

**Land South of White Horse Business Park,
Trowbridge**

Land at Trowbridge, Wiltshire

April 2020

Turley

Contents

1.	Introduction	1
2.	The Site	3
3.	The Proposed Development	5
4.	Planning Policy Context	7
5.	Consideration of Planning Issues	13
6.	Summary and Conclusions	23

David Murray-Cox
David.murray-cox@turley.co.uk

Client

Castlewood Properties Ventures Ltd

Our reference

CASR3002

April 2020

1. Introduction

1.1 This Planning Statement is submitted by Turley on behalf of Castlewood Properties Ventures Ltd (the Applicant) to Wiltshire Council in support of an outline planning application for residential development at land south of White Horse Business Park, Trowbridge (the Site).

1.2 The application is submitted in Outline with all matters reserved except for access. Specifically, consent is sought for:

‘Outline application for up to 100 dwellings and a care home (Class C2 Use) of up to 64 beds (up to 3,750 sqm), as well as vehicular access from the A363. Matters to be considered: Access in to the site.’

1.3 The Site is allocated for residential development as part of a wider site allocation (site ref. H2.2) in the recently adopted Wiltshire Housing Site Allocations Plan (WHSAP).

1.4 The application is supported by a Parameter Plan (prepared by Turley Design) which establishes the area in which development is proposed; vehicular access and maximum building heights as well as other key considerations which inform the proposals. An indicative masterplan, also prepared by Turley Design, is submitted to illustrate how the Site could be developed under the outline parameters. Further consideration of the key development management concerns will be taken at the detailed design (reserved matters) stage. In addition, this application is accompanied by a drawing which shows the proposed access into the site. It is envisaged that the access throughout the site will be confirmed at the reserved matters stage.

1.5 This Planning Statement has been prepared to assess the application proposals against the relevant provisions of the statutory Development Plan and other material considerations, particularly the National Planning Policy Framework (NPPF). This Statement will demonstrate that planning permission should be granted without delay having applied the NPPF presumption in favour of sustainable development. It will assess all relevant development management considerations, with appropriate mitigation proposed where relevant.

1.6 This remainder of this Statement is structured as follows:

- **Section 2** – provides the site context and the relevant planning history;
- **Section 3** – sets out the details of the proposed development;
- **Section 4** – considers the national and local planning policy context against which the development proposals will be assessed;
- **Section 5** – provides an assessment of the proposals against relevant planning policy;
- **Section 6** – sets out the Draft Heads of Terms; and

- **Section 7** – draws the report’s Conclusions.

1.7 Finally, this Statement should be read alongside the following supporting documents and reports which accompany the outline planning application:

- Application Drawings, prepared by Turley Design;
- Design and Access Statement, prepared by Turley Design;
- Landscape Visual Impact Assessment, prepared by Turley Landscape and VIA;
- Statement of Community Involvement, prepared by Turley Strategic Communications;
- Transport Assessment, prepared by Badingham;
- Framework Travel Plan, prepared by Badingham;
- Historic Environment Desk-Based Assessment, prepared by Cotswold Archaeology;
- Tree Survey, prepared by Greenman Environmental Management;
- Ecological Assessment, prepared by Nicolas Pearson Associates;
- Lighting Assessment, prepared by Abley Letchford Partnership;
- Utilities Assessment, prepared by Abley Letchford Partnership; and
- Flood Risk Assessment and Drainage Strategy, prepared by Abley Letchford Partnership.

2. The Site

- 2.1 The Proposed Scheme occupies approximately 8.37 hectares of greenfield land, comprising five fields of pasture to the south of Trowbridge and northeast of North Bradley.
- 2.2 The surrounding area is mixed in character. The Site is bounded to the north by the A363 beyond which is a retail park, to the east by the White Horse Business Park, to the south-east by agricultural fields, to the south-west by residential properties along the road 'Woodmarsh'.
- 2.3 The Application Site forms the northern parcel of a land allocation in the WHSAP (site ref. H2.2) that comprises approximately 20.52 hectares (hereafter referred to as 'the Allocation Site'). The two other parcels of land within the Allocation Site are being promoted separately by others. However, the proposals have been designed in collaboration with Linden Homes (Vistry) who will be submitting a separate planning application for the development of the parcel of land which abuts the Site to the south ('the Linden Site'). The details of the Allocation are discussed further in Section 4 of this Planning Statement.
- 2.4 In terms of the flood risk of the Site, the Government's online maps identify it as lying entirely within Flood Zone 1, with a low probability of flooding.

Planning History

- 2.5 There is no relevant planning history from a development management perspective for the Site.
- 2.6 An outline planning application which relates to the Elm Grove site allocated in the WHSAP (site ref. H2.1) which is located to the north Site was submitted in November 2019 (LPA ref. 19/11459/OUT). The outline application seeks permission for up to c.270 dwellings; erection of multi-use community facility (Class D1); strategic landscaping; and access and drainage works following the demolition of redundant former agricultural outbuildings. Details of access and landscaping are included in the application submission with all other matters are reserved. The application is pending consideration and the target determination deadline for the application is currently 29 May 2020.

Environmental Impact Assessment

- 2.7 Schedule 2 of the Town and Country Planning (Environmental Impact Assessment) Regulations 2017 (hereafter referred to as the 'EIA Regulations') identified projects where an EIA is required. The EIA Regulations implement the requirements of the European Community's Directive No. 97/11/EC and 2011/92/EU. Further guidance is provided in the National Planning Practice Guidance (NPPG).
- 2.8 In order to confirm whether an Environmental Statement was required for the proposed development, a Request for Screening Opinion was submitted by the

Applicant to Wiltshire Council on 20 December 2019. The Screening Request considered that the development proposals do not constitute EIA development.

- 2.9 Wiltshire Council issued their adopted EIA Screening Opinion on 23 January 2020 which confirms that an Environmental Impact Assessment is not required for the proposed development.

Community Engagement

- 2.10 The Applicant held a joint public exhibition on 10th January 2020 at North Bradley Progressive Hall, alongside Linden Homes in order to seek the views of local residents on the proposals (including Linden's). The event was advertised via a leaflet drop and a website was set up for the event (www.homesforwiltshire.co.uk).
- 2.11 The Applicant also engaged with the North Bradley Parish Council Steering Group alongside Linden Homes in order to assist the preparation of their Neighbourhood Plan.
- 2.12 The feedback and comments received in response to this exhibition have fed into the evolution of the proposals, further details of which are discussed in the supporting Design and Access Statement. Full details on the stakeholder engagement undertaken prior to the submission of this application is set out within the Statement of Community Engagement prepared by Turley.

3. The Proposed Development

- 3.1 The application seeks outline planning permission to provide residential development including a care home facility (Class C2) and green infrastructure enhancements. The application is submitted with all matters reserved except means of access.
- 3.2 Although the application is in Outline and the detailed design will be decided at the reserved matters stage, the following elements are proposed:
- Up to 100 dwellings including a range of housing options;
 - A care home of up to 64 beds (up to 3,750 sqm);
 - Vehicular access via a new junction on A363 (shown in detail), along with connection road through to the Linden Site to the south (shown on the Parameters Plan);
 - New planting and landscaping throughout the Site and creation of a 'green buffer' between the proposed development area to the north and the west of the Site, and the existing development at North Bradley;
 - The creation of public open space and a playspace for children;
 - Sustainable drainage features; and
 - Pedestrian and cycle links to Woodmarsh, the Linden site, Trowbridge and North Bradley.
- 3.3 New homes will be designed to complement the surrounding character of Trowbridge and North Bradley. We provide further details on the design proposals below.

Design

- 3.4 Whilst the detailed design will be decided at the reserved matters stage, the proposed development will take into consideration the surrounding character. A quality palette of materials is proposed including brick and render with roof tiles anticipated to be either recon slate or a red/brown tile.
- 3.5 Appropriate boundary treatments will be used within the scheme including close board timber fencing on rear boundaries and brick walling where rear boundaries face the public realm. Hedgerow and street trees will be used to delineate public and private spaces.
- 3.6 Car and cycle parking will be provided in accordance with the standards set out in the Wiltshire Local Transport Plan.

Mix

- 3.7 The proposed development will comprise a mix of detached, semi-detached and terraced family homes of between 1 and 4 bedroom units. It is envisaged that the precise housing mix will be confirmed through the reserved matters process.

Building Heights and Massing

- 3.8 The majority of dwellings will be up to 2.5 storeys. Development along the green infrastructure edges will be restricted to 2 storeys to respond to its open landscape character. The care home provides the potential to be 3 storeys. The variation in heights at key locations helps to create a legible development as well as providing visual interest.

Density

- 3.9 A mix of densities is proposed, which is generally graded from highest along the primary road to the lowest along the park edges and along the western edge due to its proximity to North Bradley which is characterised by larger gardens and building footprints.

Access

- 3.10 In line with Policy H2.2 of the WHSAP, access to the Site is proposed from Bradley Road via a priority controlled junction as shown on the drawing no. 002 Rev A (Proposed Right Turn Lane Access) prepared by Badingham. The junction will be designed to facilitate the delivery of the rest of the Allocation Site connecting to the Linden Site to the south east.
- 3.11 Improved pedestrian access will be provided through the inclusion of footpaths on Bradley Road.

Open Space and Green Infrastructure

- 3.12 Multiple areas of open space and landscaping will be incorporated into the proposed scheme and a safe network of paths and cycle routes will be delivered.
- 3.13 The layout has been configured to ensure that the majority of existing trees and hedgerows will be retained and enhanced as part of the wider landscape strategy. Green infrastructure along the eastern boundary will be planted to prevent coalescence with North Bradley. Buffer planting surrounding White Horse Business Park will be reinforced to produce a woodland feature and for the continued use by bats.
- 3.14 Formal and informal play spaces will be provided, the quantum and location of which will be decided at the RM stage.

Drainage

- 3.15 Sustainable Drainage Systems (SuDS), including attenuation basins will be incorporated into the proposal, further details of which are set out in the Flood Risk Assessment and Drainage Strategy prepared by Abley Letchford Partnership Ltd. The Site will be designed so that all development will be delivered outside of existing areas of surface water flood risk.

4. Planning Policy Context

- 4.1 Section 54(a) of the Town and Country Planning Act (1990), as repealed by Section 38(6) of the Planning and Compulsory Purchase Act 2004, states that Local Planning Authorities (LPAs) should determine planning applications in accordance with the Development Plan unless material considerations indicate otherwise.
- 4.2 The Development Plan comprises the Wiltshire Housing Site Allocations Plan (WHSAP) (adopted February 2020), the Wiltshire Core Strategy (WCS) (adopted January 2015) and the Saved Policies of the West Wiltshire District Local Plan. Material considerations including the National Planning Policy Framework (NPPF) (February 2019) and the supporting Planning Practice Guidance (PPG) (as amended).
- 4.3 The North Bradley Neighbourhood Plan (NBNP) has been recommended to proceed to Referendum. As the NBNP has been through Examination, its policies can be given weight in the determination of the current proposal.
- 4.4 Wiltshire Council has begun preparation of a Local Plan Review (LPR). Consultation on the Issues and Options was undertaken in winter 2017. No indicative dates have been provided for the next round of consultation.

Local Planning Policy Context

Wiltshire Core Strategy

- 4.5 The Core Strategy was adopted in January 2015 in order to guide development up to 2026. The document outlines a range of policies relevant to the application proposals. These include:
 - Policy CP1 (Settlement Strategy) identifies Trowbridge as a Principal Settlement, one of the first tier of settlements in the hierarchy alongside Chippenham and Salisbury.
 - Policy CP2 (Delivery Strategy) seeks to deliver at least 42,000 dwellings across Wiltshire during the plan period (2006-2026), with a minimum requirement of 24,740 dwellings for North and West Wiltshire, within which Trowbridge sits.
 - Policy CP43 (Providing Affordable Homes) states that on sites of five or more dwellings, it is identified that 30% affordable housing will be sought on sites in Trowbridge. Tenure will be negotiated on a site-by-site basis to reflect the nature of local needs.
 - Policy CP45 (Meeting Wiltshire's Housing Needs) requires developments to incorporate a range of housing types, tenures and sizes which reflects the need of the community within which a site is located. The Wiltshire Strategic Housing Market Assessment (SHMA) is identified as the basis for identifying the need and that the affordable housing units should be dispersed throughout a development and designed to a high quality.

- Policy CP46 (Meeting the needs of Wiltshire’s vulnerable and older people) sets out the requirement for the provision, in suitable locations, of new housing to meet the specific needs of vulnerable and older people. Where practicable, it is set out that accommodation should seek to deliver and promote independent living. The Policy states that housing schemes should assist older people to live securely and independently within their communities. The Policy states that the provision of sufficient new accommodation for Wiltshire’s older people will be supported, including: nursing accommodation; residential homes; extra-care facilities.
- Policy CP50 (Biodiversity and geodiversity) requires development proposals to demonstrate how they protect features of nature conservation and geological value as part of the design rationale. All development proposals shall incorporate appropriate measures to avoid and reduce disturbance of sensitive wildlife species and habitats throughout the lifetime of the development.
- Policy CP51 (Landscape) states that development should protect, conserve and where possible enhance landscape character and must not have a harmful impact upon landscape character. Any negative impacts must be mitigated as far as possible through sensitive design and landscape measures.
- Policy CP52 (Green Infrastructure) seeks to ensure that development makes 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.
- Policy CP57 (Ensuring high quality design and place shaping) establishes that development proposals should create a strong sense of place through drawing on the local context.
- Policy CP58 (Ensuring the conservation of the historic environment) sets out that development should protect, conserve and where possible enhance the historic environment.
- Policy CP60 (Sustainable transport) seeks to reduce the need to travel particularly by private car, and support and encourage the sustainable, safe and efficient movement of people within and through Wiltshire.
- Policy CP61 (Transport and new development) requires new development to be located and designed to reduce the need to travel particularly by private car and to encourage the use of sustainable transport alternatives.
- Policy CP62 (Development impacts on the transport network) seeks to ensure that development provides appropriate mitigating measures to offset any adverse impact on the transport network at both the construction and operational stages.
- Policy CP67 (Flood Risk) sets out the requirements for all new development to include measures to reduce the rate of rainwater run-off and improve rainwater

infiltration to soil and ground (sustainable urban drainage) unless site or environmental conditions make those measures unsuitable.

Wiltshire Housing Site Allocations Plan

4.6 Policy H2.2 (Land off the A363 at White Horse Business Park) allocates the Site as part of a wider residential allocation for development comprising the following elements:

- *'Approximately 175 dwellings*
- *Vehicular access from the A363*
- *Development to be directed to the north and east of the site; and*
- *Improvements to cycling and walking routes through the site link into the existing network.'*

4.7 The policy sets out a number of mitigation measures and requirements that the development of the Allocation Site will be subject to. The Policy states:

"Development will be subject to the following requirements:

- *core bat habitat will be protected and enhanced. Design and layout will be informed by appropriate surveys, impact assessments and the Trowbridge Bat Mitigation Strategy (TBMS);*
- *appropriate mitigation to protect bats, including financial contributions towards management, monitoring and any off-site measures as necessary, as informed by the TBMS;*
- *retention and enhancement of existing hedgerows and trees as part of wider landscaping and green infrastructure requirements, incorporating open space provision. Development will be expected to enhance a key gateway approach to the town and retain visual separation between the town and North Bradley;*
- *sensitive design and layout, which ensures the significance of heritage assets and their settings are not subject to unacceptable harm. This shall be informed by appropriate heritage and archaeological assessments. Development proposals [sic] will make a positive contribution towards conserving and enhancing the significance of the Baptist burial ground, its gateway and its setting; and*
- *a Flood Risk Assessment (incorporating an assessment of the predicted effects of climate change) and comprehensive drainage strategy to inform site layout and design so that surface water is controlled and does not exacerbate flooding off-site."*

North Bradley Neighbourhood Plan (Referendum Version)

- 4.8 The Neighbourhood Plan area covers land beyond the village of North Bradley, including the application site to the north-east. The Visions set out states that:

‘By 2026 North Bradley will have retained its landscape setting, including its physical separation from Trowbridge and its own distinct rural character.’

- 4.9 The relevant policies include:

- Policy 2 (Housing) supports homes specifically designed for the retired population and affordable homes. It states that all developments should aim to enhance local habitats for wildlife by design, such that development creates a net gain for biodiversity overall.
- Policy 5 (Bat Conservation) notes that the entire NBNP area falls within zones of sensitivity for those species of bats which are features of the Bath and Bradford on Avon Bats SAC. All planning applications will therefore need to comply with guidance on survey and mitigation contained in the Trowbridge Bat Mitigation Strategy.
- Policy 6 (Infrastructure Priorities) sets out the expectation that all new housing development in the area will to contribute toward local infrastructure in proportion to their scale and in accordance with National and Wiltshire Core Strategy policy.

Trowbridge Bat Mitigation Strategy

- 4.10 The Trowbridge Bat Mitigation Strategy (TBMS) SPD (Feb 2020) sets out the approach to establishing mitigation measures in the Trowbridge area to protect the bat species associated with the Bath and Bradford on Avon Bats Special Area of Conservation (SAC) from recreational pressure and/or loss of core habitat. It has been prepared to support the implementation of the Wiltshire Core Strategy (WCS) and the allocations set out in the Wiltshire Housing Site Allocations Plan (WHSAP) and thereby helps support the planned delivery of housing established in Core Policy 29 of the WCS.

National Planning Policy Context

National Planning Policy Framework (NPPF) (2019)

- 4.11 The updated NPPF was published in February 2019. The following section sets key text within the updated NPPF, however it should be noted that we have not sought to summarise all relevant text within the Framework.
- 4.12 The NPPF is underpinned by a presumption in favour of sustainable development which is embodied within Paragraph 11. For decision-taking this means:

‘Approving development proposals that accord with an up-to-date development plan without delay; or

where there are no relevant development plan policies, or the policies which are most important for determining the application are out-of-date, granting permission unless:

- *the application of policies in this Framework that protect areas or assets of particular importance provides a clear reason for refusing the development proposed; or*
 - *any adverse impacts of doing so would significantly and demonstrably outweigh the benefits, when assessed against the policies in this Framework taken as a whole’.*
- 4.13 Paragraph 59 indicates that to support the Government’s objective of significantly boosting the supply of homes, a sufficient amount and variety of land should come forward where it is needed.
- 4.14 In terms of delivering new homes, Paragraph 68 identifies that small and medium sites can make an important contribution to meeting the housing requirement of an area.
- 4.15 Paragraph 109 relates to highways matters and states that:
- ‘Development should only be prevented or refused on highways grounds if there would be an unacceptable impact on highway safety, or the residual cumulative impacts on the road network would be severe.’*
- 4.16 In terms of decision making, part d) of paragraph 118 states decisions should:
- ‘promote and support the development of under-utilised land and buildings, especially if this would help to meet identified needs for housing where land supply is constrained and available sites could be used more effectively’.*
- 4.17 Paragraph 122 goes on to say that decisions should support development that makes efficient use of land, taking into account a number of factors including *‘the desirability of maintaining an area’s prevailing character and setting (including residential gardens), or of promoting regeneration and change.’*
- 4.18 Similarly, paragraph 127 promotes developments which are, *inter alia*, visually attractive as a result of good architecture, layout and appropriate and effective landscaping; and are sympathetic to local character and history, including the surrounding built environment and landscape setting, while not preventing or discouraging appropriate innovation or change (such as increased densities).
- 4.19 Paragraph 170 states that *“Planning policies and decisions should contribute to and enhance the natural and local environment by....:*
- *minimising impacts on and providing net gains for biodiversity, including by establishing coherent ecological networks that are more resilient to current and future pressures”*
- 4.20 The following sections of the NPPF are considered most relevant to this application:
- Section 8 – Promoting Healthy and Safe Communities
- Development should facilitate use of shared space, community facilities and other local services in order to enhance public wellbeing, in turn engendering

healthy, inclusive communities. It is also important that developments are safe and accessible, in order to prevent crime from undermining community cohesion.

- Section 9 – Promoting Sustainable Transport

Transport policies are pertinent to delivering sustainable development, as well as meeting wider sustainability and health objectives.

- Section 12 – Achieving well-designed places

Great importance is attached to design in order to promote sustainable development and the shaping of better places.

- Section 14 – Meeting the Challenge of Climate Change, Flooding and Coastal Change

This section is important in terms of securing the environmental pillar of sustainable development. New development should be proactive in mitigating against climate change by taking account of flood risk, coastal change and water supply and demand.

- Section 15 – Conserving and Enhancing the Natural Environment

Development should seek to enhance the natural and local environment in terms of ecology and biodiversity. Paragraph 170

- Section 16 – Conserving and Enhancing the Historic Environment

New development should both conserve and enhance existing heritage assets.

5. Consideration of Planning Issues

- 5.1 This section considers the principal planning issues associated with the proposed development against the relevant policy framework identified in Section 4 of this Planning Statement.
- 5.2 Where relevant, this section also summarises the findings of other documentation submitted in support of the application in the context of relevant planning policy and as such, this Statement should be read alongside the suite of other application documents.

The Principle of Development

- 5.3 The Application Site is allocated for residential development under Policy H2.2 of the recently adopted WHSAP. The soon-to-be adopted NBNP supports the allocation Policy H2.2.
- 5.4 As a result of the recently adopted Site Allocation, the proposals are fully supported, in principle, by an up-to-date development plan and should be granted permission without delay. Through the allocation the Council has considered that the Site represents a sustainable location for new housing development which within well connected to a wide range of facilities, services and transport hubs with Trowbridge.
- 5.5 The Site would make a valuable contribution towards the supply of deliverable housing land within Wiltshire including the provision of policy compliant affordable housing.
- 5.6 The WCS states (paragraph 2.14) that *'by 2026 there will be a higher proportion of the older age groups, including the over 85s. This part of the population is predicted to grow the fastest, by 89.4%, over the next 15 years, and it is also predicted that there will be double the number of older disabled people by 2026.'*
- 5.7 This demonstrates that will be a continuing long-term trend which sees older residents become an increasingly large component of the Wiltshire population who's needs should be planned for. National guidance and WCS Policy CP45 encourage the delivery of a mix of housing to meet the needs of different groups within the community, including the elderly. The care home is therefore proposed to ensure the creation of a truly multi-generational community in line with WCS Policy CP46 and Policy 2 of the NBNP Referendum Version.
- 5.8 The Framework sets out in Paragraph 8 the three overarching objectives for securing such development: economic, social and environmental. All three strands need to be considered holistically. These are considered in turn below in relation to the proposed development.
- *Economic* – the proposals would deliver direct benefits in terms of jobs and investment from the construction phase and the delivery of a care home will provide long term jobs. The increased number of households that would occupy the development is also likely to help support existing services in both Trowbridge and North Bradley.

- *Social* – the provision of housing, particularly including an affordable housing element would assist in contributing to the Council’s supply of housing early in the plan period. The development will provide a range of housing offering differing tenures and sizes to meet the identified needs of the area, including the elderly.
- *Environmental* –the relevant environmental considerations in relation to the proposals are considered in further detail below. The site is not subject to any specific protective designation. It would not result in flooding and will provide enhancements to biodiversity. Overall it is not considered that the proposals would result in significant adverse environmental effects although it is acknowledged that the construction of the residential development will change the character and appearance of the site itself and that this needs to be weighed into the planning balance.

5.9 The principle of residential development on the site is considered acceptable and as will be demonstrated below, the proposals accord with the Development Plan. Given this, the development should be approved without delay, in accordance with Paragraph 11 of the NPPF.

Specific Response to Allocation H2.2

5.10 As previously discussed, this application is allocated under reference H2.2. The following text provides a response to each matter contained within the allocation.

- Development quantum: The scheme proposes up to 100 dwellings and a care home of up to 64 beds (up to 3,750 sqm). The allocation as a whole (including the Application Site and the land controlled by other parties) seeks to provide approximately 175 dwellings. The Application Site will contribute a proportion of the overall housing expected in the allocation (with other parties also in line to provide additional housing). In any event, the quantum of development referred to in the allocation is expressed as “approximately 175 dwellings” and is not an absolute or maximum expectation.
- Vehicular access from the A363: the proposal is in accordance with this expectation and provides for access from the A363.
- Development to be directed to the north and east of the site: The material submitted with the application (and the nature of the Application Site itself) demonstrates how this scheme will direct development to the northern and eastern parts of the Allocation Site.
- Improvements to cycling and walking routes through the site link into the existing network: These matters can largely be controlled via the reserved matters process, however the Illustrative Layout demonstrates how a network of connections within the Application Site can be achieved. Paragraph 7.3 of the Transport Assessment which supports this application states that “the proposed development will provide pedestrian infrastructure improvements along the A363 in the form of a 2.0m footway to the south of the carriageway together with a controlled crossing facility, providing access to Drynham Lane. This will

provide a continuation of the Drynham Lane pedestrian / cycle link into the site, providing a more attractive and formal route for future users travelling by foot or bicycle to Trowbridge town centre.”

- **Core bat habitat will be protected and enhanced. Design and layout will be informed by appropriate surveys, impact assessments and the Trowbridge Bat Mitigation Strategy (TBMS):** The application is supported by an Ecological Impact Assessment (EclA) which sets out how the proposed development has been informed by a variety of ecological considerations, including the presence of bat species in the area. The EclA sets out a range of potential impacts and the design response/mitigation measures as a result which apply to either the construction or operational phases of the development. These include, for example, minimising the loss of hedgerow network as far as possible, minimising the loss of foraging habitat, the provision of wide habitat buffers and the creation of invertebrate rich habitats within those buffers.
- **Appropriate mitigation to protect bats, including financial contributions towards management, monitoring and any off-site measures as necessary, as informed by the TBMS:** The application is supported by an Ecological Impact Assessment (EclA) which sets out how the proposed development has been informed by a variety of ecological considerations, including the presence of bat species in the area. The EclA sets out a range of potential impacts and the design response/mitigation measures as a result which apply to either the construction or operational phases of the development. These include, for example, minimising the loss of hedgerow network as far as possible, minimising the loss of foraging habitat, the provision of wide habitat buffers and the creation of invertebrate rich habitats within those buffers. The EclA highlights how sensitive lighting across the Site, including and buffer lighting zones could be used, along with the significant areas of public open space to limit recreational pressures on nearby woodlands. In addition, the EclA also identifies a potential contribution to the strategic fund to implement measures to reduce the recreational impacts planned housing growth.
- **Retention and enhancement of existing hedgerows and trees as part of wider landscaping and green infrastructure requirements, incorporating open space provision. Development will be expected to enhance a key gateway approach to the town and retain visual separation between the town and North Bradley:** The precise details and appearance of the proposed development will be controlled via the reserved matters process. The application is supported by material which considers the impact of development on existing hedgerows within the Site.
- **Sensitive design and layout, which ensures the significance of heritage assets and their settings are not subject to unacceptable harm. This shall be informed by appropriate heritage and archaeological assessments. Development proposals [sic] will make a positive contribution towards conserving and enhancing the significance of the Baptist burial ground, its gateway and its setting:** These matters are considered in various documents supporting this application, in relation to design, heritage and landscape for example. The

Applicant considers that these demonstrate how the scheme provides an appropriate response to its setting. In relation to archaeology matters, the 'Historic Environment Desk-Based Assessment' finds that "No significant known archaeological remains have thus been identified within the Site, and there is considered to be a low potential for any significant unknown archaeological remains to survive buried within the Site. No in-principle archaeological constraint to development has been identified." In relation to other heritage assets, the report concludes that "The development proposals would lead to no harm to the significance of the designated heritage assets (comprising listed buildings) located within the environs of the Site. Two nearby unlisted buildings are non-designated heritage assets; the assessment has concluded that the development proposals would lead to a low-moderate level of harm to the heritage significance of one of these buildings (Woodmarsh Farm), whose importance is defined as 'low'.

- **A Flood Risk Assessment (incorporating an assessment of the predicted effects of climate change) and comprehensive drainage strategy to inform site layout and design so that surface water is controlled and does not exacerbate flooding off-site:** A Flood Risk Assessment and Drainage Strategy accompanies this application.

5.11 In addition, the Policy states that:

"Development will take place in accordance with a masterplan approved by the Council as part of the planning application process. The design and layout will take account of all policy requirements, including the timely and coordinated provision of necessary infrastructure to achieve a comprehensive development of the site."

5.12 The design of this application has been progressed in conjunction with the promotion of adjoining land, also allocated under reference H2.2 being promoted by Linden. The application material demonstrates how this site can facilitate the delivery of the adjoining land, rather than prejudice it. For example, this is achieved by provision having been made for a route through the Site which can connect to the Linden site.

Care Home Justification

5.13 The proposed development includes a care home of up to 64 beds (up to 3,750 sqm).

5.14 The LPA's Core Strategy (paragraph 2.14) states that:

"Wiltshire has been one of the fastest growing populations in the country. Since 2001, the level of population growth has been above the national average; however, it is an ageing population which will have implications for the future economic base of the county. By 2026 there will be a higher proportion of the older age groups, including the over 85s. This part of the population is predicted to grow the fastest, by 89.4%, over the next 15 years, and it is also predicted that there will be double the number of older disabled people by 2026. It is necessary to both plan for the needs of the ageing population, while also seeking the jobs and homes that can support a more diverse population encouraging economically active and younger people to live in the area."

- 5.15 The NPPF 2019 refers to the need to have regard to the needs of different groups in the community when preparing plans. Paragraphs 60 and 61 state that:

“To determine the minimum number of homes needed, strategic policies should be informed by a local housing need assessment, conducted using the standard method in national planning guidance unless exceptional circumstances justify an alternative approach which also reflects current and future demographic trends and market signals. In addition to the local housing need figure, any needs that cannot be met within neighbouring areas should also be taken into account in establishing the amount of housing to be planned for.”

“Within this context, the size, type and tenure of housing needed for different groups in the community should be assessed and reflected in planning policies (including, but not limited to, those who require affordable housing, families with children, older people, students, people with disabilities, service families, travellers, people who rent their homes and people wishing to commission or build their own homes).”

- 5.16 The definition of older people in the NPPF 2019 states that:

“Older people: People over or approaching retirement age, including the active, newly retired through to the very frail elderly; and whose housing needs can encompass accessible, adaptable general needs housing through to the full range of retirement and specialised housing for those with support or care needs.”

- 5.17 The updated PPG confirms that meeting these needs of older people is ‘critical’ and that where there is an identified unmet need for specialist housing, local authorities should take a positive approach to schemes that propose to address this need (Paragraph 016 Reference ID 63-016-20190626).

- 5.18 It is therefore well established in national planning policy and guidance that Plan making should have regard to the needs of older people and this group of the community is likely to require a diverse range of accommodation. This is reflected in the PPG text which recognises the inherent benefits that increasing the supply of such accommodation has to older people as well as the wider socio-economic benefits derived from its provision.

- 5.19 This care home is proposed in order to help provide additional accommodation to those in need of care, particularly older people.

- 5.20 Since this application seeks outline planning permission, the exact nature of the care home and the level of care (whether residential, nursing and/or dementia care) is still to be confirmed. It is envisaged that the future reserved matters submissions will include details as to the form and operation of the care home.

Design and Layout

- 5.21 The proposed development takes account of the locally distinctive character. At the detailed design stage, careful consideration will be given to the scale and volume of the dwellings, to ensure they relate to one another and their surroundings consistent with the guiding factors set out in Paragraph 127 of the NPPF.

- 5.22 The built development will be located to the north and east of the Site to avoid coalescence between Trowbridge and North Bradley as required by WHSAP Policy H2.2. Public and semi-private spaces will be clearly separated by building frontages and boundary enclosures and the subtle use of landscaping. The proposed layout seeks to retain as many of the trees and other vegetation on the Site as possible and will provide new high quality hard and soft landscaping to complement this as supported by WCS Policy CP52.
- 5.23 Detailed commentary on the proposed design and access arrangements are provided within the accompanying Design and Access Statement, prepared by Turley Design.
- 5.24 In general, much of the detailed design of the proposed development will be established through the reserved matters process.
- 5.25 However it is considered that the proposed development, as explained in the supporting material, represents a positive response to CP57 and the need to ensure a high standard of design in all new developments.

Visual Impact

- 5.26 Turley Landscape and VIA has prepared a Landscape Visual Impact Assessment (LVIA) which identifies the baseline situation of the Site and its surroundings in terms of 'landscape elements', 'landscape character' and 'visual amenity'.
- 5.27 The Site, which comprises an area of low lying pastoral fields, is located within the following landscape character areas - 'LCA: 11C Trowbridge Rolling Clay Lowland' and 'LCA: E3 North Bradley Rolling Clay Lowland'. However, the Site is not covered by any landscape designation and is not considered to form part of a 'valued landscape' in the context of NPPF paragraph 170.
- 5.28 The LVIA notes that visually, the Site is relatively well contained due to its flat topography, mature trees and hedgerow structure, and existing built form surrounding the Site. It is not disputed that the proposed development will change the character of the landscape from an agricultural one to residential. It noted, however, that the Site is allocated for residential development so it is considered that the change has already been deemed acceptable by Wiltshire Council. Despite this, the proposals seek to ensure measures are incorporated in the scheme to reduce the impact on the landscape and visual receptors. These measures have been informed by the LVIA process and include providing a buffer (minimum 50m) between residential properties in North Bradley and proposed residential properties which would include woodland planting, open space and specimen trees and the preservation and enhancement of the retained hedgerow structure as encouraged by WCS Policy CP51.
- 5.29 The LVIA concludes that *'effects on the wider landscape and more distant views would be limited. The proposed tree and hedgerow planting and new areas of open space would improve the recreational value of the landscape and enhance parts of the landscape structure.'*

Highways

- 5.30 A Transport Assessment has been prepared by Badingham which sets out the proposed access arrangements and assesses the impact of the proposals on the surrounding highway network.
- 5.31 Consistent with WHSAP Policy H2.2, vehicular access will be provided in the form of a priority T-junction to the north of the site via the A363 Bradley Road. The junction arrangement, which is indicated on drawing no. 002 Rev A, will be subject to further detailed design as part of the post planning Section 38 / 278 agreement process.
- 5.32 To improve pedestrian connectivity, the proposals include the provision of a 2m footway and a controlled crossing facility, complete with dropped kerbs and tactile paving, approximately 110m to the west of the proposed access.
- 5.33 The alignment of the internal highway layout has taken into account the wider H2.2 allocated site by providing a link road through to the south east of the site to facilitate access to and from the Linden controlled development to the south.
- 5.34 Consistent with the paragraph 109 of the NPPF, the TA concludes that the *'impact of development traffic would not have a material impact on the operation of these junctions which is outside of usual daily variations. It is therefore considered that the full H2.2 development could be delivered in full without the need for off-site highway mitigation.'*
- 5.35 A Framework Travel Plan (FTP) has been prepared in respect of the proposed development detailing the means by which sustainable travel to and from the Site by staff and visitors will be encouraged. The TA and FTP conclude that there are no transport related reasons that should prevent the proposed development of this Site. The proposals are in line with WCS Policies CP60 and CP61 which encourage sustainable transport.

Heritage & Archaeology

- 5.36 A Historic Environment Desk-Based Assessment, prepared by Cotswold Archaeology, is submitted in support of this application although a geophysical survey is suggested to provide additional information on the below-ground resource. This confirms that there are no known archaeological remains within the Site. The hedgerows within it are 'important' hedgerows under the Hedgerow Regulations 1997 and are considered non-designated heritage assets of low value.
- 5.37 The assessment concluded that the development proposals would not lead to harm to the heritage significance of any designated heritage assets located within the wider environs of the site in line with WCS Policy CP58.
- 5.38 The proposals provide mitigation measures to screen the proposals from Woodmarsh Farm (a non-designated heritage asset of low heritage significance) and provide an appropriate 'buffer' of open space as required by WHSAP Policy H2.2. There will remain a low-moderate level of harm to the heritage significance of the farmhouse, however, Paragraph 197 of the NPPF requires the scale of harm and the heritage significance of

the non-designated heritage asset to be weighed in the planning balance. The scale of harm is low-moderate, and the heritage significance of the heritage asset is low.

- 5.39 The Assessment confirms that *'no in-principle constraint to development of the Site on heritage grounds (with regard to both potential physical impacts on archaeological remains, and nonphysical effects on the 'setting' of heritage assets) has been identified'*.

Trees

- 5.40 An Arboricultural Impact Assessment (AIA) has been undertaken by Greenman Environmental Management in support of this application. It is noted that the Site currently contains 59 trees, 4 groups, 13 hedges and one woodland area and that the Site is covered by an area Tree Preservation Order (TPO). It is expected that 53 trees, 3 groups of trees, 11 hedges and one woodland area will be retained. Of the trees proposed to be removed, 5 trees and one tree group have been recommended for removal due to their poor condition.
- 5.41 The AIA considered that suitable protection can be provided to the tree identified for retention to ensure their health and safety during the construction and operational phases.
- 5.42 Two hedges will need to be removed to facilitate the proposed design layout.
- 5.43 The AIA concludes that the proposed loss *'will not have a detrimental effect on the local visual amenity or significantly alter the visual treed character of the local area.'*

Ecology

- 5.44 The application is supported by an Ecological Impact Assessment (EcIA) which sets out how the proposed development has been informed by a variety of ecological considerations, including the presence of bat species in the area. The EcIA sets out a range of potential impacts and the design response/mitigation measures as a result which apply to either the construction or operational phases of the development. These include, for example, minimising the loss of hedgerow network as far as possible, minimising the loss of foraging habitat, the provision of wide habitat buffers and the creation of invertebrate rich habitats within those buffers. The EcIA highlights how sensitive lighting across the Site, including and buffer lighting zones could be used, along with the significant areas of public open space to limit recreational pressures on nearby woodlands. In addition, the EcIA also identifies a potential contribution to the strategic fund to implement measures to reduce the recreational impacts planned housing growth.

Flood Risk and Drainage

- 5.45 Abley Letchford Partnership have prepared a Flood Risk Assessment (FRA) and Drainage Strategy which assesses the suitability of the development proposals in the context of on and off-site vulnerability. The FRA confirms that the Site is located within Flood Zone 1 and the proposed residential development is acceptable in terms of flood risk.

5.46 It is noted that detailed flood map provided by the Long Term Flood Risk Maps indicates that the northern portion of the Site is affected by pluvial flooding, however, any future risk of pluvial flooding will be mitigated by the drainage and flood attenuation features provided to the north of the development.

5.47 The FRA concludes that:

‘the development satisfied the revised NPPF (February 2019) and can be justified in the proposed location. Any increase in surface water runoff can be managed using SuDS techniques like pervious paving used widely to provide source control as well as attenuation features proposed to provide storage in extreme storm events.’

5.48 In terms of drainage, it is confirm that all surface water drainage systems will be designed to restrict discharge rates to greenfield QBAR runoff rate and store the balance of water for all events up to and including the 1 in 100 year event including allowance for a 40% increase in rainfall intensities as a result of climate change. The proposals are therefore consistent with the requirements of Policies H2.2 and CP67.

External Lighting

5.49 The proposed external lighting solution, prepared by Abley Letchford Partnership Ltd, will be carefully designed to ensure that the overall scheme provides appropriate lighting to the proposed development whilst maintaining sensitivity towards the environment having particular regard to the recommendations contained within the Trowbridge Bat Mitigation Strategy SPD as required by Policy H2.2.

5.50 The design seeks to restrict the mounting heights of the luminaires, tilt angle, colour temperature and lumen output of exterior light sources in order to minimise the potential for obtrusive light.

Planning Obligations

5.51 It is envisaged that any planning permission may be granted subject to a Planning Obligation.

5.52 The Applicant is committed to agreeing Heads of Terms with the LPA at the appropriate time once the contributions required associated with the application proposals are understood. The Applicants is willing to comply with such a requirement subject to each contribution/obligation demonstrating compliance with the CIL Regulations 2010.

Summary

5.53 Overall the proposed development is in line with adopted policy objectives of WHSAP Policy H2.2 which allocates the Site for residential development. The proposed development of the Site is, therefore, considered to be acceptable in principle.

5.54 The proposals ensure the efficient and sustainable use of an allocated site whilst preserving the separation of the settlements of Trowbridge and North Bradley. The proposals will provide a number of tangible benefits including affordable housing, a care home and the substantial provision of green infrastructure. Not only this, but the proposals provide a number of socio economic benefits by provided much needed

homes, creating local employment opportunities (during the construction and operational phases) and represent a significant investment in the local economy. As discussed, the detailed design will be in-keeping with the sounding character, will not resulting in an increase in flooding and will be well connected with the Linden Site to the south. It is anticipated that appropriate technical evidence can be produced to justify the application proposals.

6. Summary and Conclusions

- 6.1 This Planning Statement has been prepared to support and inform an outline planning application seeking consent for the development of land to the south of White Horse Business Park, Trowbridge to provide up to 100 new dwellings and a care home facility (Class C2) of up to 64no. beds (up to 3,750 sqm), as well as associated access from the A363 and substantial areas of green space. The development will provide 30% affordable housing.
- 6.2 As demonstrated within this Planning Statement and the supporting Design and Access Statement, the development will provide a high quality, sustainable development comprising a mix of dwellings and a care home which sensitively respond to the surrounding context of the Site, and which is compliant with both national and local planning policy.
- 6.3 The Site benefits from a recently adopted residential allocation and the submitted scheme delivers a development which complies with this allocation under Policy H2.2 of the WHSAP. In addition to providing much need homes (including affordable homes), it will provide suitable accommodation to serve Wiltshire's ageing population and those in need of care.
- 6.1 The Applicant has delivered a pre-application engagement programme which has encompassed engagement with Officers, key stakeholders, as well as the local community which has helped to shape the proposals. The supporting documentation submitted with the application demonstrates that there are no known environmental or technical constraints to developing this site, where the proposals have been progressed alongside discussions with the promoters of adjoining land, namely Vistry.
- 6.2 Overall, it has been demonstrated that there are no adverse impacts that would significantly and demonstrably outweigh the benefits brought about as a result of this proposal. The presumption in favour of sustainable development therefore applies in this case and planning permission granted without delay.

Turley Office
The Pinnacle
20 Tudor Road
Reading

T 0118 902 2830

Turley