

Re: PL/2026/02943 - Land off Trowbridge Road, Bradford on Avon - Objection

I wish to object to the outline application for up to 224 homes and a 72-bed care home on the Green Belt off Trowbridge Road.

While I recognise the district's shortfall, I believe that this scheme is inappropriate in its location and its scale and conflicts with the policies that protect the Green Belt. The site is advanced as "grey belt" only on the applicant's own assessment, and is unsupported by the school places, healthcare and road capacity its residents would need.

1. "Grey Belt"

The 'test' for grey belt is whether the land strongly contributes to any of the purposes the Green Belt serves - among them preventing neighbouring towns from merging and preserving the setting and special character of historic towns. A strong contribution to one of them means the land is not grey belt. On the applicant's own appraisal, this site contributes to both counts. It helps preserve the setting of Bradford on Avon, which the appraisal accepts is "of considerable architectural and townscape significance", and it helps keep the town from merging with Trowbridge. The gap, which the appraisal measures at only about 2.25km, would be reduced by the scheme by up to a third (on the applicant's figures). The appraisal even rates the whole site's contribution to the historic-town purpose as "moderate" - downgrading it to "weak" only for the parcels it proposes to build on - which is the applicant's own judgement on its own evidence.

To date, the Council does not appear to have carried out a Green Belt review, which the applicant states (paragraph 7.22), and the only 'evidence' that the site is grey belt is therefore the applicant's own Landscape and Visual Appraisal. Planning Practice Guidance expects Green Belt assessments to be produced by the authority (Reference 64-002), and where a site has not already been identified as grey belt, expects the authority to consider the evidence and reach its own view rather than adopt the applicant's (Reference 64-009).

The Council's own Senior Urban Design Officer reinforces this. In his consultation response of 24 June 2026 he does not accept the grey belt premise: he states that "the site remains designated Green Belt and forms part of the wider countryside", and that "the proposal should be regarded as speculative in policy terms". The classification is therefore disputed within the Council itself, which only strengthens the case for the authority to reach its own, evidence-based conclusion.

The grey-belt definition also excludes land where other protected interests give a strong reason to refuse or restrict development - and this site carries several: the Bath and Bradford-on-Avon Bats SAC, the listed Widbrook Bridge, possible archaeology, and identified Flood Zones. As such, the site is Green Belt, under which the scheme is inappropriate development that can be approved only in very special circumstances. Under Green Belt protection, harm to openness carries substantial weight, and the applicant already concedes "the reduction of the current sense of openness" on the western fields and a "major-moderate adverse" visual effect for users of the public right of way.

Even if the site were grey belt, paragraph 155 sets four conditions that must all be met for the housing to be acceptable: that the development would not undermine the remaining Green Belt, that there is a demonstrable unmet need for what is proposed, that the location is sustainable, and that the Golden Rules are met. On the applicant's own evidence, the scheme fails at least three. The location is not sustainable (point 2). The need for the care home, the one element that is not housing, is not demonstrably made out (point 6). And the Golden Rules contributions are unsecured (point 4).

2. Transport

On the applicant's own distances, the GP surgery is 1.6km away, the nearest secondary school 2.8km and the town centre 1.4km. St Laurence, the designated secondary, sits within the three-mile walking distance set by the Education Act 1996, so no free school transport would be provided at this point, and the alternative to the car is to walk or cycle along Trowbridge Road. The applicant's own audit scores that cycle route at just 44 per cent, with traffic speeds of up to 33.9 mph where cyclists are unprotected, and records safety issues its design does not resolve - including more than 2,500 vehicles a day crossing the route.

All traffic from this side of town crosses the river at a single point in the historic core, the Trinity Church gyratory. The development would add an estimated 135 vehicle movements through it in the morning peak and 116 in the evening from the housing alone (excluding the care home and the sports pitches), yet the applicant has not assessed whether the gyratory can cope. Its Transport Assessment states that "due to the unconventional nature of the Trinity Church Gyratory, no junction modelling assessment has been undertaken as it would yield inaccurate capacity results" (paragraph 9.36). In its place, the applicant offers only a percentage increase derived from a traffic count on a different road some distance away. Given the scale of the proposals and the well-established traffic issues in the town, this feels short-sighted and unsatisfactory.

Closeness in distance is not the same as a sustainable location. What matters is whether facilities can realistically be reached without a car, and on the applicant's own evidence, they cannot. The car will remain the practical choice for most journeys, so the location is not sustainable in the sense paragraph 155 requires.

3. Scale

Bradford on Avon is a second-tier market town under Core Policy 1, and the site lies outside its settlement limits in conflict with Core Policy 2, which the applicant concedes and the Council's own Housing Enabling Team has confirmed. It also runs against the town's Neighbourhood Plan, which directs growth to land within the settlement boundary. The town's own housing requirement of 595 homes is already met, with 601 built or committed. There is a wider shortfall across Wiltshire, and it carries real weight, but on ordinary Green Belt the presumption in favour of approval falls away,

and a county-wide shortfall does not justify 224 homes on protected land that the plan has not released.

4. Infrastructure

No healthcare assessment accompanies the application, even though it adds around 515 residents and a 72-bed care home to the town. The proposals expressly "do not include a new health centre", relying instead on the existing GP surgeries, which the applicant's own record describes as under "incredible pressure". Wiltshire's education service has confirmed that the designated secondary, St Laurence, cannot take all the pupils the development would generate, identifying a shortfall of eleven places and seeking a contribution of £252,340 that the application does not secure. That shortfall bears directly on the Golden Rules, which require a grey belt scheme to provide affordable housing, infrastructure and open space (paragraph 156). Until that contribution is secured, those rules are not met.

The affordable housing is offered only as "up to" 50%, a ceiling rather than a floor, with no Section 106 agreement in place. The applicant is merely "committed to... agreeing a S106", and its own figures show less local need than the headline implies: of 3,783 households on the Wiltshire housing register, just 83 have expressed a preference for the town. The Council's own Housing Enabling Team has set out what securing the affordable housing would actually mean, including a defined tenure mix and a proportion of homes adapted for accessibility, and none of it is fixed by the application. National policy gives significant weight to the Golden Rules only where they are secured (paragraph 158), and here, nothing is. Foul drainage capacity should likewise be confirmed by the sewerage undertaker and secured by condition, so that occupation does not outpace it.

Sport England (26 June 2026), advising informally, does not recommend the single onsite sports pitch, which it considers insufficient for the demand, without changing facilities, and of doubtful long-term viability. It recommends instead off-site contributions secured by Section 106, which does not form part of the application. The applicant's own Planning Statement concedes the town already suffers "a lack of sports pitches and associated facilities, with a specific need for junior pitches".

5. Unfulfilled obligations

The development is large and sensitive enough to require screening for an Environmental Impact Assessment, with flood zones, listed structures, confirmed archaeology, a former landfill and a protected wildlife site all in play. I believe the regulations require the Council to carry out that screening, and that it may be prevented from lawfully granting permission until it has. No screening opinion yet appears on the portal. The site lies in the consultation zone of a protected bats site, so the habitats assessment is the Council's own duty as competent authority and cannot be discharged by adopting the applicant's document. The archaeological field evaluation, which should inform the decision, has been deferred until after permission, when it would come too late.

6. Harm/benefits

The applicant accepts that its scheme would cause harm to the setting of the listed Widbrook Bridge, yet that harm comes from the proposed care home, the scale of which is left to a later stage and is not controlled now. Two of the Council's own officers confirm the concern. The Principal Conservation Officer (23 June 2026) agrees the development would harm the setting of the Widbrook Bridge group, and finds the care home's "scale, bulk and massing" "likely to exacerbate" that harm, "appearing as a dominant and discordant feature". The Urban Design Officer, in turn, finds the single Parameter Plan submitted "fails to meet the requirements" and calls for a "Density Scale and Massing Parameter Plan" that would "include the key building locations". Until that exists, nothing is fixed against which the scale of the care home, or the harm it causes, can be confirmed.

The benefits, meanwhile, are presented at their highest. The care home "need" rests on a figure the consultant measures as "demand" rather than need, 1,177 beds pitched well above the minimum-standard Wiltshire shortfall of around 122 (per Carterwood CPNA).

Conclusion

I urge the Council to refuse this application. The shortfall in housing land is real, but it is not a permission in waiting, least of all on protected Green Belt, where very special circumstances would be required to justify inappropriate development and are not present here.