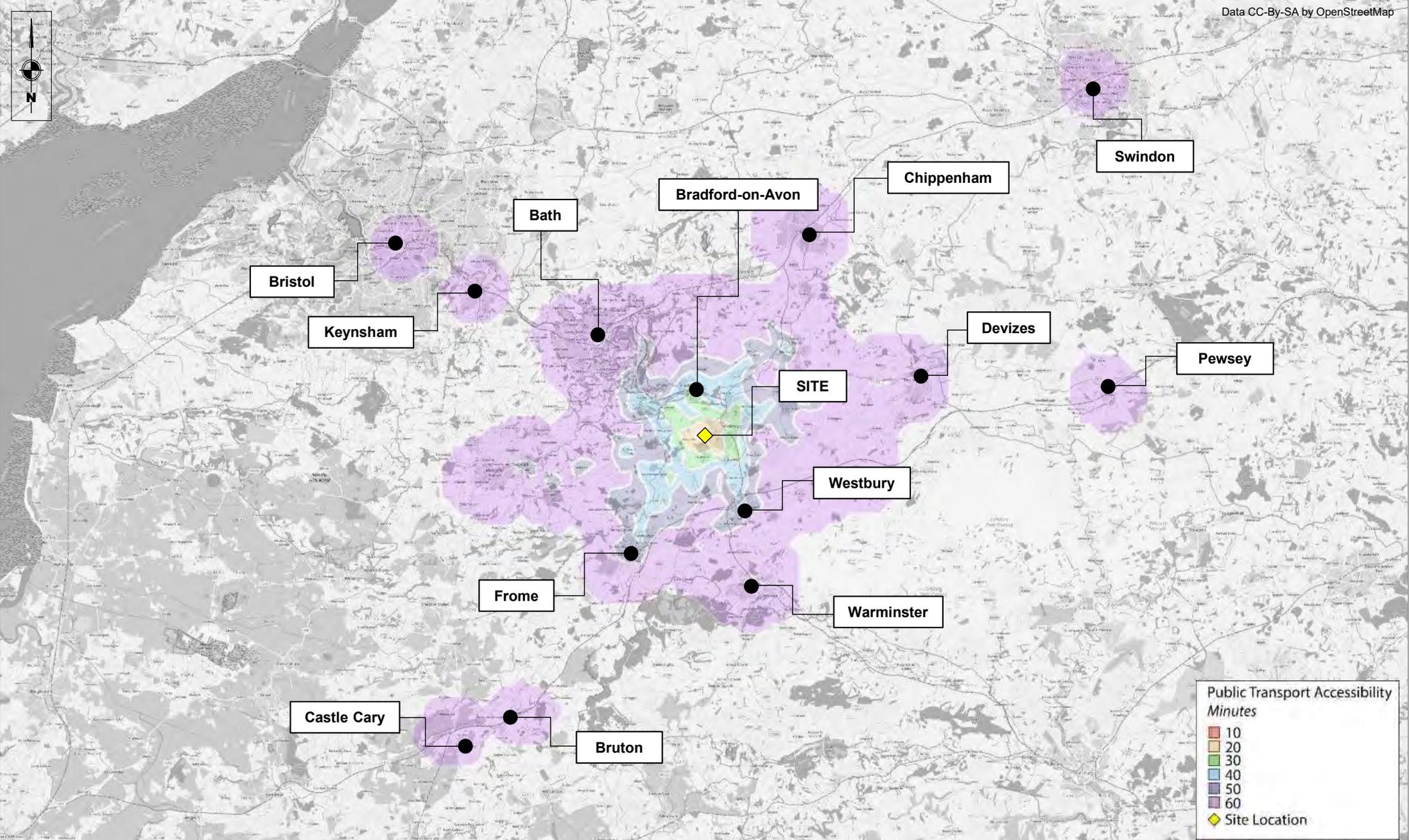
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Status
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Rev	Description	Date	By
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-	-	-	-
-	-	-	-

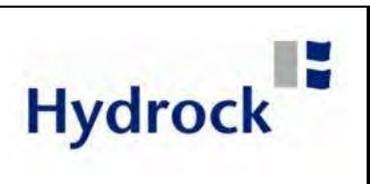
Drawing No.
 0005

Figure
 5



Public Transport Accessibility Minutes

- 10
- 20
- 30
- 40
- 50
- 60
- Site Location



Project Title
 Arnolds Farm, Trowbridge
 (Barratts Southern Parcel)

Drawing Title
 Accessibility: 60minute Public
 Transport Catchment

Job Number 10711
Date 26.02.2021
Scale NTS

Rev	Description	Date	By
P01	Public Transport Catchment	26/02/21	SG
-	-	-	-
-	-	-	-
-	-	-	-

Drawing No.
 0006
Figure
 6



**Land West of
Trowbridge**

**Preliminary
Landscape and
Visual Appraisal
and Green Belt
Assessment**

Prepared by:
**The Environmental
Dimension
Partnership Ltd**

On behalf of:
**Vistry Group and
Barratt Homes**

March 2021
Report Reference
edp2822_r002a

Contents

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Section 2	Findings of Data Trawl	3
Section 3	Landscape Character.....	11
Section 4	Visual Matters.....	19
Section 5	Mitigation and Developable Area	27
Section 6	Green Belt Assessment	29

Appendices

- Appendix EDP 1** Green Belt Assessment Methodology and Criteria
- Appendix EDP 2** Green Belt Assessment
- Appendix EDP 3** Concept Masterplan

Plans

- Plan EDP 1** Site Location and Environmental Planning Context
(edp2822_d009a 08 March 2021 GY/TR)
- Plan EDP 2** Landscape, Visual and Ecological Analysis
(edp2822_d010a 08 March 2021 GY/TR)

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Section 1 Introduction

- 1.1 The Environmental Dimension Partnership (EDP) Ltd have been appointed by Vistry Group and Barratt Homes (Vistry and Barratt) to prepare a preliminary Landscape and Visual Appraisal and Green Belt Review to inform concept masterplanning for potential residential development at Land West of Trowbridge ('the site').
- 1.2 The site location and boundary are shown on **Plan EDP 1** ('Site Location and Environmental Planning Context') with an aerial photograph at **Image EDP 1.1** below. The site abuts the western edge of Trowbridge, Wiltshire and comprises 'Land North of Westwood Road', ('Vistry land'), and 'Arnolds Hill Farm, Trowbridge' south of Westwood Road ('Barratt land').
- 1.3 The main aims of the study are to review the site in respect of its location within the Green Belt (GB) and to inform an early opinion on the potential capacity and design considerations of the site in terms of landscape and visual matters. This work is to inform next steps towards potential residential development of the site.
- 1.4 The study advises on the site's landscape and visual constraints and opportunities through the provision of **Plan EDP 2** ('Landscape and Visual Analysis'). This has informed the 'Concept Masterplan' (**Appendix EDP 3**), which illustrates the potential site capacity and design considerations should the site be progressed.
- 1.5 The key issues relating to landscape and visual and GB matters, and the conclusions drawn at this stage, are outlined in the relevant sections which follow.



Image EDP 1.1: Aerial photograph showing the site and context

Information Sources

Desk Study

- 1.6 EDP's landscape and visual study has included preliminary reviews of aerial photographs, web searches, Wiltshire Council (WC) publications and landscape character assessments. EDP has also obtained, where possible, information about relevant landscape and other designations such as Areas of Outstanding Natural Beauty (AONB), conservation areas (CAs), and registered parks and gardens (RPG).
- 1.7 In addition, a preliminary review of the planning policy context for the site has been undertaken, including the Wiltshire Core Strategy Development Plan Document (2015) and, where relevant, saved policies from the previous District Local Plan (West Wiltshire District Plan 1st Alteration – Adopted June 2004).

Field Assessment

- 1.8 A preliminary field assessment of local site circumstances was undertaken in order to corroborate the findings of the desk study with the current condition of the site. Field assessment was undertaken by a qualified landscape architect on 26 June 2015, 26 June and 06 September 2017, and 26 February 2020, from publicly accessible locations only.

Section 2 Findings of Data Trawl

- 2.1 The findings of EDP's data trawl of relevant environmental and planning designations are illustrated on **Plan EDP 1** and summarised in this section.

National Designations and Policy

- 2.2 The site does not contain or fall within any designated landscape. The Cotswold Area of Outstanding Natural Beauty (AONB) falls over 2km to the north-west, where it wraps around the northern edge of Bradford -on-Avon. However, field assessment has found that there is no apparent intervisibility between the site and the AONB and it is not considered further. In addition, the site lies within the Western Wiltshire Green Belt, which is protected by Section 13 of the National Planning Policy Framework (NPPF) 2019¹ and Planning Practice Guidance – Green Belt (22 July 2019)². Green Belt is, primarily, a planning matter rather than one related to the protection of landscape. However, it does relate to aspects of landscape character such as openness.

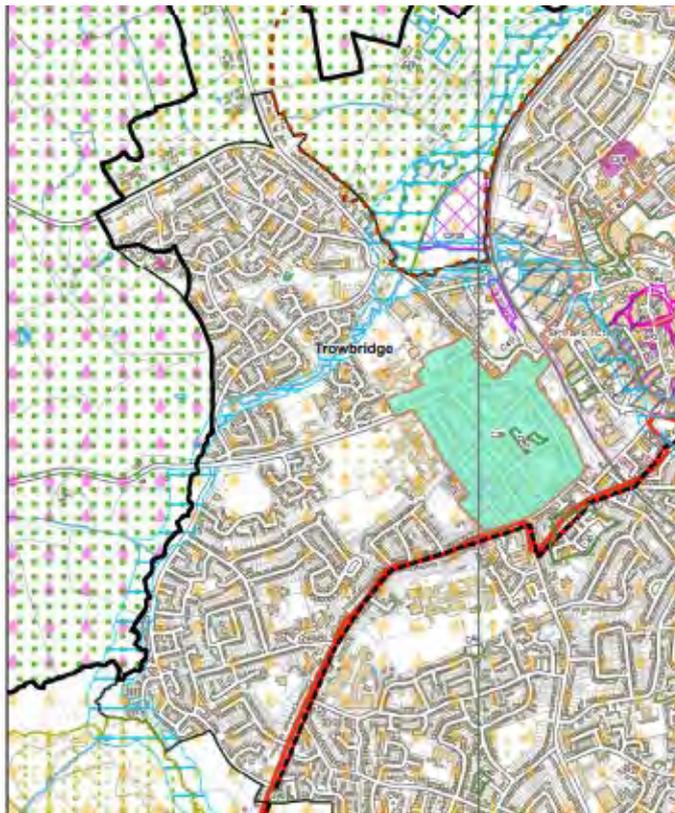
Local Designations and Policy

- 2.3 Relevant documents of the statutory development plan for Wiltshire Unitary Authority comprise the Wiltshire Core Strategy (2015) incorporating saved policies from West Wiltshire District Local Plan³.
- 2.4 An extract of the Core Strategy Policy Map: Insert Map 9: Trowbridge is included at **Image EDP 2.1**. This extract shows relevant policies over the proposed development site and include Green Belt, and Policy CP67 'Flood Risk Zone 2 & 3'. There are no landscape designations identified on the site. However, there are several general policies of relevance to this study as reviewed below.

¹ https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment_data/file/810197/NPPF_Feb_2019_revised.pdf - accessed 02 March 2021

² <https://www.gov.uk/guidance/green-belt> - accessed 02 March 2021

³ <https://www.wiltshire.gov.uk/media/372/Wiltshire-Core-Strategy-adopted-2015/pdf/Wcs.pdf?m=637099399373530000> - accessed 02 March 2021



Legend

- | | |
|---|---|
| Wiltshire Boundary | T4 New Distributor Roads (WWLP) |
| Community Area Boundary | T5 New Link Road (WWLP) |
| CP1 Settlement Framework (WCS) | TC2 Traffic Manage and Pedestrian Priority (WWLP) |
| CP1 Small Village (WCS) | U5 Sewage Treatment Works Buffer Zones (WWLP) |
| H8b, H8c, H11 Residential Allocation (WWLP) | CR2 Country Parks (WWLR DPD) |
| CP2, H4 Mixed Use Allocation (WCS & WWLP) | High Quality and/or High Value Sites (WWLR DPD) |
| E1a Employment Allocation (WWLP) | Low Value Sites (WWLR DPD) |
| CP28 Trowbridge Central Area of Regeneration (WCS) | Railway |
| CP30 Trowbridge Low Carbon Renewable Energy Network (WCS) | Primary Route Network |
| CP35 Principal Employment Area (WCS) | Local Lorry Route |
| CP67 Flood Risk Zone 2 or 3 (WCS) | Strategic Lorry Route |
| C39 Environmental Enhancements (WWLP) | Grade 1 Agricultural Land |
| C40 Tree Planting (WWLP) | Special Area of Conservation or Special Protection Area |
| C41 Areas of Opportunity (WWLP) | Site of Special Scientific Interest |
| CF8, S2, SP2, LE2 Community Facilities (WWLP) | County Wildlife Site |
| SP1, SP5, TC1 Commercial Area Boundary (WWLP) | Parks and Gardens |
| SP4 Primary Retail Frontage (WWLP) | Conservation Area |
| SP6 Local Shopping in Towns and Villages (WWLP) | Green Belt |
| 30% Affordable Housing Zone | 40% Affordable Housing Zone |

Image EDP 2.1: Core Strategy Policy Map: Insert Pap 9: Trowbridge extract

2.5 Saved policies from West Wiltshire District Local Plan of interest here include:

- **Saved Policy C3** ‘Special Landscape Areas’: *“Continue to save. Will be subject to a forthcoming review.”* This policy is not relevant as the site does not fall within, or in close proximity to, any Special Landscape Areas (SLAs);
- **Saved Policy C39** ‘Environmental Enhancement’ relates to the requirement for environmental enhancements in the ‘Newtown’ part of Trowbridge (and other parts of wider Wiltshire), and is therefore not relevant to this site;
- **Saved Policy C40** ‘Tree Planting’ seeks to protect trees with visual amenity value, those subject to Tree Preservation Orders and looks to enhance the town through planting native species characteristic of the local area in certain parts of the town;
- **Saved Policy GB1** ‘Western Wiltshire Green Belt’ is *“No longer relevant as it is covered by the NPPF”*; and
- **Saved Policy GB3** ‘Safeguarded Land Bradford on Avon’ is *“No longer relevant as assessment of housing requirement beyond 2011 has now been undertaken.”*

2.6 Wiltshire Core Strategy (2015) ‘Strategies’ and ‘Core Policies’ of relevance to this study include:

- The ‘Strategy for the Trowbridge Area’ explains what the Spatial Strategy, which is set out in Core Policies 1 and 2, means for the individual Community Areas of Wiltshire, with key elements in landscape terms set out below:

“It is recognised that the villages surrounding Trowbridge, particularly Hilperton, Southwick North Bradley and West Ashton, have separate and distinct identities as villages. Open countryside should be maintained to protect the character and identity of these villages as separate communities. The local communities may wish to consider this matter in more detail in any future community-led neighbourhood planning”; and

“all development in Trowbridge should be sensitive to constraints, such as the local County Wildlife Sites, SSSIs, Ancient Woodland, the Western Wiltshire Greenbelt and areas at risk of flooding.”;

- **Core Policy 50** ‘Biodiversity and geodiversity’ aims to protect features of nature conservation and geological value as part of the design rationale. There is an expectation that such features shall be retained, buffered, and managed favourably in order to maintain their ecological value, connectivity and functionality in the long-term;
- **Core Policy 51** ‘Landscape’ seeks to protect, conserve and enhance Wiltshire’s distinctive landscape character through reference to the European Landscape Convention, as set out below (underlining for emphasis added):

“The European Landscape Convention promotes landscape protection, management and planning, and applies to all landscapes, towns and villages, as well as open countryside; the coast and inland areas; and ordinary or even degraded landscapes, as well as those that are afforded protection. Development on the edges of towns and villages will be broadly controlled in line with Core Policy 3 (Delivery Strategy). However the principal pressure on the landscape arising from new development is erosion of the separate identity, character, visual and functional amenity of settlements and their setting, and impacts on the open countryside. Another challenge is to allow for appropriate development while having full regard to the conservation and enhancement objectives of the most highly valued landscapes including the Areas of Outstanding Natural Beauty (AONBs), New Forest National Park (NFNP) and the Stonehenge and Avebury World Heritage Site (WHS).”

Core Policy 51 also states that *“Work will be undertaken with these LCAs and the AONB Management Plans to establish a Landscape Strategy for Wiltshire early 2015”*. Discussion with the Local Authority Planning department confirms this document is a ‘work in progress’ and is not available currently.

Relevant wording of the full policy is provided below:

“Development should protect, conserve and where possible enhance landscape character and must not have a harmful impact upon landscape character, while any negative impacts must be mitigated as far as possible through sensitive design and landscape measures. Proposals should be informed by and sympathetic to the distinctive character areas identified in the relevant Landscape Character Assessment(s) and any other relevant assessments and studies. In particular, proposals will need to demonstrate that the following aspects of landscape character have been conserved and where possible enhanced through sensitive design, landscape mitigation and enhancement measures:

- i. The locally distinctive pattern and species composition of natural features such as trees, hedgerows, woodland, field boundaries, watercourses and waterbodies;*
- ii. The locally distinctive character of settlements and their landscape settings;*
- iii. The separate identity of settlements and the transition between man-made and natural landscapes at the urban fringe;*
- iv. Visually sensitive skylines, soils, geological and topographical features;*
- v. Landscape features of cultural, historic and heritage value;*
- vi. Important views and visual amenity;*
- vii. Tranquillity and the need to protect against intrusion from light pollution, noise, and motion;*

- viii. *Landscape functions including places to live, work, relax and recreate; and*
- ix. *Special qualities of Areas of Outstanding Natural Beauty (AONBs) and the New Forest National Park, where great weight will be afforded to conserving and enhancing landscapes and scenic beauty.”;*
- **Core Policy 52** ‘Green Infrastructure’ seeks to protect and enhance the green infrastructure (GI) network in Wiltshire, through the provision of the Wiltshire Green Infrastructure Strategy, “*which will define Wiltshire’s existing green infrastructure network, and provide the long term vision, objectives, policy framework, and delivery plan for the enhancement of the network.*”

The policy wording is included below, with key issues relevant to the proposed development underlined:

“Development shall make provision for the retention and enhancement of Wiltshire’s green infrastructure network, and shall ensure that suitable links to the network are provided and maintained. Where development is permitted developers will be required to:

- i. *retain and enhance existing on site green infrastructure;*
- ii. *make provision for accessible open spaces in accordance with the requirements of the adopted Wiltshire Open Space Standards;*
- iii. *put measures in place to ensure appropriate long-term management of any green infrastructure directly related to the development;*
- iv. *provide appropriate contributions towards the delivery of the Wiltshire Green Infrastructure Strategy; and*
- v. *identify and provide opportunities to enhance and improve linkages between the natural and historic landscapes of Wiltshire.*

If damage or loss of existing green infrastructure is unavoidable, the creation of new or replacement green infrastructure equal to or above its current value and quality, that maintains the integrity and functionality of the green infrastructure network, will be required.

Proposals for major development should be accompanied by an audit of the existing green infrastructure within and around the site and a statement demonstrating how this will be retained and enhanced through the development process.

Development will not adversely affect the integrity and value of the green infrastructure network, prejudice the delivery of the Wiltshire Green Infrastructure Strategy, or provide inadequate green infrastructure mitigation.

Green infrastructure projects and initiatives that contribute to the delivery of a high quality and highly valued multi-functional green infrastructure network in accordance with the Wiltshire Green Infrastructure Strategy will be supported.

Contributions (financial or other) to support such projects and initiatives will be required where appropriate from developers.”;

- **Core Policy 57:** ‘Ensuring high quality design and place shaping’ seeks to ensure that the layout and design of new developments is based on a thorough understanding of the site itself and its wider context, and seeks to maximise the benefits of the site’s characteristics; and
- **Core Policy 58** ‘Ensuring the conservation of the historic environment’ aims to protect, conserve and where possible enhance the historic environment including designated heritage assets and their settings and non-designated heritage assets, which contribute to a sense of local character and identity.

Heritage Matters

- 2.7 Heritage assets can influence the visual character of the landscape and enrich its historic value. This report considers heritage features only insofar as they are components of the wider contemporary landscape – not in terms of their significance and value as heritage assets, which is a matter for a heritage consultant.
- 2.8 As illustrated by **Plan EDP 1**, there are no scheduled monuments, registered parks and gardens, registered battlefields or world heritage sites on, or within 2km of, the site. However, the following designated heritage assets fall within 2km of the site:
- 326 listed buildings, primarily within the historic centre of Trowbridge and within Wingfield, including the Grade II* listed church, but also including buildings at Trowle Farm and Arnold’s Hill Farm, which lie between Wingfield and the site boundary; and
 - Trowbridge Conservation Area within the historic centre of Trowbridge.
- 2.9 Within the wider study area, there are also conservation areas across the centre of Bradford on Avon and across Lower Westwood at the eastern end of the village of Westwood. The closest points of both of these conservation areas fall some 2km from the site.

Ecology Matters

- 2.10 Ecology assets can influence the visual character of the landscape and enrich the value of its fabric. This report considers ecology features only insofar as they are components of the wider contemporary landscape – not in terms of their significance and value as ecology assets, which is a matter for an ecology consultant.

- 2.11 The site is not covered by, or adjacent to, any statutory or non-statutory designations for nature conservation.
- 2.12 The majority of the site comprises agriculturally improved, species-poor grassland, and arable land of limited intrinsic ecological value. Habitats of ecological value present on site relate predominantly to the Lambrok Stream, ponds, mature trees present within and adjacent to the site, and the hedgerow network.

Arboricultural Matters

- 2.13 Consistent with the current agricultural land use, there are a number of mature trees across the site primarily associated with the field boundaries and the stream although there are a few individual trees within the fields.
- 2.14 No Tree Preservation Orders (TPO) trees were identified on site from the WC online mapping service⁴.

Public Access and Rights of Way

- 2.15 A review of the definitive map reveals the following public rights of way across the site and context as illustrated on **Plans EDP 1** and **2**.

⁴<http://www.realitygeo.com/explorer.aspx?cfg=wiltspl> – accessed 02 March 2021

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Section 3 Landscape Character

Review of the Published Landscape Character Assessment

- 3.1 The Landscape Character Assessment (LCA) for this area of Wiltshire comprises the West Wiltshire Landscape Character Assessment (2007)⁵. The site falls within Landscape Type E, the 'Rolling Clay Lowland' and, within this, Landscape Area E1: 'Wingfield Rolling Clay Lowland'. The key characteristics, inherent landscape sensitivities, key landscape changes and management strategy and objectives of the landscape area are as follows, with underlining added for emphasis of matters relevant to the site and context:

Key Characteristics

- *"Gently rolling farmland based on clay with a mixture of arable and pasture;*
- *Largely rural character with extensive views;*
- *Distinct pattern of medium sized mostly irregular fields enclosed by mainly intact hedgerows with mature trees;*
- *Small settlements in the form of the village of Wingfield and several scattered farmsteads;*
- *Strong sense of tranquillity away from busy roads;*
- *Pylons as a dominant vertical element."*

Inherent Landscape Sensitivities

- *"Peaceful, rural nature of the area;*
- *The extensive views;*
- *The landscape setting and scale of the village of Wingfield;*
- *The remaining traditional field pattern with the hedgerow boundaries."*

Key Landscape Changes

- *"New developments in and around Wingfield could threaten the small scale of the village;*

⁵http://pages.wiltshire.gov.uk/west_wiltshire_landscape_character_assessment_march_2007_-_final_report.pdf - accessed 02 March 2021

- *Increasing visual intrusion and noise pollution associated with the busy roads;*
- *Potential further decline in traditional management techniques within woodland areas;*
- *Agricultural intensification could result in loss of the traditional field pattern with the network of hedges and hedgerow trees.”*

Management Strategy and Objectives

“The strategy is to maintain the rural, open character of the area with its mosaic of fields and hedgerows, farms and footpaths. Specific management objectives are to:

- *Maintain the open character of the area by resisting any development that would have adverse effects on the extensive views;*
- *Respect the small-scale village character of Wingfield by ensuring that any new development is in line with the vernacular nature of the existing buildings;*
- *Conserve the traditional field pattern by promoting new planting to repair gaps in the hedges and by encouraging ecological farming.”*

- 3.2 The visual characteristics are described as follows, with underlining added where particularly relevant to the site:

“The area has a generally rural character with a mixture of pasture and arable farmland. The B3109 which connects Bradford-on-Avon and Frome, and the A366 Trowbridge to Radstock road cut across the area, meeting in the village of Wingfield. Despite this junction of two busy roads there is a fairly strong sense of tranquillity in Wingfield and surroundings. The settlement pattern further consists of a scattering of farmsteads and manors, connected by a network of footpaths and rural roads. The medium to large sized, irregular fields, are typically bounded by hedgerows with mature trees. The condition of the hedgerows varies, being gappy in places and intact in others. Views are panoramic throughout the area with the chalk downland being visible looking south. The pylons, which are plentiful, together with some large-scale industrial buildings on the outskirts of Trowbridge – such as the sewage works – detract slightly from the rural character of the area.”

- 3.3 The site is consistent with the majority of the key characteristic of the LA, namely gently rolling farmland down to a mixture of arable and pasture and with a distinct pattern of medium sized, mostly irregular, fields enclosed by mainly intact hedgerows with mature trees, and with pylons as a dominant vertical element. Across the landscape, there are small settlements including the village of Wingfield and several scattered farmsteads.

- 3.4 However, this is a description of a relatively broad area and, unsurprisingly, does not capture matters that are of specific relevance to the character of the site and immediate context. Whilst falling within the rural area beyond the settlement boundary, the site’s rural

nature and tranquillity is diminished by: the definite urban influence across the eastern site area where land abuts, and slopes towards, the neighbouring residential areas which therefore provides the major contextual influence on its character and tranquillity here; the roads to the north (Westwood Road) and through the centre of the site (Wingfield Road (A366)); the deterioration and loss of hedgerows across the site; the over-head cables crossing the site; and the pylons and mast immediately to the west, and crossing the north-western site area, which detract from the rural character of the site's outward facing slopes and tops.

On-site Character Assessment

- 3.5 The site comprises agricultural fields, or parts thereof, north and south of the Wingfield Road (A366) at the western edge of Trowbridge. The site abuts the settlement edge of Trowbridge to the east, albeit being set back beyond the Lambrok Stream to the south, and agricultural land to the west. Wingfield Road (A366), and adjacent private dwellings to the north and south, are excluded from the site.
- 3.6 To the north, the site boundary is formed by Westwood Road and in part, by private dwellings and their curtilage, with agricultural land beyond. To the south, the site boundary is formed by the Lambrok Stream, which marks the parish boundary, with Southwick Country Park to the south separated from the site by a narrow strip of agricultural land used for horsiculture.
- 3.7 The topography of the site reflects the gently rolling nature of the host Landscape Area E1: 'Wingfield Rolling Clay Lowland'. Broadly, the site land is located on the watershed between the Wid Brook and the River Frome and tributaries, to the north and west, and the Lambrok Stream, which forms the south-eastern and southern site boundaries. As illustrated on **Plan EDP 2**, the north-western area of the site falls across a broad, apparently flat, ridge, from which the land falls away across the north-western corner of the site. A shoulder protrudes south from the broad ridge to the east of Arnold's Hill Farm, falling gently and then rising to two distinct tops to the north and south the Wingfield Road (A366). These comprise Arnold's Hill (c.55m above Ordnance Datum (aOD), to the north, and an unnamed top marked by a mast (c.60m aOD), to the south. From these tops, the site land falls east, towards the settlement, and south-east, towards the country park, which rise up the gently sloping facing slopes.



Image EDP 3.1: View east towards the settlement from southern hill top



Image EDP 3.2: View west from southern hill-top across the agricultural landscape with pylons

- 3.8 In addition to the Lambrok Stream, along the south-eastern and southern boundaries (see **Image EDP 3.3**), there is a small stream running east from Arnold's Hill Farm. There are some six ponds across the northern site area, some of which were dry at the time of the walkover survey.



Image EDP 3.3: Lambrok stream at the eastern sit boundary south of Wingfield Road (A366)

- 3.9 The site generally comprises medium to large fields of improved pasture or arable land enclosed by a mixture of mature hedgerows and cut hedges and occasional fences (see **Image EDP 3.4**). There is a semi-mature tree belt along a section of the ridge, mature trees scattered along the field boundaries and occasionally within fields, and a few small copses, primarily surrounding the ponds across the northern site area. There is evidence of hedgerow removal, with short lengths of remnant field boundaries and tree lines. The remaining hedges are generally in decline, which detracts from the character of the area.



Image EDP 3.4: View across the southern site area showing a variety of field boundaries and remnants.

- 3.10 The urban area is a prominent feature to the east. To the north, the settlement edge abutting the site is marked by an ad-hoc mixtures of fencing, trees and hedgerows, which provides a stark, unsympathetic and visually permeable edge to the town, as illustrated at **Image EDP 3.5** below.



Image EDP 3.5: The settlement edge to the north of Wingfield Road (A366) where it is marked by an ad-hoc selection of boundaries

- 3.11 To the south, the urban edge is set back beyond the Lambrok Stream which is lined by vegetation to the east. This provides some softening of the settlement edge here, although the settlement is still very much apparent as illustrated at **Image EDP 3.6** below.



Image EDP 3.6: The settlement edge to the south of Wingfield Road (A366) where it is set back beyond the stream corridor

- 3.12 There are several public rights of way (PRoW) running throughout the site (see **Plan EDP 1**), and linking to the wider agricultural and settlement landscapes abutting the site.
- 3.13 The site is broadly representative of the landscape type within which it sits, although as mentioned above, there are some key divergences – in particular the extent to which the urban area influences the eastern site area. For this reason, there is a reduced sensitivity to development in this area. This is only furthered by the overhead cable crossing eastern site area and the loss and degradation of field boundaries and the pattern and scale that they provide.
- 3.14 The western site area falls further from the settlement edge and has a western aspect so that it has limited visual connectivity with it. For these reasons, this western site area is more tranquil. However, this tranquillity is still tempered by views to pylons, to the west and

crossing the north-western site area, large industrial farm sheds, and the adjacent busy Wingfield Road (A366), see **Image EDP 3.7**.



Image EDP 3.7: Views from the site across the western site context including to pylons and large industrial style farm sheds that detract from the character of the landscape

- 3.15 In summary, the site is consistent with the majority of the key characteristic of the host Landscape Area E1: Wingfield Rolling Clay Lowland', namely gently rolling farmland down to a mixture of arable and pasture and with a distinct pattern of medium sized, mostly irregular, fields enclosed by mainly intact hedgerows with mature trees, and with pylons as a dominant vertical element. Across the landscape, there are small settlements including the village of Wingfield and several scattered farmsteads.
- 3.16 However, the site's rural nature and tranquillity is diminished by: the definite urban influence across the eastern site area; the roads to the north (Westwood Road) and through the centre of the site (Wingfield Road (A366)); the deterioration and loss of hedgerows across the site; the overhead cables crossing the site; and the pylons and mast immediately to the west, and crossing the north-western site area, which detract from the rural character of the site's outward facing slopes and tops.
- 3.17 This study also finds that the topography of the site broadly defines different character areas within the site. The eastern slopes are oriented towards and lie adjacent to the settlement edge which rises away across the facing slopes. Further, these slopes are visually divorced from the wider agricultural landscape to the west. The eastern site area therefore has a peri-urban character. This character reduces across the tops and west-facing slopes where the primary visual influences are increasingly derived from the adjacent agricultural landscape.
- 3.18 The value of the landscape, in terms of its fabric and features, is moderate by virtue of the loss and decline of many field boundaries and the pattern that they provide. Such features, as advised through planning policy and general good practice, should be retained and enhanced in any future development proposal.

3.19 Based upon this evaluation, the following elements should be considered in response to the local landscape character evaluation:

- Protect the rural open character of the wider area by ensuring that proposed development does not have any adverse affects on key views and tranquillity through screening and integration of the development, using and enhancing existing topography and vegetation and creating locally characteristic natural areas to provide a semi-rural interface between the development and the rural context;
- Retain locations for long distance views to landmarks from within the development;
- Protect the landscape setting of Wingfield by minimising intervisibility through informing the extent of the proposed development here, and the use of existing topography and existing, enhanced, vegetation for screening;
- Retain and strengthen the remaining traditional field boundary hedgerows and the pattern that they provide;
- Retain, protect and enhance other characteristic landscape elements including trees, ponds, and watercourses; and
- Ensure the PRoW that run through the site are considered, wherever possible, in terms of historic routes the linkage that they provide and their green, open, character and views.

Section 4 Visual Matters

- 4.1 Visibility to the site is more contained than might be expected for a site of this size and where there are views into the site area they are limited by the topography and vegetation within the site.
- 4.2 The eastern site area is visually contained by a combination of topography and vegetation, to the north and west, the settlement edge to the east, and by vegetation at the site boundary and across the country park c.250m to the south.
- 4.3 The more elevated nature and westerly aspect of the northern and western site areas means that they are more exposed in views from the wider rural landscape. However, the rolling nature of the topography of Landscape Type E: 'Rolling Clay Lowland' limits opportunities for elevated views, and consolidates the screening effect of topography and vegetation across the lowland, limiting substantive views to the site to within less than 1km of the site.
- 4.4 It should also be noted that there is limited potential for visibility to the site, including the more elevated northern and western site area, from more elevated locations to the west of the River Frome including open slopes around Bradford on Avon and Westwood, to the north and north-west, and at Farleigh Hungerford, to the west. This is due, in part, to distance, the limited elevation, and the screening effect of intervening vegetation and topography.
- 4.5 Principal potential visual receptors would be predominantly limited to:
- Users of the PRoW through the site (**Images EDP 4.1 to 4.6**);
 - Users of the PRoW running parallel to, and beyond, the western site boundary east of Wingfield, to the south, and north of Trowle Farm, to the north (**Images EDP 4.7a and 4.7b**);
 - Visitors to St Mary's Church at Wingfield (**Image EDP 4.8**);
 - Users of the Wingfield Road (A366) and Westwood Road where they run adjacent to, and some 100m or so beyond, the site (**Images EDP 4.9 and 4.10**); and
 - Residents at the western edge of Trowbridge and of the few properties adjacent to the northern boundary and off Wingfield Road (A366) (**Images EDP 4.11 and 4.12**).

PRoW Crossing the Site

- 4.6 **Images EDP 4.1** and **4.2** show the nature of parts of the PRoW crossing the site, which would obviously change as a result of the proposed development. It will be important, through the masterplanning of the site, that such rural links are preserved, and managed appropriately to ensure that some sense of rurality is maintained.



Image EDP 4.1: PRoW running south from Westwood Road



Image EDP 4.2 PRoW south of Wingfield Road (A366) with properties north of the road (off site) in the background

- 4.7 From the highest and most exposed parts of the site there are views over Trowbridge southwards towards the elevated chalk downland, noted as characteristic of the landscape area, as shown in **Image EDP 4.3**. It is important that some views to the downland are retained, notably from PRoW, due to their characteristic nature; their high quality; and the context of the users of the PRoW, who, will have a high sensitivity in landscape and visual terms.



Image EDP 4.3: Views towards elevated chalk downland, southwards for the north-eastern site area

- 4.8 From the more elevated east facing slopes and tops, notably at Arnold Hill and the hill to the south, there are also views across Trowbridge, to the east, that include the local landmarks provided by the spire of St James Church and the less obvious tower of the Holy Trinity Church (**Image EDP 4.4**). There are also views, notably from the north-western site area, to more elevated areas of Bradford on Avon, and high ground to the west (**Image EDP 4.5**), and glimpsed views to St Mary's Church protruding above the trees at the southern edge of Westwood, to the north-west (**Image EDP 4.6**).



Image EDP 4.4: View from Arnold Hill east across Trowbridge including the spire of St James Church and the less obvious tower of the Holy Trinity Church



Image EDP 4.5: View from the elevated north-western site area to areas of Bradford on Avon



Image EDP 4.6: Views from the elevated north-western site area to St Mary's Church protruding above the trees at the southern edge of Westwood

PRoW to the West of the Site and Visitors to St Mary's Church at Wingfield

- 4.9 **Images EDP 4.7** and **4.8** show that despite glimpsed views to the settlement edge of Trowbridge, to the south, the landscape between Wingfield and the site has a predominantly rural character that provides the landscape setting for Wingfield. To protect this character development would need to be screened along the southern section of the western boundary.



Image EDP 4.7a and b: Panorama from the PRoW between St Mary's Church and Arnold's Hill Farm to the western site boundary across the hill marked by the mast. Properties at the western edge of Trowbridge are apparent to the south



Image EDP 4.8: Views from St Mary's Church to the western site boundary across the hill marked by the mast. Properties at the western edge of Trowbridge are apparent to the south

Users of Westwood Road and Wingfield Road (A366)

- 4.10 There would be views to the site from the Westwood Road, and Wingfield Road (A366), where they run adjacent to, and some 100m or so beyond, the site, as illustrated by **Images EDP 4.9** and **4.10**.
- 4.11 **Image EDP 4.9** shows the rolling nature of the topography at the western edge of the site that predominantly screens views to Trowbridge and the eastern site area north and south of the road. The low visibility to the settlement edge means that this area has a rural character that would be sensitive to development.



Image EDP 4.9: Views from Wingfield Road (A366) west of Arnolds Hill Farm looking east. Properties at the western edge of Trowbridge are just apparent to the north

- 4.12 **Image EDP 4.10** illustrates the urbanising effect of suburban properties beyond the settlement edge of Trowbridge that reduces the sensitivity of the road here to sensitive development.



Image EDP 4.10: Views from Westwood Road west of properties beyond the western settlement edge illustrating that this section of road is already urbanised to some degree

Views from Residential Properties

- 4.13 Views towards the site from the residential/urban area to the east of the northern area are illustrated at **Image EDP 4.11** while those from the residential/urban area to the east of the southern area, are illustrated at **Image EDP 4.12**. **Image EDP 4.11** shows that there would be some open views into the site to the north, where open space and roads abut the open site boundary. There would also be views into the site from the rear and side of residential properties abutting the boundary although these would be limited, to some degree, by garden fencing and planting within the gardens. **Image EDP 4.12** shows that there would be more limited views into the site to the south due to vegetation along the stream although more properties here front onto the site. Care would clearly be required to ensure that the site adjacent to these existing residential areas is sensitive and well-considered.



Image EDP 4.11: Views from Brook Road at the edge of the residential area to the east of the northern site area



Image EDP 4.12: Views from Lambrok Road at the edge of the residential area to the east of the southern site area

- 4.14 On balance, although the site appears well-screened from many areas, there are a number of key visual issues to consider in the development of proposals for the site, in particular:
- Ensuring that the new settlement edge adjacent to the agricultural landscape is designed to protect the rural character of this landscape, notably across the landscape setting to Wingfield, and providing a positive contribution to the landscape west of Trowbridge, and the western gateway into the town, that improves on what exists. This is to be achieved through the use of existing natural topographical and vegetation features to provide a defensible, substantially screened new settlement edge that is sensitively designed, in terms of elevation, mitigation planting, set back/indentation, height, massing, orientation and materials and colour of development to ensure that it integrates with the adjacent rural landscape;
 - Ensuring that the new settlement limit does not extend along road corridors to an extent that it detracts from the character of these routes or is intrusive in the rural landscape to the west of the town;
 - Ensuring that the visual amenity of existing residential areas and roads to the east are considered in terms of, primarily, setback and orientation of development with mitigation planting where appropriate;
 - Ensuring that views towards the elevated chalk downland to the south, and the rural landscape to the west, are retained, from within proposed areas of public open space across the tops of Arnold's Hill, the hill top to the south, and/or the ridge to the north; and
 - Consider retention of visual connections to local landmarks across the site context including to St Mary's Church and church towers and steeples within Trowbridge.

Section 5

Mitigation and Developable Area

- 5.1 This preliminary assessment finds that the eastern site area is more visually contained and relates visually, and physically, to the settlement edge whilst the more elevated northern, western and southern site land would be more visible from the surrounding agricultural landscape. Further, this land has limited intervisibility and physical connectivity with the settlement edge. Any masterplanning exercise should take this into account with development primarily located across the lower ground of the eastern site area and existing elevated tops and vegetation used to limit visual impact to the north, west and south, and form the basis of further planting and open space to ensure that the development is well integrating into its rural context.
- 5.2 This latter point is perhaps more important given the Green Belt location of the site and potential that exists for the development to appear as a westerly 'spread' of the current settlement edge from some, albeit limited, locations. It may be that areas of public open space (or very low density development) are located in the more western and southerly parts of the development area with denser development to the east so as to take advantage of the existing urban influences on the eastern site area.
- 5.3 This is particularly important to the south-west and south of the site given the proximity of Wingfield, within the Green Belt, and the sensitivity of its landscape setting. Here consideration should be given to limiting intervisibility between the site and this landscape setting. This to be achieved by setting new development on the lower parts of the site, with a strong woodland belt along the lower, southern section of the western boundary, and along the southern boundary near the country park.
- 5.4 Appropriate mitigation to protect the visual amenity of existing residents, both at the settlement edge, and more dispersed, should be considered. This to be achieved through development setback and orientation, and mitigation planting where appropriate. Set-back along the eastern site boundary would also allow for incorporation of the existing stream corridor and flood zones 2 and 3 and new sustainable draining scheme features within a green corridor at the eastern development edge.
- 5.5 Consideration should also be given to a strategy to deal with the PRoW that run through the site. This in terms of retaining connectivity between the existing and proposed development and the wider rural landscape; retaining key views to the downland and other landmarks across the rural and settled site context; and retaining their existing green, open character through incorporation in green corridors wherever possible.
- 5.6 Other landscape and visual considerations for development of the site, with reference to specific mitigation, would include:
- Retention, wherever possible, and positive integration of the existing trees and hedgerows, watercourses, ponds, and PRoW to form the basis of the green infrastructure across the site;

- Retention of southerly views from elevated ground towards the elevated chalk downland to the south and the wider rural landscape to the west;
- Consideration of retention of visual connections to local landmarks across the site context including to St Mary's Church Wingfield, Westwood Church, and Bradford on Avon;
- Consideration of views from, and the character of, the wider road network, especially where they run adjacent to the site on the westerly approach and gateway to Trowbridge; and
- Provision of a multifunctional green infrastructure across the site that incorporates existing key features and PRow, and has the potential to accommodate proposed features including SuDS, that links across the site and into green corridors and open spaces within the settlement edge, to the east, and the wider GI, provided by hedgerows and watercourses, elsewhere. This could perhaps be designed to be incorporated into the emerging Wiltshire Green and Blue Infrastructure Strategy and to support the Nature Recovery Network through appropriate consultation and advice from the Local Planning Authority (LPA).

Section 6 Green Belt Assessment

Introduction and Context

- 6.1 The Green Belt (GB) Assessment tests whether bringing forward sustainable development on this site would allow the key purposes of the GB, in the context of the wider settlement of Trowbridge, to be maintained, or possibly even enhanced. The assessment considers the extent to which a continued sense of openness can be maintained within the tract of land between Trowbridge and settlements within the wider landscape to the west and north-west, particularly Bradford on Avon, Westwood, and Wingfield.
- 6.2 The NPPF requires demonstration that land contributes towards the two essential characteristics of openness and permanence, by meeting one or more of five purposes, or 'tests', of GB designation. These tests are set out at NPPF Paragraph 134 as follows:
1. *"To check the unrestricted sprawl of large built-up areas;*
 2. *To prevent neighbouring towns merging into one another;*
 3. *To assist in safeguarding the countryside from encroachment;*
 4. *To preserve the setting and special character of historic towns; and*
 5. *To assist in urban regeneration, by encouraging the recycling of derelict and other urban land."*
- 6.3 The purposes are set out in more detail in **Appendix EDP 1**.
- 6.4 It has been established by case law (Appeal Ref APP/P2935/A/14/3000634) that openness is defined by *"an absence of buildings or other forms of development"*. However, the case of Turner⁶ is important as it makes clear that a visual dimension should be included within any Green Belt Assessment.

Local Level Considerations

- 6.5 At a local level, GB policy is contained at West Wiltshire District Plan 1st Alteration – Adopted June 2004 Saved Policies GB1: 'Western Wiltshire Green Belt', and GB3: 'Safeguarded Land Bradford on Avon'. The Wiltshire Core Strategy (January 2015) states that:

⁶ John Turner v Secretary of State for Communities and Local Government and East Dorset District Council [2016] EWCA Civ 466

- Saved Policy GB1: ‘Western Wiltshire Green Belt’ is “*No longer relevant as it is covered by the NPPF, the purposes of which are considered above*”; and
- Saved Policy GB3 ‘Safeguarded Land Bradford on Avon’ is “*No longer relevant as assessment of housing requirement beyond 2011 has now been undertaken.*”

6.6 Wiltshire Council have not undertaken any sort of GB study or review to date; however, the Wiltshire Core Strategy Local Adopted Plan (2015) does list the purposes specific to the West Wiltshire Green Belt (WWGB). The Core Strategy states that the principal purpose of the GB is to “*check the expansion of towns in the area, principally Bristol and Bath, and to safeguard surrounding countryside*” (Paragraph 6.87) while its particular objectives are to:

- “*maintain the open character of undeveloped land adjacent to Bath, Trowbridge and Bradford on Avon*
- *prevent the coalescence of Bradford on Avon with Trowbridge or the villages to the east of Bath*
- *limit the spread of development along the A4 between Batheaston and Corsham*
- *protect the setting and historic character of Bradford on Avon.*

Applications for development within the Green Belt will be determined in accordance with national planning policy”.

6.7 In the absence of any more detailed GB assessments or reviews produced by, or on behalf of, the Council, this report undertakes a focussed exercise to understand the importance of the area of GB which contains the site. It does so, not based upon importance as measured by, for example, local people or the LPA, but in terms of the specific ‘purposes’ of the GB, as defined by the NPPF, and the principal purposes and objectives specific to WWGB as defined by the Core Strategy, as set out above.

Green Belt Assessment: Methodology

6.8 EDP have developed a methodology for Green Belt Assessment, which is based on landscape and visual assessment methodology with regard to the purposes of the GB, and our experience of GB reviews.

6.9 For each NPPF purpose, EDP has defined criteria that allows for an analysis to be undertaken, in landscape and visual terms, of the contribution the site makes to the open character of the GB in this location. The criteria relating to each purpose are set out in **Appendix EDP 1**.

6.10 The site is scored against the criteria listed for each purpose at **Appendix EDP 2**, with criteria scoring levels set out in **Table EDP 6.1** below.

Table EDP 6.1: GB Scoring level definitions.

Colour Code	Contribution to the Green Belt Purpose
	Limited contribution
	Moderate contribution
	Strong contribution

- 6.11 The grading of overall scores reflects the contribution the site makes towards meeting the purposes of the Green Belt. This ensures that, whilst the NPPF does not require all five purposes, or tests, to be met simultaneously, the extent to which a site contributes to the criterion of a specific purpose will better inform the decision for it to be removed from the GB or retained within it.

Green Belt Assessment: Findings

- 6.12 The GB assessment is undertaken at **Appendix EDP 2** with the findings summarised in **Table EDP 6.2** below.

Table EDP 6.2: Summary of Assessment provided at **Appendix EDP 2**

GB Purpose	Contribution to the Green Belt Purpose
Purpose 1: To check the unrestricted sprawl of large built-up areas	
Does the site form a contiguous open buffer between the existing settlement edge and the wider countryside?	Limited
Does the site have a defensible boundary which can prevent sprawl?	Limited
Purpose 2: To prevent neighbouring towns merging into one another	
Is the site well associated with the existing settlement edge?	Limited
Given the distance between the whole of the site and next nearest settlement edge, what is the effect of the perceived and actual intervisibility or potential for coalescence?	Limited
Purpose 3: To assist in safeguarding the countryside from encroachment	
To what extent does the site represent the key characteristics of the countryside?	Moderate
To what extent is the site urbanised, either by on-site or off-site features?	Moderate
Purpose 4: To preserve the setting and special character of historic towns	
What is the spatial and visual relationship between the site and the historic core of the nearest towns?	Limited

- 6.13 This assessment does not include consideration of the potential of the site to address all NPPF paragraphs relating to the GB. However, insofar as the considerations addressed here, the findings demonstrate that the site as a whole makes a moderate contribution to the GB. As would be expected for a large site of this nature, different parts of the site will vary in the contribution that they make to the GB, with the eastern site area contributing less than the western area due to its visual relationship to the settlement edge and relative visual enclosure. A summary discussion of the findings in relation to each of the purposes is provided below.

Purpose 1: To Check the Unrestricted Sprawl of Large Built-up Areas

- 6.14 This assessment considers how the site and its features contribute towards the openness of the GB and the potential to create a permanent boundary should it be taken out of the designation. The site comprises farmland that forms a small part of an expansive area of agricultural land forming a continuous buffer between Trowbridge and Bradford on Avon and Westwood, to the north and north-west, and a more limited area between Trowbridge and Wingfield, to the west. The development area of the site forms a more limited part of the gap. Openness could be retained across the remaining, undeveloped, GB area.
- 6.15 As shown on the Concept Masterplan at **Appendix EDP 3**, the proposed development is delineated by clearly definable boundaries that follow an existing road, to the north, a vegetated stream corridor, to the south, the built edge of Trowbridge, to the east, and existing field boundary hedgerows, to the west. Should development be delivered in the manner indicated on the Concept Masterplan a defensible boundary would be created to contribute further to a definitive visual separation between Trowbridge and the countryside, and settlements beyond, notably the closest settlement of Wingfield to the south-west.
- 6.16 Intervisibility between the site and the wider agricultural landscape is limited by topography and vegetation at the site boundaries and beyond, so that its perceived contribution to openness is limited.
- 6.17 The current GB boundary at the western settlement edge of Trowbridge to the north of Wingfield Road (A366) has no apparent relationship to historic field boundaries or other landscape features, it provides an uncharacteristic pattern and an abrupt unsympathetic line in the landscape. To the south of Wingfield Road (A366) the settlement edge is marked by the vegetated stream corridor however the development edge here, as to the north, it defined by modern development that does little to reflect the historic settlement core in terms of building style or layout and contributes little to the sense of place at the settlement edge or beyond.
- 6.18 The site therefore provides the opportunity to reduce the current intervisibility between the settlement edge of Trowbridge and the agricultural landscape of the adjacent GB and create a more defensible and integrated settlement edge.

Purpose 2: To Prevent Neighbouring Towns Merging into One Another

- 6.19 The site is only associated with the settlement edge of Trowbridge. It is separated from, and not physically associated with, other settlements. Bradford on Avon falls some 1.4km to the north, Westwood some 2.3km north-west, and Wingfield some 1.2 km to the west.
- 6.20 Development of the site would not reduce the gap between Trowbridge and Bradford on Avon. It would reduce the gap between Trowbridge and Westwood by some 0.5km but a substantial gap of 1.8km would remain. It would reduce the gap between Trowbridge and Wingfield by some 0.6km but a 0.6 km gap would remain. As such, the site forms only a

limited part of the open buffer between Trowbridge and these settlements and the area proposed for development on the Concept Masterplan represents a smaller proportion still.

- 6.21 The biggest reduction in the gap will be between the site and Wingfield but careful set back of development and strategic planting buffers will mean that there will be negligible intervisibility between the settlements.
- 6.22 The visual relationship between Trowbridge and the more distant settlements of Bradford on Avon and Westwood will not be substantially changed by development upon the site as shown on the Concept Masterplan.
- 6.23 The site is very well associated with the existing settlement edge of Trowbridge, being directly adjacent to, and at grade with housing here. However, the existing settlement boundary north of the Wingfield Road (A366) generally comprises rear garden boundaries and agricultural fencing and contains potential access routes to the settlement edge.
- 6.24 It is therefore considered that development of the site would have a minimal effect on the physical and visual separation between Trowbridge and settlements across the GB. Indeed, development of the site would provide an opportunity to provide a stronger, more defensible settlement edge adjacent to the GB at this western edge of the town than exists currently.

Purpose 3: To Assist in Safeguarding the Countryside from Encroachment

- 6.25 As set out regarding Purpose 1, the site comprises a limited area of the GB between settlements and is visually well contained. This visual containment could be further enhanced with planting used in combination with the topography. For both these reasons, the site makes a limited contribution to openness between settlements.
- 6.26 In landscape character terms, much of the site, notably to the east, currently has an urbanised fringe character with agricultural land uses and urban influences from the adjacent, poorly defined, settlement edge to which it is orientated by topography and transport routes.
- 6.27 Intervisibility between the site and the settlement edge of Trowbridge, and crossing pylons, reduce the tranquillity, and urbanise the site, again reducing the sense of openness that it provides. Development of the site would contribute towards increasing the built form, and therefore reduce the sense of openness experienced in views across the site, where available. However, that sense of openness has already been eroded to some degree.
- 6.28 It is considered that development of the site would provide an opportunity to enhance characteristic landscape features across the site, as illustrated by **Appendix EDP 3**, and provide a strong, defensible settlement edge, so reducing the influences of the new settlement edge on the character of the adjacent agricultural land within the GB.

Purpose 4: To Preserve the Setting and Special Character of Historic Towns

- 6.29 As set out in **Appendix EDP 2**, the nearest conservation area is within Trowbridge c. 600m to the east of the site. Intervisibility with this conservation area is limited to views from the open, elevated, facing slopes of the site to the spire and tower of historic churches, and the surrounding roofscape, within the conservation area. Visibility back towards the site is limited by the generally close-knit nature of the settlement which provides limited opportunities for views beyond adjacent buildings.
- 6.30 Intervisibility with other historic settlements protected by conservation areas is limited to glimpsed, distant, views from the most elevated areas of the site to the more elevated facing slopes of Bradford on Avon, which predominantly fall outside the conservation area. Views back towards the site from Bradford on Avon are more limited due to intervening settlement and vegetation.

Purpose 5: To Assist in Urban Regeneration, by Encouraging the Recycling of Derelict and Other Urban Land

- 6.31 Purpose 5 considers also whether or not sites can be ‘recycled’ or redeveloped, such as brownfield land within the GB. The amount of land within urban areas that could either be developed or regenerated is a planning matter that should already have been considered as part of a wider planning process, i.e. at the point of defining GB boundaries.
- 6.32 The assessment of the site at a local level against this purpose would not enable a distinction between GB areas and, as such, Purpose 5 has been excluded from this assessment.
- 6.33 However, as demonstrated above, development can occur in this location without compromising the essential functions of the GB at this western edge of Trowbridge, namely preventing merging of settlements, encroachment, and unrestricted sprawl.

Core Strategy Stated Principal Purposes of the GB

- 6.34 With reference to the Core Strategy, relevant stated principal purposes of the GB are set out below together with a summary of where they have been assessed (our emphasis):
- *“maintain the open character of undeveloped land adjacent to Bath, Trowbridge and Bradford on Avon”* – addressed above in relation to NPFF purposes;
 - *“prevent the coalescence of Bradford on Avon with Trowbridge or the villages to the east of Bath”* - addressed above in relation to NPFF purposes;
 - *“limit the spread of development along the A4 between Batheaston and Corsham”* – not relevant; and

- “protect the setting and historic character of Bradford on Avon” – addressed above in relation to NPPF purposes.

Conclusion of Green Belt Review

- 6.35 The GB assessment concludes that development can occur in this location without compromising the NPPF essential functions of the GB at this western edge of Trowbridge: preventing merging of settlements, encroachment, and unrestricted sprawl; or the Core Strategy relevant stated principal purposes of the GB.
- 6.36 This is due, primarily, to the relatively limited proportion of the existing gap between settlements that the site represents; the limited intervisibility between the site and closest settlements across the GB; and the comparatively effective defensible edge that the site would provide. The Concept Masterplan has built on this baseline to further limit the potential for compromising the functions of the GB by focussing development in the eastern area, with a sensitive approach to western area through siting of development and delivery of public open space. This further reduces the proportion of the GB represented by development, and utilising existing landform and characteristic features to provide a defensible physical boundary and further limit potential intervisibility, notably to Wingfield to the south-west of the site.
- 6.37 It is considered that the site could reasonably be removed from the GB and developed in accordance with the principles of the Concept Masterplan (**Appendix EDP 3**) without harm to the integrity of the GB overall and with potential benefits in terms of creation of a defensible GB boundary.

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Appendix EDP 1

Green Belt Assessment Methodology and Criteria

A1.1 For each NPPF purpose, EDP has defined criteria that allows for a more comprehensive analysis to be undertaken, in landscape and visual terms, of the contribution the site makes to the open character of the Green Belt in this location. The criteria for each purpose is described in more detail below.

Purpose 1: To Check the Unrestricted Sprawl of Large Built-up Areas

A1.2 This is a test that considers the site’s location in relation to defined built-up areas, particularly whether the site creates a clear, recognisable distinction between large built up areas (as defined within adopted policy) and the perceived open countryside.

A1.3 Assessment criteria considers whether any built form is contained within the site or if the site is able to prohibit further development. Commonly this is ribbon development but may also be piecemeal development in isolated areas or along settlement edges. A site may have already been compromised by some form of development, in which case it is relevant to consider the extent to which that development has eroded the sense of open character, this being whether or not there is a sense that the site is enclosed by either man-made or landscape features.

A1.4 Sprawl may also be discouraged by defensible boundaries that are either natural (e.g. topography, woodland, water course) or man-made features (e.g. as a road, railway line, or settlement edge). These may be within the site or share a boundary with it. Sites that do not contain defensible boundaries contribute towards greater openness.

A1.5 **Table EDP A1.1** provides EDP’s assessment criteria for Purpose 1.

Table EDP A1.1: Purpose 1 – To check the unrestricted sprawl of large built-up areas

Purpose 1 Criteria	Application of Criteria to Site
<ul style="list-style-type: none"> • Creates a clear, recognisable distinction between urban fringe and open countryside 	<p>Is the site perceived as forming a contiguous undeveloped buffer between the existing settlement edge and the wider countryside (higher to lower contribution a-c)?</p> <ul style="list-style-type: none"> a. Yes, the site has an open character, being free of development and associated influences with limited tree cover, strongly contributing to an open character of the Green Belt; b. There is an absence of development within the site but it is overlooked by adjacent/nearby development/-wooded/treed areas; and c. No, the site contains development and/or tree cover such that it does not clearly define a perceptible distinction between the settlement edge and the open countryside.

Purpose 1 Criteria	Application of Criteria to Site
<ul style="list-style-type: none"> • Are there any defensible boundaries? 	<p>Does the site have a defensible boundary which can prevent the sprawl of a large built up area (higher to lower contribution a-c)?</p> <p>a. The site does not have a defensible boundary and therefore open character is greater;</p> <p>b. The site has a defensible boundary/boundaries, which would need additional reinforcement; and</p> <p>c. The site has a defensible boundary/boundaries, which do not require additional reinforcement.</p>

Purpose 2: To Prevent Neighbouring Towns Merging into One Another

A1.6 The wording of the NPPF refers to ‘towns’, but in the context of this assessment study area, the GB affects a considerably smaller geographical scale, in which it is more relevant to consider the perceived merging of neighbouring settlement edges as well as distinct settlement areas that might be defined as towns. In essence, the purpose seeks to avoid coalescence of built form. This can be perceived in either plan view or ‘on the ground’ by intervening natural or man-made features.

A1.7 The interpretation of ‘merging’, in terms of geographic distances, differs according to the study area. Whilst a review of distinct towns might need to account for distances over several kilometres, when considering gaps between smaller settlements, as perceived in local views, the range can be much smaller. It is of note that susceptibility to ‘merging’ depends on the extent of open character between two settlements, and each situation needs to be reviewed in relation to the local landscape and visual context.

A1.8 **Table EDP A1.2** provides EDP’s assessment criteria for Purpose 2.

Table EDP A1.2: Purpose 2 – To check the unrestricted sprawl of large built-up areas

Purpose 2 Criteria	Application of Criteria to Site
<ul style="list-style-type: none"> • Perceptually, is the site well associated with the existing settlement edge? 	<p>Perceptually, is the site well associated with the existing settlement edge (higher to lower contribution a-c)?</p> <p>a. The site is perceived as being isolated from the settlement boundary and appears divorced from it;</p> <p>b. The site abuts one settlement boundary but is not divorced from it; and</p> <p>c. The site abuts two or more settlement boundaries and is perceived as part of an indent.</p>
<ul style="list-style-type: none"> • Prevent loss or noticeable reduction in perceived distance between towns/settlement edges; this may also be affected by agricultural land use or topography: a larger distance or more prominent topographical change would be better capable of 	<p>Given the distance between the whole of the site and next nearest settlement edge, what is the effect of the perceived and actual intervisibility on potential for coalescence (higher to lower contribution a-c)?</p> <p>a. Immediate and clear intervisibility with next nearest settlement edge;</p> <p>b. Partial visual association with next nearest settlement edges; and</p>

Purpose 2 Criteria	Application of Criteria to Site
<p>accommodating change than a narrow gap.</p> <ul style="list-style-type: none"> • The gaps may contain different elements, be it natural (e.g. topography, woodland, agricultural land or large open spaces) or man-made features, which prevent perceived merging. 	<p>c. Limited or no visual association with next nearest settlement edges.</p>

Purpose 3: To Assist in Safeguarding the Countryside from Encroachment

- A1.9 In terms of Green Belt, the ‘countryside’ is the landscape outside of the current development limits, and which is generally defined by key characteristics such as hedgerow networks, varying field patterns, presence/absence of woodland, downland character, topographical features or open space, etc. Countryside is likely to be perceived as undeveloped land that is typically rural and often managed for agriculture or forestry, or simply kept as an open natural or semi-natural landscape. It may, however, contain man-made features such as historic landmarks or isolated properties, or even larger areas of settlement.
- A1.10 This assessment is based on the key landscape characteristics of the site and its surroundings, as well as the site’s visual context. Sites that are highly representative of the key landscape characteristics, and exhibit them in good condition, make a stronger contribution towards safeguarding the countryside than land that is less representative of the landscape character area or contains features that are in poorer condition. This allows a relative and qualitative ‘value’ element to be applied to landscapes.
- A1.11 The matter of perceived ‘encroachment’ requires a judgement that considers whether or not built form (such as residential development and/or related urbanising features such as street lighting, road signs, road infrastructure, etc.) is found in the site or affects it, and also the degree to which it has preserved the key characteristics or severed them from the wider countryside. A site that has limited or no urbanising influences has a stronger role in safeguarding countryside.
- A1.12 Finally, encroachment can also be prohibited by the presence or absence of particular natural or man-made features that separate existing settlement edges from the wider countryside. Typically, it is large man-made features such as dual carriageways, or motorways; natural features might include woodland, large water bodies, such as lakes and rivers or deep, steeply sloped valleys. Such features may border a site or be contained wholly or partially within it.
- A1.13 However, natural features in particular, including woodland, rivers or ridgelines, may suffer a loss of their integrity as prominent features within the landscape if development is progressed upon, or near, them. These features should therefore be safeguarded.

A1.14 **Table EDP A1.3** provides EDP’s assessment criteria for Purpose 3.

Table EDP A1.3: Purpose 3 – To Assist in Safeguarding the Countryside from Encroachment

Purpose 3 Criteria	Application of Criteria to Site
The countryside comprises ‘key characteristics’ which define the landscape and the way it is perceived, both visually and physically.	To what extent does the site represent the key characteristics of the countryside (higher to lower contribution a-c)? a. The site is strongly representative of the key characteristics and clearly connects with off-site key characteristics; b. The site comprises some representative key characteristics but there are few connections with off-site characteristics; and c. The site comprises little or no key characteristics and there is limited or no connection with off-site characteristics.
Encroachment: features such as speed signage and street lighting affect the extent to which the countryside changes from rural to urban.	To what extent is the site urbanised, either by on-site or off-site features (higher to lower contribution a-c)? a. There are no urbanising features within the site or directly influencing it; b. There are several urbanising features affecting the site; and c. There are many urbanising features affecting the site, which reduces its representativeness of the countryside. The site is perceived as previously developed land.

Purpose 4: To Preserve the Setting and Special Character of Historic Towns

A1.15 The subject of setting and special character in the context of historic towns should be examined on a site by site basis, by specialist heritage consultants. However, the conservation area local heritage designation allows the assessment to acknowledge that historic cores exist.

A1.16 **Table EDP A1.4** provides EDP’s assessment criteria for Purpose 4.

Table EDP A1.4: Purpose 4 – To Preserve the Setting and Special Character of Historic Towns

Purpose 4 Criteria	Application of Criteria to Site
In the absence of professional judgement on setting and special character on a site-by-site basis by heritage consultants, the criteria considers the proximity of the site to a conservation area (CA) which relates to the historic character of a town.	What is the spatial and visual relationship between the site and the historic core of the nearest towns (higher to lower contribution a-c)? a. The site is partially or wholly within the historic character area of the town/conservation area; b. The site shares a boundary with or has Intervisibility with the historical character area/conservation area; and c. The site does not share a boundary with the town/-conservation area and/or there is no intervisibility with its historic core/conservation area.

Purpose 5: To Assist in Urban Regeneration, by Encouraging the Recycling of Derelict and Other Urban Land

- A1.17 Purpose 5 considers also whether or not sites can be 'recycled' or redeveloped, such as brownfield land within the Green Belt. The amount of land within urban areas that could either be developed or regenerated is a planning matter that should already have been considered as part of a wider planning process, i.e. at the point of defining Green Belt boundaries.
- A1.18 The assessment of the site at a local level against this purpose would not enable a distinction between Green Belt areas and, as such, Purpose 5 has been excluded from this assessment.

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Appendix EDP 2 Green Belt Assessment

Description of the Site

The site lies at the western edge of Trowbridge with Bradford on Avon to the north, Westwood to the north-west, and Wingfield to the west. A description of the landscape character of the site and context is set out at **Section 3** while matters relating to visual matters are set out at Section 4.

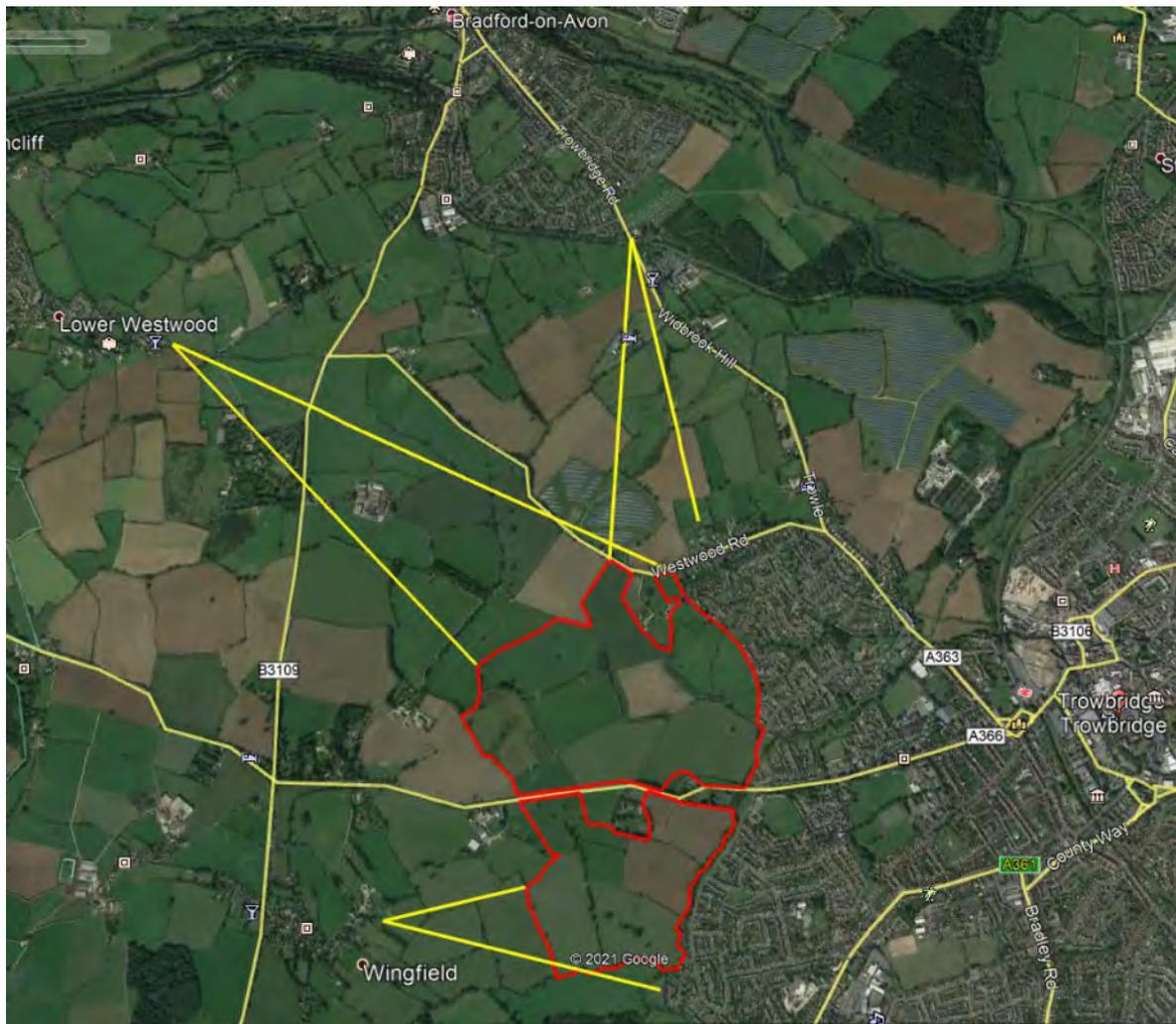


Image EDP A2.1: Aerial photograph showing locations of measured distances reported in **Table EDP A2.1** below.

Purpose 1: To Check the Unrestricted Sprawl of Large Built-up Areas		
Purpose 1 Criteria	Assessment	Score
<i>Creates a clear, recognisable distinction between urban fringe and open countryside</i>	The site is located at the western edge of the defined large built up area of Trowbridge. The site is fully within the Green Belt and contains no substantial built development. However, its boundary wraps around properties south of, and accessed from, Westwood Road, to the north, and around properties north and south of, and	Limited

Purpose 1: To Check the Unrestricted Sprawl of Large Built-up Areas																		
Purpose 1 Criteria	Assessment	Score																
	<p>accessed from, Wingfield Road (A366) cutting through the centre of the site. These properties extend the urban character along these road frontages.</p> <p>In addition, the site abuts, and its eastern area is overlooked by, the existing settlement edge of Trowbridge. The site abuts residential properties, agricultural land, and a solar farm to the north, open agricultural land to the west, and horsicultural land and the country park to the south.</p> <p>The nearest settlements beyond the GB comprise Bradford on Avon, some 1.4km to the north, Westwood, some 1.8km north-west, and Wingfield, some 560m to the west. Image EDP A2.1 above shows that these distances are from the site boundary, representing the worst case; distances from the development area proposed on the Concept Masterplans will be less.</p> <p>Set out below is a comparison of the distances between these settlements and the existing edge of Trowbridge, and between them and the site, at the nearest point. As noted above, this represents the worst case scenario, with larger distances between the development area indicated on the Concept Masterplan and settlements.</p> <p>Table EDP A2.1: Approximate distances to nearest settlements.</p> <table border="1" style="width: 100%; border-collapse: collapse;"> <thead> <tr> <th style="width: 20%;"></th> <th style="width: 20%;">Distance to Trowbridge (km)</th> <th style="width: 20%;">Distance to site (km)</th> <th style="width: 40%;">Comparison</th> </tr> </thead> <tbody> <tr> <td>Bradford-on-Avon</td> <td>1.4</td> <td>1.4</td> <td>The site will not decrease the separation being at a very similar distance from Bradford on Avon to the existing settlement.</td> </tr> <tr> <td>Westwood</td> <td>2.3</td> <td>1.8</td> <td>The site will decrease the separation by some 0.5km.</td> </tr> <tr> <td>Wingfield</td> <td>1.2</td> <td>0.6</td> <td>The site will decrease the separation by some 0.6km.</td> </tr> </tbody> </table> <p>Development of the site would not reduce the gap between Trowbridge and Bradford on Avon. It would reduce the gap between Trowbridge and Westwood by some 0.5km but a substantial gap of 1.8km would remain. It would reduce the gap between Trowbridge and Wingfield by some 0.6km but a 0.6km gap would remain. As such, the site forms only a limited part of the open buffer between Trowbridge and these settlements and the</p>		Distance to Trowbridge (km)	Distance to site (km)	Comparison	Bradford-on-Avon	1.4	1.4	The site will not decrease the separation being at a very similar distance from Bradford on Avon to the existing settlement.	Westwood	2.3	1.8	The site will decrease the separation by some 0.5km.	Wingfield	1.2	0.6	The site will decrease the separation by some 0.6km.	
	Distance to Trowbridge (km)	Distance to site (km)	Comparison															
Bradford-on-Avon	1.4	1.4	The site will not decrease the separation being at a very similar distance from Bradford on Avon to the existing settlement.															
Westwood	2.3	1.8	The site will decrease the separation by some 0.5km.															
Wingfield	1.2	0.6	The site will decrease the separation by some 0.6km.															

Purpose 1: To Check the Unrestricted Sprawl of Large Built-up Areas

Purpose 1 Criteria	Assessment	Score
	<p>area proposed for development on the Concept Masterplan represents a smaller proportion still.</p> <p>The biggest reduction in the gap will be between the site and Wingfield, but careful set back of development and strategic planting buffers will mean that there will be negligible intervisibility between the settlements.</p>	



Image EDP A2.2: Northern site boundary (right of image)



Image EDP A2.3: Western site boundary of northern parcel (across centre of image)

Purpose 1: To Check the Unrestricted Sprawl of Large Built-up Areas

Purpose 1 Criteria	Assessment	Score
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Image EDP A2.4: Western site boundary of southern parcel



Image EDP A2.5: Southern site boundary

<p><i>Are there any defensible boundaries?</i></p>	<p>The site provides defensible boundaries: to the north – Westwood Road (Image EDP A2.2), which also generally provides a northern boundary for residential development at the existing settlement edge to the east; to the west – field boundary hedges and hedgerows (Images EDP A2.3 and A2.4); to the south – the Lambrok Stream and associated vegetation which marks the current parish boundary (Image A2.5). In addition, as the Concept Masterplan shows, topography and additional planting could provide a visual and physical boundary to the development that could be further reinforced with planting along existing field boundaries that would provide a defensible boundary while retaining their historic line and the pattern that they provide.</p> <p>Internal openness is limited by vegetation, field hedges and trees, and topography.</p>	<p>Limited</p>
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Purpose 2: To Prevent Neighbouring Towns Merging into One Another		
Purpose 2 Criteria	Assessment	Score
<i>Is the site well associated with the existing settlement edge?</i>	<p>The site is physically and visually very well associated with the existing settlement edge of Trowbridge, being directly adjacent to, and at grade with, housing east of Sherbourne Road to the north, and across the stream from housing east of Lambrok Road, to the south. The site is not divorced from this edge and there is potential for good physical and visual integration between it and the existing edge.</p> <p>It is clear from historic map analysis that the settlement areas at the western extent of Trowbridge, adjacent to the site, have extended significantly over the last 60 years to accommodate growth of the town. In addition, the presence of access roads that end at the western settlement edge indicate an intent to continue expansion to the west of Trowbridge. Further, to the north of the Wingfield Road (A366), there is a lack of a strong, defensible boundary at the settlement edge. For all of these reasons, the site is considered to be well associated with the existing settlement edge.</p> <p>As noted at Purpose 1 above, the site is physical separated from, and not physically associated with, other settlements within the GB.</p>	Limited
<i>What is the intervisibility with the next nearest settlement edge?</i>	<p>The visual relationship between Trowbridge and the settlements of Bradford on Avon, to the north and Westwood, to the north-west, will not be notably changed by development across the site due to the limited apparent intervisibility between these settlements and the site. This is primarily due to distance and the screening effect of intervening vegetation across this wide rolling valley at, and beyond, the site boundaries. While there is potential for some limited visibility to the more elevated site areas from elevated open facing slopes of Bradford on Avon, and from open land at the eastern extent of Westwood, this is limited and filtered by existing vegetation and could be mitigated further through planting at the site boundaries as illustrated by the Concept Masterplans. There is potential for greater intervisibility between the site and Wingfield but this can be mitigated through the location of open space across elevated slopes and tops and along the western site boundary of the southern site area together with sympathetic planting along existing filed boundaries, as illustrated by the Masterplan for this area.</p>	Limited

Purpose 3: To Assist in Safeguarding the Countryside from Encroachment		
Purpose 3 Criteria	Assessment	Score
<p><i>How representative is the site of the key characteristics of the countryside?</i></p>	<p>Documented landscape character is reviewed at Section 3 of this report. The West Wiltshire Landscape Character Assessment places the site within Landscape Type E, the 'Rolling Clay Lowland', and Landscape Area 'E1: Wingfield Rolling Clay Lowland'. The site is consistent with the majority of the key characteristic of the landscape area, namely gently rolling farmland down to a mixture of arable and pasture and with a distinct pattern of medium sized, mostly irregular, fields enclosed by mainly intact hedgerows with mature trees, and with pylons as a dominant vertical element. Across the landscape, there are small settlements including the village of Wingfield and several scattered farmsteads.</p> <p>The main characteristics of the site that differ from these key characteristics are in relation to tranquillity and rural character, notably across the eastern site area. These are both less across this area of the site than across the wider landscape area due to the proximity of the settlement edge and the site aspect, which means that its primary visual connections are with the settlement edge. This proximity and intervisibility diminish both the rural character and tranquillity of this site area in comparison to that of the wider area.</p> <p>However, this is a description of a relatively broad area and, unsurprisingly, does not capture matters that are of specific relevance to the character of the site and immediate context. Whilst falling within the rural area beyond the settlement boundary the site's rural nature and tranquillity is diminished by:</p> <ul style="list-style-type: none"> • The definite urban influence across the eastern site area where land abuts, and slopes towards, the neighbouring residential areas which therefore provides the major contextual influence on its character and tranquillity here; • The roads to the north (Westwood Road) and through the centre of the site (Wingfield Road (A366)); • The deterioration and loss of hedgerows across the site; • The overhead cables crossing the site; and • The pylons and mast immediately to the west, and crossing the north-western site area, which detract from the rural character of the site's outward facing slopes and tops. <p>The site has the potential, as illustrated by the Concept Masterplans, to contribute to the 'Management Strategy and Objectives' set out for the West Wiltshire Landscape Character Assessment Landscape Area 'E1: Wingfield Rolling Clay Lowland',</p>	<p>Moderate</p>

Purpose 3: To Assist in Safeguarding the Countryside from Encroachment		
Purpose 3 Criteria	Assessment	Score
	<p>notably with regard to field pattern and hedgerow boundaries, as set out below:</p> <p>Specific management objectives are to:</p> <ul style="list-style-type: none"> • <i>“Maintain the open character of the area by resisting any development that would have adverse effects on the extensive views”</i> – the Concept Masterplan shows how the proposed development could be designed to retain views from more elevated areas of the site; • <i>“Respect the small-scale village character of Wingfield by ensuring that any new development is in line with the vernacular nature of the existing buildings”</i> – the site is some 570m distant, and would be substantially screened from, the village so would not offend this objective; and • <i>“Conserve the traditional field pattern by promoting new planting to repair gaps in the hedges and by encouraging ecological farming”</i> – the Concept Masterplan shows how the site could be developed while retaining and enhancing the field pattern at the site boundaries and, to some extent, within the site. 	
<i>What is the influence of urbanising features?</i>	<p>Whilst falling within the rural area beyond the settlement boundary, the site’s character is urbanised by the following considerations:</p> <ul style="list-style-type: none"> • The definite urban influence across the eastern site area where land abuts, and slopes towards, the neighbouring residential areas which therefore provides the major contextual influence on its character and tranquillity here; • The roads to the north (Westwood Road) and through the centre of the site (Wingfield Road (A366)); • The deterioration and loss of hedgerows across the site; • The overhead cables crossing the site; and • The pylons and mast immediately to the west, and crossing the north-western site area, which detract from the rural character of the site’s outward facing slopes and tops to the north and west of the site. 	Moderate

Purpose 4: To Preserve the Setting and Special Character of Historic Towns		
Application of Criteria	Assessment	Score
<i>Is there potential for intervisibility with an historic core?</i>	The nearest conservation area is within Trowbridge, c.600m to the east of the site. Intervisibility with this conservation area is limited to views from the open, elevated, facing slopes of the site to the spire and tower of historic churches, and the surrounding roofscape, within the conservation area. Visibility back towards the	Limited

Purpose 4: To Preserve the Setting and Special Character of Historic Towns		
Application of Criteria	Assessment	Score
	site is limited by the generally close-knit nature of the settlement which provides limited opportunities for views beyond adjacent buildings. Intervisibility with the conservation areas across the historic core of other settlements is limited with glimpsed, distant, views from the most elevated areas of the site to the more elevated facing slopes of Bradford on Avon. Views back towards the site from Bradford on Avon are more limited due to intervening settlement and vegetation.	

Appendix EDP 3
Concept Masterplan

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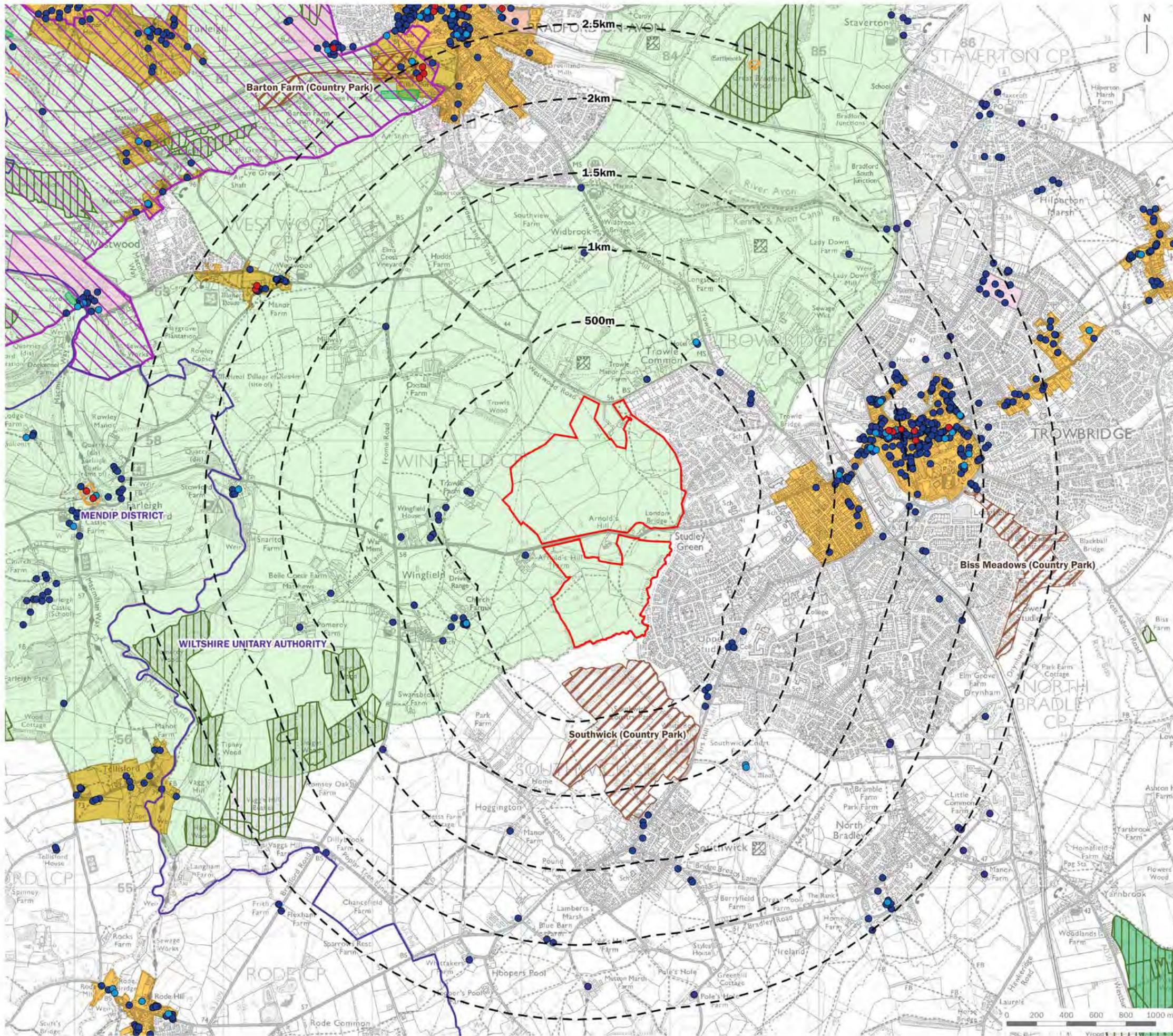
- SITE BOUNDARY
- PRIMARY VEHICULAR ACCESS
- SECONDARY VEHICULAR ACCESS
- PRIMARY ROUTE
- SECONDARY ROUTE
- FOOTPATH/CYCLEWAY
- RETAINED EXISTING PROW
- GREEN CORRIDOR
- EXISTING HEDGEROW
- POND
- DEVELOPMENT BLOCK
- COMMUNITY/RETAIL USE
- EXISTING BUILDINGS
- FEATURED SPACE
- VILLAGE GREEN
- PLAY AREA
- SPORTS PITCH
- OVERHEAD CABLES
- WATERMAIN
- FLOOD ZONE



Plans

- Plan EDP 1** Site Location and Environmental Planning Context
(edp2822_d009a 08 March 2021 GY/TR)
- Plan EDP 2** Landscape, Visual and Ecological Analysis
(edp2822_d010a 08 March 2021 GY/TR)

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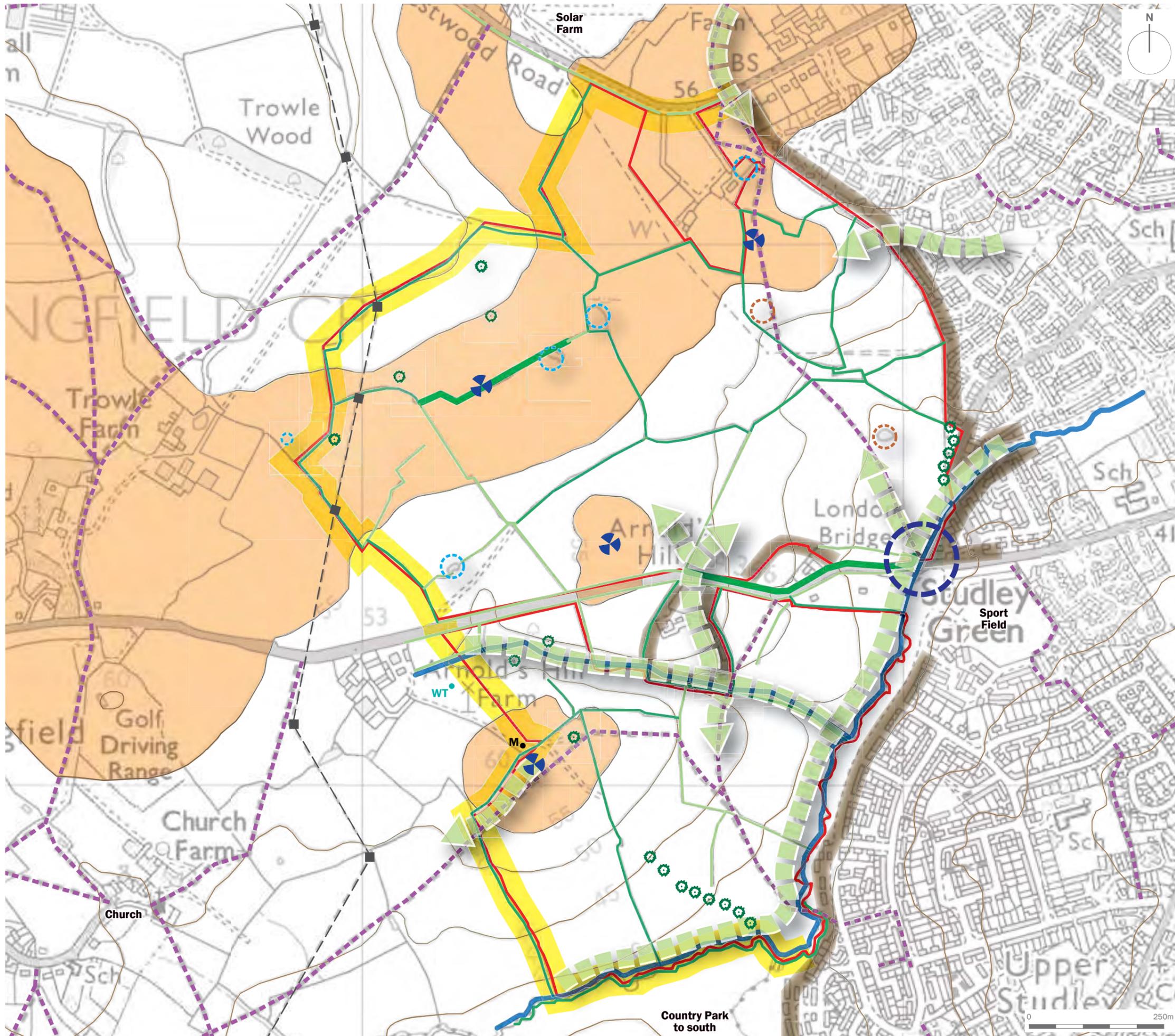
-  Site Boundary
-  Range Rings (at 500m intervals)
-  Local Authority District Boundary
- Landscape**
-  Western Wiltshire Green Belt
-  Cotswolds Area of Outstanding Natural Beauty (AONB)
-  Country Park
- Ecology**
-  Ancient Woodland Inventory (AWI)
-  Site of Special Scientific Interest (SSSI)
- Heritage**
-  Scheduled Monument
-  Grade I Listed Building
-  Grade II* Listed Building
-  Grade II Listed Building
-  Registered Park and Garden
-  Conservation Area

client
Vistry Group and Barratt Homes

project title
Land West of Trowbridge

drawing title
Plan EDP 1: Site Location and Environmental Planning Context

date 09 MARCH 2021 drawn by GY
drawing number edp2822_d009a checked TR
scale 1:25,000 @ A3 QA RB



- Site Boundary
- Visually sensitive edges - adjacent to countryside
- Existing settlement edge with open and filtered views to site - visual considerations
- Semi-native woodland - priority for retention
- Trees beyond field boundaries (approximate locations) - priority for retention
- Native hedgerows and site boundaries - priority for retention
- Native cut hedges - retain where possible
- Highest land (over 55m aOD)
- Contours at 5m intervals
- Opportunities for views out of site
- Opportunities for green corridor connections
- Ponds with potential for great crested newts - provide an appropriate buffer and incorporate into green corridors
- Dry ponds with potential for enhancement
- Streams - provide appropriate buffer and enhancements and incorporate within green corridor
- Public rights of way - retain and incorporate within green corridors wherever possible
- M** • Mast
- Pylons (over-head cable on site not shown)
- Current gateway into Trowbridge visually uninspiring
- WT** • Wind Turbine

client
Vistry Group and Barratt Homes

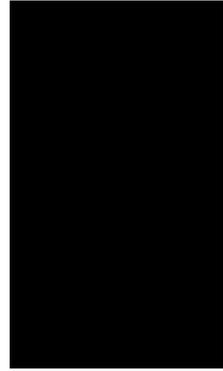
project title
Land West of Trowbridge

drawing title
Plan EDP 2: Landscape and Visual Analysis

date	09 MARCH 2021	drawn by	GY
drawing number	edp2822_d010a	checked	TR
scale	Refer to scale bar @ A3 QA		RB



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Trowb_P336

Trowbridge Consultation Response Form

Ref:	(For official use only)
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A series of 'Planning for' documents break down the work undertaken so far for each Principal Settlement and Market Town. Within these documents, information is presented, and questions asked to help shape proposals for each place.

To view these documents please visit the Council's Local Plan Review Consultation page on its website at: <https://www.wiltshire.gov.uk/planning-policy-local-plan-review-consultation>

Please return to Wiltshire Council by Tuesday 9th March 2021.

By post to: Spatial Planning, Economic Development and Planning, Wiltshire Council, County Hall, Bythesea Road, Trowbridge, Wiltshire, BA14 8JN.

By e-mail to: spatialplanningpolicy@wiltshire.gov.uk

This form has two sections:

Section One – Personal details

Section Two – Your response to the questions. Please use a separate sheet for each representation.

Section One – Personal details

*if an agent is appointed, please fill in your Title, Name and Organisation but the full contact details of the agent must be completed.

	1. Personal details	2. Agent's details (if applicable)*
Title	█	█
First name	██████	██████
Last name	██████	██████
Job title <i>(where relevant)</i>	██████████████	██████
Organisation <i>(where relevant)</i>	Persimmon Homes (Wessex) Ltd	Blue Fox Planning Ltd
Address Line 1	C/o Agent	██████████████
Address Line 2		██████████████
Address Line 3		██████████████
Address Line 4		██████
Postcode		██████████

Telephone Number		██████████
Email Address		██

Section Two – Questions

TB1. What do you think to the scale of growth? Should there be a brownfield target? Should this figure be higher or lower?

Answer:

TB2. Are these the right priorities? What priorities may be missing? How might these place shaping priorities be achieved?

Answer:

**TB3. Do you agree these sites are the most appropriate upon which to build?
If not, why not?**

Answer:

We consider the approach to Trowbridge in the context of the 'Planning for Trowbridge' consultation paper and other supporting documents. This includes the consideration of alternative development options which are not identified in the Site Selection Report. Further details are set out in our attached representations.

TB4. What are the most important aspects to consider if these sites are going to be built on?

Answer:

TB5. Considering the environmental constraints around the town, what other reasonable options should the Council consider investigating in order to address the identified forecast development needs for the place?

Answer:

For the identified preferred development sites at principal settlements, concept plans have been developed. Concept plans for each area show a way the land identified can be developed. They show the undeveloped land, areas suggested for development and possible locations for uses within them.

Please state which concept plan your answer is in relation to.

If your comments relate to both sites, please make it clear in each answer to which site your comments relate

TB6. Do you agree with the range of uses proposed, what other uses should be considered?

TB7. Do you agree with the location of the proposed uses? What should be located where and why?

TB8. Do you agree with the proposed locations for self-build and custom build housing? Would you prefer alternative locations?

TB9. Is there a particular type of renewable energy that should be provided on site?
Is there a particular type of renewable energy that should be provided?

TB10. Are there any issues or infrastructure requirements that should be identified?

Answer:

If you have any further comments you wish to make, please detail them below.

Future notification

I wish to be notified of any future updates relating to the Local Plan Review:

YES: NO:

Clicking yes will add you to the planning policy contact database. This will mean you are kept informed of any future planning policy updates and consultations.

Further information on how the Spatial Planning Department treats your personally identifiable information can be found by reading the privacy notice available via the link below:

<https://www.wiltshire.gov.uk/planning-privacy-notice>

Here you will also find information about how and why your data may be processed and your rights under the Data Subject Information Notice section further down the page.

Signature:

Date: 09.03.21

Thank you for completing this form.

Data Protection

Wiltshire Council has a duty to protect personal information and will process personal data in accordance with Data Protection legislation. The personal data you provide on this form will only be used for the purpose of the Wiltshire Development Framework. It may also be used for the prevention or detection of fraud or crime and in an anonymised form for statistical purposes. The data will be stored on computer and/or manual files. You have a right to a copy of your information held by any organisation, with some exemptions. To gain access to your personal data held by Wiltshire Council or if you have any Data Protection concerns please contact Wiltshire Council's Data Protection Officer on 01225 713000 (switchboard) or e-mail to dataprotection@wiltshire.gov.uk .”



**WILTSHIRE LOCAL PLAN REVIEW
CONSULTATION 2021**

Planning for Trowbridge

Response to Consultation

Prepared on behalf of Persimmon Homes (Wessex) Ltd

March 2021



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APPENDICES

APPENDIX 1: SHELAA SITE 3247

1. Introduction

- 1.1 On behalf of our client, Persimmon Homes (Wessex) Ltd, Blue Fox Planning Ltd is instructed to submit representations in response to the March 2021 Wiltshire Council Local Plan Review Consultation.
- 1.2 The representations set out herein are focused on the land controlled by Persimmon Homes at 'Land at Biss Farm', Trowbridge. This 14ha site is identified within the most recent Wiltshire Strategic Housing and Economic Land Availability Assessment (SHELAA), site reference **3247** (Land at Biss Farm).

APPENDIX 1: SHELAA SITE 3247

- 1.3 Alongside the specific land interests at Biss Farm, Persimmon Homes are also active in Trowbridge in terms of the delivery of other development locations, specifically land at Ashton Park and Elizabeth Way.

Ashton Park

- 1.4 Land at Ashton Park is allocated in the Wiltshire Core Strategy to provide for 2,600 homes and 15ha of employment. A planning application was submitted to Wiltshire Council in 2015 (LPA ref: 15/04763/OUT) comprising the following description of development:

'Outline planning application for mixed use development comprising: residential (up to 2,500 dwellings – Classes C3 & C2); employment (Class B1, B2 and B8); two local centres (Classes A1-A5, D1, C2 and C3); two primary schools, one secondary school, ecological visitor facility, public open space, landscaping and associated highway works including for the 'Yarnbrook / West Ashton Relief Road' and the access junctions.'

- 1.5 This complex site forms as a major component of the current strategy for growth at Trowbridge. Working collaboratively with Wiltshire Council, Persimmon Homes are advancing towards a positive determination of this application. It is anticipated that the S106 Agreement will be concluded within the next 3 months.

Elizabeth Way

- 1.6 Following the adoption of the Wiltshire Housing Site Allocations Plan on 25 February 2020, land to the south of Elizabeth Way has been allocated for development (Policy H2.3) to provide approximately 355 dwellings.
- 1.7 Pursuant to this allocation, a planning application for 71 dwellings was submitted by Persimmon Homes to Wiltshire Council in September 2020 (LPA Ref: 20/07751/FUL). In

submitting this application, alongside the wider allocated area, the objectives of the Wiltshire Housing Site Allocations Plan are being realised

- 1.8 Our representations in respect of Biss Farm are provided without prejudice to Persimmon Homes' wider interests at Trowbridge and the commitment to bring forward development at these locations, working collaboratively with Wiltshire Council.

Biss Farm

- 1.9 Land at Biss Farm is currently categorised in the Wiltshire Core Strategy (WCS) as a 'Principal Employment Area' and is therefore subject to the policy provisions set out at Core Policy 35 of the WCS (Existing employment sites). Core Policy 35 seeks to protect such sites/locations from alternative uses, on the basis that Principal Employment Areas are considered to be critical to the economic role of these settlements and Wiltshire as whole.
- 1.10 It should be recognised that not all identified Principal Employment Areas contribute to the economic strategy to the same extent, particularly where such areas have not been developed.
- 1.11 This is the case for land at the Biss Farm which was an allocation in the 2004 West Wiltshire District Local Plan (Policy E1A), as a saved policy, rather than a specific allocation in the adopted WCS. Prior to the 2004 West Wiltshire District Local Plan, this site was also identified in the West Wiltshire Local Plan (adopted 1996).
- 1.12 Paragraph 120 of the National Planning Policy Framework (NPPF) confirms that planning policies and decisions need to reflect changes in the demand for land. They should be informed by regular reviews of both the land allocated for development in plans, and of land availability.
- 1.13 For reasons set out within our representations, it is considered that the exclusion of land at Biss Farm from assessment as a potential location for housing growth at Trowbridge, premised on the current status of this site as a Principal Employment Area, is not adequately justified.
- 1.14 Trowbridge is a highly constrained settlement, as such it is our view that in order to provide resilience to housing delivery over the plan period, the Spatial Strategy should include a mix of sites in order to reduce the reliance on a very limited number of locations to deliver significant levels of growth.
- 1.15 The evidence base published in support of this current consultation, specifically the 2018 Employment Land Review, does not provide a sufficiently robust justification for the continued allocation of Biss Farm as a Principal Employment Area.

1.16 Our representations consider that given the specific circumstances of this site, it is entirely appropriate and necessary for this location to be taken forward for assessment as a potential housing site.

2. Emerging Spatial Strategy

- 2.1 It is explained that the housing requirement for Wiltshire is within the range of 40,840 and 45,630 new homes over the plan period 2036. The lower end of the range represents the results of the Standard Methodology, with a Local Housing Need Assessment (LHN) forming the upper end of this range.
- 2.2 In undertaking this Local Plan Review, the Council has applied the LHN figure as the basis for formulating the Spatial Strategy. Opting for this level of growth, which is in excess of the figures derived from the Standard Method, is supported as a matter of principle. It is agreed that in doing so, this provides for greater flexibility and contingency in housing delivery over the plan period, but also provides the opportunity to improve the resilience of the five-year housing land supply position for Wiltshire.
- 2.3 Applying the LHN to the updated Housing Market Areas (HMAs) results in a requirement at the Trowbridge HMA to provide for 11,000 new homes over the plan period to 2036. This represents a reduction of c4% when compared to the current plan period requirement for this HMA (11,490 dwellings).
- 2.4 In general terms the basis of the Spatial Strategy retains the core element set out in the adopted WCS, namely the focus of the majority of development at the top tier (Principal) settlements.
- 2.5 Through this Local Plan Review, Chippenham, Salisbury and Trowbridge will continue to be the focus of growth. There is no objection to this approach as a matter of principle, as such locations within the County provide the greatest opportunities to accommodate higher levels of development. However, it is recognised within the supporting documents that Trowbridge has a number of major constraints which limit the scope for further development.
- 2.6 The preferred development strategy for Trowbridge requires 5,380 homes for the plan period 2016-2036. This compares with 6,810 homes (2006-2026). Taking into account completions and planning commitments (pipeline), this means that there is a need for 1,805 homes to be accommodated at Trowbridge up until 2036. It is explained in the *Planning for Trowbridge Paper*, that in order to deliver a full range of necessary education infrastructure to support long-term growth at the town, the requirement for Trowbridge is increased to circa 2,600 homes, with a significant proportion of this being delivered beyond 2036.
- 2.7 In terms of employment, the *Emerging Spatial Strategy Paper* explains that there is a forecast requirement for an additional 26ha of land for businesses across the County. It is acknowledged within the *Spatial Strategy Paper* that there is already a large supply of land available to meet business needs across the County.

- 2.8 The Wiltshire Employment Land Review (ELR) explains the fit between employment demand and supply. It states that the total amount of employment land available, at sites of low or medium risk of non-delivery is 166ha. This is at the bottom end of the range of demand in Wiltshire over the 20 year plan period (157ha to 182ha). When un-allocated sites and high delivery risk sites are included, the total supply equates to 273ha. This is significantly in excess of the level of demand.
- 2.9 The ELR (para 7.1.1.) goes on to note that on the basis of these figures *'it is not necessary to allocate all potential sites in Wiltshire in order to satisfy the local demand for employment land over the Local Plan period.'* Furthermore, it notes that *'significant over-allocation could affect the deliverability of some of the currently allocated sites.'*
- 2.10 Notwithstanding this, the ELR recognises that many sites which were previously allocated have not been delivered and that there is strong *'anecdotal'* evidence that there is a lack of suitable and available sites and premises to meet demand in Wiltshire.
- 2.11 As set out in the *Spatial Strategy Paper*, a further 26ha of land is proposed across Wiltshire and this includes an additional 1ha at the Trowbridge HMA, directed to Westbury. The *Planning for Trowbridge Paper* considers that no further employment land is needed at Trowbridge as sufficient land is already allocated in the existing WCS.

3. Planning for Trowbridge

- 3.1 It is recognised within the *Planning for Trowbridge* Paper that the scale of growth at Trowbridge is 'so substantial' that significant greenfield sites will need to be identified. In this context, the proposals for development at Trowbridge are concentrated at two growth locations, North East Trowbridge (2,100 dwellings, of which 500 post-2036) and North Trowbridge (500 dwellings).
- 3.2 As explained within the NPPF (paragraph 72), the supply of large numbers of new homes can often be best achieved through planning for larger scale development, such as new settlements or significant extensions to existing settlements. Therefore, the identified areas as preferred development locations to the north/northeast of Trowbridge are consistent with this recognised approach set out in national policy.
- 3.3 However, it is considered necessary for the Local Plan to ensure that there is a wide portfolio of sites in terms of size and locations, in order to give greater resilience to housing delivery throughout the plan period. The focus of development to the north/northeast of Trowbridge places a considerable reliance on a single direction of growth at the town to meet the identified needs.
- 3.4 The strategy for growth at Trowbridge should, in our view, maximise opportunities for growth from a range of site options, including land which benefits from being allocated for alternative uses, but which has not come forward as envisaged.
- 3.5 The Trowbridge *Site Selection Report* (Figure 2) identifies those sites that were originally considered. This highlights Principal Employment Areas at the Town and this includes land at Biss Farm. There is no assessment as to the suitability of Principal Employment Sites within the Site Selection Report and for reasons set out below, specifically in the context of land at Biss Farm, it is considered that the failure to do so is a significant omission.
- 3.6 Set within the wider context of the provisions of paragraph 120 of the NPPF, through this Local Plan Review process it is incumbent upon Wiltshire Council to base emerging policies on an appropriate review of land which is allocated in the development plan. This is necessary in order to consider whether there is a reasonable prospect of development coming forward on such sites in accordance with the use allocated in the plan.
- 3.7 As previously explained, the Wiltshire ELR sets the fit between employment demand and supply. When un-allocated sites and high delivery risk sites are included then the total supply equates to 273ha which is significantly in excess of the level of demand.
- 3.8 In terms of employment provision in the Trowbridge HMA, the ADSs explains that the ELR data informed the baseline analysis and has been used to derive the HMA based

employment data. This forecast employment needs shows a reduction (c8%) in employment land planned for the next 20 years in this HMA when compared to 2011-2026.

- 3.9 As noted at paragraph 19 of the ADSs, the WCS strategy deliberately allocated a large amount of land for employment in excess of assessed need, in order to provide businesses with greater choice and flexibility and to provide a positive context for local economic growth.
- 3.10 The proposed strategy of no additional employment land at Trowbridge is considered in the Sustainability Appraisal (SA) where it states that the supply of outstanding and existing commitments is likely to be sufficient to balance the housing growth proposed at this Principal Settlement. However, the SA also acknowledges that this will depend on existing commitments being retained and delivered.
- 3.11 The interim SA states that: *“Outstanding commitments in the Trowbridge HMA are capable of meeting a significant proportion of the need for additional employment land to 2036.¹ This includes land at Biss Farm, which is identified in the current WCS (Core Policy 29) as ‘West Ashton Road’ and is a saved West Wiltshire District Plan allocation of 10ha. In addition to West Ashton Road, the WCS also allocates 15ha of employment land at the Ashton Park Urban Extension.*
- 3.12 The SA concludes that: *‘Retention of existing and allocated employment land is often challenging to manage. Consider inclusions of policies that safeguard against incompatible uses or unnecessary loss of employment sites but also set out criteria against which, in exceptional cases, an existing site or allocation is clearly and demonstrably no longer suitable for employment development and can be de-allocated or developed for an alternative use.’²*
- 3.13 Such policy protections are already provided by way of WCS Core Policy 35 (Existing employment sites). As explained, land at West Ashton Road (Biss Farm) is currently categorised in the WCS as a ‘Principal Employment Area’ and is therefore subject to the policy provisions set out at Core Policy 35. Core Policy 35 seeks to protect such sites/locations from alternative uses, on the basis the Principal Employment Areas are critical to the economic role of these settlements and Wiltshire as whole.
- 3.14 It should be recognised that not all identified Principal Employment Areas contribute to the economic strategy to the same extent, particularly where such areas have not been developed. This is the case for the Biss Farm site which was an allocation in the 2004 West Wiltshire District Local Plan (Policy E1A), as a saved policy, rather than a specific allocation in the adopted WCS. Prior to the 2004 West Wiltshire District Local Plan, this site was also identified in the West Wiltshire Local Plan (adopted 1996).

¹ Interim SA – Page 278

² Interim SA – Page 279

- 3.15 Core Policy 35 states that: *‘Wiltshire’s Principal Employment Areas (as listed in the Area Strategies) should be retained for employment purposes within use classes B1, B2 and B8 **to safeguard their contribution** to the Wiltshire economy and the role and function of individual towns.’* (Our emphasis)
- 3.16 Land at Biss Farm has remained undeveloped and it is a matter of fact that this site has never delivered or provided for any employment provision, whether this be in terms of physical units and/or jobs. Therefore, it is self-evident that this site has not made any ‘contribution’ to the local and wider economy. It is therefore questionable whether the objectives and provisions of Core Policy 35 are capable of being applied to this site.
- 3.17 Furthermore, Core Policy 35 goes on to explain that: *‘Within Principal Settlements, Market Towns and Local Service Centres and Principal Employment Areas proposals for the redevelopment of land or buildings **currently or last used** for activities falling within use classes B1, B2 and B8 must demonstrate that they meet, and will be assessed against the following criteria.’* (Our emphasis). Given that this site has remained undeveloped and has not, at any point, provided for employment uses, the criteria set out at Core Policy 35 is also unlikely to be directly applicable to the Biss Farm site.
- 3.18 The 2018 ELR (section 5.4) includes a *‘detailed review’* of a small number of selected sites, in order to understand any barriers to delivery and to consider how these might be overcome. It is explained within the ELR that these sites, which includes West Ashton Road (South Trowbridge Business Park), have been selected as sites which can make a significant contribution to the future delivery of employment land.
- 3.19 The review presented within the 2018 ELR makes no reference to the significant period of time for which this site has been allocated as land for employment but has remained **undeveloped**, i.e. since the 1996 West Wiltshire Local Plan.
- 3.20 The ELR does not consider the extensive planning history of the site. Rather it simply states that: *“Wiltshire Council should consider the policy and development management levels that it has to encourage the delivery of this employment site.”*
- 3.21 In omitting any reference to, or consideration of, the period of time for which this site has been allocated but remained undeveloped, this is considered to be a significant error.
- 3.22 As a consequence, it does not provide an accurate or robust review as to the suitability and deliverability of this site to continue to be allocated for employment use.
- 3.23 This site has an extensive planning history as set out in the table below.

Reference	Description	Status
W/92/01607/OUT	Development of land for employment use (Use Classes B1, B2 and B8)	Withdrawn
W/98/01149/OUT	Land for employment use classes B1, B2 and B8	Approved
W/01/01617/FUL	Section 73 application for continuation of development without compliance with the standard three-year reserved matters period relating to outline planning application W/98/01149/OUT	Approved
W/01/01551/REM	Approval of reserved matters for siting, design, levels, external appearance and means of access for proposed B1, B2 and B8 employment use following outline planning permission W/98/01149/OUT	Withdrawn
W/05/00744/FUL	Section 73 application for the variation of Condition 01 and the deemed time limit to allow for phasing and the extension of time to submit reserved matters.	Approved
W/10/03031/FUL	Application to renew planning permission W/05/00744/FUL to allow time to submit reserved matters pursuant to reference 98/01149/OUT	Approved (Appeal)
W/11/01697/FUL	Application to renew planning permission 05/00744/FUL to allow time to submit reserved matters pursuant to reference 98/01149/OUT	Withdrawn
W/11/01663/REM	Approval of reserved matters for employment development comprising B1, B2 and B8 uses and associated access and landscaping.	Approved

- 3.24 In addition to the planning history set out above, bellmouth access points have been constructed. In doing so, the intention was to support the marketing of the site and generate interests, by ensuring that such arrangements were already in place and able to support employment development at this site.
- 3.25 Paragraph 120 of the NPPF confirms that planning policies and decisions need to reflect changes in the demand for land. They should be informed by regular review of both the land allocated for development in plans, and of land availability.

- 3.26 The NPPF continues to explain that where the local planning authority considers there to be '*no reasonable prospect*' of an application coming forward for the use allocated in the plan.
- a. They should, as part of plan updates, reallocate the land for a more deliverable use that can help to address identified needs (or, if appropriate, deallocate a site which is undeveloped); and
 - b. In the interim, prior to updating the plan, applications for alternative uses on the land should be supported, where the proposed use would contribute to meeting an unmet need for development in the area.
- 3.27 The 2018 Wiltshire ELR does not fulfil, to any great extent, the obligations set out at paragraph 120 of the NPPF. Whilst the ELR explains that a 'detailed review' of specific sites has been undertaken, which includes land at Biss Farm, the extent of this review is extremely limited and does not consider to a sufficient degree, the particular circumstances of this site.
- 3.28 The most recent application at this site, (17/09961/OUT) included information on marketing and the promotion of the Biss Farm for its allocated employment use. This is not repeated within these representations, but when considered alongside the planning history of this site, it is self-evident that the site has not made any contribution to the economic strategy at Trowbridge and the wider Wiltshire area.
- 3.29 As an undeveloped site, we do not support the continued allocation of Biss Farm as a Principal Employment Area. In doing so, this is not consistent with the premise behind the protections afforded by WCS Core Policy 35. It does not perform any economic role as part of the wider economic strategy and therefore the basis for its continued protection falls away owing to the fact that this site has always remained undeveloped.
- 3.30 In addition, the criteria set out at Core Policy 35 which may allow for the redevelopment of Principal Employment Areas, includes circumstances where the site is not appropriate for the continuation of its present or any employment use due to a significant detriment to the environment or amenity of the area.
- 3.31 Since land at Biss Farm was originally allocated in previous West Wiltshire District Local Plans the context of the site has changed. The WCS allocation at Ashton Park, which is to provide for 2,600 dwellings and 15ha of employment land means that the Biss Farm is no longer an edge of settlement location. The consequence of the Ashton Park allocation, once constructed, will mean that Biss Farm is enclosed on all sides by residential development, significantly altering the context from when the site was first allocated.
- 3.32 As previously explained, the Ashton Park allocation also includes 15ha of employment land and it should be noted that this will form part of the early phases of development.

- 3.33 There is no specific analysis of this changing context within the Wiltshire ELR or consideration as to the suitability of the proposed employment use at this location when considered against the substantial residential-led development (2,600 dwellings) at Ashton Park.
- 3.34 Accordingly, it is considered necessary and appropriate for land at Biss Farm to be considered within the site selection process as a genuine opportunity to meeting the housing requirements of Trowbridge.
- 3.35 The fact that the site is a Principal Employment Area does not accurately reflect the particular circumstances of the site, both in terms of its undeveloped nature and lack of any contribution to the economic strategy for Trowbridge and the wider Wiltshire area.
- 3.36 Moreover, the physical context of the site is subject to considerable change owing to the Ashton Park urban extension, meaning that it is no longer an edge of settlement employment site, and once Ashton Park is delivered, it will enclose the Biss Farm site on all sides with residential development.
- 3.37 Trowbridge is a highly constrained settlement and therefore the approach of the Local Plan should be to maximise opportunities to meet the identified requirements for new homes, particularly given the fact that a considerable number of new homes are not expected until post-2036.
- 3.38 Excluding specific sites, such as Biss Farm, on the basis of their status as a Principal Employment Area, it not supported. The approach of the site selection methodology is to apply such designations as an automatic exclusionary criteria without any specific assessment as to the extent to which such sites actually support their planning status as Principal Employment Areas. This should be addressed by including land at Biss Farm in the site selection process and taking it forward for further detailed assessment.
- 3.39 We do not consider that the evidence base produced in support of the Local Plan Review, specifically the ELR, provides a sufficiently detailed assessment as to the justification for the retention of this land for employment.
- 3.40 Since the launch of this current consultation, the Council has published responses to Q&A sessions hosted as part of the virtual consultation meetings. In respect of the approach to Trowbridge, the specific question was raised regarding the re-use of land such as Biss Farm. In response, the Council has stated:

“An opportunity to review the Place-shaping Priorities in the plan making process may very well include the opportunity to review long-standing employment allocations that remain to be built out. If you consider that alternative options should be reviewed, please put them forward in your consultation response.”³

³ Main Settlement live events Q&A sessions: responses. Q8, Page 85

- 3.41 We welcome the apparent willingness of the Council to consider such sites following this round of consultation and we trust that our representations will be considered along these lines.
- 3.42 It is not clear why any such review is referenced in the context of 'place-shaping principles', given the requirement of paragraph 120 of the NPPF. Notwithstanding this, given the location of this site, and surrounding uses, bringing forward this area for residential development would be entirely consistent with adjoining uses and support the expansion of Trowbridge in this area.
- 3.43 It is difficult to envisage how the development of this site for residential use could have any adverse impacts on the wider objectives set out within the proposed place-making principles.

4. Summary and Recommendations

- 4.1 On behalf of our client, Persimmon Homes (Wessex) Ltd, we welcome the opportunity to submit representations in response to the Wiltshire Council Local Plan Review. Our representations are concerned with the proposed strategy for Trowbridge.
- 4.2 Our representations are focused on the approach to the selection of sites at Trowbridge and specifically the exclusion of land at Biss Farm from consideration as a potential development location as part of the strategy to deliver the housing requirements for Trowbridge.
- 4.3 It is recognised within the consultation documentation that Trowbridge is a highly constrained settlement, resulting from the Green Belt to the west, the potential effects on the Bath and Bradford on Avon Bats Special Area for Conservation and the need to preserve the setting to several outlying settlements. Such constraints impact on the availability of land and sites and requires the future growth strategy for Trowbridge to balance such constraints against the need to provide for sufficient levels of development to support Trowbridge's role as a principal settlement and in providing for local needs.
- 4.4 Set within this context, and the provisions of national policy (i.e. paragraph 120 of the NPPF), in preparation of the development strategy, including the consideration of site options, it is incumbent upon Wiltshire Council to fulfil its obligations under paragraph 120 of the NPPF. This should include a review of the extent to which land allocated for development in an existing plan, has any reasonable prospect of coming forward for the use identified. This should include sites classified as Principal Employment Areas, which includes land at Biss Farm.
- 4.5 However, there is no reference within any of the consultation documentation to the approach the Council has taken to such sites, but it is evident that the status of a site as a Principal Employment Area is used as an exclusionary criteria, meaning that development opportunities at such locations are automatically excluded from any consideration in the site selection process.
- 4.6 Therefore, wider opportunities for growth, such as that presented at Biss Farm, at a settlement which is highly constrained, have not been considered through the plan-making process to date and are excluded without any specific assessment as to their suitability for either their existing (allocated) use or alternative uses, where such uses could contribute to meeting identified needs.
- 4.7 We comment within our representation on the 'detailed review' of the 2018 ELR and for reasons explained, it is not considered that the assessment of Biss Farm is sufficiently robust to support the decision to reject it from assessment as a potential site for housing. There is no regard to the fact that this site has remained undeveloped

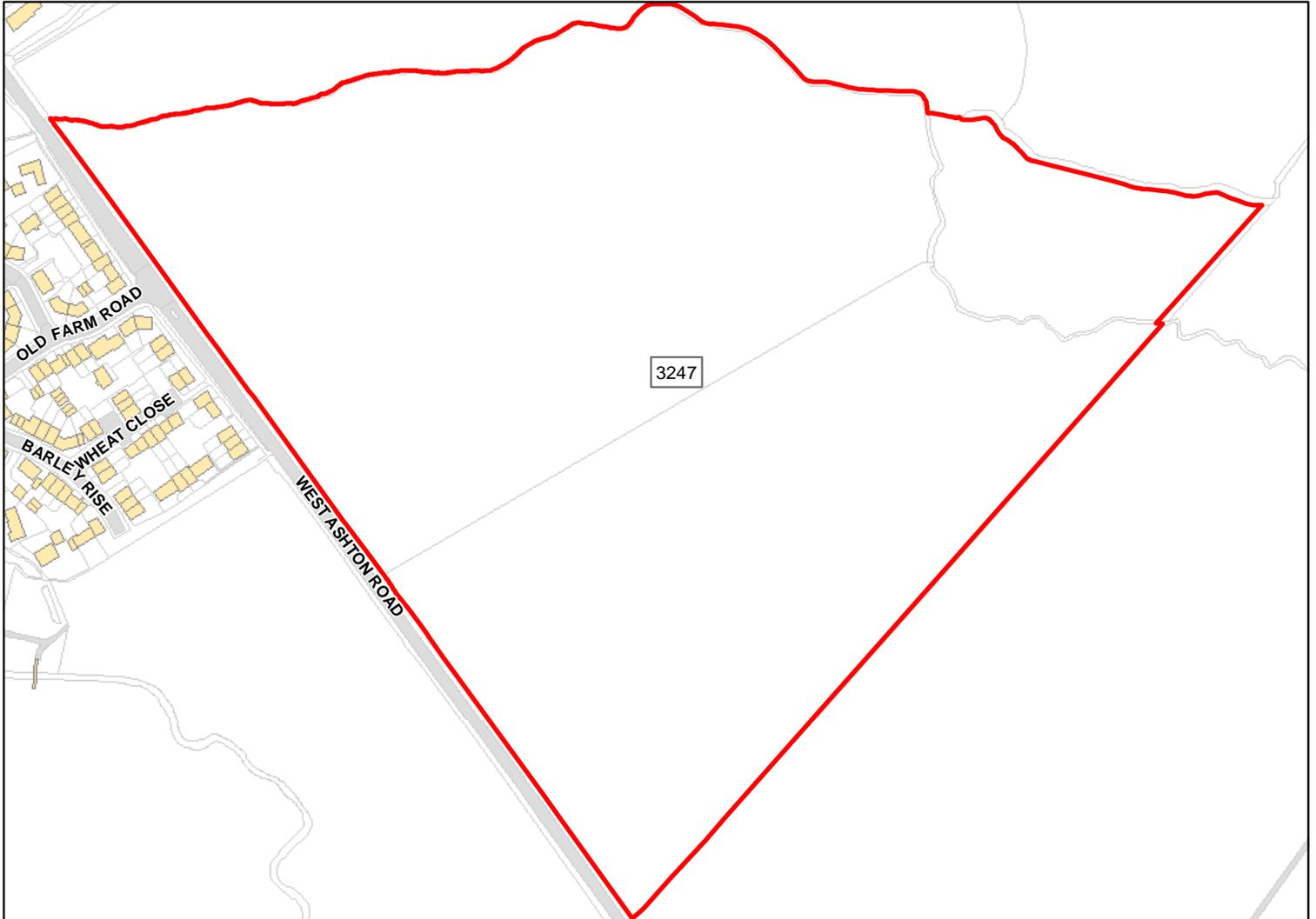
since first allocated in 1996. Moreover, there is no recognition within the evidence base that acknowledges the fact that in terms of the current economic strategy, this site has made no contribution, either in terms of employment units and/or job growth.

- 4.8 Furthermore, there is also no regard to the changing context of land at Biss Farm and the fact that with the delivery of the Ashton Park urban extension, the site is no longer an edge of settlement location, with the resulting Ashton Park development meaning that the site will eventually be enclosed on all sides by residential development.
- 4.9 In order to build in resilience to housing delivery at Trowbridge over the plan period, it is considered essential that there is a sufficient portfolio of site options, in order to reduce the reliance on single development locations.
- 4.10 In this context land at Biss Farm is considered to offer a genuine development opportunity to provide for residential development. Given the fact that this site has remained undeveloped since its original allocation for employment use (1996), it is self-evident that the site has not contributed to the economic strategy for a significant period of time.
- 4.11 The continued allocation for employment use at Biss Farm fails to correctly understand the specific circumstances of this site. The status of the site as a Principal Employment Area does not accurately reflect the realities of this site and its undeveloped nature.
- 4.12 For reasons we have set out within our representations, land at Biss Farm, should be taken forward for considerations in the Trowbridge site selection process as a genuine development opportunity to provide for residential growth.

APPENDIX 1



SHELAA SITE: 3247



Site Address: Land at Biss Farm

Total Area: 14.0014ha HMA: North & West Wiltshire

Suitable Area: 2.5005ha (17.9%) Previous Use: Greenfield

Suitability Constraints*: N/A

All Constraints*: Allocation, FZ3, FZ2, ALCG1

Suitable: Yes. No suitability constraints. Available: Yes

Achievable: Yes (Residential) Deliverable: Yes

Capacity: 94 Developable: In short-term

*Note: Constraint abbreviations can be found in the SHELAA Methodology Report in Appendices 1 and 2 on pages 14 and 16.

Trowb_P338

[Redacted]

From: [Redacted]
Sent: 09 March 2021 14:59
To: Spatial Planning Policy
Cc: [Redacted]
Subject: Fwd: The Proposed Development of 500 homes- Staverton
Categories: MH

Subject: FW: The Proposed Development - Staverton

Dear Sirs

Proposed Building Development at New Terrace. Staverton. Trowbridge. 500 Houses

Following receipt of the councils proposals to have a development of 500 houses constructed in Staverton I wish to lodge my objections for the following reasons

Traffic and the Environment

Interesting Traffic Information and future statistics for the rush hours in Trowbridge

08:00 to 09:00

Scenario	CO2	Av Journey Time Queues Seconds	Average Distance Over Capacity KM	Av KPH	Emmissi KG
on	HRS	HRS			

2009 Base Year	411 58	3.73	32.6	4865	382
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2026 with Committed Development	466 588	249	3.78	29.2	6592
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2026 with Trowbridge Strategic Site	564 705	3.81	24.3	8128	793
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17:00 – 18:00

2009 Base Year	397 35	3.76	34.4	4447	314
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2026 with Committed

Development	450	3.79	30.3	6198
535	187			
2026 with Trowbridge Strategic Site				
516		3.82	26.6	7412
432				727

Whilst studying the report made a couple of years ago Staverton Bridge Signals had a junction performance capacity over 70%. That figure did not include the increased traffic volumes being diverted through the Staverton Bridge Signals following a number of new developments and the fact that Bath is now diverting HGV traffic through Staverton Village. The junction performance will further deteriorate should additional pressure be applied by the introduction of in excess of 1000 housing units being built in Staverton on the B3105 and Elizabeth way

It appears that in studies Staverton Bridge Signals is only one of a number of signal sites in Trowbridge expected to exceed 70% capacity which represents a failure of the junction to assist with traffic flow. This failure is only as a result of traffic volume and road capacity. This 70% figure does not however represent the projections in studies and of the one study completed for Wiltshire Council it was projected that the Staverton Bridge Signals would be operating at 123% in the mornings and 124% in the evenings in the future with planned developments not including the recent one raised in the consultation looking at capacity towards 2026. Add to this the new proposed developments and you are condemning Staverton Village to a future of congestion and ill health with all the associated risks to the children attending the schools and clubs in the area

Using conservative estimates with the average household car ownership now being 1.7 vehicles this would add a further potential 1700 (residential owner only) vehicles using the road on a daily basis and this volume only represents the occupiers. Further additional traffic volume would increase exponentially as a result of delivery vehicles, guests, families etc and coupled with the huge increase in internet purchasing (Delivery Vehicles for internet shopping deliveries) could increase the number of vehicles substantially resulting in a huge congestion problem resulting in health and wellbeing problems. The traffic could actually increase by a number exceeding 5000 should this development proceed

The failure of any plans to improve the road network surrounding Staverton and the B3105 New Terrace at Staverton Bridge Signals will result in considerable increases in Traffic Volumes and congestion will increase. The current single road will not withstand the increase in volumes and repairs etc will cause further disruption resulting in more congestion and poorer air quality for the homes and residents in the village

In addition to the above traffic volume issues there is a serious road network infrastructure failure in Staverton with the only route being currently sat on a flood plain with regular serious flooding taking place resulting in the closure of the only road out of the local area. The B3105 at Staverton Bridge is not fit for purpose and in its current state will fail to manage the projected traffic volumes. During the periods when the Causeway floods traffic is diverted via Bradford On Avon (Currently using a new one way system to prevent and manage congestion in addition to the BAN on HGVs) and Holt (Small village with very congested road) leading to the A350 at Melksham. The area proposed for development is called Hilperton Marsh for a reason and the council planning officers should be mindful of that

These two routes are completely inadequate and experience congestion most days in the peak periods. This congestion will only increase with the increase in local housing developments as the new residents attempt to make their way to work etc

A bypass was previously planned for the area and this is the only viable option to provide the road network solution for the area. None of the housing development plans include any provision for traffic management and the dire effects on Staverton has simply been ignored

Any increase in traffic volumes and thus congestion volumes will further affect the local population. The village already struggles with the disruption caused by BANES Council diverting all of its HGV traffic through the village and, coupled with the Staverton Bridge Signals (One way Signal System) the problems for health and well being will only increase. The B3105 (New Terrace) is the only route for many people in Trowbridge to gain access to towns such as Bath and Bristol and is regularly congested. When the road isn't congested and flowing the locals are subjected to HGV traffic accessing the A350 and regularly speeding motorists using New Terrace. Both of these factors cause anxiety and danger to the young children living in the area especially as they need to walk along New Terrace to access the local primary school. The road only has one pavement on the opposite side to the housing and, as a result locals and children are put at risk.

New Terrace spans both the Kennet Canal and the River Avon and the bridges spanning those stretches of water were initially built hundreds of years ago. The bridges require constant maintenance and repair and were never designed or built to withstand the pressures of managing heavy goods vehicles up to 44 tons. In addition any failure of either of the bridges where maintenance is required results in serious and unwanted problems for the residents of Staverton wishing to go about their daily business.

Flooding & Environmental Issues

The proposed area is sandwiched between a flood area (Serious flood area) and a canal. In recent years the water level have risen and the entire area is slowly being saturated. The water and run off needs to go somewhere and a new development of 500 units on New Terrace will simply result in an increase in the water table thus resulting in an increased flood risk. I have measured the level in New Terrace following a 4 day rain period and the run off drain ditch next to the B3105 had in excess of 30 inches flowing through which meant the level was almost to the level of the B3105 potentially putting houses on that road at risk.

The photos are attached and show the run off and flooding issues following only a minor number of rain days

The area is regularly flooded sits between the River Avon and The Kennet & Avon Canal. There is no provision for flood defences in the area and a large development will only increase the flood risk in addition to representing a real flood hazard for the new occupants of any such development as proposed

Population and Services Infrastructure

Staverton School is already over capacity and this is reflected in the standards and the fact the school is falling woefully behind in standards. The school is attended by children from all areas in Trowbridge with many of those outside the area driving their children to the school which also causes additional pressure on the road network without adding to it.

The proposed 500 plus units on New Terrace will apply additional pressure to local services and, with the average family size of 2 adults and 1.89 children the potential requirement could be up to 945 children in the area requiring education and healthcare services. Coupled with the fact that people in the area commonly exceed that national child estimate the current education facilities will simply fail to be in a position to provide any service. The local plan suggests that schools will be built with additional allocation for more children spaces in 2026. The suggested school allocation is not adequate for the proposed developments. Are Wiltshire council using the correct formula for calculating child numbers ?

If we adopt a crude estimate of population increase for the development it will result in 500 homes x 2 adults and 1.89 children. This would mean an estimated increase in population of 1945. The village census in 2011 shows a population number of 1868 which will no doubt have increased since then (The 2021 Census will provide an accurate number)

In essence the village will double in population and will require the following:

Education Capacity Increased – This will be in the form of schools being built and those schools must be adequate and fit for purpose in respect of education needs and the numbers of children in the area both at the time of construction and adequate to manage any increase in the future

Healthcare Capacity Increased - A doctors surgery will be required to cope with the increase in healthcare needs – Doctors Surgeries in the area are over subscribed and completely inadequate for the current population. In addition to the need for additional clinical premises there seems to be no factoring of the reliance on getting healthcare professionals to relocate to the area in order to manage these facilities

Social Welfare Capacity Increased – This will fall within the healthcare requirements and, as the current provision falls woefully short and completely inadequate then what propositions are there to resolve the chronic failure of the current council to assist and manage this crisis. Adding pressure to the current failing system will only result in further delays and peoples health suffering

Local Amenities Capacity Increased – A requirement for services such as shops, parking etc – Where are the plans for adequate provision of amenities. The population increase wont be able to survive on the proposition of country walks and cycle paths. Real amenities and services are required

The current proposals talk about being “shaped by a range of key consideration, including potential effects on landscape, heritage assets, ecology as well as the need to address climate change through positive adaptation and mitigation measures” Indeed Wiltshire Council once again adopt a process of climate buzz words and suggestions but the problem is we are not in a position to have any impact of changing the current climate problems and, if you actually believed the words they are printing the effect of the proposed site causes more damage to the area than it prevents. I cannot believe that the person writing the local plan actually thinks that mass development in this area will somehow be managed with mitigated environmental consequences especially bearing in mind the reality of the damage caused by any large housing development in a countryside area.

If Wiltshire council genuinely believe the words they spout in the plan then they are literally contradicting themselves – Lets protect the land and climate but build huge housing estates of concrete and brick ! The justification seems to lie in the suggestion that a couple of cycle paths, and orchard and some playing areas will offset all the damage that the development will cause

On the flipside and putting the environmental factors to one side should the development be viable Wiltshire council seem to think that the current and completely inadequate New Terrace road (The only road servicing this proposed development) should not really be mentioned and quietly resigned to footnotes. As with the comments above the B3105 has no capacity to manage the potential increase in traffic caused by 2 new developments and there are a number of arguments that I will put forward despite what the Wiltshire Plan states

- The cycling utopia that the plan states will never happen. The only mass cycling that will take place should cycle paths be constructed will be limited to recreation cycling during good weather with the minority of people cycling to work in the close area. The writers of the plan who thought it acceptable to push this ridiculous notion of a cycling heartland have omitted to consider a number of factors:

- We live in an area and country of seasons and for two of those seasons (6 months) the area suffers with poor weather and rain. Hardly the type of environment where mum, dad and the children all cycle to school and work
- In order for cycling to be a real alternative to the car a number of services are required in close proximity. Those services are employment. Trowbridge does not currently have a high employment rate and the town, despite the dreams of the council regarding the bowyers site etc is not awash with large employers looking to relocate to the area. People simply will not cycle to work
- Food/Provisions. The proposed development site is situated in the north of the town which means that any major food or provision requirement will result in the need to travel some distance in order to satisfy that requirement. Families will not choose to take a bicycle to county way for the weekly shop or cycle to Currys on Bradley Road to collect a TV or fridge freezer. This notion that we are living in a temperate climate with everything we need to buy just yards away from our houses is a nonsense. The ownership of a car is a necessity for work and life and a development of this size will put even more cars on the already congested trowbridge roads
- Wiltshire Council state that the proposed locations are largely adjacent to Trowbridge Town and will be able to provide walking and cycling links to and from the town centre. The current routes are poor and considered dangerous in respect of safety and the crime level on the current cycle routes have yet to be addressed without the potential for additional routes being added. There seems to be no mention of the requirement for security considerations in order to reduce crime potential for both the proposed routes and the effect of the inevitable increase in criminal activity whilst the potential site is developed.
- Many of the people who may move into this proposed development will have employment outside of the area which will require transportation of some method (The family Car) We have a poor local transport network and an even poorer road network provision in the B3105. These residents will need to get to those places of employment and this will require a major upheaval of the current road provision. No matter how far Wiltshire Council hide the problems residents in Staverton Village suffer as a result of the inadequacy of the single road present they cannot ignore it. The village was promised a by pass many years ago and that solution has been quietly ignored. It can no longer be ignored in the face of the current pressure to develop land in the area. Now turning to the statement regarding environmental factors this again contradicts everything mentioned about the climate change protections. In other words the development should not go ahead because none of the arguments can be satisfied
- Electric Car Charging Points on Houses and the plan. I see that the Plan includes the suggestion that the move to electric vehicles will protect the environment and this should be embraced. This is completely false. The construction of such vehicles causes more harm and the affect on the environment is drastic bearing in mind the damage to the planet
- Wiltshire Council state that they want development planned “in a manner that focuses on providing land to enhance bio diversity and protect habitat to thereby help communities adapt to and mitigate for the affects of climate change” What exactly is that supposed to mean ? Wiltshire Council want to develop fields that provide a home and food for wildlife including badgers and roe deer. The area floods as a result of the land and its proximity to the Avon and Kennet and the council want to construct a huge housing estate that will push the water elsewhere thus affecting the wildlife and the rivers immediately next to it. They suggest providing land to enhance bio diversity but are already suggesting taking that land in the first place to build houses !! The continued use of strap lines and method statements does nothing to convince the reader that this is solving the climate and environmental problems. The use of these meaningless phrases simply serves to confuse and divert the readers attention from the fundamental desire of Wiltshire Council to build on this site/sites

- The council talk about “the need to maintain undeveloped land to help maintain the setting of the town, important views across the countryside as well as setting separate identity of surrounding villages” yet have seen fit to ignore the identity of Staverton and Hilperton and simply include them as “Trowbridge” In addition the current housing targets have already been exceeded for the area so there is not actually a requirement to build further homes
- The area on the B3105 New Terrace is completely unsuitable for further development. Wiltshire Council themselves state that a substantial amount of green space should be undeveloped yet seem committed to developing that exact land. There are already other more suitable areas in Trowbridge that have been put forward for planning and the rules clearly state that those sites should be used before the council attempt to develop on countryside areas

This is a poorly designed and planned proposal and should be dismissed for the reasons stated above.

Here are some examples of the flooding after limited rainfall. Where is this water supposed to go with 500 houses on the field ?







