

North Bradley Neighbourhood Plan
Regulation 16 Consultation Responses

Comments on the above by the North Bradley NDP Steering Group

September 2019

Comment ID (WC Consultation Portal)	Respondent	Comment	Steering Group Response
20	Castlewood Property Ventures (Turley Associates)	Strategic Site H2.2 Indicative main development areas too prescriptive. Remove proposed NDP site at 54 Woodmarsh	<p>Given that the areas are indicative we do not believe that any change is needed. The text could however be amended to clarify this. It is essential that some indication is given to ensure an undeveloped area remains between new homes and N. Bradley.</p> <p>The site was allocated following a thorough process that complies with Regulations and takes account of landscape issues. These were the subject of a full independent landscape report. Issues regarding bats have also been covered and the County Ecologist does not object to the site. This is the last remaining site from the site selection process. It is essential to the overall philosophy of the North Bradley NDP (Environmental protection balanced by development) that this allocation remains. The NPPF makes clear that the planning system is Plan-Led and that local communities should have a voice in how this is developed.</p>
16	Linden Homes	<p>Location of indicative development areas conflict with HSAP.</p> <p>Bat corridor</p> <p>NDP Housing Site at 54 Woodmarsh</p>	<p>We believe this respondent may have been looking at an earlier draft of the Policy Map and the responses have been made in error. We do not believe any changes to the map are required which was developed in consultation with Wiltshire Council. See also comments made above re Castlewood Properties which also apply.</p> <p>Again, see comments above. We completely disagree with the points made by this developer. The site was carefully selected and must remain. The requirement for it comes from community engagement, the Housing Needs Survey and the need to create a balanced plan and deliver sustainable development. We believe that this developer's comments are based on the fact that they may have plans for the site themselves.</p>

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17	Wiltshire Council	<p>Excessive document length</p> <p>Indicative numbers of homes required (para 14)</p> <p>More detail about Historic Landscape character needed.</p> <p>More emphasis on improving air quality, encouraging development of brownfield sites over greenfield, noise control and alternative energy sources for heating.</p> <p>Objective 6 could also refer to protecting and improving the 'historic' environment, rather than simply the natural and built environments, as this is a specific sustainability objective of the NPPF.</p>	<p>Residents dislike numerous documents and prefer that the main story of how the NDP came to be is told in one document. We would therefore ask that it remain as it is. The actual Plan is quite short with most detail in appendices or separate documents where necessary. We do not think that existing Appendices make the document unwieldy as it can quite easily be read without them.</p> <p>We have no objections to this being changed.</p> <p>No indication is given as to how this would make a better plan. Most development in North Bradley is in fact modern and inclusion of historic landscape material would not improve the evidence base for the ACTUAL POLICIES IT CONTAINS including site selection. The evidence base is already robust, and we do not think that more is required in order to make it proportionate to the task.</p> <p>A Neighbourhood Plan does not have to include these elements. However, we would be prepared to consider them in a Plan Review.</p> <p>The Objectives were drawn from community engagement and we do not feel the need to amend them. It is not a requirement that NDP Objectives align with every aspect of the NPPF.</p>

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17	Wiltshire Council	<p>Areas for development are overly prescriptive for site H 2.2 in Policy Map (paragraph 23)</p> <p>There are various references in the draft Plan to the establishment of a 'Landscape Gap' between Trowbridge and North Bradley and between Site H2.2 and Trowbridge. However, the Policy Map only shows a Landscape Gap to the north-west of North Bradley, not between Site H2.2 and North Bradley.</p> <p>Modify 8.9, 8.10 and 8.11 of the draft Plan, which provide details and maps of draft WHSAP allocations H2.1, H2.2 and H2.6</p>	<p>The areas are indicative only. This could be made clearer in the text. It is considered essential that a clear policy direction is given in order to ensure development remains away from North Bradley village.</p> <p>The Landscape Gap exists as open country between Trowbridge and North Bradley. Between the BUILT-UP PART of site H 2.2 and North Bradley the 'gap' is to be provided by UNDEVELOPED PARTS OF THE ACTUAL SITE. This is why development must be concentrated in the North and East of the site.</p> <p>Accepted.</p>
17	Wiltshire Council	Draft Plan paragraph 8.13 – the final sentence states that the conclusions of the Landscape & Visual Setting Analysis are taken forward in the draft Plan. However, as stated above, the extent of the Landscape Gap shown on page 29 of the submitted Landscape & Visual Setting Analysis does not appear to have been carried forward into the Policy Map on page 25 of the Plan.	The broad conclusions of the Landscape & Visual Setting Analysis ARE taken forward in the draft Plan – this does not mean that the eventual plan and the Landscape analysis maps (produced some time apart) are the same. Development of the Landscape Gap concept included a number of other inputs, such as the emerging site H 2.2, heritage information, advice from the county ecologist and heritage conservation officer.

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17	Wiltshire Council	<p>As referred to earlier, the reference in Policy 1 to 'layout of site H2.2 shall follow the general layout indicated in the comprehensive map' is not considered to be acceptable. National planning policy states that a neighbourhood plan should support the strategic development needs set out in the Local Plan and should not constrain the delivery of a strategic site allocated for development in the Local Plan. Policy 1 as currently drafted would conflict with the proposals for Site H2.2 in the emerging Wiltshire Housing Site Allocations Plan (WHSAP), which is now at an advanced stage of preparation and can be given some weight given its stage in the planning process. It is agreed that development within Site H2.2 should be located in the north and east of the site, as per the WHSAP, but considered that the location of development shown for H2.2 on the Comprehensive Policy Map is too prescriptive, pre-empts the outcomes of the WHSAP examination process, which is still ongoing, and does not allow sufficient flexibility. The Policy Map specifies a precise location in the north and east of the site and also locates some development in the south-east of the site. It is requested that this should be amended</p>	<p>The wording is consistent and very similar to that included in the draft HSAP and does not attempt to constrain a strategic site, merely reflecting the policy wording of the same. In fact, we have gone out of our way to avoid conflict. The Policy Map does not conflict with the HSAP at all – merely carrying forward the need to concentrate development in an area to the north and east and leave a space for a bat corridor.</p> <p>The NDP DOES NOT intend to indicate a precise area for development – merely general principles. The areas shown are INDICATIVE ONLY. This could be clarified in the text.</p> <p>The bottom line is that the main policy of the NDP is to keep North Bradley separate from other settlements (through a Landscape Gap) and it is considered essential that the policy should indicate that development must take place only in the north and east of H 2.2 in order to keep a corridor free for bats of the SAC and a landscape gap between the housing and North Bradley.</p>

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17	Wiltshire Council	<p>It is noted that Policy 1 states that WHSAP site allocations H2.1, H2.2 and H2.6 are accepted, subject to a reduction in dwelling numbers on H2.2 to 175 dwellings; this reduction to 175 dwellings was included in the Schedule of Proposed Changes (refs PC51 and PC60) that was submitted alongside the WHSAP...</p> <p>Policy 1 states that 'no development will be permitted in the 'North Bradley Landscape Setting Gap' shown on the policy map except in accordance with Wiltshire Core Strategy Policy.' It should be noted that there are various exception policies within the WCS that could potentially allow development within the 'gap', as set out in WCS paragraph 4.25. These include employment development and special needs housing etc. Policy 1 would not afford the same degree of protection as say an area designated as Local Green Space.</p>	<p>Policy 1 still needs to mention the limit of 175 units and is considered fit for purpose.</p> <p>We understand and accept these exception policies, as we have stated in past consultations.</p> <p>It is not possible to designate the entire area as Local Green Space as suggested, as this is contrary to the NPPF which states that a Local Green Space cannot be a 'large tract of land'.</p>
17	Wiltshire Council	<p>Paragraph 8.35 of the draft Plan notes that the site has various constraints and that the main issues that will require addressing prior to development commencing are identified in the policy. Any planning application on this site will also need to meet other requirements of the draft Plan and WCS at the planning application stage and it may be useful to include this in the wording of the policy. Comments re no flood plan. (paragraph 41)</p>	<p>As any application will have to comply with these policies there seems no point in repeating it here. It will not improve the plan.</p> <p>Not a requirement but could be included in a Plan review.</p>

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14	Owners of Park Farm (deleted site)	<p>Reinstate Park Farm site</p> <p>Owner of 54 Woodmarsh previously advised the site is unavailable.</p> <p>The risks which have been identified from the Woodmarsh site to the SAC are such that this site should at the very least be subject to further assessment before allocation</p>	<p>The Tattenhall Judgement made clear that the Steering Group is under no obligation to consider a site that would not pass referendum, since this is not a 'meaningful alternative'. The site has been firmly and implacably rejected by the community (see CS) and including it would risk the Plan failing referendum.</p> <p>There is also no need to include it based on housing supply considerations.</p> <p>This was corrected during the plan process – see CS.</p> <p>These risks have been studied by the County Ecologist who has no objections to the site. The site selection process has been logical and thorough.</p>
18	Gladman	<p>Policy 1 goes on to state that no development will be permitted in the North Bradley Landscape Setting. This approach is overly restrictive and does not accord with the NPPF (2019) requirement for plans to be prepared positively and with the objective of contributing to the achievement of sustainable development.</p>	<p>Incorrect. The creation of the Landscape Setting is a legitimate planning objective and is supported by abundant evidence. Positive planning is evidenced by acceptance of strategic sites and inclusion of a housing site approved by the community. The LPA does not dispute the validity of this policy.</p>

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18	Gladman	Policy 2. This policy states that small-scale housing schemes and infilling will be supported within the settlement boundary. Gladman would suggest that wording is added to the policy that would consider development proposals adjacent to the settlement boundary.	No. What is suggested would conflict with WCS Core Policies 1 and 2, would not be acceptable to the community, and would conflict also with NDP Policy 1 (Landscape Gap).
18	Gladman	Policy 5. This policy states that development proposals will have to comply with guidance on survey and mitigation contained within the Trowbridge Bat Mitigation Strategy. This strategy is, as stated, guidance and there should be no requirement for a development proposal to comply with this guidance.	No. Inclusion of this wording was specifically requested by the County Ecologist.
13	Private individual	Field behind 11 Westbury Road We have noted that the latest plan has now designated this field for housing development despite my previous objections.	It appears that this comment refers to the strategic site H 2.2. This is of course not a site allocated by the NDP, but one to which it responds. This point does not seem to be understood by this respondent.

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15	Heynes Planning	<p>Arguing for Organpool Farm site (Rejected)</p> <p>Comments on site at 54 Woodmarsh</p>	<p>This response makes a number of points, including an attack on the allocated site at 54 Woodmarsh, but the underlying purpose is to bring about the inclusion in the NDP of their client's proposed site at Organpool Farm.</p> <p>54 Woodmarsh has been subject to a rigorous site selection procedure and is acceptable to the LPA. Officers at Wiltshire Council have advised however that they are proposing to reject a current application (19/02095/OUT) made by the developer for Organpool Farm.</p> <p>The site at Organpool Farm was comprehensively rejected during site selection and community engagement. Inclusion of it would risk the plan at Referendum and it is therefore not an alternative that the Steering Group will be proceeding with.</p>
12	Trowbridge Town Council	Disappointment that the NDP has accepted strategic sites	The NDP cannot block strategic sites in the way implied and the Steering Group would not wish to do so.
1	Individual	'It appears that despite residents attending and commenting on the housing allocation sites for North Bradley nothing has been amended. Most residents wish to keep the green corridor, albeit slim, between Westbury Road and Wood Marsh. Development of the proposed sites would eliminate any gap between Trowbridge and the village of North Bradley'.	This response seems to refer to strategic site H 2.2, which is not allocated in the NDP. The Steering Group has gone to some length to explain the difference between strategic and local sites, but it seems that this respondent has unfortunately not understood this.