

Planning and Affordable Housing Statement

Uplands, West Ashton Road, Trowbridge

Prepared on behalf of Hills Homes Developments Limited

July 2026



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“Full planning application for the demolition of existing dwelling (‘Uplands’) and erection of 40 dwellings with associated public open space, landscaping and sustainable urban drainage system. Removal of existing access and provision of new replacement vehicular access to West Ashton Road.”

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On behalf of Hills Homes Developments Limited

OG Planning Ltd

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1.0 Introduction

1.1. This Planning and Affordable Housing Statement has been prepared by OG Planning Ltd on behalf of Hills Homes Development Limited (“the Applicant”) and accompanies a full planning application for the development of 40 new homes on Land off West Ashton Road, Trowbridge (“the Site”).

1.2. The description of development is as follows:

“Full planning application for the demolition of existing dwelling (‘Uplands’) and erection of 40 dwellings with associated public open space, landscaping and sustainable urban drainage system. Removal of existing access and provision of new replacement vehicular access to West Ashton Road.”

1.3. This document assesses the planning considerations associated with the proposal and considers the development in the context of national and local planning policy and guidance. This Statement should be read in conjunction with the other documents that form part of the planning application:

1. Site Location Plan
2. Topographical Survey
3. Existing and Proposed Site Layout Plans
4. Proposed Floor Plans and Elevations
5. Proposed Sections
6. Site Access Plan
7. Landscape and Planting Plans
8. Design and Access Statement
9. Statement of Community Involvement
10. Ecological Impact Assessment
11. BNG Statement
12. BNG Metric calculations
13. Lighting Assessment
14. Landscape and Visual Appraisal
15. Flood Risk Assessment and Drainage Strategy
16. Transport and Travel Plan Statement

17. Archaeological Desk-Based Assessment
18. Report on results of archaeological investigations and trench evaluation
19. Geophysics Report
20. Arboricultural Impact Assessment
21. Energy & Sustainability Statement
22. Waste Minimisation Statement
23. CIL Form

- 1.4. We conclude that the proposal is in accordance with the Development Plan when read as a whole, and the National Planning Policy Framework (NPPF), in combination with other material considerations. Having regard to the planning balance, it is considered that these material considerations weigh significantly in favour of approval.

Environmental Impact Assessment

- 1.5. Consideration has been given to the requirement or otherwise for an Environmental Impact Assessment (EIA) to be undertaken for the proposed development.
- 1.6. The proposed development falls within Schedule 2 of the Town and Country Planning (Environmental Impact Assessment) Regulations 2017 – Column 1, Part 10 (Infrastructure Projects), but does not meet the thresholds set out in Column 2; nor does it fall within a ‘sensitive area’ as defined in the Regulations.
- 1.7. Accordingly, whilst the Local Planning Authority will be required to screen the proposals as part of its legal requirements, the applicant does not consider that an Environmental Statement is required.

2.0 Site Description and Planning History

- 2.1. The application site (which measures 5.75ha in area) consists of an existing dwelling ('Uplands') with garden space and an area of amenity grassland situated towards the southeastern edge of Trowbridge. It is relatively flat, sloping slightly down from north to south. A combination of mature trees/hedgerows bound the site to the majority of boundaries, along with a small copse of mature native trees to the east of the existing dwelling.
- 2.2. Existing housing adjoins the site along its N/E/W boundaries. West Ashton Road runs along the site's western boundary, which provides access to the main Trowbridge urban area to the north and to the A350 to the south. A watercourse and existing public right of way runs E-W beyond the southern boundary, with green space beyond. Further to the southwest of the site across West Ashton Road lies further housing, along with a country park.
- 2.3. With regard to environmental and heritage designations, the site is relatively unconstrained. There are no Listed Buildings or Scheduled Ancient Monuments in or adjoining the Site and it does not lie within a designated SSSI or local wildlife area. It is not within a National Landscape or protected local landscape feature. Part of the site running along the southern boundary lies within Flood Zones 2 and 3, which will remain undeveloped. The site is at low risk from surface water flooding.
- 2.4. The Site is very well connected to existing facilities and amenities. There are a number of amenities within easy walking distance of the site, including primary school and public houses. Table 4.1 within the Transport and Travel Plan Statement (prepared by Cole Easdon) indicates the closest facilities to the site and shows that a number of local amenities, such as a primary school, a supermarket, pharmacy and dentist are located within 1.5km (0.9 miles).
- 2.5. Good access to public transport is also available, with the nearest bus stop to the application site located along the western side of West Ashton Road, opposite the BP petrol station, approximately 160m from the site access point.
- 2.6. This stop is served by the No. 66 bus service, which is operated by Frome Bus on a circular route. The No. 66 provides a regular service to Trowbridge Town Hall, which runs approximately every 30 minutes Monday to Friday and hourly on Saturdays. The No. 66 stops at Trowbridge Town Hall where connections to other bus services towards Warminster and Corsham are available.

2.7. Planning History

In terms of planning history, the site was subject to an outline planning application for residential development in 1995 (Ref No: W/95/00590/OUT); this was refused although the reasons for this are not available on the Council's website.

2.8. It is worth noting that the field immediately south of the site, beyond the public footpath, is designated as a principal employment area in the adopted Wiltshire Core Strategy and has been the subject of planning applications for employment development over the last decade or so. Beyond this site further to the south lies a large strategic allocation (Ashton Park Urban Extension), also contained within the Core Strategy, which has outline planning permission for residential development of up to 2,500 dwellings and associated facilities (Ref: 15/04736/OUT).

2.9. Public Consultation

This application is accompanied by a Statement of Community Involvement (SCI). This confirms that the applicant has undertaken a process of community engagement in advance of the submission of the application. This included a dedicated website outlining the proposal and a questionnaire.

2.10. The SCI sets out the responses received as part of the consultation and how the scheme responds to the comments raised.

3.0 Proposed Development

3.1. This section of the Planning Statement presents the various elements of the development proposal, comprising: Land Use, Access, Parking, Green Infrastructure, Scale and Design.

3.2. The proposed description of development is as follows:

“Full planning application for the demolition of existing dwelling (‘Uplands’) and erection of 40 dwellings with associated public open space, landscaping and sustainable urban drainage system. Removal of existing access and provision of new replacement vehicular access to West Ashton Road.”

3.3. Assessment of the scale, layout, appearance etc is included within the Design & Access Statement.

3.4. The Site Layout Plan shows how the site will be developed for:

- 40 dwellings with a new vehicular/pedestrian access point from West Ashton Road (the existing access for ‘Uplands’ will be closed off)
- Landscaped public open space
- Children’s play space
- Sustainable Urban Drainage System (SuDS), and
- Biodiversity enhancements.

3.5. **Land Use**

The proposal is for the development of 40 new homes, incorporating a variety of house types and sizes ranging from 1 to 4-bedrooms. The proposed development also includes ancillary public open space, children’s play space, landscaping. SuDS will be provided, in the form of attenuation basins located on the southern edge of the developed area of the site.

3.6. 30% of the proposed dwellings will be provided as Affordable Housing, equating to c.12 homes in total. The tenure split proposed is a mix of Affordable Rent (60%), First Homes (25%) and

Shared Ownership (15%), although the final split will be negotiated with the Council during determination of this application. At least 10% of the affordable dwellings will be built to M4(2) standards and all will be NDSS compliant.

- 3.7. Significant areas of open space (POS) will be retained in the southern half of the site, which will serve a number of purposes. It will ensure areas of the site within Flood Zones 2 and 3 remain free of built development and will provide a suitable ecological buffer, in line with Trowbridge and Westbury Bat Mitigation Strategy guidance to provide suitable new core bat habitat (15m) and dark buffer zone (10m). The open space areas will also provide the opportunity to create new/enhanced biodiversity habitats, along with providing informal amenity space for use by occupants of the development.

3.8. **Access and Movement**

As shown on the Site Layout Plan, the proposed development layout has been designed around a clear street hierarchy through the site. The proposed scheme is to be served by a new vehicular and pedestrian access onto West Ashton Road, with the existing access to 'Uplands' closed off and landscaped. The proposed access arrangements are shown on drawing no: 9740/201A, prepared by Cole Easdon.

3.9. **Parking**

The Site Layout Plan shows a range of different parking typologies can be provided, including on plot parking and off-street parking bays, which meets the Council's current guidelines on parking provision. Electric Vehicle Charging Points (EVCP) will be provided to each home in order to support sustainable living.

3.10. **Public Open Space (POS)**

Existing trees and hedges forming many of the site boundaries will be retained and enhanced where possible and will form a valuable component of the site's green infrastructure. Additional tree planting, mixed scrub planting and landscaping design using native species are proposed to enhance biodiversity. The proposed drainage strategy includes SuDS features.

3.11. The required 10% biodiversity net gain (BNG) will be achieved through the creation of new mixed scrub, modified grassland and the creation of a network of vegetated gardens, along with new tree planting. A BNG of 14.63% (habitat) and 13.29% (hedgerow) is achievable on-site.

3.12. **Design**

The application is accompanied by a Design and Access Statement, which clearly sets out how the development has responded positively to the site and its surroundings, whilst delivering a high-quality residential development in keeping with the prevailing residential character within this part of Trowbridge.

4.0 Affordable and Accessible Housing Statement

- 4.1. We can confirm the following details in respect of Affordable and Accessible Housing which will be provided by the proposed development:

Question	Answer
The total number of dwellings proposed:	The application seeks planning permission for 40 new homes.
The number of affordable dwellings proposed:	The proposal seeks to deliver 30% on-site affordable housing (12 dwellings).
The tenure split for affordable housing:	The proposed development will look to achieve an acceptable tenure split through discussion with the local planning authority. The proposed tenure split at this stage is 60% Affordable Rent, 25% First Homes and 15% Shared Ownership.
The type of homes and number of bedrooms:	This application is in outline. The proposals assumed a mix of 1, 2, 3 and 4 bedroom homes.
A layout plan showing the location of each affordable home:	Site layout plan (Ref: 3164/150E) shows the location of the proposed affordable dwellings.
Build standards to be used:	All affordable homes will be built to NDSS standards
Delivery method:	This will be secured within the S.106 Agreement
Information on the affordability of any intermediate affordable housing including type of product, level of equity share sold, level of interest charged on remaining share and open market value:	The key parameters are to be identified within the s.106.
Any service charges:	It is likely that service charges will be capped and key parameters in this regard can be specified within the s.106.

4.2. **Accessible Housing Statement**

10% of the affordable units will be provided to Building Regulations M4(2) standards, in accordance with the Council's policy.

5.0 Planning Policy Context

- 5.1. This section of the planning statement provides a summary of the relevant planning policy context, including Wiltshire Council's adopted Core Strategy and the made Trowbridge Neighbourhood Plan, as well as other material considerations including supplementary planning documents and guidance.

The Development Plan

- 5.2. In accordance with Section 38(6) of the Planning and Compulsory Purchase Act 2004, the determination of a planning application must be made in accordance with the development plan unless material considerations indicate otherwise.

- 5.3. The statutory development plan for the site comprises:

- Wiltshire Core Strategy (adopted January 2015)

- 5.4. It is accepted that the proposed development is in conflict with certain policies of the adopted Development Plan. However, it can be demonstrated that material considerations exist, including the Council's inability to demonstrate a five-year housing land supply and a lack of identified harm, to justify a departure from the plan.

- 5.5. A summary of the planning policies relevant to the determination of the planning application is provided below.

- 5.6. **Wiltshire Core Strategy (WCS)**

The following WCS policies are considered relevant to this site:

- 5.7. **Core Policy 1 Settlement Strategy (CP1)** identifies Trowbridge as one of three Principal Settlements in Wiltshire, the others being Chippenham and Salisbury. These are defined as strategically important centres and the primary focus for development, which will safeguard and enhance their strategic roles as employment and service centres. The policy states that the Principal Settlements will provide significant levels of jobs and homes, together with supporting community facilities and

infrastructure, meeting their economic potential in the most sustainable way to support better self-containment.

- 5.8. **Core Policy 2 Delivery Strategy (CP2)** sets out the delivery strategy for growth for the period to 2026 and aims to distribute development in a sustainable manner. Within the defined limits of development for settlements there is a presumption in favour of permitting sustainable development. Development proposals outside these defined limits are not supported in principle unless the proposal satisfies the exceptions set out within paragraph 4.25 of the WCS. The policy goes on to emphasise that the limits of development may only be altered through the identification of sites for development through subsequent Site Allocations DPDs and the Neighbourhood Plan making process.
- 5.9. **Core Policy 3 Infrastructure Requirements (CP3)** states that all new developments will be required to provide for necessary on-site and, where appropriate, off-site infrastructure requirements arising from the proposal. These will be delivered directly by the developer and/or through an appropriate financial contribution prior to, or in conjunction with, new development.
- 5.10. **Core Policy 29 Spatial Strategy – Trowbridge Community Area (CP29)** states that development should be in accordance with the Settlement Strategy set out in Core Policy 1.
- 5.11. **Core Policy 41 Sustainable Construction and Low Carbon Energy (CP41)** – outlines how sustainable construction and low-carbon energy will be integral to all new development.
- 5.12. **Core Policy 43 Providing affordable homes (CP43)** is concerned with the provision of affordable housing in certain situations. Trowbridge lies within a zone requiring provision of at least 30% Affordable Housing on sites of five or more dwellings.
- 5.13. **Core Policy 45 Meeting Wiltshire's Housing Need (CP45)** states that new housing (including both market and affordable), must be well designed to address local housing need incorporating a range of different types, tenures and sizes of homes to create mixed and balanced communities.
- 5.14. **Core Policy 50 Biodiversity and Geodiversity (CP50)** highlights that proposals should demonstrate how they protect features of nature conservation and geodiversity value in their design rationale. The policy advises that there is an expectation that such features shall be retained, buffered, and

managed favourably to maintain their ecological value, connectivity and functionality in the long-term.

- 5.15. **Core Policy 51 Landscape (CP51)** – States that development must protect, conserve and wherever possible enhance the landscape character of an area. Any negative impacts should be mitigated through sensitive design, whilst being informed by and sympathetic to distinctive character.
- 5.16. **Core Policy 52 Green Infrastructure (CP52)** states that development should make provision for the retention and enhancement of the existing green infrastructure network, ensuring suitable links are provided and maintained.
- 5.17. **Core Policy 57 Ensuring High Quality Design and Place Shaping (CP57)** outlines that a high standard of design is required in all new developments, creating a strong sense of place by taking reference from the local context.
- 5.18. **Core Policy 58 Ensuring the conservation of the historic environment (CP58)** states that development should protect, conserve and where possible enhance the historic environment. It advises that distinctive elements of Wiltshire’s historic environment, including non-designated heritage assets, which contribute to a sense of local character and identity will be conserved, and where possible enhanced.
- 5.19. **Core Policy 60 Sustainable Transport (CP60)** states that sustainable, safe and efficient movement will be encouraged and supported by the Council.
- 5.20. **Core Policy 61 Transport and New Development (CP61)** emphasises that new development should be located and designed to reduce the need to travel particularly by private car, and to encourage the use of sustainable transport alternatives.
- 5.21. **Core Policy 62 Developments Impact on the Transport Network (CP62)** – states that developments should provide the appropriate mitigating measures to offset any adverse impacts on the transport network.
- 5.22. **Core Policy 64 Demand Management (CP64)** states that demand management measures (such as traffic management and smarter choice measures and residential and private non-residential

parking standards), will be promoted where appropriate to reduce reliance on the car and to encourage the use of sustainable transport alternatives.

5.23. **Core Policy 67 Flood Risk (CP67)** – states that all new development will include measures to reduce the rate of rainwater run-off and include sustainable urban drainage features wherever possible.

5.24. **National Planning Policy Framework (NPPF) – December 2024**

The following NPPF chapters are of relevance to this proposal:

- Chapter 2 (Achieving sustainable development)
- Chapter 4 (Decision-making)
- Chapter 5 (Delivering a sufficient supply of homes)
- Chapter 8 (Promoting healthy and safe communities)
- Chapter 9 (Promoting sustainable transport)
- Chapter 11 (Making effective use of land)
- Chapter 12 (Achieving well-designed places)
- Chapter 14 (Meeting the challenge of climate change)
- Chapter 15 (Conserving and enhancing the natural environment)

5.25. The revised Standard Method for calculating housing requirements, which accompanied the revised December 2024 NPPF, calculates that the proposed housing requirement for Wiltshire will be 3,525 new homes annually.

Wiltshire Housing Land Supply Position

5.26. The latest Wiltshire Council Statement on Housing Land Supply (June 2025) confirms that the District only has a **2.42 year** housing land supply, a very significant shortfall of 9,561 dwellings when calculated against the identified Local Housing Need (LHN) of 3,525 new homes per year.

5.27. There is therefore a significant shortfall in housing supply, and it is concluded that Wiltshire Council cannot currently demonstrate a five-year housing land supply for the purposes of assessing this application against NPPF Para. 11d (footnote 8). The relevant strategic policies within both CP1 and CP2 are considered to be out of date for the purposes of determining applications.

Accordingly, a presumption in favour of sustainable development applies to this proposal and the “tilted balance” should be applied.

Wiltshire Local Plan Review

- 5.28. Up until recently, the Council was in the process of producing a Local Plan Review (LPR), to cover the period 2020 – 2038, which was undergoing Examination. However, the Examination Inspectors had advised the Council that there are a number of matters that require reassessment and/or additional evidence; these include the Sustainability Appraisal, Habitats Regulations Assessment, housing need and the housing requirement, and employment land, together with the plan period.
- 5.29. Following a recommendation from the Inspectors, the Council has since agreed to withdraw the plan and immediately commence work on a new Local Plan, to be assessed under the new NPPF and Local Plan regulations.

6.0 Planning Policy Analysis

- 6.1. This section of the Planning Statement considers the principle of development and the sustainable development benefits of the proposal.
- 6.2. The principle of residential development for the site is considered to be acceptable having regard to the Development Plan, the current NPPF (December 2024) and the proposed scheme benefits.

Principle of Development

- 6.3. The development proposals seek to deliver 40 no. new homes in what is considered by the WCS to be a sustainable location, immediately adjoining a Principal Settlement, and therefore appropriate for further growth. Whilst the development site lies outside, but immediately adjoining, the defined Settlement Framework Boundary of Trowbridge as defined within the WCS, the Site is well-related to the settlement and is within easy walking distance of existing facilities within the town.
- 6.4. Whilst the development is not allocated within the spatial strategy set out in the WCS, this document is now over 10 years old and is considered to be out of date for the purposes of assessing planning applications of this nature. The weight to be attached to it is therefore significantly reduced.
- 6.5. Notwithstanding this, a number of material considerations exist that lend considerable weight to the acceptability of development on this site and that, on balance, the development is acceptable when judged against the Development Plan as a whole. These considerations are as follows.

Contribution to Housing Supply

- 6.6. First and foremost, this development will make a material contribution towards Wiltshire District's housing land supply and supporting National Government policy for significantly boosting the supply of housing, as advised at paragraph 61 of the NPPF. As the NPPF also

recognises, at paragraph 73, medium-sized sites such as this can be built-out quickly, adding weight to their ability to assist with a five-year housing land supply

- 6.7. As advised above, the latest Wiltshire Council Statement on Housing Land Supply (June 2025) confirms that the district only has a **2.42 year** housing land supply (a very significant shortfall of 9,561 dwellings against identified Local Housing Need).
- 6.8. On this basis, Wiltshire District cannot currently demonstrate a five-year housing land supply for the purposes of NPPF Para. 11d (footnote 8), and therefore these relevant strategic policies within both CP1 and CP2 of the WCS are out of date for the purposes of determining applications. Accordingly, a presumption in favour of sustainable development applies in this instance.
- 6.9. It is considered that any adverse impacts associated with the development will not significantly and demonstrably outweigh the benefits when assessed against the Framework as a whole. This is particularly so when considering the Site's sustainable location adjoining the Principal Settlement of Trowbridge; the effective use of the land deemed to be developable; the ability to secure a well-designed place that works with the Site's existing characteristics; and the provision of affordable housing.

Lack of policy constraints

- 6.10. The site is unconstrained in terms of existing environmental and heritage designations. It does not lie within a National Landscape (formerly AONB) or any protected local landscape areas. It is at low risk from surface water flooding. Finally, the site is not within a Conservation Area and there are no Listed Buildings on or adjoining the site.
- 6.11. The key constraints are that the southern part of the site lies within Flood Zones 2 and 3 and to the north the site adjoins an area of trees covered by a group Tree Preservation Order (TPO).

Sustainable location

- 6.12. The site lies directly adjoining the existing built-up area of Trowbridge, which is one of three Principal Settlements within Wiltshire, as defined in WCS policy CP1. The Site is well connected to existing facilities and amenities within the town.

- 6.13. The proposal will have vehicular and pedestrian access via West Ashton Road, incorporating links into the existing pedestrian footway network that provides access to the key community facilities within the town, including the local bus route referred to in paragraph 2.6 above.

Sustainable Development

- 6.14. As demonstrated above, Wiltshire Council cannot currently demonstrate a five-year supply of housing land. In addition, the Core Strategy is over 10 years old and is considered to be out-of-date. The application should therefore be considered in the context of the presumption in favour of sustainable development (NPPF paragraph 11d), and the 'tilted balance' should be engaged.
- 6.15. The proposed development does not fall within either of the two exceptions to the presumption in favour of sustainable development outlined in NPPF paragraph 11d (i and ii). The proposal is therefore not excluded from the presumption on this basis.
- 6.16. The presumption in favour of sustainable development is at the heart of the NPPF. Paragraph 7 states that the purpose of the planning system is to contribute to the achievement of sustainable development, this objective is summarised as '*meeting the needs of the present without compromising the ability of future generations to meet their own needs*'.
- 6.17. Three overarching objectives to achieve sustainable development are identified as economic, social and environmental in Paragraph 8.
- 6.18. The proposed development's benefits and their alignment to these respective objectives is considered below:
- 6.19. The **Economic** objective is achieved through the following:
1. The new residents will increase demand for local services and businesses.
 2. Increased investment in the local community, supporting the vitality of Trowbridge
 3. Construction and related industry job creation.
 4. Increased local resident expenditure
 5. Increased Council Tax payments

6.20. The **Social** objective is achieved by the following:

Delivery of much needed new, high-quality homes in a desirable community and a sustainable location within walking distance of existing local facilities and amenities. A mix of housing typologies will be provided to facilitate inclusive and balanced communities and assist the Council with its housing land supply.

6.21. *Affordable Homes:*

This application includes 30% affordable homes, in line with WCS policy CP43, allowing many families who cannot access market housing to benefit from a home. The provision of these affordable homes should therefore be given very significant weight.

6.22. The **Environmental** objective is achieved through the following:

6.23. *Ecology:*

GE Ecology Ltd has undertaken a series of ecological surveys at the Site and has prepared an Ecological Impact Assessment (EcIA). The EcIA has concluded the following:

6.24. The Site is of moderate ecological interest, comprising other neutral grassland, mixed scrub, existing hard standing, introduced shrub, vegetated garden and individual trees which is bound by native hedgerows and line of trees as well as non-native ornamental hedgerows. It is located in the vicinity of Salisbury Plain SAC/SPA and Bath and Bradford on Avon Bats SAC. In the absence of mitigation, negative impacts are possible to several ecological receptors, namely bats.

6.25. Mitigation and compensation have been incorporated into the design to ensure that the proposal and work programme is designed to minimise adverse impacts on ecological features. Measures included within a CEMP would protect a range of ecological features during the construction phase of the development. Created habitats would be protected and maintained as defined within a HMMP as part of the BNG assessment.

6.26. Enhancement features have also been described with the aim of providing an increase in wildlife opportunities on Site post-development, contributing to the aims of National Planning Policy Framework and local policy. An indicative Biodiversity Metric has been supplied which

shows a net gain in habitat units is likely achievable on Site. The assessment will be updated based on final plans for the development, as part of the pre-commencement BNG condition.

6.27. Therefore, the proposals are compliant with the NPPF and WCS policy CP50 in ecological terms.

6.28. *Landscape and Visual Impact:*

Reckless Orchard Ltd has prepared a Landscape and Visual Appraisal (LVIA). In summary the LVIA has concluded that the limited views of the site, its strong visual enclosure and the added mitigatory woodland, hedge and tree planting; together with the carefully considered design of the housing and landscape treatments, results in a scheme that will have a minimal effect on the landscape character and views of the surrounding area and a negligible effect on any long-distance views. In addition, the proposed expansion of Trowbridge southwards will see the site, currently on the edge of the town, subsumed deep within its urban fabric.

6.29. Therefore, the proposals are compliant with WCS policy CP51 in landscape and visual terms, and appropriate for the edge of settlement location.

6.30. *Archaeology and Heritage:*

An Archaeological Desk-Based Assessment has been completed by Landgage, following a site walkover and geophysical survey of the site. This has concluded as follows:

6.31. Whilst the study site had the potential to contain Prehistoric and Roman remains, and also possible evidence of activities associated with Medieval agricultural practices, recent archaeological fieldwork has revealed that no archaeological remains are present on the study site that could be impacted by the future development.

6.32. On this basis, it is clear that the proposed development would not have an impact on the archaeological potential of the study site and no further mitigation is required to make the development acceptable in terms of potential archaeological impacts. It therefore accords with the requirements in paragraphs 207 and 212 - 216 of the NPPF and policy 58 and 99 of the Wiltshire Council's Core Strategy.

6.33. *Sustainable Design and Construction:*

Accompanying this application is a Site Layout Plan (Ref: 3164/150F) which demonstrates that a development of 40 dwellings, incorporating a mix of 1, 2, 3 and 4-bed dwellings including

associated landscaping, drainage, public open space and children's play space, can be accommodated on the Site. It is considered the proposals will deliver a high-quality development that responds well to the character and appearance of this part of the town.

- 6.34. The overall density of the development considers the prevailing residential character of the surrounding area, which consists primarily of detached/semi-detached family dwellings with garden plots. The scheme will make effective use and protection of natural resources where possible (e.g. trees/hedgerows) and promote sustainable design using appropriate construction materials, and the orientation and design of the dwellings themselves will assist in maximising energy efficiency.
- 6.35. The dwellings have been designed with energy efficiency in mind, with highly insulated walls and roof and heating systems that meet or exceed the current Building Regulations. Sustainable heating/cooling and hot-water generation will be incorporated within the scheme, through the use of Air Source Heat Pumps (ASHP). Electric Vehicle Charge Points (EVCP) will be installed for each property. Therefore, this overall design approach is considered to be in line with paragraph 128 of the NPPF and policies CP41 and CP57 of the WCS.
- 6.36. *Flood Risk and Drainage:*
- 6.37. The application is accompanied by a full Flood Risk Assessment (FRA) and Drainage Strategy, which has assessed flood risk to the proposed development from various sources, such as fluvial, sewers, groundwater, reservoirs and overland flow has been considered in this study. The FRA has concluded that flood risk from groundwater is considered to be low-moderate, with risk from all other sources considered low. All finished floor levels will be set 150mm above surrounding finished ground levels or 150mm above the modelled 1:100 year + climate change flood level, whichever is higher. The introduction of a SuDS scheme for the development will ensure that post development runoff is managed positively without any increase in surface water flood risk.
- 6.38. The proposed dwellings are wholly in Flood Zone 1. The proposed access is located outside of the 1:100 year modelled floodplain (FZ3) but partially within the modelled 1:100 year + 26% climate change flood zone. The access road will therefore be raised above the 1:100 year + 26% climate change flood level and compensatory storage will be provided as part of detailed design to mitigate the loss of floodplain storage.

- 6.39. Attenuation-based SuDS will be used, comprising of two attenuation basins. Permeable paving is proposed in car parking areas for water quality, conveyance and interception purposes. The proposed SuDS provide adequate interception to runoff in accordance with National Standards. All SuDS have been sized to accommodate runoff from the 1 in 100 year + 45% storm event, without flooding.
- 6.40. In terms of flood risk and drainage strategy, it is concluded that the development can be occupied and operated safely for its lifetime and there will be no increase in the level of flood risk to the site or neighbouring areas. Therefore, the proposal complies with the NPPF and WCS policy CP67.
- 6.41. *Transport, Connectivity and Access:*
- Trowbridge is one of three Principal Settlements in Wiltshire, which benefits from a wide range of existing services and facilities, and the site is therefore considered to be an appropriate location for residential development in principle due to its strong accessibility credentials. There is good quality walking infrastructure within the local area facilitating access to local amenities.
- 6.42. A full Transport Statement (TS) has been prepared in support of this planning application. It has considered the highway and transportation matters associated with the proposed development, including an appraisal of the local highway network and personal injury accident record, an analysis of the site's accessibility by sustainable transport modes and proximity to local services and facilities, parking provision and access arrangements, and the predicted vehicle trip generation.
- 6.43. Access to the site is proposed via a new priority-controlled T-junction arrangement on West Ashton Road, incorporating appropriate visibility splays and including a 2m wide footway on the northern side continuing through the site.
- 6.44. The TS concludes that the local highway network exhibits a good road safety record and there are no highway safety reasons to preclude the development as proposed. An assessment of vehicle trip generation indicates that the proposed development is predicted to generate 19 and 18 two-way vehicle trips in the AM and PM peak hour periods respectively, which is unlikely to materially impact the operation of the existing local highway network.

- 6.45. Based on the information provided above, and when assessing the proposal in the context of the National Planning Policy Framework (December 2024), the TS has concluded that there will be no severe residual cumulative impacts resulting from the development, nor an unacceptable impact on highway safety. Therefore, this application complies fully with the NPPF and WCS Policies CP61 and CP62.

7.0 Planning Obligations – Draft S106 Heads of Terms

7.1 It is expected that the following matters will need to be covered as planning obligations as part of the scheme. The applicant would welcome discussion and confirmation of these matters as part of the determination process so that an appropriate agreement can be concluded at the earliest opportunity.

- The provision of 30% on-site affordable housing. The proposed tenure split at this stage is 60% Affordable Rent, 25% First Homes and 15% Shared Ownership; this will be discussed/agreed with the local planning authority.
- On-site open space provision.
- Education contributions, to be confirmed during the course of the application.
- Healthcare Contribution
- Bus Service Contribution

8.0 Planning Balance and Conclusion

- 8.1. This application is made in the context of the Government's requirement to significantly boost housing land supply and the presumption in favour of sustainable development, as outlined in the NPPF (December 2024).
- 8.2. The Council cannot demonstrate a five-year housing land supply. This proposal will assist the overall housing land supply and the identified needs for market and affordable housing in Wiltshire as a whole. As the WCS is now over 10 years old, the policies most important for determining the application are considered to be out of date and the presumption in favour of sustainable development applies via paragraph 11(d) of the NPPF (December 2024).
- 8.3. If permitted, construction of the Site is likely to begin within the next 18 months and will increase the supply and choice of housing at this sustainable location at the Principal Settlement of Trowbridge. It would contribute towards economic growth and have wider social benefits to the local community, meeting a requirement for both market and affordable housing. The design and layout of the development, as described within the Design and Access Statement, will ensure that a high-quality scheme is delivered.
- 8.4. The supporting material, assessments and reports submitted with the application demonstrate that there are no technical or environmental constraints that would preclude the development of the Site, subject to planning conditions and/or obligations where relevant/necessary.
- 8.5. The relevant material considerations in this case are:
- The Council cannot demonstrate a five-year supply of deliverable housing land;
 - The Site is suitable and accessible for residential development in terms of location and characteristics;
 - The Site is not of high environmental or heritage value; and
 - There are no significant and demonstrable adverse impacts arising from the development
- 8.6. The proposal is in general conformity with policies contained within the adopted WCS, when assessed as a whole.

- 8.7. As a result, the NPPF policies on the delivery of sustainable housing development carry significant weight, and the delivery of the proposed development would support housing development objectives, in compliance with all three strands of sustainable development contained within the NPPF (social, economic and environmental).
- 8.8. There are no technical or environmental impacts that would significantly and demonstrably outweigh the benefits of the proposal outlined above, and it is considered that material considerations exist which mean that, on balance, planning permission should be granted.