

29th August 2023

Delivered via email

David Cox
Planning Department
Wiltshire Council
County Hall
Bythesea Road
Trowbridge
BA14 8JN

Dear David,

20/03461/OUT, LAND SOUTH OF WHITE HORSE BUSINESS PARK, TROWBRIDGE – UPDATED APPLICATION MATERIAL AND RESPONSE TO APPLICATION COMMENTS

We write on behalf of the Applicant (Castlewood Property Ventures Ltd) in formally submit amendments in relation to the abovementioned application for outline planning permission.

In addition, this submission seeks to respond to matters raised by consultees and in representations by members of the public.

AMENDED / ADDITIONAL APPLICATION MATERIAL

As it was originally submitted, the description of development proposed the following:

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

Changes were then made to the scheme and submitted in January 2022. In light of the amendments made to the scheme at that time, the description of development was subsequently revised as follows:

“Outline application for up to 100 dwellings, landscaping, green infrastructure, associated drainage measures and vehicular access from the A363 as well as all associated works. Matters to be considered: Access into the site.”

In light of the more recent discussions between the Applicant, the LPA and Natural England, the developable area within the Application Site has reduced, with a consequential reduction in the level of development proposed. Accordingly, we now propose that the description of development is amended as follows:

“Outline application for up to 70 dwellings, landscaping, green infrastructure, associated drainage measures and vehicular access from the A363 as well as all associated works. Matters to be considered: Access into the site.”

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This submission is accompanied by a range of material which reflect the changes to the scheme and to explain why the proposal is acceptable having regard to relevant material considerations and the prevailing policy context. The material included with this submission includes:

- The following drawings:
 - Drawing CASR3002 5000 Revision K (Parameter Plan – Land Use)
 - Drawing CASR3002 4005 Revision K (Illustrative Sketch Layout)
 - Drawing 003 Rev D (Proposed Right Turn Lane Access)
 - Drawing NPA 11020 301 P03 (Green Infrastructure Parameter Plan)
- A Design and Access Statement Addendum dated July 2023
- A Noise Impact Assessment (Version No: 3) produced by SLR and dated June 2023
- An Air Quality Technical Memorandum produced by SLR
- An Ecology Addendum produced by Nicholas Pearson Associates and dated July 2023
- A Biodiversity Metric 3.0 completed by Nicholas Pearson Associates
- A Lighting Strategy produced by Abley Letchford Partnership dated 4th July 2023
- A Flood Risk Assessment and Drainage Strategy produced by Abley Letchford Partnership dated 5th July 2023
- A Highways Technical Note (ref 0655/TN2.1) produced by Badingham Ltd and dated August 2023
- A Landscape and Visual Technical Note produced by Turley and dated August 2023

The table included below lists the material originally provided with the application and identifies how this has been superseded or whether it remains part of the application:

Plan/Document	Original Material / Dated / Reference Previous Amendments	Updated material
Redline Plan	1001 Rev -	Unchanged
Land Budget and Access Plan	CASR3002 5000 Rev D (as originally submitted) <i>Superseded by</i> CASR3002 5000 Rev J (submitted in January 2022)	Superseded by CASR3002 500 Rev K
Illustrative Sketch Layout	CASR3002 4005 Rev E (as originally submitted) <i>superseded by</i> CASR3002 4005 Rev I (submitted in January 2022)	Superseded by CASR3002 4005 Rev K

illustrative Sketch Layout	CASR3002 4001.01 Rev E (as originally submitted)	Superseded and replaced by CASR3002 4005 Rev K
Proposed Right Turn Lane Access drawing	003 Rev A (as originally submitted) 003 Rev B (submitted in January 2022)	Superseded by 003 Rev D
Comprehensive Land Use Plan	CASR3002 3600 Rev E	No longer part of the application Revised version included as part of the Allocation Masterplan document (at Figures 7 and 11) (submitted on an informal basis by BBA Architects on 24 th August 2023)
Green Infrastructure Parameters Plan	NPA 11020 301 P01 (as originally submitted)	Superseded by NPA 11020 301 P03
Joint Ecology Parameters Pan	10996 NPA ZZ ZZ DR Y 1202 P01 (submitted 7 th July 2022)	No longer part of the application Refer to the Allocation Masterplan document (submitted on an informal basis by BBA Architects on 24 th August 2023)
Design and Access Statement	Design and Access Statement (April 2020) (as originally submitted) Design and Access Statement Addendum (2022)	Supported by the Design and Access Statement Addendum produced by Turley and dated July 2023
LVIA	LVIA April 2020 (as originally submitted) <i>supplemented by</i> Landscape and Visual Technical Note (submitted in January 2022)	Supported by the Landscape and Visual Technical Note produced by Turley and dated August 2023
Planning Statement	Dated April 2020 (as originally submitted)	Unchanged and supplemented by this covering letter
Statement of Community Engagement	Dated February 2020 (as originally submitted)	Dated February 2020 (as originally submitted)
Arboricultural Impact Assessment	Dated February 2020 (as originally submitted)	Dated February 2020 (as originally submitted)
Lighting Strategy	A201-R004A (dated April 2020) (as originally submitted)	A Lighting Strategy produced by Abley Letchford Partnership dated 4th July 2023
Transport Assessment	Issue 2 (dated April 2020) (as originally submitted) <i>supplemented by</i> A Technical Note (1.1) on Highways (submitted in January 2022)	Supported by the Highways Technical Note (ref 0655/TN2.1) produced by Badingham Ltd and dated August 2023
Framework Travel Plan	Issue 2 (dated April 2020) (as originally submitted)	Issue 2 (dated April 2020) (as originally submitted)

Flood Risk Assessment and Drainage Strategy	A201-R003A (dated April 2020) (as originally submitted)	Flood Risk Assessment and Drainage Strategy produced by Abley Letchford Partnership dated 5 th July 2023
Air Quality Assessment	Version No: v1.1 (submitted in January 2022)	Supported by the An Air Quality Technical Memorandum produced by SLR
Noise Assessment	Version No: Rev 2 (submitted in January 2022)	A Noise Impact Assessment (Version No: 3) produced by SLR and dated June 2023
Archaeological Evaluation	An Archaeological Evaluation (Cotswold Archaeology) (May 2021) was included in the material submitted in January 2022.	Unchanged
Geophysical Survey Report	00521 dated October 2020	Unchanged
Historic Desk Based Assessment	CR0242_1 (dated April 2020) (as originally submitted)	CR0242_1 (dated April 2020) (as originally submitted)
Ecological Impact Assessment	Ecological Impact Assessment dated April 2020 Ecology Addendum submitted in January 2022	Supported by the Ecology Addendum produced by Nicholas Pearson Associates and dated July 2023
Utilities Assessment	Utilities Assessment produced by Abley Letchford Partnership and dated April 2020	Unchanged

RESPONSE TO POLICY H2.2 OF THE SITE ALLOCATIONS PLAN

This Application Site forms part of a wider area allocated under Policy H2.2 of the Wiltshire Housing Site Allocations Plan (February 2020) for the development of approximately 175 dwellings. The Policy itself includes a series of requirements, as set out below alongside a response on behalf of the Applicant.

Policy Requirement	Applicant's Response	Is the criterion satisfied
Approximately 175 dwellings	This application now proposes up to 70 dwellings and will make a positive contribution to the overall level of development proposed within the allocation.	Yes
Vehicular access from the A363	Although it is largely in outline, the application proposes the means of access into the site from	Yes
Development to be directed to the north and east of the site	As the amended material demonstrates, the application directs development to the northern part of the application site, and accordingly, to the northern part of the allocation.	Yes

Improvements to cycling and walking routes through the site to link into the existing network	The proposal includes a range of access routes, including to the north onto the A363, to connect to the land to the south (subject to a separate application by Vistry). In addition, the application material also demonstrates the potential creation of a pedestrian access into the site from the south west off Woodmarsh.	Yes
<i>Development will be subject to the following requirements:</i>		
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)	This matter is primarily addressed through the information on ecology, including the Ecology Addendum produced by Nicholas Pearson Associates and dated July 2023	Yes
Appropriate mitigation to protect bats, including financial contributions towards management, monitoring and any off-site measures as necessary, as informed by the TBMS	This matter is primarily addressed through the information on ecology, including the Ecology Addendum produced by Nicholas Pearson Associates and dated July 2023. Planning obligations, including any financial contributions will be agreed where they satisfy CIL Regulation 122(2).	Yes.
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 retention of existing features within the site has been a key consideration of the proposal from both a landscape and ecological perspective. The increased separation between the development and Woodmarsh would further reduce the impacts on the landscape setting of North Bradley with clear visual and physical separation between the settlement areas. The field adjacent to Woodmarsh has been left free from development and will be used for public open space and strengthening wildlife corridors.	Yes
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 will make a positive contribution towards conserving and enhancing the significance of the Baptist burial ground, its gateway and its setting	These matters are addressed in a number of documents submitted with this application and supported through the additional material which is provided with these amendments.	Yes

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.	The application is supported by an FRA and Drainage Strategy which takes climate change into account. These factors have had a direct influence on the design of the proposed development and the location of associated drainage measures.	Yes
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In addition, Policy H2.2 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.”*

The application material has included a Masterplan for the broader allocation, with the most recent version of that being drawing CASR3002 3600 Rev E (submitted July 2022). Since then, Castlewood and Vistry have engaged collaboratively, including with the LPA’s Officers, and as such a revised Masterplan (including an associated document) has been prepared. This was submitted (on an informal basis) by BBA Architects on 24th August 2023.

TECHNICAL MATTERS

In many cases, the responses to the matters raised by consultees and in representations are set out in the amended and updated application material which is included as part of this submission and so we do not address those issues here.

Nevertheless, there are a small number of matters arising from representations which it is necessary to address at this stage. In setting out the Applicant’s response, the starting point to note is that this site forms part of an area allocated for residential development in the Housing Site Allocations Plan.

Since this submission includes amended and additional application material, we will provide a further response to matters raised in representations once the LPA has undertaken consultation has been undertaken.

The Principle of Development

Representations refer to the availability of other, previously developed, sites which could accommodate new homes, or to the preference that North Bradley should only be required to provide new homes to meet ‘its needs’.

In response to such considerations, we note that the principle of development at this Site is established through the Housing Site Allocations DPD and will contribute towards the overall level of housing development to be delivered in line with the adopted Core Strategy for Wiltshire as a whole.

Representations also refer to the North Bradley Neighbourhood Plan and imply that this has been ignored. That is not the case, but the Applicant’s position is that the NBNP does not override or change in any way the fact that this site is allocated in a different part of the Development Plan.

Development within the Countryside

Representations indicate that the Application Site is located within the open countryside and allege that the scheme would fail to conserve and where possible, enhance landscape character or relate positively to its landscape setting. Representations allege that the proposal would be contrary to Policies 51 and 57 of the Core Strategy.

It is recognised that the Application Site lies outside of the settlement boundaries as defined by the Policies Map. However, these boundaries were set through the adoption of the Core Strategy prior to the adoption of the Site Allocations DPD which allocates the site for residential development. Accordingly, despite not being within the settlement boundary, the principle of development is acceptable and well-established through the Development Plan.

In relation to the landscape impact of the proposals and the alleged conflict with Policies 51 and 57 of the Core Strategy, these must be applied in the context that the principle of development is established. In any event, these policies have been

There are representations which refer to the site being within the Green Belt, however as you will be aware, that is not correct.

Landscape Considerations

There are a variety of matters arising in relation to landscape considerations, including, the Landscape Officer's comments; comments arising from the Parish Council and the amended scheme. We address these considerations below. The comments raised in representations regarding development in the countryside are addressed elsewhere in this letter.

In addition, this letter is accompanied by a Landscape and Visual Technical Note produced by Turley and dated July 2023 which considers the amended proposals.

Landscape Officer's Comments

The Council's Landscape Officer's comments are dated 15th October 2020.

The response noted that the scope of the LVA submitted with the application was agreed with Wiltshire Council and is considered appropriate and proportionate to the scale of the development. The Officer also agreed that the site is an undesignated, unremarkable landscape and not considered to be part of a valued landscape and with the conclusions and judgements in the LVA overall.

The Landscape Officer explained that *"the assessment is robust and appropriate to inform a planning decision. The predicted landscape and visual effects will be experienced at a local level on the site and its immediate environs and are not considered to have any significant adverse residual effects. The current proposal retains and enhances the existing vegetation structure where possible and will provide a new quantum of green infrastructure that will be accessible to residents."* However, the Officer also explained that they would like to see *"a joined-up masterplan approach to Site H2.2 with a separation gap to North Bradley that is appropriate and identifiable. I appreciate that this application is for outline consent with landscaping to be approved as a reserved matter but it would give me some comfort if there was some agreed detail for the landscape strategy at this stage."*

As we comment elsewhere, the Masterplan document for allocation H2.2, produced in conjunction with Vistry, has been provided under separate cover (submitted on an informal basis by BBA Architects on 24th August 2024).

North Bradley Neighbourhood Plan – Policy 1: Landscape Setting Gap

A number of comments makes reference between Policy 1: Landscape Setting Gap of the North Bradley Neighbourhood Plan, and the Application Site not providing a sufficient landscape gap to satisfy the policy, particularly between the development and Woodmarsh.

Policy 1 of the Neighbourhood Plan identifies the Landscape Setting Gap on the Comprehensive Policy Map, outlined in green on the extract below:



Figure 1: Extract from the North Bradley Neighbourhood Plan showing the Landscape Setting Gap outlined in green

The policy goes on to state that the Landscape Setting Gap is designated to protect the landscape setting of North Bradley village and that any development permitted within the gap must ensure the setting gap is not harmed. However, the Application Site is within Housing Allocation site H2.2, identified on the Neighbourhood Plan policy map in white, entirely outside of the landscape setting gap, and in part separated from the gap by the existing settlement boundary for North Bradley, identified in black.

The wording of the policy relates only to matters within the area identified on the Comprehensive Policy Map. Accordingly, the policy does not (and cannot) relate to the land within the Application Site.

Amendments to the Application

This letter is accompanied by Landscape and Visual Technical Note which serves as a rebuttal to landscape matters referred to in responses, and to support the revised scheme.

The Applicant considers that the amendments to the application are a positive response in light of the comments made by the LPA's Landscape Officer in October 2020.

The increased separation between the development and Woodmarsh would further reduce the impacts on the landscape setting of North Bradley with clear visual and physical separation between the settlement areas. The field adjacent to Woodmarsh has been left free from development and will be used for public open space and strengthening wildlife corridors.

The revised illustrative layout and parameter plan places the developable area closer to the White Horse Business Park. The proposed cycle and pedestrian access to the Site would connect with the Elm Grove Farm development to the north. A clear break between development within Trowbridge (inclusive of the White Horse Business Park) and North Bradley would be provided as experienced along the A363 and Woodmarsh which would maintain the sense of visual and physical separation between these areas of settlement. Houses to the north of the development would front on to an open providing green space at the entrance to the development.

Baptist Burial Ground

North Bradley Parish Council have stated that the scheme put forward ignores policy 7 of the North Bradley Neighbourhood Plan. Similar comments from public representations have raised that a suitable location for the burial ground should come forward with a masterplan.

The wording of policy 7 of the Neighbourhood Plan does not refer to land identified within allocation H2.2 to provide land for burial grounds within the parish, nor does it specifically request that burial grounds are provided with schemes but instead states that they would be supported. As such, there is no specific requirement that this scheme should provide for a burial ground.

Coordination Between Parties

Castlewood Property have been actively collaborating with Vistry Homes, who are proposing residential development to the south of the Castlewood application. A joint ecology parameter plan and comprehensive land use plan have come forward for both applications demonstrating that a robust and coordinated response is to be provided should both applications be given approval. Those plans will be superseded by the amendments proposed by Castlewood. A Masterplan document produced in conjunction with Vistry has been provided on an informal basis by BBA Architects on 24th August 2024.

Infrastructure

The Parish Council's response refers to local infrastructure priorities, including those referred to in NP Policy 6.

Furthermore, whilst concern has been raised locally regarding the ability of existing services and facilities to accommodate the additional demand created, these can be addressed through appropriate contributions, where required.

As an allocated site, the Applicant respectfully requests that the LPA sets out those matters to which contributions are required so that these can be considered and addressed through a S106 Agreement. This application should only be required to make contributions or provision towards infrastructure where such obligations meet the 'tests' of CIL Regulation 122(2).

We note that Wiltshire Council's Community Infrastructure Charging Schedule came into effect in 2015. As a 'CIL liable' development, this proposal will make contributions under the Levy, to be spent on infrastructure as considered necessary by the Council.

Housing Officer

The Council's Housing Enabling Team set out comments on the application on 10th June 2020. These included comments on the mix and tenure of affordable housing.

This is an application for outline planning permission where the housing mix is to be determined through subsequent reserved matters approval. In this instance, the Applicant expects either that the affordable housing mix and matters relating to its tenure will also be set through the reserved matters process, or addressed as part of this application, via the S106 Agreement.

Ecology

Ecological considerations have been a significant factor in influencing the amendments to this proposal (and the proposals for the wider allocation including the land promoted by Vistry).

An Ecology Addendum was undertaken by Nicholas Pearson Associates (NPA) addressing queries raised by Wiltshire Council's Ecology Officers and set out how the proposals on their own would avoid significant negative ecological impacts.

However, since that point, discussions have taken place with the Council's Ecologists and with Natural England. As a result of those discussions. Given the above, it was agreed that to provide a higher degree of confidence that the sites would continue to provide this function post development, that a significantly larger buffer/corridor would be required than is set out with the Trowbridge Bat Mitigation Strategy (TBMS). As such it was agreed to provide a field's width corridor in the western half of the Site and allow proposed built development to be concentrated in the eastern half with buffer at the margins smaller than that set out within the TBMS. The same approach was agreed for the proposed development to the south (planning app ref PL/2022/05426) such that if that if both applications are approved, they would provide a robust integrated/continuous network of bat habitat through the landscape that would avoid negatively impacting bat species associated with the TBMS.

As shown on the GI Parameters Plan the revised proposals would include:

- A buffer of over 100m between the built development proposals and built development within North Bradley;
- The buffer would be enhanced for bat commuting/foraging, including through provision of a woodland corridor (to provide strong north-south bat connectivity), parkland trees, scrub planting and sensitive grassland management;
- A retained dark corridor east-west from Elm Grove through to Axe and Cleaver Lane;
- A minimum 10m buffer along the eastern boundary of the Site with the woodland belt of the White Horse Business Park; and
- Sensitive lighting proposals to ensure a robust dark integrated network of bat habitat, achieved through sensitive street lighting proposals (as shown in the update Lighting Strategy – Abley Letchford Partnership, July 2023), housing along the boundary with the White Horse Business Park not having any glazing above first floor level facing that boundary and housing along all the boundaries having sensitively designed internal lighting.

The updated Metric calculation based on the GI parameters plan demonstrates the proposals could result in an 18.63% increase Habitat Units, and therefore the revised proposals would still exceed the 100% habitat mitigation criteria of the TBMS. To maximise BNG scoring the metric has been populated based on the remaining grassland being retained and enhanced. As discussed with and accepted by the county ecologist and Natural England, if habitats that were more beneficial to the woodland bat species were then proposed (e.g. woodland, orchard, scrub), but which scored more poorly on the metric, the score based on grassland retention/enhancement would be accepted.

Leisure and Play Strategy

The LPA's Leisure and Play Strategy Officer provided comments dated 30th June 2020. In general, these comments seek the inclusion of art and design within the scheme as a means of enhancing the quality of their development and influencing overall design and place shaping, through the engagement of artists, creative and design professional. Alternatively, the Officer explained that "In the event of public art being sought through planning obligations an indicative figure would be in the region of £30,000 (based on £300 per dwelling) which could be commuted to the Council's arts service to engage an experienced professional public art specialist to devise, manage and deliver the art and design process and programme in line with our 2011 guidance note)."

In this case, the Applicant requests that the LPA identify any conditions and obligations that it considers are necessary in order to make the scheme acceptable in planning terms, whether that be in relation to on-site or off-site measures.

Air Quality

The EHO's comments of 11th August 2020 noted that an Air Quality Assessment had not been included with the application. That Assessment was subsequently provided alongside the amendments submitted in January 2022.

SLR's Assessment concluded that there is no justification for resisting this proposal due to air quality considerations. We expect that conditions can be applied to the outline permission to require the details and implementation of any mitigation identified as being necessary by SLR (see section 7.1 of their report) in relation to the construction phase.

As the EHO's comments of March 2022 set out, SLR (acting on behalf of the Applicant) engaged with the EHO and submitted an updated version of the Air Quality Assessment. At that time, the EHO's recommended that a condition be imposed (in relation to a scheme for Ultra Low Energy Vehicle infrastructure) and that financial contributions be secured in respect of Air Quality and the ongoing monitoring activity that takes place in the Trowbridge area.

The updated material included with this application includes a Technical Memorandum on Air Quality produced by SLR. SLR conclude that a review of the design changes has been undertaken in relation to the previous assessment outcomes in addition to consideration of updates to policy and guidance in the interim. The findings indicate that the previous assessment outcomes remain unchanged and no further assessment is required. As such, no additional mitigation measures than those presented in the previous air quality assessment are required.

SLR's Technical Memorandum also notes the comments made by the EHO in March 2022 and explain that vehicle charging facilities will be provided in accordance with local policy requirements. Furthermore, SLR conclude that transport related mitigation measures proposed within the transport assessment would reduce the impact of the proposed development on air quality. The Travel Plan will bring forward an array of measures to encourage sustainable travel including walking and cycling improvements together with financial commitments.

Noise

The EHO's comments of 11th August 2020 noted that a Noise Assessment had not been included with the application. That Assessment was subsequently provided alongside the amendments submitted in January 2022

SLR's assessment concluded that there is no justification for resisting this proposal due to noise considerations. We would expect subsequent reserved matters to demonstrate how proposals at that stage result in an acceptable form of development at that stage having regard to the mitigation measures identified by SLR.

The updated material included with this application includes a Noise Assessment (Version 3) (dated June 2023) produced by SLR. Their updated Assessment concludes that:

- Commercial noise and activity from the business parks to the north have not been readily observed at the development site.
- The Stage 1 assessment in accordance with ProPG has provided that the site is influenced by road traffic noise, being most significant on aspects facing north and northwest. The initial site noise risk assessment has been categorised at low to medium risk on the future occupants of the new noise sensitive development.
- The Stage 2 assessment in accordance with ProPG has reviewed a good acoustic design process, internal ambient noise levels, external amenity areas and other matters. Commensurate design specifications have been established considering current industry guidance. It has been realised that suitable internal and external amenity standards can be achieved by the scheme.

- On the basis that design guidance within this report has been adopted, SLR state that it follows that any significant adverse noise impacts will be avoided in the finished development as to accord with overarching national and local planning requirements for new residential development.

Archaeology

An Archaeological Evaluation (Cotswold Archaeology) was included in the material submitted in January 2022.

In April 2021, Cotswold Archaeology carried out an archaeological evaluation at the Site. A total of 22 trenches were excavated.

A series of ditch, pit and posthole features were recorded in the eastern part of the Site, potentially indicative of an area of Iron Age settlement, and features of Iron Age date were also recorded elsewhere within the Site.

Medieval/post-medieval furrows were recorded throughout the Site, and field boundaries of post-medieval/modern date were also identified.

A shallow bank of probable natural origin was recorded in the north-western part of the Site, correlating to an earthwork recorded on LiDAR imagery.

The Assistant County Archaeologist's response of 10th June 2021 set out:

"In short, there are no overriding archaeological constraints within the site that would prevent development as per the Masterplan. The evaluation has identified locally significant archaeological activity in the shape of Iron Age settlement in the south east of the site (the area delimited by evaluation Trenches 18-22). I am therefore advising this area to be made the subject of an full archaeological excavation in order to mitigate the impact of the development upon this archaeological resource. I would also advise that the area covered by Trenches 13-15 be made the subject of monitoring by qualified archaeologists during preparatory groundworks prior to the commencement of construction. Both the excavation and the monitoring are to be secured via conditions to be attached to any planning permission that may be issued.

The evaluation has established the presence of archaeology, but there is no evidence that this would be nationally significant (which is the only type of activity that would be an overriding constraint to development). The applicant may decide that they don't want to front the cost of an excavation here, so they may re-design the Masterplan to leave that part of the site as open ground that would not be impacted by the development. In either case I would be happy."

Care Home

Although the application originally proposed a care home, this has since been removed from the application and although it is referenced in representations, we do not comment any further in this regard.

SUMMARY

We trust that this letter provides a useful response to matters raised by public representations and sets out the nature of the amended or additional application material, however if you require any further information for your consideration, please let us know.

Your sincerely